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Item No. 7.1	Classification: Open	Date: 22 November 2021	Meeting Name: Planning Sub-Committee B
Report title:	Development Management planning application: Application 21/AP/1207 for: Full Planning Application Address: 17 – 21 RISBOROUGH STREET, SOUTHWARK LONDON SE1 0HG Proposal: Redevelopment of the site to construct seven storey office building (Class E(g)) with roof terrace, plus basement with ancillary cycle parking, refuse storage, including plant facilities and installation of PV panels and green roof.		
Ward(s) or groups affected:	Borough and Bankside		
From:	Director of Planning and Growth		
Application Start Date	21/04/2021	PPA Expiry Date	26/11/2021
Earliest Decision Date	26/05/2021		

RECOMMENDATION

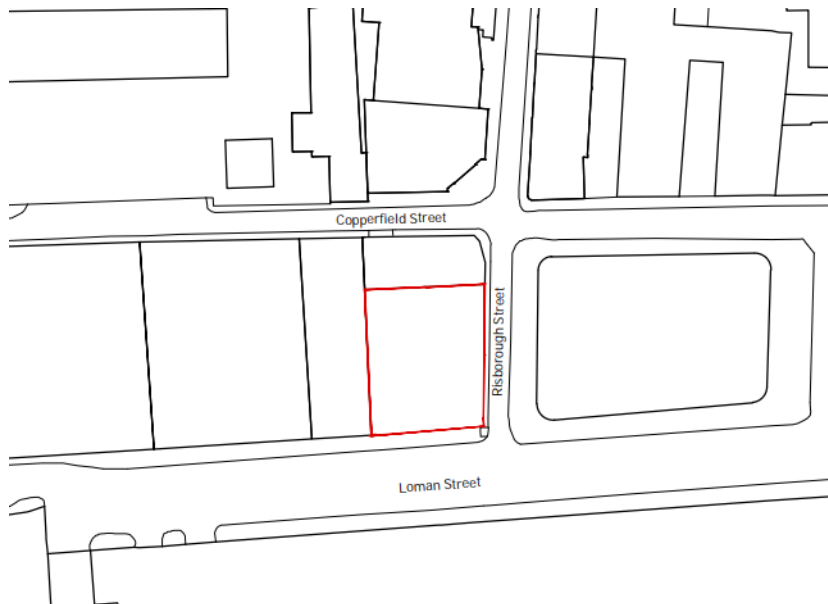
1. That planning permission be granted subject to S106 legal agreement.
2. In the event that a legal agreement is not signed by the applicant by 20 April 2022, the Director of Planning and Growth be authorised, if appropriate, to refuse planning permission for the reason in paragraph 72 of this report. In the event that a legal agreement is not signed by the applicant by 20 April 2022, the Director of Planning and Growth be authorised, if appropriate, to refuse planning permission for the reason in paragraph 72 of this report. In the event that a legal agreement is not signed by the applicant by 20 April 2022, the Director of Planning and Growth be authorised, if appropriate, to refuse planning permission for the reason in paragraph 72 of this report.

BACKGROUND INFORMATION

Site location and description

3. The application site (17-21 Risborough Street) is a three storey office building dating back to the 1990s. The building is in use as commercial floorspace and has frontages onto Risborough Street and Loman Street.

Site location plan



The surrounding area

4. The surrounding area includes the Blackfriars Crown Court building being to the south of the site, which has consent to be redeveloped as an office and commercial use building. There are residential buildings to the north and north-east of the site. This includes 15 Risborough Street adjacent to the application site, with 42 and 46 Copperfield Street directly opposite no. 15 Risborough Street. North-east of the site lies 38 Copperfield Street which is a live-work complex. Approximately 50m to the east of the site is the Grade II listed 55 Great Southwark Street, with the King's Bench conservation area beyond that.
5. The site is located within the following designated areas:
 - *Air Quality Management Area*
 - *Bankside and Borough – District Town Centre*
 - *Bankside C1 - Controlled Parking Zone (CPZ)*
 - *Bankside, Borough and London Bridge – Opportunity Area*
 - *Better Bankside - Business Improvement District (BID)*
 - *Central Activity Zone (CAZ)*
 - *Flood Risk Zone 2/3*
 - *On the border with the New Southwark and Roman Roads Archaeological Priority Area (APA)*

Details of proposal

6. Redevelopment of the site to construct seven storey office building (Class E(g)) with roof terrace, plus basement with ancillary cycle parking, refuse storage, including plant facilities and installation of PV panels and green roof.

Consultation responses from members of the public and local groups

7. 5 contributions were received all objecting to the proposed development. Summarised below are the material planning considerations raised by

members of the public.

8.
 - Development too high and does not appear subservient to the surroundings; overdevelopment of the site
 - The design and use of materials is out of keeping with the character of the area
 - Lack of planting and urban greening
 - The development would harmfully impact local ecology
 - Significant increase in traffic and noise related pollution
 - Harmful impact upon daylight and sunlight for nearby buildings
 - Impact upon privacy by way of overlooking from upper floors
 - Against principle of development for office and commercial premises
 - Width of walkway and pavements not wide enough to accommodate building of this size.

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

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

Planning policy

10. 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 within the NSP (2020) constitute material considerations but are not part of the statutory development plan. Any policies which are particularly relevant to the consideration of this application are highlighted in the report. A list of policies which are relevant to this application is provided at Appendix 2.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

11. The main issues to be considered in respect of this application are:
 - Principle of the proposed development in terms of land use
 - Affordable workspace
 - Design quality
 - Impact of proposed development on amenity of adjoining occupiers
 - Transport and highways
 - Environmental impacts
 - Ecology
 - Energy and sustainability
 - Planning obligations (S106 agreement) and
 - Mayoral and Borough Community Infrastructure Levy (CIL).
12. These matters are discussed in detail in the 'Assessment' section of this report.

Legal context

13. 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.
14. 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.

ASSESSMENT

Principle of the proposed development in terms of land use

15. The NPPF promotes sustainable development which means improving the built and natural environment whilst creating jobs and improving the design and function of places. This site is within the Central Activities Zone (CAZ) and an Opportunity Area, where a mix of uses and intensification is encouraged. The land uses proposed are for redevelopment of a site in existing office use for new office use only, and this is considered appropriate under policies for the Central Activities Zone and Opportunities Areas.
16. The lawful use of the existing building is for office space (Class E) which this scheme seeks to re-provide and provide additional office accommodation. As such there is no conflict with saved policy 1.4 (Employment sites outside preferred office locations and preferred industrial locations) of the Southwark Plan (2007).
17. The re-provision and significant increase in B1 office space within the CAZ is consistent with the aims of the Southwark Plan and Core Strategy, as well as the London Plan and associated CAZ SPG (2016). The redevelopment of the site would provide a more efficient use of the site, giving access to an increased number of jobs and access to employment. Despite being located in a town centre location, the need for active frontages on this site is not required given it is a fair distance from the main roads where such uses are concentrated. As such it is considered appropriate to maximise office space and therefore the principle of development is considered acceptable.

Affordable workspace

18. Draft Policy P30 (Affordable Workspace) of the New Southwark Plan requires major development proposals to deliver at least 10% of the gross new

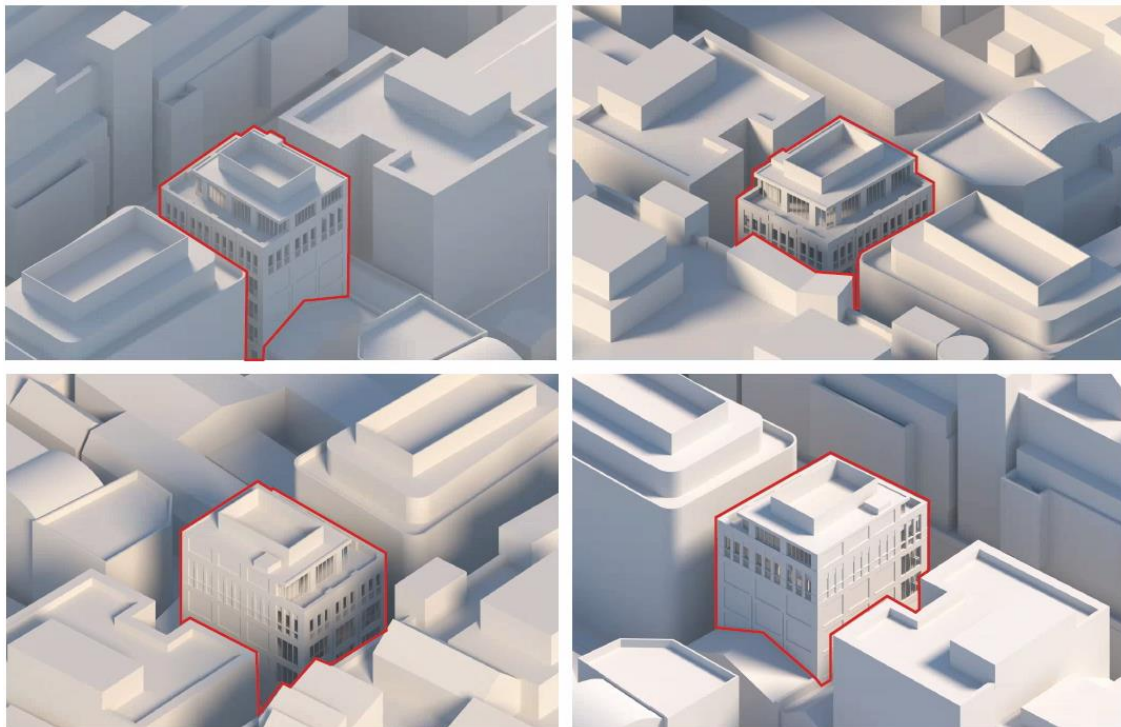
employment floorspace as affordable workspace, on site at a discounted market rent for a period of at least 30 years.

19. The applicants have committed to providing 191 sqm of affordable workspace. This will be provided for a 6-month rent free period, with the remaining period offered at 75% Local Market Rent. The affordable workspace will be secured through an S106 legal agreement.

