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<b>Item No.</b> 6.2	<b>Classification:</b> Open	<b>Date:</b> 17 January 2023	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<b>Development Management planning application:</b> Application 22/AP/2295 for: Full Planning Application  <b>Address:</b> Ludgate House, 245 Blackfriars Road, London, Southwark, SE1.  <b>Proposal:</b> Construction of a lower ground, upper ground and 18 storey building comprising Use Class E (office and retail) floorspace incorporating internal amendments to part of the existing site-wide basement at levels B1 and B2 and all landscaping, public realm and highways improvements together with all associated and ancillary works.		
<b>Ward(s) or groups affected:</b>	Borough and Bankside		
<b>From:</b>	Director of Planning and Growth		
<b>Application Start Date</b>	21/07/2022	<b>PPA Expiry Date</b>	31/03/2023
<b>Earliest Decision Date</b>	13/10/2022		

## RECOMMENDATIONS

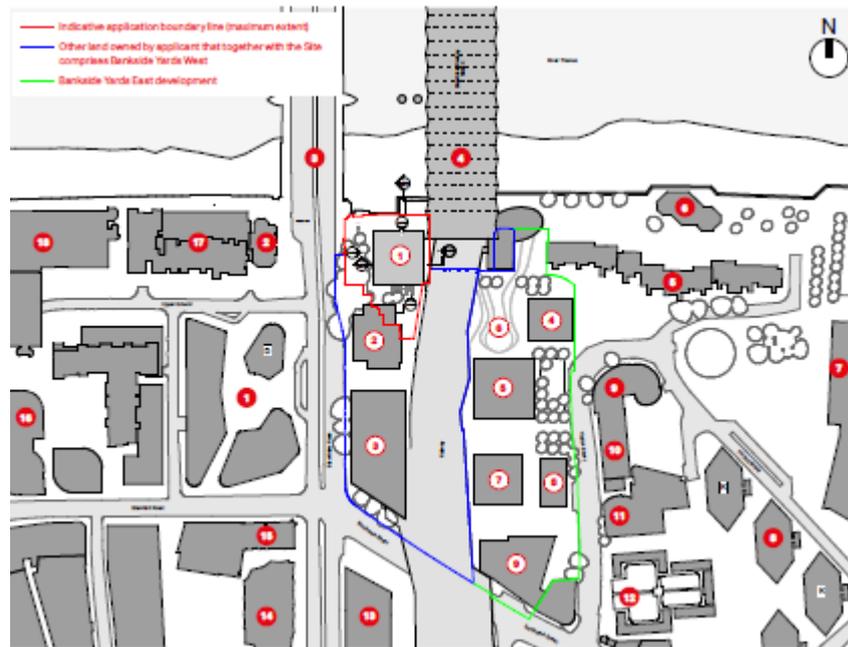
1. That planning permission is granted subject to conditions, referral to the Mayor of London and the applicant entering into an appropriate legal agreement by no ;later than 31 March 2023; and
2. That environmental information be taken into account as required by Regulation 26(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended); and
3. That the Planning Committee in making their decision has due regard to the potential Equalities impacts that are outlined in this report; and
4. That following the issue of planning permission, the director of planning and growth write to the Secretary of State notifying them of the decision, pursuant to Regulation 30(1)(a) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017; and
5. That following issue of planning permission, the director of planning and growth place a statement on the Statutory Register pursuant to Regulation 28(1) of the TCP (EIA) Regulations 2017, which contains the information required by Regulation 28 and, for the purposes of Regulation 28(1)(h) being the main reasons and considerations on which the planning committee's decision was based shall be set out in the report; and

6. That, in the event that the requirements of (1) are not met by 31<sup>st</sup> March 2023 that the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in Paragraph 260 of this report.

## EXECUTIVE SUMMARY

7. Planning permission was granted in 2014 for the redevelopment of the site known as Sampson House and Ludgate House which is located at the northern end of Blackfriars Road and is further bound by Southwark Street, Hopton Street and the River Thames. The site spans the Blackfriars Thameslink railway viaduct which essentially divides the site into two sections, Sampson House to the east and Ludgate House to the west.

Image – Site location and relationship to Bankside Yards



8. The original planning permission was granted with a legal agreement on 28 March 2014 and was valid for three years (planning application reference. 12/AP/3940). The planning permission includes the demolition of the existing Sampson House and Ludgate House buildings and redevelopment of the entire site to provide 489 flats as well as offices, retail (Classes A1-A5), community uses (Class D1) and a gym (Class D2). The approved development includes nine new buildings ranging in height from 5 to 49 storeys. The consent was implemented in 2016 and this was confirmed by way of a Certificate of Lawfulness on 29 March 2017. The approved building heights are set out below

Approved Building (new reference)	Height
LH-A (BY1)	62.08m AOD
LH-B (BY2)	169.6m AOD
LH-C (BY3)	73m AOD
SH-A (BY4)	79.5m AOD
SH-B (BY5)	123.9m AOD

SH-C (BY7)	107.9m AOD
SH-D (BY8)	42.2m AOD
SH-F (BY9)	28.9m AOD

9. In 2015 the site was purchased by Native Land (the current applicant) who sought agreement for the development to be treated as two separate phases, each capable of delivery independently. To this end, an application to vary the legal agreement was approved in March 2019 under reference 18/AP/1316. The amendments to the legal agreement essentially separated the Ludgate House and Sampson House obligations. Sampson House has now been demolished whilst the construction on the Ludgate site is well under way with building BY3 completed. Together the sites are known as Bankside Yards with the two sides (and now separate consents) known as Bankside Yards West (Ludgate side) and Bankside Yards East (Sampson side).
10. The proposal is for a large, commercial led development at the northern end of the site formerly occupied by Ludgate House and forming part of the consented Bankside Yards redevelopment. The proposed development is an alternative to the previously consented (but not constructed) building known as Ludgate House A (LHA) or Building 1 in the same area of Bankside Yards West. The building is now known as BY1. Together the permissions comprise the Bankside Yards redevelopment. A basement (pursuant to the Bankside Yards Masterplan and the BYE Consent) is consented beneath the whole of the Bankside Yards redevelopment area, with access from Bankside Yards East through to Bankside Yards West at basement level.
11. The development would replace the approved but not constructed residential building with a taller building for office use. At C75m AOD, the proposed building would be approximately 13m taller than the previously consented BY1 and would be larger in terms of massing. The position of the building and the ground level arrangement would be largely similar to the consented scheme. Pedestrian routes through the site that were approved on the earlier consents would be maintained as part of the current proposal.
12. The architecture and standard of design of the new building is considered to be exceptional which is a requirement and expectation for a building of this scale in such a prominent, riverside central London location where the standard of new development architecture is one of excellence. The proposed office accommodation would be of a high standard and would meet the needs of modern office users.
13. The development would include 10% affordable workspace at a 51% discount on market rent levels. Retail would be provided at ground level which would activate the public realm and provide retain facilities to complement those approved as part of the consented scheme. The development would be capable of providing up to 800 new full time jobs which is welcomed.
14. The development would be highly energy efficient and sustainable with an on-site carbon reduction of 42.6%% above the 2013 Building Regulations in addition to a carbon offset payment that would help the development achieve Carbon Zero targets. It is expected that the development would achieve BREEAM 'Excellent' and this would be a conditioned requirement of any consent.

15. The site is located in the Central Activities Zone, the Bankside Borough and London Bridge Opportunity Area and the Bankside and Borough District Town Centre, and is allocated in the Southwark Plan as NSP19. The proposals are consistent with the site allocation and the objectives of the development plan for this area.
16. The impact on the amenity of neighbours in terms of privacy, outlook and daylight/sunlight is set out in the report. It is noted that there would be no significant adverse impacts on any residents and there would be no significant overshadowing solar glare or light pollution impacts.

	Existing sqm	Proposed sqm	Change +/-
Public Open Space	645	939	+294
Play Space	N/A	N/A	N/A

CO2 Savings beyond part L Bldg. Regs.	%
Trees lost	Zero. 5 retained. Previous consent secured PP for them to be removed.
Trees gained	8 gained (on roof terrace, L17). 13 proposed in total

	Existing	Proposed	Change +/-
Urban Greening Factor	0.03	0.45	0.42
Greenfield Run Off Rate			
Green/Brown Roofs	0	179sqm	+179sqm
EVCPS (on site)	0	0 (no car parking proposed)	0
Cycle parking spaces	0	275 long stay 30 short stay	+275 long stay +30 short stay

17. A total of 461 letters were sent to local residents as part of the Council's neighbour consultation exercise and no objections have been received.

## BACKGROUND INFORMATION

### Site location and description

18. The Bankside Yards site is bordered by the Thames River Walkway and London Blackfriars Rail Station to the north; Hopton Street to the east; Southwark Street to the south-west; and Blackfriars Road to the west. It is divided by a railway viaduct and associated arches.

19. The site was formerly occupied by Ludgate House which comprised 23,836 sqm (GEA) of B1 office space over lower ground, ground and nine upper floors. The building was used as the headquarters for United Business Media (UBM). The building has now been demolished and its site (within Bankside Yards West as part of the wider Bankside Yards site) has been cleared and is subject to ongoing consented basement works (pursuant to the Bankside Yards Masterplan)
20. The site forms the northern part of Bankside Yards West, which also comprises two further buildings to the south. To the immediate south of the site, the area at which Ludgate House building 2 (BY2) is proposed has been cleared, with all piling and excavation works associated with the building completed. The superstructure works associated with Ludgate House building 3 (BY3), south of LH2, have been completed.

### Surrounding Area

21. The site is bound to the north by the Thames Path which provides pedestrian links to numerous cultural attractions on the South Bank. To the east of the site lies the railway viaduct and beyond is Hopton Street, which is both residential and commercial in character and includes flatted developments such as Falcon Point (including Falcon Point piazza) and Bankside Lofts. The site is within the setting of several listed structures including the Hopton Street Almshouses which are Grade II\* listed; 61 Hopton Street which is Grade II listed; and the Blackfriars and St Paul's railway bridge which is also Grade II listed.

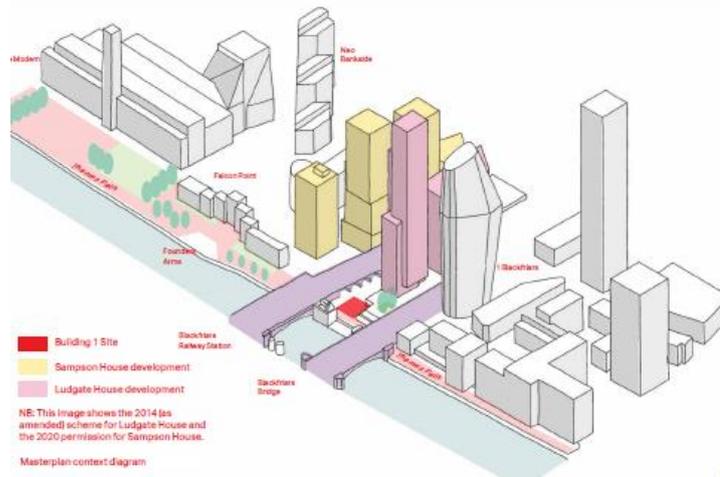
### Image – Site location



22. To the south along Blackfriars Road is the office development known as 240 Blackfriars which rises to 20 storeys. Adjoining Sampson House to its south at 144 Southwark Street is an office building known as Titan House.
23. To the west lies River Court, a residential housing block fronting the river and also the site of 1 Blackfriars, a mixed use commercial, residential and hotel development with the tallest building rising to 50 storeys. The nearest conservation area is the Old Barge House Alley Conservation Area, which is to the west of the site, split between the boroughs of Southwark and Lambeth and contains the unlisted Oxo Tower building. Other nearby conservation areas are Bear Gardens to the east of the site (east of the Globe Theatre) and Kings Bench

to the south east of the site (south of Union Street). The Whitefriars Conservation Area is located across the river, within City of London.

Image – Consented context



**Details of proposal**

- 24. Planning consent is sought for a new 18 storey building rising to approximately 75m AOD. The proposed development is predominately for office use, with a flexible retail offer at the lower ground floor. Below ground are two levels of basement for plant, servicing and storage, which form part of the wider BYW basement.
- 25. The relevant land use floor areas are set out in the table below:

Use	Use Class	Proposed GIA (sqm)	Proposed GEA (sqm)
Office	Class E	7,911	8,547
Retail	Class E	322	302
Plant	-	5,748	6,295
<b>Total</b>	-	<b>13,691</b>	<b>15,164</b>

- 26. Additionally, the development would provide 1,333sqm of public realm which includes improvements to the existing Rennie Garden, the existing east-west route along the Thames Path to the north of the site and the Rennie Arch link (a route underneath the railway viaduct arches connecting the development to the wider Bankside Yards redevelopment) and a new north-south pedestrian route to the east of the site

Image – Proposed development



27. The development would provide a total of 305 cycle parking spaces as well as changing and showering facilities. The proposed cycle parking provision will comprise 275 long stay spaces at basement level and 30 short stay spaces within the public realm.
28. All servicing activity would be undertaken on-site in a dedicated service yard within the consented Bankside Yards basement which would be accessed from Southwark Street.

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

29. Letters were sent to local residents when the application was first received in August 2022, at this time the application was advertised as EIA development in the local press and site notices were posted. A total of 461 neighbour notification letters were sent. No objections have been received.

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

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

## **KEY ISSUES FOR CONSIDERATION**

### **Summary of main issues**

31. The main issues to be considered in respect of this application are:
  - Principle of the proposed development in terms of land use and compliance with the site allocation NSP19;
  - Affordable workspace
  - Environmental impact assessment
  - Design, including layout, building heights, landscaping and ecology;

- Heritage considerations
- Archaeology
- Impact of proposed development on amenity of adjoining occupiers and surrounding area, including privacy, daylight and sunlight
- Transport and highways, including servicing, car parking and cycle parking
- Environmental matters, including construction management, flooding and air quality
- Energy and sustainability, including carbon emission reduction
- Ecology and biodiversity
- Planning obligations (S.106 undertaking or agreement)
- Mayoral and borough community infrastructure levy (CIL)
- Consultation responses and community engagement
- Community impact, equalities assessment and human rights
- All other relevant material planning considerations

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

### **Legal context**

33. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2021 and the Southwark Plan 2022. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications for development within Conservation Areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. Section 66 of the Act also requires the Authority to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.

34. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

### **Planning policy**

35. The statutory development plans for the Borough comprise the London Plan (2021) and The Southwark Plan (2022). The National Planning Policy Framework (2021) is a material consideration but is not part of the statutory development plan. A list of policies which are relevant to this application is provided at Appendix 3. Any policies which are particularly relevant to the consideration of this application are highlighted in the report.

### **Policy designations**

36. The site is subject to the following policy designations:

- Air Quality Management Area
- Bankside, Borough and London Bridge Opportunity Area

- Central Activities Zone
- Bankside and Borough Bridge District Town Centre
- Strategic Cultural Area
- Thames Policy Area

### Site allocation NSP19

37. The application site benefits from an allocation within the Southwark Plan 2022. Allocation NSP19 refers specifically to the application site and requires redevelopment to:
- Provide new homes (C3); and
  - Provide new employment floorspace (E(g), B class);
  - Provide active frontages with ground floor retail, community or leisure uses (as defined in the glossary) along Blackfriars Road; and
  - Provide new east-west green links connecting Blackfriars Road to Hopton Street, including a new cycle link; and
  - Provide leisure, arts, culture or community uses for the benefit of new residents and the existing local community; and
  - Provide new open space of at least 15% of the site area.
  - The allocation notes that planning consents 12/AP/3940 and 18/AP/1603 are relevant to this site.

NSP 19 sets out that the site is suitable for a taller building, subject to a range of considerations, including its location within the Thames Policy Area.

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

### Conservation Areas

39. The site is not located within or immediately adjacent to any conservation areas although the Old Barge House Alley conservation area lies to the west on the opposite side of Blackfriars Road.

### Listed Buildings

40. The site is within the setting of Grade II listed buildings including Blackfriars Bridge, as well as being in proximity of Grade II\* Hoptons Almshouses and undesignated heritage assets including the Tate Modern, River Walk and the railway viaduct. Additional listed buildings include:
- 41.
- 1 and 3 Stamford Street – Grade II
  - Christchurch – Grade II
  - 1, 2 and 3 Paris Gardens – Grade II
  - 15–17 Hatfields – Grade II
  - 61 Stamford Street, London Nautical School – Grade II
  - 63 Stamford Street – Grade II
  - 99 Southwark Street – Grade II\*

- 97 Southwark Street – Grade II
- 15–17 Hatfields – Grade II

### London View Management Framework protected views

42.      • The site does not directly affect any LVMF views

## **ASSESSMENT**

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

#### Relevant policy designations

43. The proposed development would be office led and should be read in the context of the wider consented Bankside Yards development. The development of the site would be office led with some retail space whilst the remainder of the Bankside Yards consented development would provide additional office space, housing, retail, cultural space and significant new public realm. The new public realm would significantly improve the street level experience of this area and would improve animation, activity and interest at street level in addition to improving pedestrian connectivity and legibility.

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

44. The National Planning Policy Framework (NPPF) was updated in 2021. At the heart of the NPPF is a presumption in favour of sustainable development. The framework sets out a number of key principles, including a focus on driving and supporting sustainable economic development. Relevant paragraphs of the NPPF are considered in detail throughout this report. The NPPF also states that permission should be granted for proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.
45. Borough and Bankside are part of the London Central Activities Zone, the Bankside, Borough and London Bridge Opportunity Area and the Borough and Bankside District Town Centre. The London Plan notes that this area has considerable potential for intensification and scope to develop the strengths of the area for strategic office provision as well as housing, especially in the hinterland between Blackfriars and London bridges. Mixed leisure and culture related development should enhance its distinct offer as part of the South Bank Strategic Cultural Area and this should include visitor accommodation. This is further reflected in Policy SD2 – Opportunity Areas of the London Plan which increases the indicative target for new jobs to 5,500.

#### *Bankside and Borough Area Vision*

46. The site is located within AV.02 – Bankside Area Vision. Development in London Bridge Should:

- Continue to consolidate Bankside and The Borough as part of the London Central Activities Zone; an international destination for business headquarters, small businesses, tourism and transportation that is entwined with historic communities with local services, open spaces and excellent transport links;
- Bankside and Borough are part of the London Central Activities Zone, the Bankside, Borough and London Bridge Opportunity Area delivering 10,000 new jobs and the Bankside and Borough District Town Centre. Site allocations in Bankside and the Borough will deliver at least 166,000sqm (gross) new offices and employment workspaces and around 0.3ha new open space. There are also many smaller development sites that could accommodate new homes and new employment space.

#### *Southwark Plan Site Allocation NSP19*

47. The site benefits from a site allocation within The Southwark Plan. NSP19 which covers the site, states that development must:
- Provide new homes (C3); and
  - Provide new employment floorspace (E(g), B class);
  - Provide active frontages with ground floor retail, community or leisure uses (as defined in the glossary) along Blackfriars Road; and
  - Provide new east-west green links connecting Blackfriars Road to Hopton Street, including a new cycle link; and
  - Provide leisure, arts, culture or community uses for the benefit of new residents and the existing local community; and
  - Provide new open space of at least 15% of the site area.
  - The allocation notes that planning consents 12/AP/3940 and 18/AP/1603 are relevant to this site.

#### *Conclusions on policy designations*

48. The principle of a development containing Class E office space and Class E retail would support the role and functioning of the Central Activities Zone, the Bankside and Borough District Town Centre as well as being consistent with the policies for the Opportunity Area and the site allocation. The other requirements of the site allocation regarding new homes, visitor accommodation and cultural space would continue to be met on the consented Bankside Yards development.

#### Offices

49. Promoting the economy and creating employment opportunities is a key priority for the planning system. The site lies within a London Plan Opportunity Area (Policy SD1) and within a District Town Centre (Policy SD6). London Plan Policy GG5 requires local planning authorities to plan for sufficient employment and industrial spaces to support economic growth whilst Policies E1 and E2 deal specifically with the provision of B Use Class (now called Class E(g) since the change to the Use Classes Order in 2021). London Plan Policy E11 requires development proposals to support employment, skills development, apprenticeships, and other education and training opportunities in both the

construction and end-use phases.

50. Southwark Plan Policy SP4 seeks to ensure that Southwark can develop a strong, green and inclusive economy. To achieve this the development plan aims to deliver at least 460,000sqm of new office space between 2019 and 2036 (equating to around 35,500 jobs). The policy states that around 80% of new offices will be delivered in the Central Activities Zone and sets a strategic target of 10,000 new jobs for the Borough, Bankside and London Bridge Opportunity Area. Policy SP4 further requires 10% of all new employment floorspace to be affordable workspace for start-ups and existing and new small and independent businesses in Southwark. Finally, the policy identifies the CAZ and district town centres as appropriate for delivering approximately 19,670sqm of retail floorspace.
51. The aforementioned London Plan and Southwark Plan policies support the provision of a commercial led development on this site. The proposed development would provide 7,911sqm (GIA) of Class E(g) office floorspace that would have the potential to support up to 800 full time jobs. This represents an uplift in office employment floorspace compared to the consented scheme and job provision would satisfy the aims of the London Plan and the Southwark Plan in creating new jobs and high quality office space within the Central Activities Zone, the Bankside, Borough and London Bridge Opportunity Area and the Bankside and Borough District Town Centre and is a welcome benefit of the development.

### Retail

52. London Plan Policy SD6 and Southwark Plan policies identify this site as being within a town centre. The existing site did not contain any retail floorspace and the now demolished Ludgate House had little beneficial impact on the vitality of the surrounding retail area.
53. The proposed development would provide 302sqm of retail space which would further complement the retail spaces approved as part of the consented Bankside Yards development. The proposed Class E accommodation would be high quality and would contribute more positively to the vitality and viability of the surrounding retail environment.
54. As originally approved, BY1 would have provided 17 very large private apartments. Whilst the proposed development would result in the loss of 17 approved but not constructed dwellings, it should be noted that this would have no impact on the delivery of affordable housing on the wider Bankside Yards site which would remain as previously consented. The scheme would still deliver the requirements of the site allocation, but would make a larger contribution to the delivery of the Southwark Plans job targets should it be implemented.

### Conclusion on land use

55. The proposal involves the provision of high quality office floorspace alongside retail which are acceptable town centre uses. The provision of new offices is fully supported and the provision of modern, high quality offices is considered to be a benefit of the scheme and would facilitate the growth of employment

within the Central Activities Zone and the Opportunity Area. Overall the proposed development and the adjacent site within the allocation would include a mix of uses, including residential that are appropriate for the site's location within the CAZ, Opportunity Area and town centre.

### Affordable workspace

56. London Plan Policy E2 requires the provision of a range of low-cost Class B1 business space to be supported to meet the needs of micro, small and medium sized enterprises and to support firms wishing to start up and expand. The policy states "development proposals for new B1 business floor space greater than 2,500sqm, or a locally determined lower threshold in a local development plan document, should consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises.
57. Policy E3 of the London Plan deals specifically with affordable workspace. The policy states "In defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purposes". The policy identifies the circumstances in which it would be appropriate to secure affordable space.
58. Southwark Plan Policy P31 deals with affordable workspace. Criterion 2 of the policy requires Major 'B Use Class' development proposals to deliver at least 10% of the floorspace as affordable workspace on site at a discounted market rent for a period of at least 30 years. The policy recognises that there are many different forms that such space could take depending on the site location, characteristics and existing/proposed uses on site. The space should be offered to existing business on site first and then small and independent local businesses. Only where on-site provision would be impracticable are developers permitted to make a payment in lieu of the on-site provision.
59. In exceptional circumstances affordable retail, affordable cultural uses, or public health services which provide a range of affordable access options for local residents, may be provided as an alternative to affordable workspace (employment uses). This will only be acceptable if there is a demonstrated need for the affordable use proposed and with a named occupier. If the alternative affordable use is no longer required in the future, the space should be made available for affordable workspace (employment uses).
60. The proposed development would provide a total of 7,911sqm (GIA) of employment floorspace and as such a total of 791sqm of affordable workspace should be provided in order to comply with planning policy.
61. In floorspace terms the proposed offer equates to 10% and would meet the policy requirement. The applicant is proposing that the space be offered on a 51% discount on market rent levels which is a considerable discount and it welcomed.

In addition, the Section 106 Agreement would include an Affordable Workspace Strategy. This would ensure, among other things, that:

- the workspace is provided for a 30-year period at the discounts set out above;
- no more than 50% of the market rate floorspace can be occupied until the affordable workspace has been fitted-out ready for occupation;
- detailed plans showing final location of affordable workspace;
- a management plan is in place to secure the appointment of a Workspace Provider and a methodology for that Provider to support the occupiers;
- appropriate marketing of the affordable workspace will be conducted; and
- the rates and service charges payable by the tenant will be capped.