Design quality

Site context

20. The application site is a three storey building dating back to 1990s with a mixture of traditional and modern detailing, however it is not considered a building of worthy architectural merit or local value. The building presents its gable end onto Loman and Copperfield Streets, but has its entrance onto Risborough Street. The application site is not within a conservation area, nor within the immediate vicinity of any listed building or other heritage assets. The wider streetscape has undergone significant pre-post war reconstruction that has resulted in the amalgamation of industrial and warehouse buildings with a mixture of commercial and residential uses. Overall the building is considered to sit well within the townscape, adding to the sense of local distinctiveness.
21. Model of building within surrounding context of approved schemes



Height scale and massing

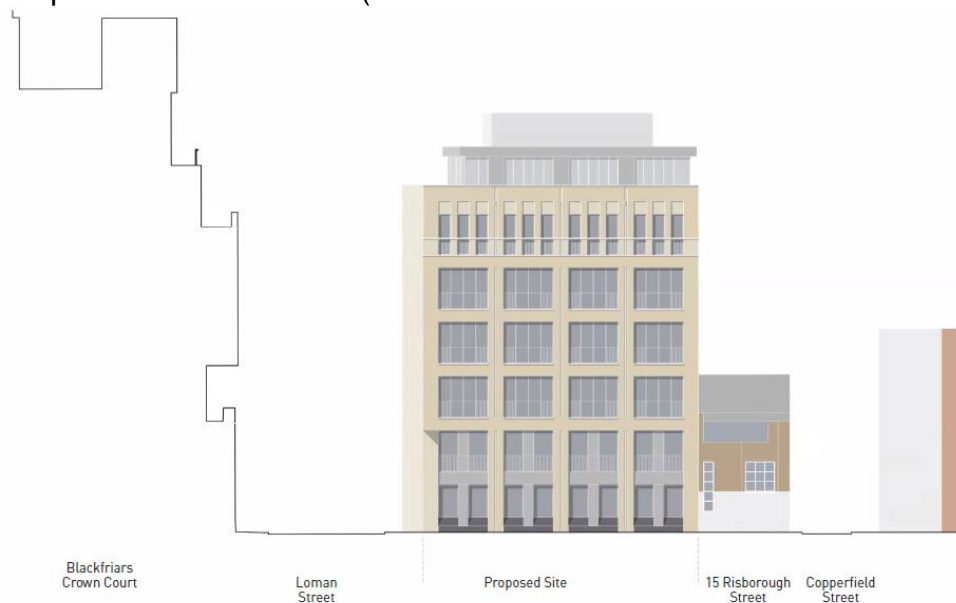
22. The proposed seven storey building is of a similar footprint to the existing building and the redeveloped element signs well with the retained rear section of the building. The massing and scale therefore are considered to suitably maintain the building alignment along Loman Street which presents a consistent street form.

23. The building represents a significant increase in height however this is not uncomfortable within the surrounding context. The additional height proposed is considered appropriate given the heights of immediate buildings surrounding the application site. 32-36 Loman Street has been granted permission (ref: 19/AP/1404) for the construction of a seven storey building directly east of the site, with Blackfriars Crown Court south of the site also receiving permission (ref: 20/AP/1537) for the construction of a seven storey building. It is therefore considered that the height and scale of the development suitably infills the streetscape without harming the urban grain around the site.

24. Proposed South Elevation



25. Proposed East Elevation (with Blackfriars Crown Court outlined redevelopment)



26. The massing has been adjusted which ensures the final storey is set back, with the shoulder height of the building reading at six storeys. Whilst the adjoining no. 44 Loman Street is of a modest two storey height, the scale of no. 44 is rather underwhelming for its locality. Overall, the height, massing and scale is designed convincingly to ensure a soft and comfortable scaled build for the urban context which is acceptable in design terms.

Urban design

27. The relocation of the building entrances onto Loman Street is supported, given the higher road hierarchy and increased activation and footfall that will likely emerge from the redevelopment of Blackfriars Crown Court opposite. The entrances will ensure a good street frontage with a transparent ground floor along Risborough Street which informally provides passive surveillance. Overall the layout and urban design of the proposal is considered appropriate.
28. Proposed visualisation along Loman Street



Materiality

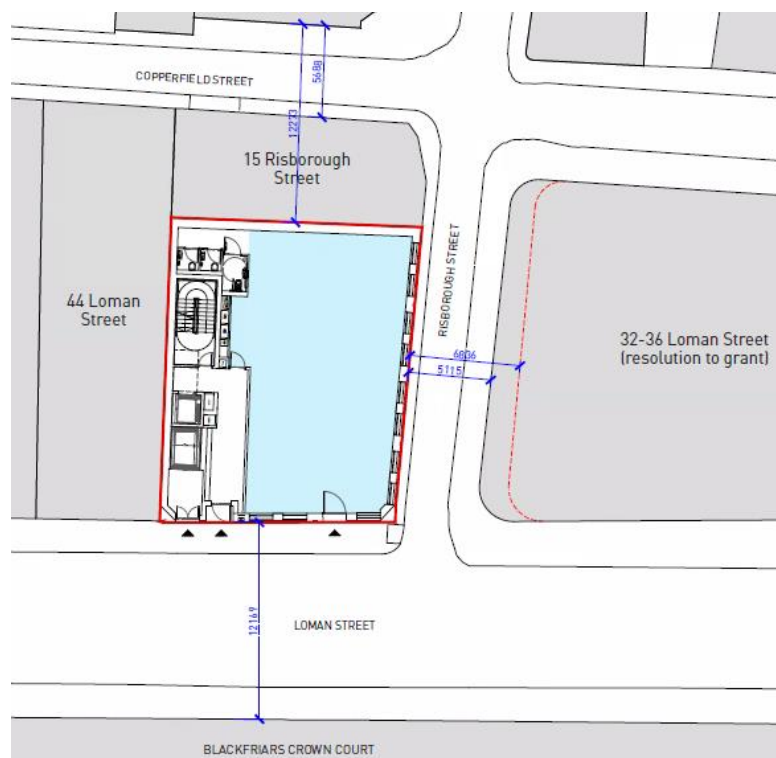
29. The design represents a quasi-warehouse aesthetic comprising of brickwork, vertical and horizontal piers and large openings with recessed metal framed windows. The brickwork colour of buff and London stock matches within the materiality of neighbouring buildings - this overall gives robust quality elevations with the metal casements contrasting providing a contemporary character. The windows include Juliette balconies with a low-key balustrade design. In terms of fenestration the building cleverly presents a good sense of base, middle and top which maintains the visual balance of the building. Overall the fenestration of the building is considered acceptable however details of external facing materials should be supplied by way of a condition.

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

30. Strategic policy 13 of the Core Strategy 'High environmental standards' seeks to ensure that development sets high standards for reducing air, land noise and light pollution and avoiding amenity and environmental problems that affect how we enjoy the environment in which we live and work. Saved Policy 3.2 relates to the protection of amenity and states that permission would not be granted where a loss of amenity to present occupiers would be caused.

Privacy and sense of enclosure

31. The proposed building will be approximately 28m in height which is classified as a tall building within the Blackfriars Road SPD. Whilst the application site does not immediately fall within an area identified for development, the close proximity to development area designation still makes the Blackfriars Road SPD relevant guidance. The building is considered to sit well within the townscape of other tall buildings of a similar height which have been and are being constructed.
32. The building to the east, 32-36 Loman Street was granted permission under 19/AP/1404 to develop into a seven storey office building. The building to the south, Blackfriars Crown Court was granted permission under 20/AP/1537 to develop into a seven storey multi-purpose mixed use commercial premises. The building to the west, 46 Loman Street was granted permission under 18/AP/3462 to develop into a six storey office building. Once these developments would be completed, the townscape of Loman Street would be fundamentally changed with adjacent buildings characterised by 6 – 8 storeys.
33. The footprint of the proposed building is between 6 – 12m away from adjacent buildings to the north, east and south. The adjoining building 15 Risborough Street will be most impacted from the development however, the cumulative impact from the development of no. 32-36 Loman Street would already impact the property. The redevelopment of this site is therefore not considered to contribute to sense of enclosure a detrimental degree.
34. Proposed ground floor building footprint with distances to neighbours



35. The immediate neighbours are mainly commercial office premises, or to be redeveloped to include commercial premises. Whilst there are a few residential units nearby, there would be no residential-residential overlooking which would

harmfully impact privacy for residential occupiers. The proposed building will only be occupied during office hours, with no overnight accommodation nearby residents will not suffer from undue overlooking or privacy impacts at sensitive times.

Daylight and sunlight

36. There is no specific national planning policy related to such matters however, the BRE Report “Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice” is an established guidance document detailing industry standards considered appropriate for urban development analysis.
37. The two main measures to assess the impact of daylight and sunlight from the development are VSC (Vertical Sky Component) for daylight and, APSH (Annual Probable Sunlight Hours) for sunlight.
38. VSC – assessment of all rooms/windows within surrounding properties that both face and overlook the proposed development. (Acceptable Impact score: 0.8).
39. APSH – assessment of those windows facing 90 degrees due south of the proposed development. (Acceptable Impact score: 25% annual and 5% winter).
40. The neighbours deemed to be most impacted from the development are:
 - 46 Copperfield Street
 - 42 Copperfield Street
 - 38 Copperfield Street
 - 15 Risborough Street

41. 46 Copperfield Street

Vertical Sky Component (VSC)					
Windows			Loss		
Total	Pass	BRE compliant %	0-30%	31-40%	41%+
6	0	0	0	6	0
Annual Probably Sunlight Hours (APSH)					
Rooms			Loss		
Total	Pass	BRE compliant %	0-30%	31-40%	41%+
3	3	100	3	0	0

42. VSC: The VSC scoring between 0.66 – 0.71 is on balance appropriate given the dense built form of urban London. The windows appear to serve one room at each floor level across three flats. The survey records scores that are not significantly below the BRE target of 0.8, and therefore on balance the impact is considered acceptable.
43. APSH: The scores for the annual level of probable sunlight were well above the

required threshold. Whilst two rooms failed to meet the winter targets, one recorded score was already below as existing. The proposed development will still ensure a sufficient amount of sunlight over the year and therefore this is considered acceptable.