## **Environmental impact assessment**

62. Environmental Impact Assessment is a statutory procedure that provides for a process assesses and reports upon the beneficial and adverse (positive and negative) environmental effects of development projects. The proposed development falls within Schedule 2, Category 10(b) 'Urban Development Project' of the EIA Regulations 2017 and constitutes EIA development having regard to its potential for likely significant environmental effects
63. Regulation 3 of the EIA Regulations precludes the granting of planning permission unless the Council has undertaken an Environmental Impact Assessment, taking account of the environmental information, which includes the ES, any further information, any representations made by consultation bodies, and any other person, about the environmental effects of the development.
64. In accordance with the EIA Regulations, an Environmental Statement (ES) comprising a Non-Technical Summary, Environmental Statement and Technical Appendices accompanies the application. That information has been taken into account. Officers are satisfied that the ES is up to date and that the effects described in the ES properly identify the likely significant effects of the proposed development on the environment.

## *Alternatives*

65. The EIA Regulations require the ES to provide information on the alternative options considered by the applicant and this includes a 'Do Nothing' scenario. It is stated by the applicant's consultants and accepted by officers that the 'Do Nothing' alternative would leave the application site in its current state. It should be noted that it has also been established in the Southwark Plan that the site represents an opportunity to redevelop a currently underutilised parcel of land in the heart of London to provide a sustainable and high quality office space, food/retail, cultural provision and public realm.
66. The 'Do Nothing' scenario is considered to have no environmental benefits compared with the proposed redevelopment of the site as the 'Do Nothing' scenario would either revert to the consented development or it would leave a sustainable, brownfield site in central London under used and would not bring forward the various benefits associated with development such as improved public realm and employment opportunities.
67. No alternative sites or locations have been considered for the proposed development as the site benefits from a site allocation and policy support to

deliver a strategic development in this location. This is reflected in the various consents that have been granted since 2012.

68. The ES also describes the design evolution of the scheme which has been influenced by environmental factors and discussions with officers as part of a pre-application enquiry. The design has been informed by townscape and heritage; local and strategic views; wind; daylight, sunlight and overshadowing; solar gain; biodiversity; and appropriate scale and massing. As such, the final version of the scheme has been designed having full regard to the constraints and opportunities presented by the site as well as issues raised during the process.

### *Cumulative impacts*

69. The ES considers cumulative effects arising from the proposed development in combination with other surrounding consented and planned developments and where relevant these effects are discussed further in the topic specific chapters later in the report. Cumulative scenarios included the development in combination with the rest of the consented Bankside Yards development as well as an additional scenario that included other developments in with wider surrounding area.
70. A detailed assessment of the likely potential and residual impacts of the scheme is provided in the relevant sections of this report, taking into account the ES and the material planning policy considerations. In summary, officers are satisfied that the ES is adequate to enable a fully informed assessment of the environmental effects of the proposal. The ES considers the following issues:
- Socio-economics;
  - Air quality;
  - Noise and vibration;
  - Daylight, sunlight, overshadowing, solar glare and light pollution
  - Wind microclimate.

### **Design**

71. The NPPF stresses that good design is a key aspect of sustainable development and is indivisible from good planning (paragraph 124). Chapter 3 of the London Plan seeks to ensure that new developments optimise site capacity whilst delivering the highest standard of design in the interest of good place making. New developments must enhance the existing context and character of the area, providing high quality public realm that is inclusive for all with high quality architecture and landscaping. The importance of good design is further reinforced in the Southwark Plan Policies P13 and P14 which require all new buildings to be of appropriate height, scale and mass, respond to and enhance local distinctiveness and architectural character; and to conserve and enhance the significance of the local historic environment. Any new development must take account of and improve existing patterns of development and movement, permeability and street widths; and ensure that buildings, public spaces and routes are positioned according to their function, importance and use. There is a strong emphasis upon improving opportunities for sustainable modes of travel by enhancing connections, routes and green infrastructure. Furthermore all new

development must be attractive, safe and fully accessible and inclusive for all

### Site context

72. London Plan Policy D3 requires developments to make the most efficient use of land to optimise density, using an assessment of site context and a design-led approach and this is reflected in Southwark Plan Policy P18.
73. The application site is characterised by a mix of building types and scales, particularly along Hopton Street, albeit the application site is read more within the immediate context of Blackfriars Road, being separated off by the intervening railway viaduct. Its immediate context is notable for the metropolitan scaled No.1 Blackfriars Road (c.170m), which sits opposite the site on the west side of the bridgehead, and for No.240 Blackfriars Road (c.85m), which is on the junction of the main road and Southwark Street to the south of the site.
74. This Thameside section of Blackfriars Road has undergone significant post-war redevelopment, with few buildings of historic value remaining; the short Victorian terrace with its Grade II listed corner public house (Mad Hatter) on the junction of Blackfriars Road/Southwark Street being of note. To the east, Hopton Street retains more of its traditional buildings and is notable for the Grade II\* listed two-storey mid-Georgian almshouses (1-20 Hopton Gardens) and a Grade II listed two-storey with attic early Georgian house (no.67), amongst the converted Edwardian warehouse and part 5/6/9-storey new buildings of the Bankside Loft complex (no.65, 69-71) and the backdrop of the modern hi-rise residential complex of Neo-Bankside in Holland/ Sumner Street at 12, 18 and 24-storeys beyond.

### Image – Rennie Gardens



75. The masterplan is not within a conservation area, the nearest being Old Barge House Alley; located some 250m to the west of the site, just beyond Sea Containers House. It is also outside of the LVMF protected viewing corridors and wider consultation areas, as well as outside the borough's protected views.

### Background

76. A key material consideration is the extant consent for the comprehensive redevelopment of the former Ludgate House and Sampson House sites (12/AP/3940). Known as the Bankside Yards development, the residential-led mixed-use scheme was approved in 2014 and above ground work is well underway on building BY3 (formerly LHC) and BY9 on either side of the viaduct at the Southwark Street end of the masterplan site. The consented masterplan is for a new residential and office quarter, providing a series of large scale and hi-rise buildings of up to 48-storeys (165m), and intervening new public realm.
77. The 2014 consent included a 14-storey mixed-use building (c.57.5m) on the application site. The tall building provided a multi-functional space at lower, upper and 1<sup>st</sup> floor levels and 17 flats on the 10 upper floor levels (Building LHA). Subsequent amendments have been made to the wider masterplan, including the adjustments of the quantum of office and residential floorspace across the site and concomitant adjustments of building heights, footprints and elevations (e.g., 18/AP/1603 and 21/AP/3723). The current application is part of this on-going process as the masterplan development is built out.
78. The application is for the substitution of the consented residential-led mixed use building (formerly LHA, renamed BY1) with an office-led mixed use building, comprising retail at lower ground (riverwalk) level and offices at upper ground (street level) and above. The replacement building would read 19 storeys in height (c.70.5m). In addition to the increase in height, the massing would double with comparative floorplates of 760sqm, compared to the 360sqm for the residential scheme (including balconies). The elevations would also be distinctly different, reflecting the alternative commercial use.

### Site layout

79. London Plan Policy D8 requires new developments to create well designed, accessible, safe, inclusive attractive and well-connected public realm where appropriate. The policy sets out a range of criteria which new public realm should address. In respect of site layout and public realm Southwark Plan Policy P13 requires developments to ensure that the urban grain and site layout take account of and improve existing patterns of development and movement, permeability and street widths; to ensure that buildings, public spaces, open spaces and routes are positioned according to their function, importance and use and to ensure that a high quality public realm that encourages walking and cycling and is safe, legible, and attractive is secured. Landscaping must be appropriate to the context, including the provision and retention of street trees and use of green infrastructure. The detailed design of all areas of public realm must be accessible and inclusive for all ages and people with disabilities as well as providing opportunities for formal and informal play and adequate outdoor seating for residents and visitors.
80. The proposed site layout and building footprint is rational and legible and largely reflects the principles established as part of the previously consented scheme. The development would maintain the northern east-west route through the site that was previously consented and access to the riverside and Thames Path

would be maintained.

81. The new development is arranged to address the Blackfriars Road and the riverside walkway as the primary routes. It therefore continues to be dual-fronted, with a retail frontage onto the Thames pathway at lower ground floor and the main office entrance onto Rennie Gardens at upper ground floor level. Nonetheless, it is designed to operate in the round, with additional public routes provided to the off-side and rear, and as such, the building sits as a discrete, freestanding building within new public realm, as do all the buildings within the masterplan.
82. At grade, the building is set back from the river wall by c.11m to provide an extended area of public realm across the full width of the application site. This is welcome, both in terms of providing new riverside public open space, but also in effectively widening the present public footpath, which at 3m can become congested. This new public realm is partly achieved by undercutting the new building, with the base of the building set back 1.8m below its main volume, which has the advantage of providing an element of covered public realm. The new public realm is activated by the new retail use provided within the base of the building, providing direct animation and oversight of this otherwise generally 'enclosed' section of the Thames path.

Image – View from Thames Path



83. The façade undercut is aligned with the archway entrance to Blackfriars Station, with an additional cut back created of the northeast corner of the lower ground floor, creating additional public space immediately opposite the entrance, improving both the legibility of and ease of access to the station.
84. The existing steep stairway from the riverwalk up to Rennie Gardens is retained and refurbished, and is supplemented by a new public lift that is conveniently provided adjacent to the stairs, taking pedestrians up the 4m to street level. The building's main office entrance is aligned to the flank of Rennie Gardens, with its frontage also set back and undercut to provide an extended area of public realm. This new public space doubles as the entranceway to the new commercial

building, with the extensively glazed foyer engaging with the adjacent public realm.

85. The new building works in the round, with new public footpaths provided to the off-side (east) and rear (south); with the former running parallel with the railway viaduct and linking through to the southern end of the masterplan as an extension to the Low-line project; and the latter running east-west from Blackfriars Road immediately behind the new building to connect through to the main public square at the centre of the masterplan, via a railway archway. To the offside, the building makes use of the new route to locate its entrances to its cycle store/end-of-journey facilities, but seeks to modestly animate the route with a small café kiosk. To the rear, a new staircase and public lift address the steep change in street level, with a Dutch-rail for those cyclists choosing not to use the lift. Whilst the rear route is not activated by the new building, the route would be wide (11m) and reasonably overseen from the neighbouring BY2 building.

#### Image – View from Thames Path



86. Overall, the layout is largely a repeat of the previously consented schemes, and is again welcome in supporting a coherent urban form, with the new building working very well to provide and address a series of well-connected public routes, with significant provisions of new public space and improvements to the existing public realm. The layout is refined to improve the legibility and accessibility of the railway station, whilst the new building offers engaging frontages that support the public realm and should make for appealing street scenes, subject to landscaping details.

#### Height scale, massing and tall buildings

87. London Plan Policy D9 deals with tall buildings. The policy sets out a list of criteria against which to assess the impact of a proposed tall building (location/visual/functional/environment /cumulative). London Plan Policy D4 requires that all proposals exceeding 30 metres in height and 350 units per hectare must have undergone at least one design review or demonstrate that they have undergone a local borough process of design scrutiny.

88. Southwark Plan Policy P17 deals with tall buildings. The policy sets out a list of requirements for tall buildings. The policy states that tall buildings must:

1. Be located at a point of landmark significance; and
2. Have a height that is proportionate to the significance of the proposed location and the size of the site; and
3. Make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings; and
4. Not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough views; and
5. Respond positively to local character and townscape; and
6. Provide a functional public space that is appropriate to the height and size of the proposed building; and
7. Provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents where appropriate



### *Scale and massing*

89. A point of landmark significance is where a number of important routes converge, where there is a concentration of activity and which is or will be the focus of views from several directions. In this case the site, located at the southern bridgehead of Blackfriars Bridge, adjacent to Blackfriars Station and within the cluster of permitted and completed tall buildings around the junction of Stanford Street and Blackfriars Road is considered a point of landmark significance.
90. Whilst the replacement scheme is for a larger building than previously consented, it nonetheless remains a relatively modest-sized commercial office building in terms of its office floorplate: Taken over the full floors above reception level, it provides 7,911sqm of new office floorspace (GIA).
91. In terms of its massing, whilst it may be slightly longer and broader than previously consented, it nonetheless remains a relatively compact built form. The

building's planform is simple, comprising almost a square that measures just under 28m to the front (riverside) and rear, and just over 28m to the sides when measured at second floor level and above. The simple planform is extruded upwards 15 full floors at 2<sup>nd</sup> floor level and above. The levels below (lg, ug, 1<sup>st</sup> floors) have a more compressed floorplate created by building undercuts to the front and sides. A final floor (17<sup>th</sup>) comprises a rooftop garden with a small rooftop pavilion for office amenity (c.70sqm) and extensive plantroom. A further element of services sits above this at the rear (south) end of the building, containing mainly lift overruns and the building maintenance unit (bmu).