44. 42 Copperfield Street

Vertical Sky Component (VSC)					
Windows			Loss		
Total	Pass	BRE compliant %	0-30%	31-40%	41%+
7	4	57	4	2	1
Annual Probably Sunlight Hours (APSH)					
Rooms			Loss		
Total	Pass	BRE compliant %	0-30%	31-40%	41%+
2	2	100	2	0	0

45. VSC: 57% of the windows assessed across two residential units are deemed to BRE compliant. The three windows which fail to comply are split across two units (two windows at second floor level and one window at third floor level) and so the impact upon daylight is not considered to be to a detrimental degree.

46. APSH: The survey scores for the annual level of probable sunlight were well above the required threshold. Whilst only one room failed to meet the winter targets, the proposed development will still ensure an acceptable amount of sunlight over the year which is acceptable.

47. 38 Copperfield Street

Vertical Sky Component (VSC)					
Windows			Loss		
Total	Pass	BRE compliant %	0-30%	31-40%	41%+
32	32	100	32	0	0
Annual Probably Sunlight Hours (APSH)					
Rooms			Loss		
Total	Pass	BRE compliant %	0-30%	31-40%	41%+
9	9	100	9	0	0

48. VSC: The building is made up of residential flats and all windows scored over 0.8, ensuring daylight amenity is not impacted significantly. All windows will be BRE compliant not impacting neighbours to a significant degree, and as such this is considered acceptable.

49. APSH: The survey scores for the annual level of probable sunlight was well above the required threshold. Only two rooms failed to meet the winter targets, one recorded score was already below as existing. The proposed development will ensure a sufficient amount of sunlight over the year, including during the winter for the majority of the rooms and as such, sunlight impact is considered acceptable.

50. 15 Risborough Street

Vertical Sky Component (VSC)					
Windows			Loss		
Total	Pass	BRE compliant %	0-30%	31-40%	41%+
1	0	0	0	1	0
Annual Probably Sunlight Hours (APSH)					
Rooms			Loss		
Total	Pass	BRE compliant %	0-30%	31-40%	41%+
1	0	0	0	0	1

51. VSC: The one window assessed seemingly serves a bedroom window, the VSC scores 0.68 which whilst below BRE guidance is still considered appropriate given the dense built form of the surrounding area.
52. APSH: The survey scores for both the annual and winter scores fail to comply with BRE guidance. The development would significantly impact sunlight entering the room, however given the scale of development there are limited changes which can be pursued to change this impact.

Transport and highways

53. The application site is located with the Bankside CPZ and has the highest PTAL rating 6b which demonstrates excellent connectivity to TfL transport services. The Bankside CPZ provides adequate car parking control at this location on weekdays from 08:00 to 18:30 plus between 09:30 to 12:30 on Saturdays. There are currently five car club bays within a short walking distance from the application site and two disabled car parking bays close by on Sawyer Street.

Cycle parking

54. The development provides 52 cycle parking spaces in the basement which exceeds the London Plan (2021) standard of 29 cycle spaces and the NSP (2020) requirement of 50 cycle spaces. The proposed basement plan indicates 36 cycle parking spaces provided as two tier bike racks, with 10 provided as Sheffield cycle racks and 6 folding bicycle lockers. A compliance condition will be attached to the permission in order to ensure are provided and retained.

Servicing and deliveries

55. Vehicular movements resulting from this development is considered to produce some 2 two-way additional vehicle movements in the morning and evenings at peak hours. This analysis was conducted using the council's interrogation of comparable sites' travel surveys, within the Trip Rate Information Computer System (TRICS) travel database, a figure which is similar to that estimated within the Transport Survey provided. As such it is not considered that the proposed development would have any noticeable adverse impact, on the prevailing vehicular movements on the adjoining roads. The survey also reports the development is projected to generate some 23 two-way net supplementary transport trips, in the morning or evening at peak

hours and 1 two-way service vehicle movements per day. An above grade condition for the submission of a Travel Plan plus a Service and Delivery Management Plan for approval will be attached onto the permission.

Highways development

56. The Highways Development team have reviewed the submitted information with regards to the proposed development. A number of alterations and mitigation measures relating to highway works will be required in order to accommodate the new building. These include:
- Resurfacing of the damaged Risborough Street section next to this site
 - Construction of a raised entry treatment at Copperfield Street/Risborough Street junction; Reconstruction of the footways adjoining this site on Risborough Street and Loman Street including new kerbing
 - Reconstruct any redundant vehicular crossovers fronting the development as footway
 - Provide access arrangements such as a dropped kerb construction to accommodate refuse collection
 - Promote all necessary Traffic Regulation Orders (TMOs) to amend parking arrangements
 - Review existing and proposed signage fronting the development and investigate the possibility to install any existing / proposed signs on the building walls in order to improve effective footway widths
 - Refresh road markings following kerb installation
 - Upgrade / improved existing crossing points (I.e. New tactile paving, etc.)
 - Rectify any damaged footways, kerbs, inspection covers and street furniture due to the construction of the development
 - All works should be constructed to Southwark Streetscape Design Manual (SSDM) standards.
57. These works will be secured through a S278 agreement which the applicant has agreed to enter into with the Local Authority.

Construction management

58. Given the scale of development within a prominent central location, a Construction Environmental Management Plan shall be required to ensure health, safety and impacts from deliveries and servicing do not cause pollution or unreasonable disturbance during the construction phase. This is to be secured by way of a pre-commencement condition which the applicant has agreed to in writing.

Environmental impacts

Noise and vibration

59. The provision of Use Class E(g) within the area proposed is not considered to cause detrimental harm to neighbours in terms of noise and/or vibration. The

Environmental Protection Team have reviewed the submitted Ensafé Noise and Vibration Impact Assessment (ref: AC109923-1R0, dated 31 March 2021). The details and specification of the proposed plant is not yet known and so an above grade plant noise condition is to be attached.

Air quality

60. The Council's Environmental Protection Team have reviewed the submitted Ensafé Air Quality Assessment (ref: AQ109939, dated 7 April 2021). The findings and conclusions are agreeable, and as such no air quality mitigation is required for this development. Impacts from dust will be captured within the condition for the Construction Environmental Management Plan.

Flood risk

61. The submission includes a FRA and preliminary sustainable urban drainage strategy (ref: 134080-R1(0)) which has been reviewed by the council's Flood Engineering team. Whilst the report is considered satisfactory, it is considered further attenuation measures can be explored to help reduce the flow velocity of peak flows of rainwater. Two pre-commencement conditions for further drainage details and a verification report have been recommended which have been agreed with the applicant.

Archaeology

62. The proposed development includes the construction of a basement. As the site is located at the margins of the Borough, Bermondsey and Rivers archaeological priority zone, archaeological conditions will be required to safeguard the APZ. The council's Archaeologist has reviewed the submitted materials and a pre-commencement condition be attached for archaeological mitigation and a time-limit condition for archaeological reporting.

Ecology

63. The application site combined with the scale of proposed development provides a good opportunity for biodiversity net-gain. As such it is recommended that green roofs should be provided with a substrate base depth of between 80-150mm. This shall include an agreed mix of species secured by an above grade condition. The council Ecologist has requested a minimum of 12 swift bricks to be provided to be secured by condition, details of which should be provided prior to the commencements of works.
64. Using the Urban Greening Factor (UGF) model, the site provides good biodiversity net gain. Policy G5 Urban Greening of The London Plan (2021), stipulates commercial development should seek to achieve a minimum UGF score of 0.30.

Proposed UGF Calculations

- Extensive green roof: $0.7 \times 90\text{sqm} = 63$
- Modular green wall: $0.6 \times 70\text{sqm} = 42$

- Permeable paving: $0.1 \times 69\text{sqm} = 6.9$

Total site area sqm: 279

Total contribution: 111.9

Urban Greening Factor score: 0.40

Energy and sustainability

65. Development should seek to reduce greenhouse gas emissions in operation and minimising both annual and peak energy demand, in accordance with the energy hierarchy outlined in the London Plan (2021).
- a) Be lean: use less energy and manage demand during operation
 - b) Be clean: exploit local energy and supply energy efficiently
 - c) Be green: use low carbon or zero carbon energy
 - d) Be seen: monitor performance and review.
66. The submission includes an energy statement which has demonstrated carbon reduction savings of 35%. Whilst the development should seek to achieve net-zero, an in-lieu monetary contribution to Southwark's carbon off-set fund should be provided. This will be secured through the S106 legal agreement.
- 370 tonnes of CO₂ required to be off-set over 30 years; 12.3 tonnes per annum $\times \text{£}2850 = \text{£}35,150$ to be contributed.

Planning obligations (S.106 agreement)

67. Saved Policy 2.5 of the Southwark Plan and Policy 8.2 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. 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:
- 68.
- 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
69. 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.

70.	Planning Obligation	Mitigation	Applicant Position
	Affordable workspace provision	<i>10% of affordable workspace to be provided. Total of 191 sqm of affordable workspace; 6-month rent free period with remaining period offered at 75% Local</i>	Agreed.

	<i>Market Rent.</i>	
Carbon off-set contribution	<i>370 tonnes of CO2 required to be off-set over 30 years; 12.3 tonnes per annum x £2850 = £35,150 to be contributed.</i>	Agreed.

71. The Highways Development Team have also requested the following works by way of a Section 278 agreement:

- *Resurfacing of the damaged Risborough Street section next to this site;*
- *Construction of a raised entry treatment at Copperfield Street/Risborough Street junction; Reconstruction of the footways adjoining this site on Risborough Street and Loman Street including new kerbing;*
- *Reconstruct any redundant vehicular crossovers fronting the development as footway;*
- *Provide access arrangements such as a dropped kerb construction to accommodate refuse collection;*
- *Promote all necessary Traffic Regulation Orders (TMOs) to amend parking arrangements;*
- *Review existing and proposed signage fronting the development and investigate the possibility to install any existing / proposed signs on the building walls in order to improve effective footway widths;*
- *Refresh road markings following kerb installation;*
- *Upgrade / improved existing crossing points (I.e. New tactile paving, etc.);*
- *Rectify any damaged footways, kerbs, inspection covers and street furniture due to the construction of the development;*
- *All works should be constructed to Southwark Streetscape Design Manual (SSDM) standards.*

72. In the event that a satisfactory legal agreement has not been entered into by 20 April 2021, it is recommended that the director of planning be authorised to refuse planning permission, if appropriate, for the following reason: The proposal, by failing to secure appropriate planning obligations secured through the completion of a s106 agreement fails to ensure the protection of the affordable workspace in the event of disposal, and also the secure highway works to mitigate the impacts of development in accordance with saved policy 2.5 of the Southwark Plan 2007, strategic policy 14 of the Core Strategy and policy 8.2 of the London Plan, and the Planning Obligations and Community Infrastructure Levy SPD 2015.