92. The building has an overall height of 70.5m when measured from the riverside walkway or c.66m when measured from pavement level on Blackfriars Road (c.75 m AoD). However, the perceived scale would be generally 19-storeys (c.66m) towards the river, with the extended framework for the rooftop garden reading as the final storey; and part 18/19-storeys (63.5-65.5m) towards Blackfriars Road, where the additional rooftop plant at the rear becomes more evident.



93. Looking at the building's proportions, the height to width ratio is just under 2.5:1, which is not especially slender as a tall building, but is not dissimilar to the consented scheme, which has a ratio of 2.9:1. Importantly, the compact massing and detailed treatment of the elevations and service core (see later) work well to relieve the sense of bulk and to provide a much stronger verticality, suggesting a reasonably slim built form that should sit sufficiently well as part of the emerging cluster of taller, slender buildings.
94. Regarding its general height, at part 18/19-storeys, the replacement building would be taller than the previously consented part 13/14-storey scheme, but would remain significantly below the height of its metropolitan-scaled neighbours, BY2 and 1 Blackfriars. Moreover, the new building would continue to respond to the stepped form of BY2, which sits to its immediate south. Whilst the latter is 49 storeys in height (170m AoD), it features a mid-rise setback on its north elevation at 20-storeys or c.80m, designed to allow the scale of the building

to step down towards the riverfront. This step change in height is part of the masterplan concept, with BY1 continuing the transition downwards.

95. Whilst the change in heights between the 'shoulder' height of BY2 and the proposed replacement BY1 would become less exaggerated, the transition downwards would still occur. It would still be evident, albeit quite subtly, assisted by the different colour finishes of the new building's rear service core and the main office element. However, the overall concept of the transition in heights would remain.
96. The proposed scale of the scheme is supported. It presents a modestly taller and wider replacement building onto the riverfront, but is setback slightly further from the river edge compared to the consented scheme. It remains a medium-height tall building and sufficiently slender in its proportions, set against the backdrop of a significantly tall building. It would continue in its masterplan role of transitioning in height down towards the river.

### *Architecture*

97. The proposals present a significant adjustment in terms of the elevational architecture, reflecting the proposed change in use, with the scheme redesigned with a modern office aesthetic, albeit the consented residential building did include large expanses of glazing. The replacement building comprises conventional curtain wall glazed elevations that enclose a concrete structural frame. However, this simple form is cleverly detailed to provide a contemporary architecture and a distinctive building that is both well-composed and well-articulated.

### Image – View from Blackfriars Bridge



98. The architecture features a strong visual hierarchy, clearly expressing the building's base, middle and top. The base of the building is read over three

storeys onto the riverfront and east passageway, with its datum carried round onto Rennie Gardens and south side as two storeys. This is made evident by the overt undercut of the floorplate, created by setting back the facades on these lower levels. The base features triple and double-storey glazing, involving the use of back-painted glass to obscure the floorslabs, and the appearance of the large structural columns that are seen to ground the building at riverwalk and street levels. Above this, the middle of the building rises orthogonally, filling out its floorslab, with the exception of the corner-cut balconies (see below); whilst the top is expressed by the framed rooftop terrace with its flying parapets to the front and flanks that suggest a crown to the building.

99. The elevations are further articulated by a framework of piers and horizontals that overclad the curtain wall glazing and are used to detail the facades, as well as provide solar shading to the flanks. The framework responds to the internal building structure, with the piers and horizontals aligned with the columns and alternate floorplates, resulting in a well-proportioned, orthogonal grid of double-storey openings. This arrangement brings a well-ordered and robust appearance to the building. The grid also provides a secondary scale to the elevations.
100. The framework comprises terracotta profiled and treated to bring a texture, richness and depth to the finish. The terracotta is coloured mid-blue for the main office floors, whilst the lower ground, upper ground and first are finished in a darker, navy blue colour, emphasizing the visual distinction of the base. Importantly, the navy blue ceramic wraps around onto the exposed soffits of the base, bringing a high quality finish to the undercroft space that will reflect the dappled light that bounces up from the river.
101. This primary grid is generally carried around the building and onto its rear elevation, where it is used for the service tower. In the instance of the rear portion of the building, however, there is a switch in colour to white and potentially in material finish, with the options of the same terracotta or a metalwork finish. The change in finish is effective in expressing the functional split between the main offices and the supporting services, and adding visual interest to the architecture. . A recessed slot is introduced between the two elements and finished in dark metalwork/ tinted glazing, helping to visually separate the two elements.
102. A key feature of the new architecture is the provision of office balconies on the northwest and northeast corners of the building, which face onto the river and provide river views upstream and downstream. The balconies are double-height spaces, created by recessing the upper floorplate and by setting back the glazing to form a diagonal corner cut. Additional structural bracing in steelwork is introduced to support the corner cut, with the metalwork read in contrast to the terracotta and adding to the building's robustness. The diagonal corner cuts are made on alternate paired floors and on alternate sides of the building, resulting in a staggered balcony arrangement. This produces a dynamic building form and distinctive silhouette, adding both visual interest and a sense of place. The silhouette will become more pronounced during dusk and night-time, with the proposed up-lighting of the corner cuts.
103. In addition to the primary grid, an intervening grid of openings is provided, using narrow sections of aluminium framing. This gives the elevations a finer detailed grain, as well as additional solar shading for the main office floors. This finer grid-

work is omitted over the lowermost floors for improved engagement and visual distinction of the base. Whilst it is also omitted for the service tower at the rear, it is substituted by a series of planter boxes and vertical trellising that are designed to support a green wall, which will characterise the rear elevation and soften the appearance of the service core when viewed from the adjacent residential building (BY2).

104. The rooftop storey features an extensive, planted terrace towards the front, which is partly screened to the west side by plant room that doubles as a windbreak at this level. The terrace is bounded by glazed screening and large planters, providing a soft green fringe to the building's shoulder line, and is framed by extending the primary terracotta-clad grid upwards for a full floor to provide a flying parapet. This creates an open crown appearance to the building, which is effective, giving an ethereal appearance to the top. The rooftop includes a small pavilion building, which appears to be finished in terracotta to match, albeit its final detailing should be confirmed by condition.
105. Regarding the functional quality of the architecture, the building features floor-to-floor heights of 3.5m, with good floor voids (400mm) and exposed concrete soffits, providing a minimum clearance of 2.8m. The moderately deep planform and fully glazed front and side elevations support excellent outlook and daylight penetration, whilst the internal structural grid and positioning of the services to the rear allow for generally unencumbered, flexible floorplates, as well as solar shading to the south. The general amenities are high, with a generous reception area over ground and 1<sup>st</sup> floor levels, access to a good-sized corner balcony on alternate floors and to an attractive rooftop pavilion and terrace, river views towards the City, and access to well-appointed end-of-journey facilities within the basement. The scheme targets Breeam "Excellent".
106. Overall, the architecture is high quality and engaging, with well-composed elevations, extensive and effective articulation, and the attractive use of high quality materials. The finer details of the elevations should be controlled by condition, as should the material finishes, with the option of terracotta throughout preferred. The offices have a high functional quality, and should make for an appealing, more boutique style of accommodation.

### *Tall building*

107. The application site is located within the Bankside/Borough/London Bridge Opportunity Area (BBLB) and the Central Activities Zone, where the general principal of a tall building is acceptable under Policy P17. The site allocations policy NSP19 for Ludgate and Sampson House references the opportunity for taller buildings on the site, subject to impacts on the local character, heritage and townscape. The now demolished Ludgate and Sampson House were large 'groundscraper' office buildings that at 12 commercial storeys already exceeded the borough's 30m threshold for high rises. As such, the general policy context for considering the potential of a new tall building on the application site remains valid.
108. Moreover, there is an extant permission for a new tall building on the application site, with the replacement scheme not especially taller. In this instance, it is therefore generally a matter of confirming whether the revised designs are of

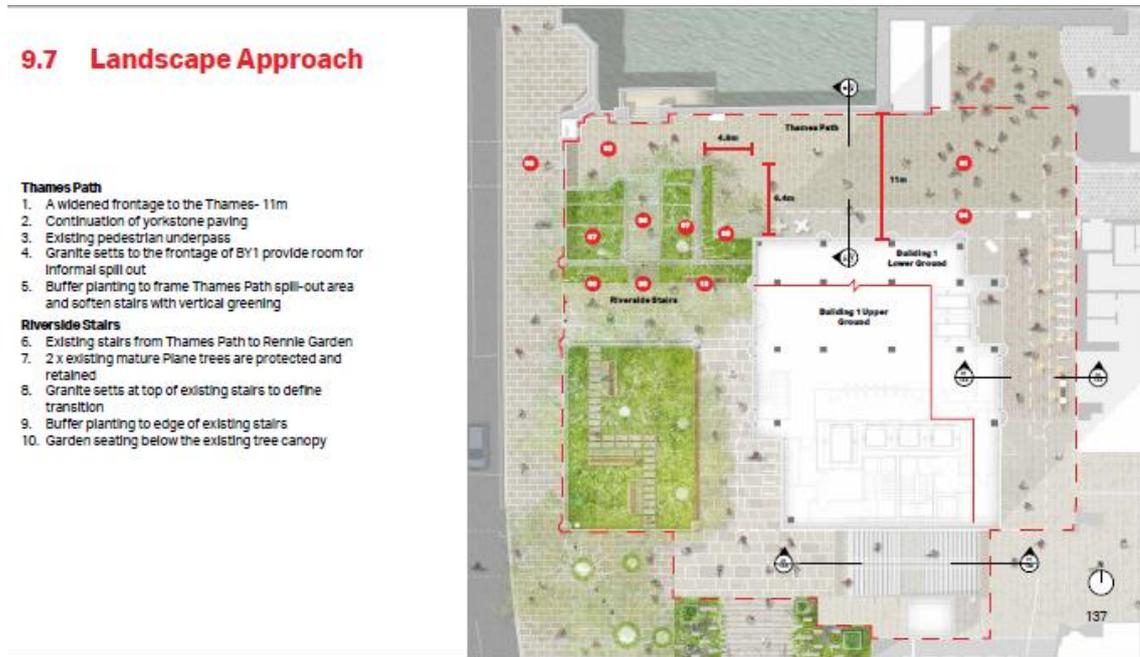
exemplary design and meet the additional detailed requirements of the new tall building policy, P17: and whether the detailed adjustments to the scale and to the architecture do not result in new or additional harmful impacts on important views and heritage settings that could be considered harmful.

109. Looking at the architectural qualities, as set out earlier, the proposals are for a high quality office building with a well-composed elevational design and attractive material finish. The designs of the lower floors support active frontages and a positive pedestrian experience, particularly onto the riverside walkway and new area of public realm.
110. The building is in a position of landmark significance and is part of the emerging cluster of tall buildings within the Bankside/ Blackfriars Bridge area, and would make a positive contribution to the local skyline.
111. The scheme serves as a mediator, easing the transition of scales down to the riverside. It includes the new riverside public space and extended public realm in Rennie Gardens and wide pavements that are commensurate to its scale.
112. The replacement tall building relates well to its immediate surroundings both in terms of the building's base and its general design. The building's base has a visually open, transparent character at ground floor, with new entrances activating the riverwalk and Rennie Gardens, with clear glazing bringing animation to the adjacent street scenes. The inclusion of the riverfront commercial retail space works well to enliven this part of the Thames Path for pedestrians, helping to bring activity to this stretch of riverwalk. Its scale and elevational architecture also relates well to its wider context, with the building's footprint and massing providing an improved and more rational alignment within its riverside and streetscape settings, whilst its scale and modern office aesthetic works well within its masterplan context, maintaining the transition of height downwards towards the riverfront.

### Public realm, landscaping, trees and urban greening

113. London Plan Policy G7 and Southwark Plan Policy P61 recognise the importance of retaining and planting new trees wherever possible within new developments, Policy G5 requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. The policy identifies a scoring system for measuring urban greening on a particular site (Urban Greening Factor) and suggests a target score of 0.3 for predominately commercial development.
114. With regards to trees, London Plan Policy G7 states that development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

115. The layout provides a generous setback onto the riverwalk, both enhancing the riverside setting of the Thames Path and access to Blackfriars Station. The extended pavement is surfaced in Yorkstone, providing an attractive high quality finish in a natural stone. The public realm is moderately sheltered, with conditions more favouring strolling and shorter-term lingering rather than outside dining, although this has not changed from the consented scheme. The new frontage has an open character with extensive glazing onto the retail and office reception above.