73. 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 DF1 Delivery of the Plan and 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)

74. 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.
75. The site is located within Southwark CIL Zone 2 and MCIL2 Zone. Based on the existing floor areas provided in the agent's CIL Form1 (GIA), the gross amount of CIL is approximately £185,335.00 consisting fully of Mayoral CIL only. This amount is based upon the net chargeable floor area being 991 sqm. It should be noted that this is an estimate, and the floor areas will be checked when the related CIL Assumption of Liability Form is submitted – after planning approval has been obtained.

Community impact and equalities assessment

76. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
77. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
78. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three "needs" which are central to the aims of the Act:
1. The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act.
 2. The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
 - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
 - Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
 - Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low
 3. The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.

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

Human rights implications

80. 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.
81. This application has the legitimate aim of commercial development. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

Positive and proactive statement

82. 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.
83. 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.

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

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

CONCLUSION

85. The proposal will would provide additional affordable workspace within the Central Activities Zone within the Borough. The impacts of the scheme in

relation to daylight and sunlight are on balance considered acceptable, and whilst there would be departures from the BRE guidelines, the daylight and sunlight levels are still considered adequate for a dense urban area. A S106 agreement would be secured to ensure continuity of affordable workspace in the event and to secure improvements to the neighbouring footways. The development accords with the development plan in terms of providing re-providing and increasing workspace, and makes reasonable provision to protect neighbour amenity. It is therefore recommended that planning permission be granted subject to conditions and the completion of a Section 106 Legal Agreement under the terms as set out above.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: 1467-17 Application file:21/AP/ 1207 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	Recommendation (draft decision notice)
Appendix 2	Relevant planning policy
Appendix 3	Planning history of the site and nearby sites
Appendix 4	Consultation undertaken
Appendix 5	Consultation responses received

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth		
Report Author	Zaib Khan, Planning Officer		
Version	Final		
Dated	7 October 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		3 November 2021	

APPENDIX 1

Recommendation

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

This document is not a decision notice for this application.

Applicant	Mr Josh Chadd TLS (Risborough) Ltd	Reg. Number	21/AP/1207
Application Type	Major application		
Recommendation	GRANT subject to Legal Agreement	Case Number	1467-17

Draft of Decision Notice

Grant subject to Legal Agreement for the following development:

Redevelopment of the site to construct seven storey office building (Class E(g)) with roof terrace, plus basement with ancillary cycle parking, refuse storage, including plant facilities and installation of PV panels and green roof.

17-21 Risborough Street London Southwark

In accordance with application received on 8 April 2021 and Applicant's Drawing Nos.:

Existing Plans

Proposed Plans

PROPOSED BLOCK PLAN 1886(00)102 REV P1 received 08/04/2021

PROPOSED BASEMENT FLOOR PLAN 1886(00)109 REV P1 received 08/04/2021

PROPOSED GROUND FLOOR PLAN 1886(00)110 REV P1 received 08/04/2021

PROPOSED FIRST FLOOR PLAN 1886(00)111 REV P1 received 08/04/2021

PROPOSED SECOND FLOOR PLAN 1886(00)112 REV P1 received 08/04/2021

PROPOSED THIRD FLOOR PLAN 1886(00)113 REV P1 received 08/04/2021
PROPOSED FOURTH FLOOR PLAN 1886(00)114 REV P1 received 08/04/2021
PROPOSED FIFTH FLOOR PLAN 1886(00)115 REV P1 received 08/04/2021
PROPOSED SIXTH FLOOR PLAN 1886(00)116 REV P1 received 08/04/2021
PROPOSED ROOF PLAN 1886(00)117 REV P1 received 08/04/2021
PROPOSED SOUTH ELEVATION 1886(00)120 REV P1 received 08/04/2021
PROPOSED NORTH ELEVATION 1886(00)121 REV P1 received 08/04/2021
PROPOSED EAST ELEVATION 1886(00)122 REV P1 received 08/04/2021
PROPOSED WEST ELEVATION 1886(00)123 REV P1 received 08/04/2021
PROPOSED SECTION AA 1886(00)130 REV P1 received 08/04/2021
PROPOSED SECTION BB 1886(00)131 REV P1 received 08/04/2021
TOPOGRAPHICAL SURVEY received 08/04/2021

Other Documents

FLOOD RISK ASSESSMENT AND PRELIMINARY SUSTAINABLE DRAINAGE STRATEGY received 08/04/2021
Site location plan 1886(00)001 REV P1 received 08/04/2021
DAYLIGHT AND SUNLIGHT REPORT received 08/04/2021
NOISE & VIBRATION IMPACT ASSESSMENT received 08/04/2021
STATEMENT OF COMMUNITY INVOLVEMENT received 08/04/2021
DESIGN AND ACCESS STATEMENT received 08/04/2021
ARCHAEOLOGICAL DESK BASED ASSESSMENT received 08/04/2021
ENERGY STATEMENT received 08/04/2021
BREEAM ASSESSMENT REPORT received 08/04/2021
BRUKL OUTPUT DOCUMENT received 08/04/2021
PHASE I GEOENVIRONMENTAL DESK STUDY & PRELIMINARY BASEMENT IMPACT ASSESSMENT REPORT received 08/04/2021
PLANNING STATEMENT received 08/04/2021
TRANSPORT STATEMENT received 08/04/2021
TRAVEL PLAN STATEMENT received 08/04/2021

Time limit for implementing this permission and the approved plans

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

Reason:

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

3. Archaeological Reporting

Within one year of the completion of the archaeological work on site, an assessment report detailing the proposals for the off-site analyses and post-excavation works, including publication of the site and preparation for deposition of the archive, shall be submitted to and approved in writing by the Local Planning Authority, and the works detailed in the assessment report shall not be carried out otherwise than in accordance with any such approval given. The assessment report shall provide evidence of the applicant's commitment to finance and resource these works to their completion.

Reason

In order that the archaeological interest of the site is secured with regard to the details of the post-excavation works, publication and archiving to ensure the preservation of archaeological remains by record in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and Chapter 16 - Conserving and enhancing the historic environment of the National Planning Policy Framework 2021.

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

4. Archaeological Mitigation (Watching Brief)

Before any work hereby authorised begins, the applicant shall secure the implementation of a programme of archaeological mitigation works, an archaeological watching brief, in accordance with a written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority.

Reason

In order that the details of the programme of works for the archaeological mitigation are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with

Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and Chapter 16 - Conserving and enhancing the historic environment of the National Planning Policy Framework 2021.

5. Construction Environmental Management Plan (CEMP)

No development shall take place, including any works of demolition, until a Construction Environmental Management Plan (CEMP) has been submitted and approved by the Local Planning Authority. The CEMP shall oblige the applicant, developer and contractors to commit to current best practice with regard to site management and to use all best endeavours to minimise off site impacts. A copy of the CEMP shall be available on site at all times and shall include the following information:

- A detailed specification of demolition and construction works at each phase of development including consideration of all environmental impacts and the identified remedial measures;
- Engineering measures to eliminate or mitigate identified environmental impacts e.g. acoustic screening, sound insulation, dust control, emission reduction, location of specific activities on site, etc.
- Arrangements for direct responsive contact for nearby occupiers with the site management during demolition and/or construction (signage on hoardings, newsletters, resident's liaison meetings);
- A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme;
- Site traffic - Routing of in-bound and outbound site traffic, one way site traffic, lay off areas, etc.;
- Waste Management - Accurate waste identification, separation, storage, registered waste carriers for transportation and disposal to appropriate destinations.

A commitment that all NRMM equipment (37 kW and 560 kW) shall be registered on the NRMM register and meets the standard as stipulated by the Mayor of London.

Guidance on preparing CEMPs and best construction practice can be found at <http://www.southwark.gov.uk/construction>

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

Reason:

To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of unnecessary pollution or nuisance, in accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011) saved policy 3.2 'Protection of amenity' of the Southwark Plan (2007) and the National Planning Policy Framework 2021.

6. Site Contamination

- a) Prior to the commencement of any development, a phase 1 desktop study of the historic and current uses of the site and adjacent premises shall be carried out together with an associated preliminary risk assessment including a site walkover survey, identification of contaminants of the land and controlled waters and develop a conceptual model of the site with conclusion and recommendations whether a Phase 2 intrusive investigation is required. This report shall be submitted to the Local Planning Authority for approval before the commencement of any intrusive investigations.
- b) If the phase 1 site investigation reveals possible presence of contamination on or beneath the site or controlled waters, then, prior to the commencement of development works, an intrusive site investigation and associated risk assessment shall be completed to fully characterise the nature and extent of any contamination of soils and ground water on the site.
- c) In the event that contamination is found that presents a risk to future users or controlled waters or other receptors, a detailed remediation and/or mitigation strategy shall be prepared and submitted to the Local Planning Authority for approval in writing. The strategy shall detail all proposed actions to be taken to bring the site to a condition suitable for the intended use together with any

monitoring or maintenance requirements. The scheme shall also ensure that as a minimum, the site should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. The approved remediation scheme (if one is required) shall be carried out and implemented as part of the development.

d) Following the completion of the works and measures identified in the approved remediation strategy, a verification report providing evidence that all works required by the remediation strategy have been completed, together with any future monitoring or maintenance requirements shall be submitted to and approved in writing by the Local Planning Authority.

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

Reason

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with saved policy 3.2 'Protection of amenity' of the Southwark Plan (2007), strategic policy 13' High environmental standards' of the Core Strategy (2011) and the National Planning Policy Framework 2021.

7. NESTING BOXES

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

No less than 12 nesting boxes / bricks shall be provided and the details shall include the exact location, specification and design of the habitats. The boxes / bricks shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained.