116. The existing public staircase is refurbished and enhanced with new planted terraces that cascade down on both sides, and is supported by the new external lift, the detailed appearance of which should be reserved by condition. Whilst every effort has been taken to retain the existing mature plane trees on site, it is understood that this may not be possible, whilst additional/ replacement tree planting to the south of the site is proposed.
117. At street level, Rennie Gardens is refurbished and the adjacent paving resurfaced in Yorkstone, and extended to form a small plaza area outside the main office entrance, with the reception providing an open character onto the space. Elsewhere, the new pedestrian and cycle links are provided to the south and east of the building, with the latter supporting the opening up of the adjacent arches for commercial uses and forming part of the Low-line Project. Again, the surfaces are high quality paving, paired with high quality street furniture, the final choices of which should be conditioned to ensure the good design coordination across the masterplan area and with the adjacent public realm. The narrow eastern passageway includes catenary lighting for character and avoid any additional pavement clutter. This too should be conditioned as part of the landscaping.
118. Lastly, the green wall makes a contribution to the public realm, adding a welcomed vertical landscape feature. The regularly positioned planters are automatically irrigated, whilst the plant specification is suitable. Nonetheless, the

details should be confirmed by condition, including on-going maintenance, to ensure their long-term contribution.

119. The building notably achieves a score of 0.45 for its Urban Greening Factor (UGF), compared to the requirement of 0.3 for new commercial buildings, although this takes into account additional landscaping within the public realm. The new green wall that runs the full height of the rear façade is welcome and engaging, glimpsed from street level and from the elevated railway. The architecture is considered to meet the requirement of an exemplary design.

### Design Review Panel

120. Lastly, the proposals were reviewed by the Council's DRP at the pre-application stage in October 2021. The scheme was generally endorsed by the panel, which agreed there was scope for an office-led mixed-use building in this location. It felt the designs to be progressing in the right direction, but needed greater refinement. The commercial building offered a more straightforward scheme than the previous residential, but felt that the massing should step down more deliberately from the neighbouring shoulder height, and pulled in more at the base to open up access to the station. The panel wanted more information on the cultural role the building would offer.
121. It endorsed the planform and elevational designs, highlighting the double-height diagonal corner features offering design interest, but which needed to be bigger and better detailed. The base was at risk of being heavy-handed, not allowing the main office volume to float above. It also advised on reducing the visual dominance of the service core, and that the crown felt unresolved and needed to be bolder. It welcomed the use of terracotta and the proposed green wall. Lastly, it raised the matter of outlook and amenity of the neighbouring residential building (BY2).
122. The scheme architects responded positively to the DRP comments, creating a more deliberate step down in storey height and finish to the crown, introducing the extended frame. The undercuts to the building's base were revised, opening up the route to the station, whilst the soffit finish was redesigned. The treatment of the service core was finessed and the green wall further detailed. Officers are satisfied with the adjustments subsequently made.

### Designing out crime

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

## Fire safety

124. A Fire Safety Strategy (updated in June 2021) has been submitted to demonstrate compliance with the requirements of London Plan Policy D12. This policy requires developments to achieve the highest standards of fire safety and ensure that they identify suitably positioned unobstructed outside space for appliances, incorporate features to reduce risk to life and injury in the event of a fire; designed and constructed in order to minimise the spread of a fire; and provide suitable and convenient means of escape for all building users.
125. The policy requires that the Fire Strategy statement should include information in terms of the building's construction, means of escape for all users, fire suppression features and measures that would reduce risk to life and injury. The strategy should also include details of how access would be provided for fire service personnel and equipment as well as provision for appliances to gain access to the building.
126. The submitted Fire Statement has been prepared in accordance with Policy D12 of the London Plan. Building Regulations guidance permits a notional boundary to be taken to the centreline of the railway as future development is unlikely. However, in this case the railway is elevated with the station below. Guidance does not address this situation as the railway could be considered a building due to the station below. The elevations have been assessed to the site boundary and do not require any protection to the facades (assuming the Building 1 plant and office space are separate fire compartments). This is with the exception of the east elevation (Ground floor upper-Level 3) where the neighbouring train station roof crosses the site boundary and so introduces potential risk of fire spread. The strategy to address the risk of fire spread to or from the station in this area will be developed post planning but the use of a 'drencher' sprinkler is envisaged at this stage. The fire strategy will draw on guidance from BS 9999:2017 for all areas
127. A minimum L2 standard of alarm will be provided within the building installed in accordance with BS 5839-1. Emergency lighting will be provided in accordance with BS 5266-1 to illuminate escape routes in the event of mains failure. Exits signs in accordance with BS ISO 3864-1 and BS 5499-4 will be provided on common escape routes. Commercial sprinklers will be provided in accordance with BS EN 12845.
128. The building has two stairs. Based on the provision of sprinklers and the relatively small floor plate, the two stairs provide adequate capacity for a simultaneous evacuation of all upper floors for a typical office occupant density of 6m<sup>2</sup>/person. The basement accommodation is primarily plant and ancillary accommodation to the office, e.g. cycle store and changing rooms so will not significantly increase the occupancy using the stairs. At this stage a simultaneous evacuation strategy is proposed. The final escape route from the stairs will be protected to the same standard as the stair on other levels i.e. lobby separation from accommodation. Both stairs will be lobbied at every level. Some of technical detail of the internal layouts are still under development but will ensure the recommendations of guidance and the functional requirements of the Building Regulations are met.
129. The development includes a retail unit comprising a lower ground, upper ground

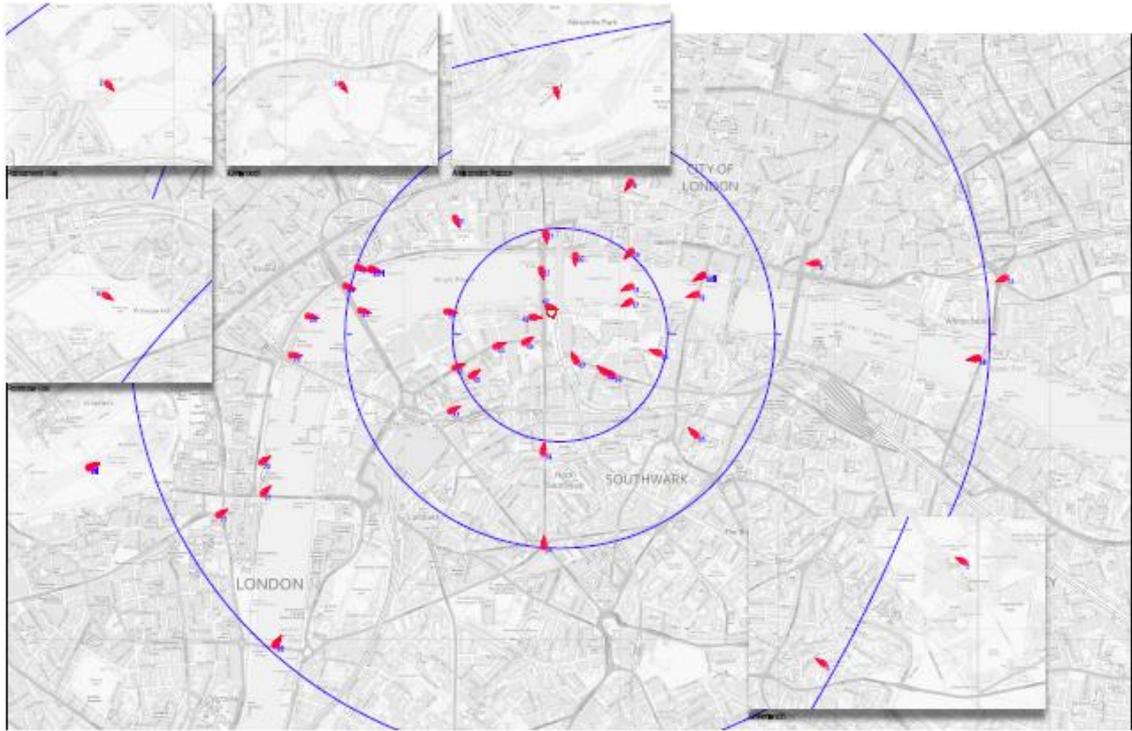
and first floor. Retail units typically have a higher occupancy than office spaces at a density of 2m<sup>2</sup>/person (4m<sup>2</sup>/person on non-primary floors which have no direct access from outside). The design will ensure there is adequate fire separation between the retail and office areas and will ensure exits are sized appropriately for the occupancy within the building taking into account any merging flow scenarios. The retail unit will have a linked alarm to the office. However, it may be possible to configure so that it does not need to evacuate simultaneously as it has an independent exit direct to outside.

130. The building has a link to the basement area of Building 2 which itself connect to the basement areas of Building 3 and the wider overall basement. The design will ensure there is sufficient fire separation and protection to the upper levels of Building 1 and the connecting areas of Building 2. The basement floors will need a means of venting smoke. This will be using the same mechanical system serving the basement areas of Building 2 and 3.
131. The structure of the building will achieve 2 hours fire resistance. It may be possible to reduce this to 90 minutes considering the provision of sprinklers and available ventilation via the non-fire rated glazing on the elevations as permitted in guidance. Any reductions in fire resistance will be fully assessed holistically and will be discussed with the approving authorities during the early stages. Floors will be designed as compartment floors achieving 2 hours fire resistance.
132. Policy D5(B5) of the London Plan 2021 makes recommendations for inclusive design and the dignified escape of mobility impaired occupants. It recommends that at least one lift per core should be a suitably sized fire evacuation lift. Building 1 is served by two stairs located adjacent to each other within the same core. The East stair will be designed as a firefighting shaft. The floorplate is less than 900m<sup>2</sup> on all levels so a single firefighting shaft is compliant with guidance. The firefighting shaft (the East stair) will be provided with a firefighting lift which can be used by mobility impaired occupants prior to Fire Brigade arrival. The West stair is provided with a dual-purpose goods/evacuation lift. This means each stair will have at least one lift suitable for evacuation.
133. The evacuation lift to the West stair will be the primary evacuation route for occupants of reduced mobility. However, in the scenario that a fire blocked occupants from reaching the West stair lobby, then they could instead go the East stair lift lobby. From here they could use the firefighting lift to evacuate. On Fire Brigade arrival, the firefighting lift may no longer be available for the evacuation of occupants of reduced mobility. However, the evacuation lift/firefighting lift will have prioritised occupants on the most at-risk floors first, meaning any occupants still waiting to use the lift would at this point be on the non-fire floors. The provision of compartment floors means that occupants on the non-fire floors will not be in immediate danger from the fire. Those occupants still waiting in the East lift lobby when firefighters arrive can travel to the West core to use the evacuation lift.
134. The Health and Safety Executive and the London Fire Brigade have both been consulted on the development. Whilst the HSE has not provided any comments, the London Fire Brigade have confirmed that they have been consulted and do not have any further observations to make.

## Heritage and townscape considerations

135. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to consider the impacts of a development on a listed building or its setting and to pay special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
136. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to consider the impacts of proposals upon a conservation area and its setting and to pay “special regard to the desirability of preserving or enhancing the character or appearance of that area”. Section 66 of the Act also requires the Authority to consider the impacts of a development on a listed building or its setting and to have “special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”. The NPPF (2021) provides guidance on how these tests are applied, referring in paras 199-202 to the need to give great weight to the conservation of the heritage asset (and the more important the asset, the greater the weight); evaluate the extent of harm or loss of its significance; generally refuse consent where the harm is substantial; and, where necessary, weigh the harm against the public benefits of the scheme. Para 203 goes on to advise taking into account the effect of a scheme on the significance of a non-designated heritage asset.
137. Chapter 16 of the NPPF contains national policy on the conservation of the historic environment. It explains that great weight should be given to the conservation of heritage assets. The more important the asset, the greater the weight should be (paragraph 199). Any harm to, or loss of significance of a designated heritage asset should require clear and convincing justification (paragraph 200). Pursuant to paragraph 201, where a proposed development would lead to substantial harm or total loss of significance of a designated heritage asset, permission should be refused unless certain specified criteria are met. Paragraph 202 explains that where a development would give rise to less than substantial harm to a designated heritage asset, the harm should be weighed against the public benefits of the scheme. Paragraph 203 deals with non-designated heritage assets and explains that the effect of development on such assets should be taking into account, and a balanced judgment should be formed having regard to the scale of any harm or loss and the significance of the asset. Working through the relevant paragraphs of the NPPF will ensure that a decision-maker has complied with its statutory duty in relation to Conservation Areas and Listed Buildings.