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

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

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with Chapter 15 (Conserving and enhancing the natural environment) of the National Planning Policy Framework (2021); Policy G6 (Biodiversity and access to nature) of the London Plan (2021); Strategic Policy 11 (Open spaces and wildlife) of the Southwark Core strategy (2011) and 3.28 (Biodiversity) of the saved Southwark Plan (2007).

8. Drainage Details

No works (excluding demolition and site clearance) shall commence until full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS) have been submitted to and approved in writing by the Local Planning Authority, including detailed design, size and location of attenuation units and details of flow control measures. The strategy should achieve a reduction in surface water runoff rates during the 1% Annual Exceedance Probability (AEP) event plus climate change allowance, as detailed in the Flood Risk Assessment and Preliminary Drainage Strategy prepared by RSK Consulting (dated 31st March 2021). The applicant must demonstrate that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows.

Reason

To minimise the potential for the site to contribute to surface water flooding in accordance with Southwark's Strategic Flood Risk Assessment (2017) and Policy SI 13 of the London Plan (2021).

9. Drainage Verification Report

The building shall be occupied for use until a drainage verification report prepared by a suitably qualified engineer has been submitted to and approved in writing by the Local Planning Authority. The report shall provide evidence that the drainage system (incorporating SuDS) has been constructed according to the approved details and specifications (or detail any minor variations where relevant) as detailed in the Flood Risk Assessment and Preliminary Drainage Strategy prepared by RSK Consulting (dated 31st March 2021), and shall include plans, photographs and national grid references of key components of the drainage network such as surface water attenuation structures, flow control devices and outfalls. The report shall also include details of the responsible management company.

Reason

To ensure the surface water drainage complies with Southwark's Strategic Flood Risk Assessment and Policy SI 13 of the London Plan (2021).

Permission is subject to the following Grade Condition(s)

14. MATERIALS SCHEDULE AND PRESENTATION OF SAMPLES

Before any above grade work hereby authorised begins (excluding demolition):

- a) a materials schedule providing the specification of all facing materials to be used in the development hereby approved shall be submitted to the Local Planning Authority, and;
- b) sample panels of at least 1 square metre in surface area of all external facing materials and surface finishes to be used in the carrying out of this permission shall be presented on site (or an alternative location agreed with the Local Planning Authority) to the Local Planning Authority;
- c) and written approval from the Local Planning Authority for parts a and b (referred to above) shall be obtained.

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

Reason:

In order that the Local Planning Authority may be satisfied that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing, are suitable in context and consistent with the consented scheme in accordance with: the National Planning Policy Framework 2021, Strategic Policy 12 (Design and Conservation) of the Core

Strategy 2011, and; Saved Policies 3.12 (Quality in Design) and 3.13 (Urban Design) of the Southwark Plan 2007.

15. Cycle Parking Details

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

Reason:

In order to ensure that satisfactory safe and secure cycle parking facilities are provided and retained in order to encourage the use of cycling as an alternative means of transport to the development and to reduce reliance on the use of the private car in accordance with Chapter 9 (Promoting sustainable transport) of the National Planning Policy Framework (2021); Policy T5 (Cycling) of the London Plan (2021); Strategic Policy 2 (Sustainable Transport) of the Core Strategy (2011); and Saved Policy 5.3 (Walking and Cycling) of the Southwark Plan (2007).

16. Plant Noise

The Rated sound level from any plant, together with any associated ducting, shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. Furthermore, the Specific plant sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific Sound levels shall be calculated fully in accordance with the methodology of BS4142:2014+A1:2019. A validation test shall be carried out and the results submitted to the Local Planning Authority for approval in writing to demonstrate compliance with the above standard. Once approved the plant and any acoustic treatments shall be permanently maintained thereafter.

Reason

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the National Planning Policy Framework 2021, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

17. GREEN ROOFS FOR BIODIVERSITY

Part 1: Before any above grade work hereby authorised begins, details of the biodiversity (green/brown) roof(s) shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity (green/brown) roof(s) shall be:

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

The biodiversity (green/brown) roof shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency.

The biodiversity roof(s) shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.

Part 2: Full Discharge of this condition will be granted once the green/brown roof(s) are completed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the roof has been constructed to the agreed specification.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with: Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure), G5 (Urban Greening) of the London Plan 2021; Strategic Policy 11 (Design and Conservation) of the Core Strategy 2011, and; Saved Policy 3.28 (Biodiversity) of the Southwark Plan 2007.

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

10. SERVICE MANAGEMENT PLAN

Before the first occupation of the building hereby permitted, a Service Management Plan detailing how all elements of the site are to be serviced shall be submitted to and approved in writing by the Local Planning Authority.

The development shall be carried out in accordance with the approval given and shall remain for as long as the development is occupied.

Reason:

To ensure compliance with: Chapter 9 (Promoting sustainable transport) of the National Planning Policy Framework (2021); Policy T7 (Deliveries, servicing and construction) of the London Plan (2021); Strategic Policy 2 (Sustainable Transport) of the Core Strategy (2011); and Saved Policy 5.2 (Transport Impacts) of the Southwark Plan (2007).

11. TRAVEL PLAN AND DETAILED TRANSPORT METHODS SURVEY

a) Before the first occupation of the building hereby permitted commences, the applicant shall submit in writing and obtain the written approval of the Local Planning Authority to a Travel Plan setting out the proposed measures to be taken to encourage the use of modes of transport other than the car by all users of the building, including staff and visitors.

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

Reason:

In order that the use of non-car based travel is encouraged in accordance with: Chapter 9 (Promoting sustainable transport) of the National Planning Policy Framework (2021); Policy T2 (Healthy streets) of the London Plan (2021); Strategic Policy 2 (Sustainable Transport) of The Core Strategy (2011); and Saved Policies 5.2 (Transport Impacts), 5.3 (Walking and Cycling) and 5.6 (Car Parking) of the Southwark Plan (2007).

12. Prior to occupation of the building use, details of the screening for the eastern side of the roof terrace hereby approved, shall be submitted to the local planning authority for approval; any screening approved shall be erected before the first use of the terrace and retained thereafter.

Reason:

To protect the amenity of neighbours in accordance with saved policy 3.2 Protection of Amenity of the Southwark Plan 2007 and policy 13 High Environmental Standards of the Core Strategy 2011.

13. DETAILS OF THE REFUSE STORAGE FACILITIES

Before the first occupation of the development hereby permitted begins, details of the arrangements for the storing of domestic and/or commercial refuse (whichever is applicable) shall be submitted to and approved in writing by the Local Planning Authority.

Thereafter, the approved refuse storage facilities shall be provided and made available for use by the occupiers of the development and the facilities shall thereafter be retained and shall not be used or the space used for any other purpose.

Reason:

To ensure that the refuse will be appropriately stored within the site thereby protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance in accordance with Chapters 8 (Promoting healthy and safe communities) and 12 (Achieving well-designed places) of the National Planning Policy Framework (2021); Policy D4 (Delivering good design) of the London Plan (2021); Strategic Policy 13 (High Environmental Standards) of the Core Strategy (2011); and Saved Policies 3.2 (Protection of Amenity) and 3.7 (Waste Reduction) of the Southwark Plan (2007).

Permission is subject to the following Compliance Condition(s)

18. Removal of Permitted Development Rights

Notwithstanding the provisions of Schedule 2 Part 3 Class O of the Town and Country Planning General Permitted Development Order (or amendment or re-enactment thereof) no change of operations should occur on site without seeking permission from the Local Planning Authority.

Reason:

To safeguard the character and the amenities of the premises and adjoining properties in accordance with Chapter 12 (Achieving good design) of the National

Planning Policy Framework (2021); Policies D4 (Delivering good design) and HC1 (Heritage conservation and growth) of the London Plan (2021); Strategic Policy 12 (Design and conservation) and Strategic Policy 13 (High environmental standards) of The Core Strategy (2011); and Saved Policies 3.2 (Protection of Amenity) and 3.12 (Quality in Design) of the Southwark Plan (2007).

19. RESTRICTION ON THE INSTALLATION OF TELECOMMUNICATIONS EQUIPMENT

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

Reason:

In order to ensure that no telecommunications plant or equipment which might be detrimental to the design and appearance of the building and visual amenity of the area is installed on the roof of the building in accordance with Chapter 12 (Achieving well-designed places) of the National Planning Policy Framework (2021); Policy D4 (Delivering good design) of the London Plan (2021); Strategic Policy 12 (Design and Conservation) of the Core Strategy (2011); and Saved Policies 3.2 (Protection of amenity) and 3.13 (Urban Design) of the Southwark Plan (2007).

Planning policy

National Planning Policy Framework (2021)

The revised National Planning Policy Framework ('NPPF') was published in July 2021 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental. Paragraph 212 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.

The relevant chapters from the Framework are:

- Chapter 2 Achieving sustainable development
- Chapter 6 Building a strong, competitive economy
- Chapter 7 Ensuring the vitality of town centres
- Chapter 8 Promoting healthy and safe communities
- Chapter 9 Promoting sustainable transport
- Chapter 11 Making effective use of land
- Chapter 12 Achieving well-designed places
- Chapter 14 Meeting the challenge of climate change, flooding and coastal change

The London Plan (2021)

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

The relevant chapters from the Plan are:

- Policy SD1 Opportunity Areas
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, other strategic functions and residential development in the CAZ
- Policy SD6 Town centres and high streets
- Policy D1 London's form, character and capacity for growth
- Policy D3 Optimising site capacity through the design led approach
- Policy D4 Delivering good design
- Policy D5 Inclusive design
- Policy D10 Basement development
- Policy D14 Noise
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E3 Affordable workspace
- Policy HC1 Heritage conservation and growth
- Policy G1 Green infrastructure
- Policy G5 Urban greening

- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI12 Flood risk management
- Policy SI13 Sustainable drainage
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6.2 Office parking
- Policy T6.5 Non-residential disabled persons parking
- Policy T7 Deliveries, servicing and construction
- Policy DF1 Delivery of the Plan and Planning Obligations

Core Strategy (2011)

The Core Strategy was adopted in 2011 providing the spatial planning strategy for the Borough.

The relevant strategic policies in the Core Strategy are:

- Strategic Policy 1 Sustainable development
- Strategic Policy 2 Sustainable transport
- Strategic Policy 10 Jobs and businesses
- Strategic Policy 12 Design and conservation
- Strategic Policy 13 High environmental standards

Southwark Plan (2007)

In 2013, the council resolved to 'save' all of the policies in the Southwark Plan 2007 unless they had been updated by the Core Strategy with the exception of Policy 1.8 (location of retail outside town centres). Paragraph 213 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 in the Plan are:

- Policy 1.1 Access to employment opportunities
- Policy 1.4 Employment sites outside preferred office locations and preferred industrial locations
- Policy 2.5 Planning obligations
- 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 3.9 Water
- Policy 3.11 Efficient use of land
- Policy 3.12 Quality in design
- Policy 3.13 Urban design
- Policy 3.14 Designing out crime
- Policy 3.15 Conservation of the historic environment

- Policy 3.18 Setting of listed buildings, conservation areas and world heritage sites
- Policy 3.19 Archaeology
- Policy 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

Emerging Policy – New Southwark (2020)

The New Southwark Plan (NSP) was submitted to the Secretary of State in January 2020. The Examination in Public (EiP) for the NSP took place between February to April 2021 and the amendments within the Proposed Changes to the Submitted New Southwark Plan will be considered along with the consultation responses received at each stage of public consultation. It is anticipated that the plan will be adopted later in 2021 following the EiP, which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy. 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 NPPF.

The relevant policies within the NSP are:

- P12 Design of places
- P13 Design quality
- P17 Efficient use of land
- P22 Archaeology
- P27 Access to employment and training
- P29 Office and business development
- P30 Affordable workspace
- P34 Town and local centres
- P48 Public transport
- P49 Highway impacts
- P50 Walking
- P52 Cycling
- P55 Protection of amenity
- P59 Biodiversity
- P64 Improving air quality
- P67 Reducing flood risk
- P69 Energy
- IP3 Community Infrastructure Levy (CIL) and Section 106 planning obligations

Supplementary Planning Documents (SPDs)

Of relevance in the consideration of this application are:

- Sustainable Design and Construction SPD 2008
- Blackfriars Road SPD 2014

APPENDIX 3

Relevant planning history

18/AP/3462 – GRANTED

46 Loman Street SE1 0EH

Erection of an infill extension at 3rd and 4th floors and the construction of an additional storey 5th floor level (with lift shaft and staircore above) for office use, together with changes to the Loman Street and Copperfield Street facades and the installation of a roof terrace at 6th floor level

Date: 19/12/2018

20/AP/1537 – GRANTED

Blackfriars Crown Court 1-15 Pocock Street SE1 0BT

Development of site, involving part demolition, alterations and extensions to the existing building and basement, including the change of use from Class D1 to Class B1, to provide a seven-storey building with rooftop pavilions comprising: office floorspace (Class B1); retail spaces (Class A1); a cafe (Class A3); a restaurant (B1/A3); a bar (Class A4/B1); leisure uses including a publicly accessible roof terrace (Class D2); other external amenity spaces and landscaping; a new entrance on Loman Street and route through the building; plant, and; other associated works.

Date: 06/05/2021

19/AP/1404 – GRANTED

32-36 Loman Street SE1 0EH

Demolition of the existing four storey office building with basement and redevelopment of the site to provide a new seven storey office building plus basement (Use Class B1).

Date: 18/08/2021

Consultation undertaken

Site notice date: n/a.

Press notice date: 29/04/2021

Case officer site visit date: n/a

Neighbour consultation letters sent: 26/04/2021

Internal services consulted

Design and Conservation Team [Formal]
Archaeology
Design and Conservation Team [Formal]
Ecology
Highways Development and Management
Flood Risk Management & Urban Drainage
Transport Policy
Environmental Protection

Statutory and non-statutory organisations

Environment Agency
London Fire & Emergency Planning Authority
Metropolitan Police Service (Designing O
Thames Water

Neighbour and local groups consulted:

Unit 1 54 Great Suffolk Street London
Second Floor North Block 47-51 Great Suffolk Street London
Third Floor 57 Great Suffolk Street London
59C Great Suffolk Street London Southwark
Second Floor 1 Risborough Street London
Flat 20 59B Great Suffolk Street London
Flat 14 59B Great Suffolk Street London
Fourth Floor 46 Loman Street London
Unit B1 Union Print Business Centre 164 - 180 Union Street
Unit B4 Union Print Business Centre 164 - 180 Union Street
Units 401 To 410 Union Print Business Centre 164 - 180 Union Street
Unit 108 Union Print Business Centre 164 - 180 Union Street
Unit B9 Union Print Business Centre 164 - 180 Union Street
Unit 203 Second Floor Union Print Business Centre 164 - 180 Union Street
Unit 107 Union Print Business Centre 164 - 180 Union Street
Part First Floor 47-51 Great Suffolk Street London

Second Floor 64 Great Suffolk Street London
Studio 36 Moonraker Point Pocock Street
Ground Floor 53 Great Suffolk Street London
Studio 93 Moonraker Point Pocock Street
Studio 68 Moonraker Point Pocock Street
Flat 7 Whitehill House 7 Sawyer Street
Flat 2 Whitehill House 5 Sawyer Street
Flat 15 Whitehill House 9 Sawyer Street
Studio 215 Moonraker Point Pocock Street
Studio 203 Moonraker Point Pocock Street
Studio 198 Moonraker Point Pocock Street
Studio 173 Moonraker Point Pocock Street
Studio 160 Moonraker Point Pocock Street
Studio 133 Moonraker Point Pocock Street
Studio 99 Moonraker Point Pocock Street
Studio 86 Moonraker Point Pocock Street
Studio 64 Moonraker Point Pocock Street
Studio 33 Moonraker Point Pocock Street
Studio 17 Moonraker Point Pocock Street
Studio 7 Moonraker Point Pocock Street
Flat 25 59B Great Suffolk Street London
Crown Court 1 Pocock Street London
Olwen House 8-20 Loman Street London
52A Great Suffolk Street London Southwark
Unit 2 38 Copperfield Street London
76 Great Suffolk Street London Southwark
Flat 8 Whitehill House 7 Sawyer Street
Unit 4 Moonraker Point Pocock Street
63 Great Suffolk Street London Southwark
Studio 217 Moonraker Point Pocock Street
Studio 159 Moonraker Point Pocock Street
Studio 145 Moonraker Point Pocock Street
Studio 118 Moonraker Point Pocock Street
Studio 110 Moonraker Point Pocock Street
Studio 98 Moonraker Point Pocock Street
Studio 92 Moonraker Point Pocock Street
Studio 82 Moonraker Point Pocock Street
Studio 47 Moonraker Point Pocock Street
Studio 39 Moonraker Point Pocock Street
Studio 26 Moonraker Point Pocock Street
Studio 21 Moonraker Point Pocock Street
Studio 14 Moonraker Point Pocock Street
Studio 13 Moonraker Point Pocock Street
Flat 5 70 Great Suffolk Street London
First Floor 53 Great Suffolk Street London
First Floor 64 Great Suffolk Street London
Flat 5 59 Great Suffolk Street London
Top Floor Flat 66 Great Suffolk Street London
Unit 303 Union Print Business Centre 164 - 180 Union Street

Unit 112 Union Print Business Centre 164 - 180 Union Street
Unit 111 Union Print Business Centre 164 - 180 Union Street
Part Ground Floor Front 47-51 Great Suffolk Street London
72 Great Suffolk Street London Southwark
156B Union Street London Southwark
Studio 102 Moonraker Point Pocock Street
Studio 213 Moonraker Point Pocock Street
Flat 28 59B Great Suffolk Street London
Flat 6 59B Great Suffolk Street London
Ground Floor Embassy Tea House 195 - 205 Union Street
Ground And First Floor 61A Great Suffolk Street London
Flat 5 Whitehill House 5 Sawyer Street
Flat 17 Whitehill House 9 Sawyer Street
Cells Crown Court 1 Pocock Street
2 South Side Apartments 58 Great Suffolk Street London
Fifth Floor Rear 57 Great Suffolk Street London
Railway Arches 28 To 31 Great Suffolk Street London
Advocates Crown Court 1 Pocock Street
G38 171 Union Street London
Ground Floor 1 Risborough Street London
113 Jerwood Space 171 Union Street London
Studio 38 Moonraker Point Pocock Street
Studio 12 Moonraker Point Pocock Street
Unit 5 38 Copperfield Street London
Studio 192 Moonraker Point Pocock Street
Studio 171 Moonraker Point Pocock Street
First Floor 181 Union Street London
7 South Side Apartments 58 Great Suffolk Street London
Ground Floor 15 Risborough Street London
Arch 32 74 Great Suffolk Street London
Basement And Part Ground Floor 47 - 51 Great Suffolk Street London
Fourth Floor 57 Great Suffolk Street London
Third Floor South Block 47-51 Great Suffolk Street London
Unit 1 38 Copperfield Street London
9 Risborough Street London Southwark
Ground Floor 11 Risborough Street London
Flat 5 160 Union Street London
Flat 22 59B Great Suffolk Street London
Flat 2 160 Union Street London
Flat 23 59B Great Suffolk Street London
154 Union Street London Southwark
6 Risborough Street London Southwark
Flat 3 3 Risborough Street London
1 South Side Apartments 58 Great Suffolk Street London
4 South Side Apartments 58 Great Suffolk Street London
Flat A 162 Union Street London
Second Floor 9 Risborough Street London
59A Great Suffolk Street London Southwark
Fourth Floor Main Part 47-51 Great Suffolk Street London