## Image – Assessed views



138. Development plan policies (London Plan Policy HC1 and Southwark Plan Policies P19, P20 and P21) echo the requirements of the NPPF in respect of heritage assets and require all development to conserve or enhance the significance and the settings of all heritage assets and avoid causing harm.
139. The submission includes a Zone of Visual Influence map (ZVI) and a townscape visual impact assessment (TVIA) as part of the ES that provides verified images of the development when viewed from a number of locations in and around the Bankside area, as well as when viewed from within the relevant protected panoramas and river prospects. The set of verified views is extensive, providing 52 images, including night-time images, from 47 locations, and in effect repeats and updates the submission from the 2012 masterplan scheme (12/AP/3940).
140. In general, despite being c.70m high, the proposed tall building is less widely visible than the height suggests. This is mainly because of other large and tall buildings located nearby, particularly to the west and south of the site that often mask the development from wider view. The ZVI indicates it will be seen along the riverbanks nearby and in the middle distance, although mainly on the north side of the river; on Blackfriars Bridge and onwards along Farrington Road; from the adjacent bridges both upstream and downstream; and from the elevated mainline railway running into Blackfriars Station. Beyond this, visibility of the site is sporadic, where the local townscape briefly opens up.
141. Where it is seen from the southwest, south and southeast, it is generally a glimpsed view, where it is briefly read as one of several tall or large-scale buildings among an emerging cluster within the Blackfriars Road area. It will be taller than previously consented on the site and as such will be more visible, although the additional impact will be modest and is not considered to be harmful. Nonetheless, it does remain visible in a number of nearby and more distant

views, where it potentially affects protected views, the settings of designated heritage assets, and other sensitive townscape views.

### *Protected views and townscape*

142. The submission demonstrates that at the proposed height the development will not be particularly visible in the protected panoramic views from Alexandra Palace (LVMF 1A.1, view #1), Parliament Hill (LVMF 2A.1, view #2), Kenwood House (LVMF 3A.1, view #3) or Primrose Hill (LVMF 2A, view #4). In these views, only the top of the building is discernible, but sits below the horizon, among other large buildings and well away from the vista of St Paul's Cathedral. The development does not impact upon the borough's protected views from One Tree Hill (BV1), Nunhead Cemetery (BV2) and Camberwell Road (BV3), being outside the protected landmark viewing corridors and their wider setting consultation areas.
143. Regarding river prospects upstream, the view from the centre of Waterloo Bridge (LVMF 15B.2, view #27) the tip of the building is visible above the riverfront buildings, but generally blends with the context. However, from the north end of the bridge (LVMF 15B.1, view #26), it is more discernible and whilst it reads as part of the context of riverfront buildings it obscures the chimney of Tate Modern, which is a notable riverside landmark. The impact is limited, given that the chimney is only glimpsed in this view. A similar impact also occurs in the view further along the Embankment (view 25 and 24n), where the new building appears to the right of the Tate chimney and at the same height and, whilst a sky-gap remains between the two, it nonetheless detracts from the chimney as a stand-alone structure close to the foreshore. The impact is minor, given that the chimney remains visible.
144. The main protected river views affected by the new building are those from Southwark Bridge, the Millennium Bridge and the adjacent Blackfriars Bridges (road and rail). Given the proximity of these locations, more of the new building's architectural quality becomes evident in the views.
145. Regarding the view from the north end of Southwark Bridge (LVMF 12A.2, view #15) the new building will appear in front of no.1 Blackfriars and will be seen to rise higher than the foreshore buildings to either sides (Sea Containers House and Falcon Point). Its impact will be moderate, tempered by the context of the much taller buildings of no.1 Blackfriars, 240 Blackfriars Road and the emerging BY3 building in the immediate backdrop. It will sit at the bridgehead and form a local landmark to Blackfriars Bridge and the mainline station, with its distinctive architecture of its serrated corner profile and the strong orthogonal grid of its blue and white terracotta framework. It will be seen to mediate between the heights of its taller neighbours to the rear and the wider riverfront context, providing a transitioning of height downwards. Overall, the impact is moderate and positive.
146. This impact is much the same from the centre of Southwark Bridge (LVMF 12A.1, view #16), albeit the white terracotta becomes more evident, which lends a relatively slim appearance to the new building. In time, it will appear similar in height to the consented 17-storey SHA building, which is part of the Bankside Yards masterplan and is located to the east of the railway viaduct just behind

Falcon Point, but has yet to be constructed. The two buildings will be seen together, mediating the scale of development along this stretch of riverfront.

147. Similar views are obtained from the Millennium Bridge (LVMF 13, views #17, #18 and #19), where the new building will offer as local landmark to the station, with its eroded profile, strong elevational composition and relatively slim form. The step down from the shoulder height of BY2, when constructed, is not especially evident. However, overall, it will continue to convey and effective transition in scale down towards the riverfront, appearing not dissimilar in height in these views to Sea Containers House, the Manhattan Loft buildings in Hopton Street and eventually building SHA. Overall, the impacts are moderate and positive.
148. The submission includes two views on Blackfriars Bridge (views #21 and #22) and additional verified views nearby from Upper Ground (view #46) and Stamford Street (view #45), as well as CGIs immediately adjacent to the new building (see DAS). In the view from the north-end of the bridge by the station entrance (north) the new building reads similar in scale to the foreground buildings on the north bridgehead, and against the backdrop of the much taller no.1 Blackfriars and no.240 Blackfriars Road. The high quality architecture is evident and presents a distinctive and engaging modern office building. Its scale reads comfortable within the context. The townscape impact is moderate and positive, which is also the experience from the centre of the bridge (view #22).
149. The view from Upper Ground (view #46) is towards Rennie Gardens with the west elevation of the building forming an engaging focal point, with its distinctive and attractive architecture. A sky-gap will be retained between the new building and the neighbouring BY2, whilst the application building will offer a distinctive step down within the emerging cluster of tall buildings. The townscape effect is moderate and positive.
150. Overall, the new building has no or little impact on the long distance protected views and river prospects. Where visible in closer-by river prospects and townscape views, it has a minor or moderate effect, with its architecture having a modestly positive effect on the townscape.

### *Heritage assets*

151. The verified views from the north and south bastions of Tower Bridge (views #13 and #14) show only the tip of the building visible over the intervening context of More London, the development would have negligible effect on views of the Grade 1 listed Tower of London or on Tower Bridge.
152. Regarding other listed buildings, the site and the wider masterplan do not contain any listed buildings or structures. However, it is adjacent to the southern abutment of the former West Blackfriars/ St Paul's railway bridge and directly affects the adjacent road bridge, both of which are Grade II listed structures. The Portland stone abutment is located next to the river wall in front of the site and is a surviving element of the former railway bridge by Joseph Cubitt, which was constructed in 1862-64. As the bridge was to form part of the original Blackfriars Station, it was given cast-iron ornaments, featuring large decorative shields bearing the railway company's name and livery.

153. The special interest of the abutment is its high quality materials and decorative finish; its value as a surviving element of the former Victorian railway bridge constructed by a renowned Victorian architect; and its group value alongside the Victorian road bridge. In terms of the heritage impact, the replacement building would not detract from the significance of the abutment; its setback position on the riverwalk maintaining clear sightlines of the structure along the riverwalk and from the high vantage points of the adjacent road and railway bridges. Arguably, the replacement building is a slight improvement compared to the consented scheme, with its improved setback and recessed three-storey base creating more space around the abutment. The new building's overt structural framework and diagonal bracing add to the infrastructure character of the setting.
154. Similar considerations are made regarding the setting of the Blackfriars Road bridge, which dates from 1869 and is thought to be by James Cubitt (no relation). The road bridge features shallow segmental arches of cast iron; grey granite abutments and piers with Portland stone caps and cases; and a Gothic-style balustrade in grey granite. Its special interest is as a significant element of Victorian riverine engineering with townscape importance and its robust and engaging design by a similarly well renowned Victorian architect.
155. The new building would not affect the significance of the road bridge in terms of its setting; its setback position and height reading comfortably scaled and not overbearing as a bridgehead (views #21 and #22).
156. In terms of other listed buildings in the vicinity, there is very limited inter-visibility between the proposed tall building and the Grade II\* listed two-storey mid-Georgian almshouses (1-20 Hopton Gardens) and Grade II listed two-storey with attic early Georgian house at no.67 Hopton Street, which are located to the east of the site. The historic buildings are beyond the railway viaduct and the intervening large scale developments within Hopton Street, which include those emerging as part of the masterplan development. Views are glimpsed at most and at a sufficient distance not to affect how the heritage assets are experienced, preserving their setting (views #39 and #42). Similarly, the Grade II listed mid-Victorian commercial buildings at no.1 and no.3 Stamford Street (Mad Hatter public house) are not particularly affected, the emerging BY3 and soon to be built BY2 generally obscuring views between the listed buildings and the application building (views #44 and #45).
157. Lastly, the application site is outside a conservation area, as indeed is the wider Bankside Yards masterplan development. The nearest LB Southwark conservation area is Old Barge House Alley, which is located some 250m to the west of the site, just beyond Sea Containers House. Whitefriars conservation area in the City of London is located a similar distance diagonally west across the river. Further afield are Southwark's Bear Gardens, Thrale Street and Union Street conservation areas to the east and southeast; LB Lambeth's Roupell Street, Waterloo and South Bank conservation areas to the southwest and west; and the City of London's Temples, St Paul's and Queens Street conservation areas to the northwest, north and northeast.
158. The significance of the conservation areas is generally the historic street patterns and traditional scale and architecture, comprising mainly mid-rise warehousing and commercial offices, ecclesiastical buildings and occasional low-rise

residential buildings, with little or no public open space. Within these conservation areas, the street pattern and dense urban form generally restrict outward views towards the site, with the intervening distance and building context further limiting any impact (e.g., views #10, #14, #23, #35, #37, #40 and #41). On those occasions, the building is seen, it is glimpsed and read as one of a number of tall or large-scale buildings in the backdrop, and as such there is no harm to the significance of their settings, preserving the heritage assets. It is notable that to date, the City of London, LB Lambeth and Historic England have raised no objections on heritage grounds.

159. The building will form an engaging local landmark at the bridgehead, whilst its height will read as mediating between the riverfront context and the tall building cluster to the immediate south. It has little or no impact on strategic views and where seen, a neutral or modestly positive impact on the settings of nearby listed buildings and structures, and a neutral impact on the settings of surrounding conservation areas. Overall, the development preserves the heritage assets, and is supported on townscape and heritage grounds.

### Conclusion on design and heritage

160. The scheme is of high architectural and urban design quality, providing a well-appointed office building and a robust, appealing office architecture that has a local landmark quality, with its strong orthogonal grid, use of high quality terracotta and distinctive serrated profile. The building works well in the round, providing good permeability and well animated routes.
161. Its articulated massing and elevational designs are engaging and support local distinctiveness within this section of Blackfriars Road. The building sits comfortably within the local townscape and preserves the settings of nearby heritage assets.

### **Archaeology**

162. The site lies within an Archaeological priority Zone and archaeology was considered in full as part of the masterplan consent. Given the site's potential to contain archaeological remains in one small area of the site and, in light of the small and localised area of proposed impact, no further archaeological fieldwork is required pre-determination of this planning application, but archaeological interest should be managed for the areas of the site not impacted by previous development. This would be secured by continuing to attach the relevant conditions to any grant of planning permission.
163. These conditions would include archaeological evaluation, archaeological building recording, archaeological mitigation, archaeological foundation and basement design, archaeological reporting and a final condition setting out a public engagement programme.

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

164. The importance of protecting neighbouring amenity is set out Southwark Plan

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

165. A development of the size and scale proposed will clearly have potential significant impacts on the amenities and quality of life of occupiers of properties both adjoining and in the vicinity of the site. The proposal has required an EIA in order to ascertain the likely associated environmental impacts and how these impacts can be mitigated. The accompanying Environmental Statement (ES) and addendum deals with the substantive environmental issues. An assessment then needs to be made as to whether the residual impacts, following mitigation, would amount to such significant harm as to justify the refusal of planning permission.

### Outlook and privacy

166. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear. The closest existing neighbour is the residential tower at One Blackfriars and the proposed development would maintain or exceed the minimum distances as set out in the supplementary planning document and as such it is considered that there would be no significant adverse impact in terms of overlooking or loss of outlook. Consideration has also been given to the impact of the development on the permitted but unbuilt BY2 which forms part of the masterplan site. This would be a residential tower located to the south of the proposed building and officers are satisfied that the separation distance of 11.4 metres is acceptable given that there would be no overlooking and the fact that the two buildings are offset.

### Daylight

167. A daylight and sunlight report has been submitted as part of the Environmental Statement. The report assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight. This is included in Chapter 9 of the ES.
168. The BRE Guidance provides a technical reference for the assessment of amenity relating to daylight, sunlight and overshadowing. The guidance within it is not mandatory and the advice within the guide should not be seen as an instrument of planning policy. The guidance notes that within dense urban environments and areas of modern high rise buildings, a higher degree of obstruction may be unavoidable to match the height and proportion of existing buildings. This site benefits from an allocation in the Southwark Plan as well as existing planning consents for comprehensive redevelopment with tall buildings.
169. The BRE sets out the detailed daylight tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted. This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site.

The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by about 20% of their original value before the loss is noticeable. In terms of the ES, the level of impact on loss of VSC is quantified as follows;

Reduction in VSC	Level of effect
0-19.9%	Negligible
20-29.9%	Minor
30-39.9%	Moderate
40% +	Major

170. The second method is the No Sky Line (NSL) or Daylight Distribution (DD) method which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of 20% in the area of sky visibility, daylight may be affected.

171. The ES considers the effects on the following neighbouring buildings:

- 1 Blackfriars Bridge
- 1-30 Falcon Point
- 31-42 Falcon Point
- 43-56 Falcon Point
- 57-72 Falcon Point
- 73-84 Falcon Point
- 85-110 Falcon Point
- 1-87 River Court
- One Blackfriars

172. All assessed properties with the exception of 1-87 River Court and One Blackfriars would remain fully compliant with the BRE in terms of both VSC and NSL. The tables below outline the general results in terms of the loss of VSC and NSL that would be experienced by the remaining affected buildings and a more localised assessment of the affected properties is detailed below.

Table – VSC Results

Property	No. of windows tested	No. retaining at least 80% of their baseline value	No. with minor adverse impact of up to 29.9% reduction in VSC	No. with moderate adverse impact of between 30%-39.9% reduction in VSC	No. with major adverse impact of over 40% reduction in VSC
1-87 River Court	283	275	4	0	4
One Blackfriars	1983	1932	51	0	0

Table NSL Results

Property	No. of rooms tested	No. retaining at least 80% of their baseline value	No. with minor adverse impact of up to 29.9% reduction in VSC	No. with moderate adverse impact of between 30%-39.9% reduction in VSC	No. with major adverse impact of over 40% reduction in VSC
1-87 River Court	203	203	0	0	0
One Blackfriars	829	829	0	0	0

*1-87 River Court*

173. VSC was tested at 283 windows at this property and 275 of them would remain compliant with the BRE which is a compliance rate of 97.2%. Four windows would see minor effects with reductions in VSC of between 20-29.9% whilst the remaining four windows would see reduction in excess of 40% which would be a major effect. However, the affected windows have very low existing VSC levels which results in a disproportionate percentage reduction and the real terms VSC reductions would be in the range of 0.9% to 1.6% and this would not be a noticeable change. All 203 rooms tested for NSL would remain fully compliant with the BRE and as such the overall effect on this property would be negligible.

*One Blackfriars*

174. VSC was tested at 1983 windows at this property and 1932 of them would remain compliant with the BRE which is a compliance rate of 97.4%. A total of 51 windows would see minor effects with reductions in VSC of between 20-29.9%. All 829 rooms tested for NSL would remain fully compliant with the BRE and as such the overall effect on this property would be negligible.

Sunlight

175. All windows and rooms tested for sunlight (APSH and WPSH) would remain fully compliant with the BRE guidance.

Overshadowing of amenity spaces

176. The ES has also considered overshadowing of amenity spaces which in this case is the River Thames and the Thames Path. The ES notes that there would be minor levels of overshadowing at periods throughout the day in both the March and June scenarios. The overshadowing would be transient and for short periods and the overall effect is minor and not significant.

Cumulative impacts

177. The ES has identified cumulative effects once the proposed development is complete and operational in combination with the wider Bankside Yards

redevelopment in terms of effects relating to daylight (at 1-30 Falcon Point, 1-87 River Court, and One Blackfriars) and sunlight (at 1-30 Falcon Point, 31-42 Falcon Point, and 1-87 River Court). It should be noted that this further reduction in daylight and sunlight levels is as a result of the inclusion of the wider Bankside Yards redevelopment within the assessment. This is in line with the reductions in daylight and sunlight at these properties which have already been accepted in planning terms as part of these existing consented and implemented developments.

### Conclusion on daylight and sunlight

178. The daylight and sunlight assessment presented as part of the ES demonstrates that there would be no significant impacts as a result of the proposed development.
179. The application site has been identified in policy, including in The Southwark Plan, as being suitable for a taller building and this is reflected in the existing implemented planning consents on the site. Developing sites in highly urbanised environments often results in some unavoidable impacts to daylight and sunlight. Recognising the challenges associated with developing inner city sites, the numerical targets given in the BRE are expected to be treated with a degree of flexibility, having due regard for the existing and emerging context within which these sites are located and accordingly the standards should be applied with some degree of flexibility.
180. Officers consider that, when reading the BRE guidance with the required flexibility, and in view of the positive benefits of the development proposal, the degree of harm to amenity would not justify withholding planning permission in this case.

### Solar glare

181. Solar glare has been considered as part of the ES in Chapter 10. A total of 32 viewpoints have been tested. 24 of the locations are considered to either have no effect or negligible effects. At the remaining eight locations it is considered that minor adverse effects could occur and these are not considered to be significant. In terms of the minor adverse effects, it is considered that these effects would not affect road user or train driver responsiveness, due to the potential reflections occurring over a short period of time, the option of utilising unaffected traffic signals and/or being able to deploy a car's visors which would shield the majority of reflections.

### **Transport and highways**

182. Chapter 9 of the NPPF seeks to ensure that transport issues are properly addressed as part of development proposals. Proposals must assess the impact upon existing transport networks, promote and maximise opportunities for sustainable transport modes whilst mitigating any adverse transport related environmental effects and must make a significant contribution to improving accessible movement and permeability as a key priority for place making. Paragraph 111 states "development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety,

or the residual cumulative impacts on the road network would be severe”.

### Image – Circulation and access



183. This approach is reflected in Chapter 10 of the London Plan and Southwark Plan Policies P49 – P55, which require development proposals to maximise sustainable modes of transport by minimising car journeys, to deliver enhanced walking and cycling opportunities and safe, accessible routes to public transport. Developments should be car free save for disabled parking provision and mitigation will be secured where necessary to address impacts upon the road and public transport networks to serve new developments
184. This application was accompanied by a Transport Assessment and the documents have been reviewed by the Council’s Transport Policy and Highways Teams, and Transport for London (TfL).

### Site context

185. The site abuts Blackfriars Road, which forms part of the Transport for London Road Network (TLRN). Southwark Street, approximately 150 metres south of the site, also forms part of the TLRN. The site records a Public Transport Accessibility Level (PTAL) of 6b on a scale of 0 to 6b where 6b represents the most accessible locations. The site is immediately adjacent to Blackfriars Rail Station, and is within a short walk of a number of bus routes, tube stations, riverboat piers, and rail stations.
186. Cycleway 6, running along Blackfriars Road and Bridge, runs north-south on the opposite side of the road to the site. Other high-quality cycleways and quiet routes also run near the site, including Cycleway 3 along the north shore of the Thames River, and Cycleway 14 to the south. The site is well-positioned to help drive a significant increase in cycling mode share in this part of London.

### Site layout

187. Site layout would remain largely as consented with the building being serviced from the centralised servicing yard in the basement of the Bankside Yards

development. The basement would be accessed from Southwark Street as consented.

### *Proposed*

188. The development would slot into the site layout approved on the consented scheme. As such, pedestrian, cyclist and vehicular routes and access points would largely remain as approved. This would include the new east west route through the Bankside Yards site, vehicular access (servicing) from Southwark Street into the shared basement and direct access from the building itself into the cycle parking area within the basement. In site layout terms, the proposed development is considered acceptable.

### Image – Access and routes



### Trip generation

189. In terms of proposed vehicle movements associated with the proposed development, the Council's Transport Policy Team have reviewed the applicant's Transport Assessment as well as the travel surveys within the TRICS database. The office part of the development would be anticipated to generate 19 and 10 two way vehicle movements in the morning and evening peak periods respectively. The remaining retail use would be expected to generate 4 and 7 two way vehicle movements in the morning and evening peaks respectively. Overall, this development would be expected to produce 23 and 17 two-way vehicle movements in the morning and evening peak hours. Although these figures are higher than the vehicle movements predicted by the applicant's consultant, the Council's transport officer considers that this level of net

supplementary vehicular traffic would not have any noticeable adverse impact on the prevailing vehicle movements on the adjoining roads.

190. As far as public transport is concerned, the development is anticipated to generate an additional 399 and 380 two way public transport trips in the morning and evening peaks respectively across underground, train and bus services. Given the high public transport accessibility level of the site and the various options available for public transport, this level of trip generation is not expected to have any significant adverse impact on the public transport network. A contribution towards public transport service improvements would be secured in the legal agreement with specific contributions to be agreed with TfL prior to Stage II referral.
191. Additional mitigation/travel plan measures proposed include the provision of cycling shower /change facilities, travel information, delivery lockers, promotion of a cycle to work week, and appointment of a travel plan co-ordinator who would promote sustainable travel including organising and publicising sustainable travel events in addition to monitoring the travel plan. Cycle hire scheme membership should also be provided for 10% capacity of the building. A Construction Logistics Plan, Construction Environmental Management Plan, Service Management Plan and Travel Plan would be secured in the S106

### Servicing and deliveries

192. It is proposed that all servicing would take place from within a dedicated on-site servicing yard within the Bankside Yards East basement which would be accessed from Southwark Street. This servicing yard would be sufficiently sized in order to accommodate the peak demands of the development without any servicing activities having to take place from the street and all vehicles would be able to access and egress the site in a forward gear therefore minimising any highways safety impacts.
193. Off-site consolidation should be implemented. The primary role of delivery consolidation is to reorganise non-perishable goods in order to provide a more economic and environmentally friendly delivery strategy. The key functions of delivery consolidation are to:
  - reduce the number of vehicles on the road network surrounding the site;
  - improve vehicle capacity utilisation;
  - undertake deliveries outside of peak hours; and,
  - mitigate against missed deliveries through scheduling.
194. The use of delivery consolidation, should be secured in the legal agreement.

### Refuse storage arrangements

195. Refuse will be stored within the shared basement which is sufficiently sized and located to accommodate all waste generate by the proposed development. These details would be secured by condition. All waste servicing will be undertaken from a centralised basement-level area in BYE, accessed via Southwark Street. On an agreed schedule the onsite Facilities Management (FM)

team will exchange the full bins from the commercial waste store for empty ones from the centralised waste storage area in BYE, using an electric tow tug.

### Car parking

196. London Plan Policy T6 seeks to encourage car free and car limited development as much as possible and sets maximum car parking standards for different uses whilst recognising the need for an appropriate provision of disabled parking and adequate arrangements for servicing. Non-residential uses should provide a minimum of 1 disabled space. All car parking spaces must be fitted with electric vehicle charging points. Southwark Plan Policies P54 and P55 set out car parking standards for various land uses and echo the requirements of the London Plan in terms of setting maximum car parking standards and promoting car free development save for minimum disabled provision.
197. The development is proposed to be 'car free' with the exception of the parking already approved within the basement of the wider implemented masterplan consent.

### Cycle parking and cycling facilities

198. London Plan Policy T5 sets minimum cycle parking standards for different uses. Southwark Plan Policy P53 sets out a higher requirement than the London Plan standards.
199. The development proposes a total of 275 long stay cycle parking spaces that will be within the basement and accessed from lifts. The long stay cycle parking would include:
  - 52 Sheffield stand spaces (19% of the total) including 6 oversize spaces for large or adapted bicycles;
  - 27 spaces (10% of the total) are foldable bicycle lockers (as per the recommendation in the 2021 London Plan);
  - 10 spaces are vertical racks;
  - 186 spaces are two-tier racks.
200. A total of 30 short stay cycle parking spaces would be provided in the form of 15 Sheffield stands. These are located on ground level adjacent to the building entrance and lower ground level between BY1 and the viaduct.
201. The development would be compliant with the London Plan and Southwark Plan with regards to long stay cycle parking. In terms of the short stay cycle parking, the development would be compliant with the London Plan and there would be a minor shortfall on the requirements for the Southwark Plan and officers are satisfied that this would be suitably dressed by condition.