Second Floor 53 Great Suffolk Street London
First And Second Floor 11 Risborough Street London
The Reading Room 47 - 51 Great Suffolk Street London
Unit G3 Union Print Business Centre 164 - 180 Union Street
Unit 202 Union Print Business Centre 164 - 180 Union Street
Unit 306 Union Print Business Centre 164 - 180 Union Street
Unit 210 Second Floor Union Print Business Centre 164 - 180 Union Street
Unit G7 Union Print Business Centre 164 - 180 Union Street
Ground Floor Meeting Room Union Print Business Centre 164 - 180 Union Street
Units 307 And 308 Union Print Business Centre 164 - 180 Union Street
Unit G4 Union Print Business Centre 164 - 180 Union Street
Unit 401 Union Print Business Centre 164 - 180 Union Street
Unit G5 Union Print Business Centre 164 - 180 Union Street
Unit 204 Second Floor Union Print Business Centre 164 - 180 Union Street
Unit 101 Union Print Business Centre 164 - 180 Union Street
Unit G1 Union Print Business Centre 164 - 180 Union Street
Unit 309 Union Print Business Centre 164 - 180 Union Street
Unit 302 Union Print Business Centre 164 - 180 Union Street
Unit 209 Union Print Business Centre 164 - 180 Union Street
Flat 2 3 Risborough Street London
First Floor And Second Floor Flat 52 Great Suffolk Street London
Studio 188 Moonraker Point Pocock Street
Units 57C And 57D 57 Great Suffolk Street London
Second Floor And Third Floor Flat 13 Risborough Street London
Flat 8 59B Great Suffolk Street London
Roger King House 44 Copperfield Street London
Studio 195 Moonraker Point Pocock Street
Studio 72 Moonraker Point Pocock Street
Studio 48 Moonraker Point Pocock Street
Studio 216 Moonraker Point Pocock Street
Studio 156 Moonraker Point Pocock Street
Fifth Floor Flat 47-51 Great Suffolk Street London
80 Great Suffolk Street London Southwark
Ground Floor 21 Risborough Street London
Second Floor And Mezzanine 19 Risborough Street London
Ground And First Floor 17 Risborough Street London
Front 47-51 Great Suffolk Street London
Unit 508 Union Print Business Centre 164 - 180 Union Street
Flat 12 59B Great Suffolk Street London
Flat 4 59B Great Suffolk Street London
Flat 1 59 Great Suffolk Street London
Studio 175 Moonraker Point Pocock Street
Studio 147 Moonraker Point Pocock Street
Studio 139 Moonraker Point Pocock Street
Studio 125 Moonraker Point Pocock Street
Studio 117 Moonraker Point Pocock Street
Studio 94 Moonraker Point Pocock Street
Studio 41 Moonraker Point Pocock Street
Unit C 25 Copperfield Street London

46A Copperfield Street London Southwark
44 Loman Street London Southwark
156A Union Street London Southwark
21 Risborough Street London Southwark
Studio 229 Moonraker Point Pocock Street
Studio 227 Moonraker Point Pocock Street
Studio 209 Moonraker Point Pocock Street
Studio 202 Moonraker Point Pocock Street
Studio 194 Moonraker Point Pocock Street
Studio 179 Moonraker Point Pocock Street
Studio 126 Moonraker Point Pocock Street
Studio 119 Moonraker Point Pocock Street
Studio 116 Moonraker Point Pocock Street
Studio 71 Moonraker Point Pocock Street
Studio 31 Moonraker Point Pocock Street
Studio 18 Moonraker Point Pocock Street
Studio 8 Moonraker Point Pocock Street
Studio 6 Moonraker Point Pocock Street
70B Great Suffolk Street London Southwark
Flat 1 70 Great Suffolk Street London
Flat 13 59B Great Suffolk Street London
Flat 9 59B Great Suffolk Street London
Flat 6 59 Great Suffolk Street London
Flat 3 59 Great Suffolk Street London
61B Great Suffolk Street London Southwark
Studio 226 Moonraker Point Pocock Street
Studio 218 Moonraker Point Pocock Street
Studio 130 Moonraker Point Pocock Street
Studio 89 Moonraker Point Pocock Street
Studio 81 Moonraker Point Pocock Street
Studio 76 Moonraker Point Pocock Street
Studio 57 Moonraker Point Pocock Street
Studio 49 Moonraker Point Pocock Street
Studio 46 Moonraker Point Pocock Street
Flat 9 70 Great Suffolk Street London
Flat 3 70 Great Suffolk Street London
Unit 2B Moonraker Point Pocock Street
Studio 189 Moonraker Point Pocock Street
Studio 182 Moonraker Point Pocock Street
Studio 181 Moonraker Point Pocock Street
Studio 166 Moonraker Point Pocock Street
Studio 164 Moonraker Point Pocock Street
Studio 141 Moonraker Point Pocock Street
Studio 131 Moonraker Point Pocock Street
Studio 123 Moonraker Point Pocock Street
Studio 103 Moonraker Point Pocock Street
Studio 101 Moonraker Point Pocock Street
Studio 100 Moonraker Point Pocock Street
Studio 97 Moonraker Point Pocock Street

Studio 88 Moonraker Point Pocock Street
Studio 56 Moonraker Point Pocock Street
Studio 52 Moonraker Point Pocock Street
Studio 45 Moonraker Point Pocock Street
Studio 37 Moonraker Point Pocock Street
Flat 4 70 Great Suffolk Street London
Flat 19 59B Great Suffolk Street London
First Floor 7 Risborough Street London
Ground Floor 46 Loman Street London
Flat 10 59B Great Suffolk Street London
Flat 1 59B Great Suffolk Street London
Flat 4 59 Great Suffolk Street London
Studio 228 Moonraker Point Pocock Street
Studio 223 Moonraker Point Pocock Street
Studio 208 Moonraker Point Pocock Street
Studio 196 Moonraker Point Pocock Street
Studio 193 Moonraker Point Pocock Street
Studio 185 Moonraker Point Pocock Street
Studio 170 Moonraker Point Pocock Street
Studio 165 Moonraker Point Pocock Street
Studio 122 Moonraker Point Pocock Street
Studio 96 Moonraker Point Pocock Street
Studio 73 Moonraker Point Pocock Street
Studio 10 Moonraker Point Pocock Street
Studio 5 Moonraker Point Pocock Street
Flat 6 70 Great Suffolk Street London
Second Floor 181 Union Street London
50A Great Suffolk Street London Southwark
46B Copperfield Street London Southwark
152B Union Street London Southwark
24 Pepper Street London Southwark
Flat 4 Whitehill House 5 Sawyer Street
Flat 1 Whitehill House 5 Sawyer Street
Flat 14 Whitehill House 7 Sawyer Street
Unit 5A Moonraker Point Pocock Street
Unit 7 Moonraker Point Pocock Street
19 Risborough Street London Southwark
Ground Floor Front 181 Union Street London
Studio 224 Moonraker Point Pocock Street
Studio 197 Moonraker Point Pocock Street
Studio 174 Moonraker Point Pocock Street
Studio 146 Moonraker Point Pocock Street
Studio 140 Moonraker Point Pocock Street
Studio 134 Moonraker Point Pocock Street
Studio 124 Moonraker Point Pocock Street
Studio 106 Moonraker Point Pocock Street
Studio 90 Moonraker Point Pocock Street
Studio 84 Moonraker Point Pocock Street
Studio 77 Moonraker Point Pocock Street

Studio 66 Moonraker Point Pocock Street
Studio 58 Moonraker Point Pocock Street
Studio 34 Moonraker Point Pocock Street
Studio 4 Moonraker Point Pocock Street
Flat 17 59B Great Suffolk Street London
Flat 5 59B Great Suffolk Street London
Flat 2 59 Great Suffolk Street London
Part Fourth Floor Trigram Partnership 47-51 Great Suffolk Street London
12 Risborough Street London Southwark
Third Floor And Mezzanine 64 Great Suffolk Street London
Second Floor South Block 47-51 Great Suffolk Street London
Second Floor 7 Risborough Street London
152A Union Street London Southwark
First Floor 15 Risborough Street London
Second Floor 57 Great Suffolk Street London
Unit 7 38 Copperfield Street London
Flat 11 Whitehill House 7 Sawyer Street
Flat 11 Risborough Street London
Ground Floor 64 Great Suffolk Street London
Basement 181 Union Street London
Moonraker Point Pocock Street London
Unit F 25 Copperfield Street London
Part Fourth Floor Harpers 47-51 Great Suffolk Street London
156 Union Street London Southwark
First And Second Floors 21 Risborough Street London
Unit 3 38 Copperfield Street London
7 Risborough Street London Southwark
6 South Side Apartments 58 Great Suffolk Street London
61A Great Suffolk Street London Southwark
First Floor 5 Risborough Street London
Flat 6 Whitehill House 7 Sawyer Street
Flat 21 59B Great Suffolk Street London
Flat 24 59B Great Suffolk Street London
Flat 26 59B Great Suffolk Street London
Unit D4 Moonraker Point Pocock Street
Basement Unit 54 Great Suffolk Street London
Ground And First Floor 19 Risborough Street London
Second Floor And Mezzanine 17 Risborough Street London
Unit 6 Moonraker Point Pocock Street
52 Great Suffolk Street London Southwark
47-51 Great Suffolk Street London Southwark
Flat 3 160 Union Street London
Jury Restaurant Crown Court 1 Pocock Street
Flat C 162 Union Street London
57B Great Suffolk Street London Southwark
57A Great Suffolk Street London Southwark
201 Embassy Tea House 195 - 205 Union Street London
Ground Floor 5 Risborough Street London
First Floor 46 Copperfield Street London

Second Floor Flat 15 Risborough Street London
Unit 310 Union Print Business Centre 164 - 180 Union Street
Ground Floor Cafe Union Print Business Centre 164 - 180 Union Street
Unit 110 Union Print Business Centre 164 - 180 Union Street
Unit 402 Union Print Business Centre 164 - 180 Union Street
Unit B2 Union Print Business Centre 164 - 180 Union Street
5 South Side Apartments 58 Great Suffolk Street London
Studio 51 Moonraker Point Pocock Street
Part First Floor North Block And Part First Floor South Block 47-51 Great Suffolk Street
London
Studio 54 Moonraker Point Pocock Street
Studio 3 Moonraker Point Pocock Street
Unit G 25 Copperfield Street London
56 Great Suffolk Street London Southwark
Maisonette Flat 5 Risborough Street London
Unit 2 54 Great Suffolk Street London
First Floor Unit A And Unit B 57 Great Suffolk Street London
Unit 5B Moonraker Point Pocock Street
Unit 3 Moonraker Point Pocock Street
Studio 191 Moonraker Point Pocock Street
Studio 183 Moonraker Point Pocock Street
Studio 144 Moonraker Point Pocock Street
Studio 115 Moonraker Point Pocock Street
Studio 78 Moonraker Point Pocock Street
Studio 30 Moonraker Point Pocock Street
Basement And First To Fifth Floors Embassy Tea House 195 - 205 Union Street
183-185 Union Street London Southwark
13 Risborough Street London Southwark
Flat 18 Whitehill House 9 Sawyer Street
Studio 230 Moonraker Point Pocock Street
Studio 186 Moonraker Point Pocock Street
Studio 184 Moonraker Point Pocock Street
Studio 177 Moonraker Point Pocock Street
Studio 163 Moonraker Point Pocock Street
Studio 161 Moonraker Point Pocock Street
Studio 155 Moonraker Point Pocock Street
Studio 138 Moonraker Point Pocock Street
Studio 121 Moonraker Point Pocock Street
Studio 111 Moonraker Point Pocock Street
Studio 79 Moonraker Point Pocock Street
Studio 74 Moonraker Point Pocock Street
Studio 60 Moonraker Point Pocock Street
Studio 55 Moonraker Point Pocock Street
Studio 50 Moonraker Point Pocock Street
Studio 35 Moonraker Point Pocock Street
Studio 16 Moonraker Point Pocock Street
Studio 11 Moonraker Point Pocock Street
70A Great Suffolk Street London Southwark
Flat 7 70 Great Suffolk Street London

Fifth Floor Front 57 Great Suffolk Street London
First Floor 1 Risborough Street London
Second Floor 46 Loman Street London
Unit 311 Union Print Business Centre 164 - 180 Union Street
Units 301 And 302 Union Print Business Centre 164 - 180 Union Street
Unit 109 Union Print Business Centre 164 - 180 Union Street
Unit G8 Union Print Business Centre 164 - 180 Union Street
Unit 211 Second Floor Union Print Business Centre 164 - 180 Union Street
Unit 208 Second Floor Union Print Business Centre 164 - 180 Union Street
Unit 207 Second Floor Union Print Business Centre 164 - 180 Union Street
Studio 220 Moonraker Point Pocock Street
Basement And Ground Floor Rear 181 Union Street London
The Charles Dickens 160 Union Street London
Studio 22 Moonraker Point Pocock Street
Studio 135 Moonraker Point Pocock Street
Studio 9 Moonraker Point Pocock Street
First Floor 9 Risborough Street London
G32 Jerwood Space 171 Union Street
Unit 4 38 Copperfield Street London
Flat 15 59B Great Suffolk Street London
Studio 210 Moonraker Point Pocock Street
Studio 201 Moonraker Point Pocock Street
Studio 157 Moonraker Point Pocock Street
Studio 154 Moonraker Point Pocock Street
Studio 104 Moonraker Point Pocock Street
Studio 91 Moonraker Point Pocock Street
Studio 67 Moonraker Point Pocock Street
Studio 59 Moonraker Point Pocock Street
Studio 44 Moonraker Point Pocock Street
Studio 28 Moonraker Point Pocock Street
Flat 4 160 Union Street London
Flat 1 160 Union Street London
171 Union Street London Southwark
1 Risborough Street London Southwark
4 Risborough Street London Southwark
57 Great Suffolk Street London Southwark
Flat 9 Whitehill House 7 Sawyer Street
Flat 16 Whitehill House 9 Sawyer Street
Unit 1 3 Risborough Street London
Studio 222 Moonraker Point Pocock Street
Studio 212 Moonraker Point Pocock Street
Studio 211 Moonraker Point Pocock Street
Studio 207 Moonraker Point Pocock Street
Studio 200 Moonraker Point Pocock Street
Studio 172 Moonraker Point Pocock Street
Studio 158 Moonraker Point Pocock Street
Studio 151 Moonraker Point Pocock Street
Studio 150 Moonraker Point Pocock Street
Studio 105 Moonraker Point Pocock Street

Studio 75 Moonraker Point Pocock Street
Studio 69 Moonraker Point Pocock Street
Studio 42 Moonraker Point Pocock Street
Studio 27 Moonraker Point Pocock Street
Studio 19 Moonraker Point Pocock Street
Flat 16 59B Great Suffolk Street London
Flat 11 59B Great Suffolk Street London
First Floor 46 Loman Street London
Unit B10 Union Print Business Centre 164 - 180 Union Street
Unit 104 Union Print Business Centre 164 - 180 Union Street
Unit G10 Union Print Business Centre 164 - 180 Union Street
Unit 206 Union Print Business Centre 164 - 180 Union Street
Units G6 And G9 Union Print Business Centre 164 - 180 Union Street
Unit 205 Union Print Business Centre 164 - 180 Union Street
Studio 149 Moonraker Point Pocock Street
Studio 148 Moonraker Point Pocock Street
Studio 129 Moonraker Point Pocock Street
Studio 108 Moonraker Point Pocock Street
Studio 65 Moonraker Point Pocock Street
Studio 43 Moonraker Point Pocock Street
Studio 180 Moonraker Point Pocock Street
Studio 176 Moonraker Point Pocock Street
32-36 Loman Street London Southwark
Flat 10 Whitehill House 7 Sawyer Street
62 Great Suffolk Street London Southwark
Unit 2A Moonraker Point Pocock Street
Studio 178 Moonraker Point Pocock Street
Studio 167 Moonraker Point Pocock Street
Studio 127 Moonraker Point Pocock Street
Studio 112 Moonraker Point Pocock Street
Studio 70 Moonraker Point Pocock Street
Studio 62 Moonraker Point Pocock Street
Studio 25 Moonraker Point Pocock Street
Studio 23 Moonraker Point Pocock Street
111 Jerwood Space 171 Union Street London
Flat 27 59B Great Suffolk Street London
152 Union Street London Southwark
5 Risborough Street London Southwark
Flat 3 Whitehill House 5 Sawyer Street
55 Great Suffolk Street London Southwark
Africa House 66 Great Suffolk Street London
60 Great Suffolk Street London Southwark
Studio 214 Moonraker Point Pocock Street
Studio 206 Moonraker Point Pocock Street
Studio 169 Moonraker Point Pocock Street
Studio 168 Moonraker Point Pocock Street
Studio 128 Moonraker Point Pocock Street
Studio 114 Moonraker Point Pocock Street
Studio 63 Moonraker Point Pocock Street

Studio 61 Moonraker Point Pocock Street
Studio 53 Moonraker Point Pocock Street
3 South Side Apartments 58 Great Suffolk Street London
Flat B 162 Union Street London
207 Union Street London Southwark
Flat 3 59B Great Suffolk Street London
Flat 2 59B Great Suffolk Street London
1m03 Jerwood Space 171 Union Street
Unit 301 Union Print Business Centre 164 - 180 Union Street
Unit G2 Union Print Business Centre 164 - 180 Union Street
Studio 412 Union Print Business Centre 164 - 180 Union Street
Unit 201 Union Print Business Centre 164 - 180 Union Street
Unit 304 To 305 Union Print Business Centre 164 - 180 Union Street
Store Union Print Business Centre 164 - 180 Union Street
Unit B7 Union Print Business Centre 164 - 180 Union Street
Unit B11 Union Print Business Centre 164 - 180 Union Street
Unit 212 Second Floor Union Print Business Centre 164 - 180 Union Street
Studio 109 Moonraker Point Pocock Street
Studio 225 Moonraker Point Pocock Street
Studio 204 Moonraker Point Pocock Street
Studio 85 Moonraker Point Pocock Street
Fourth Floor South Block 47-51 Great Suffolk Street London
Studio 132 Moonraker Point Pocock Street
Studio 113 Moonraker Point Pocock Street
Studio 29 Moonraker Point Pocock Street
Flat 2 70 Great Suffolk Street London
Third Floor North Block 47-51 Great Suffolk Street London
Third Floor 46 Loman Street London
Ground Floor 181 Union Street London
Flat 12 Whitehill House 7 Sawyer Street
Ground Floor 46 Copperfield Street London
Flat 18 59B Great Suffolk Street London
Flat 7 59B Great Suffolk Street London
Studio 205 Moonraker Point Pocock Street
Studio 162 Moonraker Point Pocock Street
Studio 152 Moonraker Point Pocock Street
Studio 142 Moonraker Point Pocock Street
Studio 120 Moonraker Point Pocock Street
Studio 107 Moonraker Point Pocock Street
Studio 83 Moonraker Point Pocock Street
Studio 20 Moonraker Point Pocock Street
Studio 15 Moonraker Point Pocock Street
158 Union Street London Southwark
Unit D 25 Copperfield Street London
Flat 19 Whitehill House 9 Sawyer Street
Studio 221 Moonraker Point Pocock Street
Studio 219 Moonraker Point Pocock Street
Studio 199 Moonraker Point Pocock Street
Studio 190 Moonraker Point Pocock Street

Studio 187 Moonraker Point Pocock Street
Studio 153 Moonraker Point Pocock Street
Studio 143 Moonraker Point Pocock Street
Studio 137 Moonraker Point Pocock Street
Studio 136 Moonraker Point Pocock Street
Studio 95 Moonraker Point Pocock Street
Studio 87 Moonraker Point Pocock Street
Studio 80 Moonraker Point Pocock Street
Studio 40 Moonraker Point Pocock Street
Studio 32 Moonraker Point Pocock Street
Studio 24 Moonraker Point Pocock Street
Studio 2 Moonraker Point Pocock Street
Studio 1 Moonraker Point Pocock Street
Flat 8 70 Great Suffolk Street London

APPENDIX 5

Consultation responses received

Internal services

Design and Conservation Team [Formal]
Archaeology
Design and Conservation Team [Formal]
Ecology
Highways Development and Management
Flood Risk Management & Urban Drainage
Transport Policy
Environmental Protection

Statutory and non-statutory organisations

Environment Agency
Metropolitan Police Service

Neighbour and local groups consulted:

38 Copperfield St London SE1 0EA
Unit 4 38 Copperfield Street London
5 Risborough Street London SE1 0HF
Unit 2 38 Copperfield Street London
Unit 1 38 Copperfield Street London