### Healthy Streets

202. London Plan Policy T2 requires development proposals to demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance. The development, alongside the wider

Bankside Yards consented development, provides the opportunity to greatly improve the pedestrian environment, improving the street level experience, improving pedestrian connectivity and legibility, promoting sustainable forms of transport and the use of public transport modes.

203. This development would be car free save for the parking secured on the wider implemented masterplan consent and as such the development would promote walking, cycling and use of public transport. The applicant has considered healthy Streets within the Transport Statement which indicates the following:

*Street density*

204. The London permeable neighbourhood network layer indicates that some of the areas around the site are permeable, for instance to the south and east. The River Thames forms a barrier to movement to the north with Blackfriars Bridge providing a crossing facility for pedestrians, crossing and vehicles. The new Bankside Yards masterplan will facilitate improved walking and cycling network density.

*Public transport density*

205. The site has a PTAL score of 6b which indicates excellent public transport accessibility level. Nearby rail and Underground stations provide access to National Rail and Underground services, which serve locations across London, and there are multiple high frequency bus services.

*Green spaces*

206. The site is located close to the River Thames and its southern walkway provides an attractive continuous walking route with different commercial facilities and pockets of green spaces. This route is ideal for walking, exercise, or relaxing.

*Wider consented Bankside Yards masterplan*

207. The proposed building is situated within the wider Bankside Yards Combined Masterplan which will provide a mixture of land uses including residential, retail, hospitality, community as well as green spaces and new public realm, all of which will contribute positively towards healthy living and working, and encouraging travel by active modes.

## **Environmental matters**

### **Flood risk**

208. The application site is located within Flood Risk Zone 3A and as such a Flood Risk Assessment, Basement Impact Assessment and Drainage Strategy have been submitted as part of the application. The main source of flood risk in Southwark is as a result of tidal activity within the River Thames which lies approximately just to the north of the site. It should be noted that the site would benefit from protection by the Thames Barrier up to the 1 in 1000 year event.

209. The proposed development does not include any residential accommodation and all of the proposed uses are classified as "less vulnerable" and as such are acceptable within Flood Zone 3a. The site itself has been assessed as being at low risk of flooding from rivers or tidal sources; from surging sewers; groundwater sources; artificial sources; and surface water flooding. The Environment Agency have been consulted on the proposed development and have raised an objection. The applicant has provided the additional information and clarification required and the Environment Agency have been re-consulted. Whilst no comments have been received to the re-consultation, Officers will ensure that the issue is resolved prior to the Stage II referral. Any consent issued would be subject to the imposition of conditions.

#### *Sustainable Urban Drainage (SUDS)*

210. SUDS has been considered as part of the submitted Flood Risk Assessment. The SUDS assessment reviewed various SUDS strategies for their suitability to be employed within the development. Given the site specific circumstances and limited external space associated with the development, the opportunity to incorporate significant SUDS technologies is difficult, however, the scheme would benefit from the drainage strategy of the wider masterplan of which it would form a part. This incorporates permeable surfaces and an attenuation to allow the reduction of the peak discharge. The proposed building would discharge surface water to the River Thames in line with the existing situation and the consented development.

#### Noise and vibration

211. The ES considers the potential for noise and vibration impacts during demolition, construction and operation of the development. This is reported within Chapter 8 of the ES. Once complete and operational, the noise and vibration assessment considered noise and vibration effects associated with operational road traffic noise on surrounding roads, operational noise from building services systems and operational noise from the proposed uses.
212. During the construction phase, the impacts on surrounding sensitive receptors (neighbours) is considered to be negligible subject to compliance with appropriate mitigation in the form of adopting best practice measures and complying with a Construction Environmental Management Plan and Construction Method Statement which would be required as part of any consent issued and this would include appropriate noise and vibration management and monitoring measures.
213. In terms of the completed and operational development, no significant effects are anticipated from road traffic, vibration or building services plant associated with the development. Conditions will be imposed on any consent issued to ensure that all plant noise would be in line with the Council's limits and standards. Conditions would also be imposed to limit the hours of use of balconies and terraces.

#### Air quality

214. Policy SI 1 of the London Plan 'Improving Air Quality' seeks to minimise the

impact of development on air quality, and sets a number of requirements including minimising exposure to existing poor air quality, reducing emissions from the demolition and construction of buildings, being at least 'air quality neutral', and not leading to a deterioration in air quality. The application site is located within an Air Quality Management Area and the impact of the development on air quality has been assessed as part of the ES. The results of this assessment are reported in Chapter 7 of the ES. In terms of potential air quality effects, the assessment has considered:

- the impacts of the demolition and construction phase of the proposed development on dust soiling and concentrations of PM10 at existing sensitive receptors during the demolition and construction period;
- the impacts of changes to highway movements;
- the impacts of existing emission sources of NO<sub>2</sub>, PM10 and PM2.5 on future residents and users of the development;
- whether or not the proposed development is 'air quality neutral'; and
- the cumulative impacts on air quality of the proposed development in combination with cumulative schemes identified in the local area.

215. The demolition and construction phase of a development is temporary and short term. It is acknowledged that there would be an increase in the number of heavy goods vehicles (HGV) on the roads as a result of the demolition and construction phase of the development. All demolition and construction works have the potential to generate significant adverse effects on air quality without appropriate mitigation measures in place. In line with standard air quality guidance, mitigation measures will be put in place to ensure that there are no significant effects. Mitigation measures will include the implementation of a dust management plan, planning the site layout so that dust causing machinery and activities are kept far away from sensitive receptors, and covering all vehicles accessing and leaving the site to prevent material escape. With these mitigation measures in place there would be no significant air quality effects during the demolition and construction period, which by their nature would be short term and temporary.

216. The Proposed Development will not cause any exceedances to the air quality objectives as a result of utilising zero-emission Air Source Heat Pumps and being a car-free development. As such the development would not lead to any adverse or significant adverse effects on air quality at existing and future local sensitive receptor locations resulting from emissions generated during the completed development / operation stage. Furthermore, the development would achieve air quality neutral in line with the London Plan.

## Wind

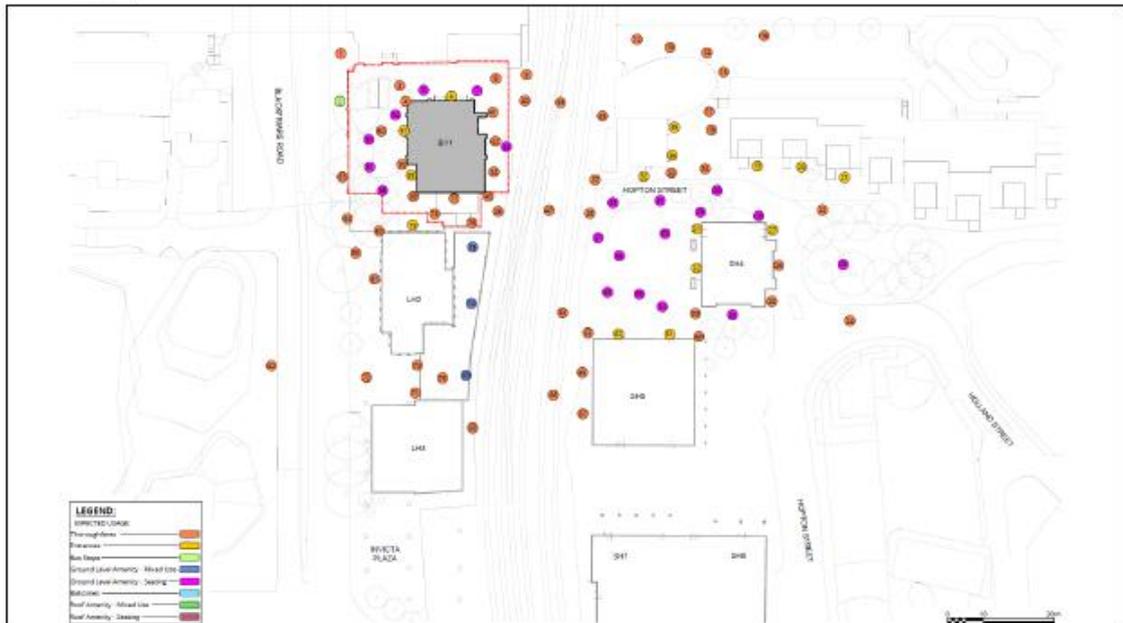
217. Wind microclimate has been considered as part of the ES and the results are set out in Chapter 10 of the ES. The assessment seeks to understand whether any undesirable wind conditions would be created on site or within the surrounding area as a result of the proposed development. It considers if the resultant wind speed changes would be suitable for the intended use of specific locations around and within the site in terms of comfort and safety.

218. The assessment of the wind conditions requires a standard against which the measurements can be compared. This assessment of the wind tunnel results

adopts the Lawson Comfort Criteria which are the well established guidelines that have been in use for over 30 years. The Lawson Criteria establishes four pedestrian activities (comfort categories) taking into account that less active pursuits require more benign wind conditions. The four categories include: sitting, standing, strolling and walking.

219. The assessment considered areas within the site, at ground level (such as thoroughfares and building entrances), roadways, pedestrian crossings, bus stops, amenity areas and roof terraces. In addition, areas around other buildings surrounding the site (such as building entrances), roads, nearby bus stops, car parks and thoroughfares have been tested. The image below details the probe locations that have been used as well as their current use:

Figure 10.3 Intended Usage – Ground Level (Proposed Development and off-site Existing and Future Receptors)



220. During construction the nature and layout of the site will be constantly evolving, some areas will become calmer and some areas will become windier during construction phase. Negligible effects (not significant) were identified during the construction stage to construction site workers and off-site thoroughfares and entrances. Hoarding will surround the site during construction until the point at which the landscaping measures will be incorporated, and the building becomes operational, which would provide shelter to parts of the site.
221. Once the development is completed and operational, wind conditions for on-site areas/receptors would be negligible to moderate beneficial at thoroughfares and entrances. Additionally, negligible effects were identified at the ground level amenity areas as well as the balconies and the roof terrace amenity space.
222. In terms of off-site receptors, negligible to minor beneficial (not significant) effects were identified at the assessed off-site thoroughfares and negligible effects (not significant) were identified at off-site entrances, ground level amenity areas and bus stops. Furthermore, no strong winds were identified at and around the proposed development.

223. The assessment established that wind conditions would be windier than suitable for the intended use at two locations on-site during the summer season in areas expected to provide seating, whereby standing conditions were established (one category of wind comfort higher than required). As a result, mitigation measures were agreed upon between the wind consultants and design team and incorporated into the design of the proposed development in order to ensure suitable wind conditions (i.e. sitting conditions) at these locations.

### Ecology

224. Policy G6 of the London Plan 'Biodiversity and access to nature' states that SINC's should be protected. Where harm to a SINC is unavoidable and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the policy sets out a mitigation hierarchy which must be followed. The policy states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
225. At borough level policy P60 of the Southwark Plan 'Biodiversity' states that development must contribute to net gains in biodiversity including through enhancing the nature conservation value of SINC's, protecting and avoiding damage to SINC's, protected species and habitats, and including features such as green and brown roofs, green walls and soft landscaping.
226. The applicant has submitted a Preliminary Ecological Appraisal. The application site presently has very low ecological value. The submitted assessment concludes that there is an opportunity to increase biodiversity net gain through design measures such as bird boxes, bat boxes, living roof, green walls and the provision of wildlife friendly planting. The Council's Ecologist has reviewed the application and raises no objection subject to conditions. The relevant conditions would be imposed on any consent issued whilst an Ecological Management Plan would be secured as part of the S106 Agreement

### Light pollution

227. The ES has considered light pollution as part of the Daylight and Sunlight Assessment (Chapter 9) and notes that light pollution is only relevant in the cumulative scenario alongside the remainder of the Bankside Yards development. The impact of the development on the residential buildings at LH2, SH4 and SH5 has been considered and the light pollution assessment has shown that these buildings would not be affected. The effects are therefore negligible.

### Socio-economics

228. Socio-economics is assessed in Chapter 6 of the ES. The assessment notes that the site currently provides up to 165 full time jobs and that the loss of the existing employment on site, during demolition and construction, would be an adverse effect, albeit temporary and not significant. The construction phase of the

development would be expected to generate up to 210 full time positions and whilst this effect would be beneficial, it would not be significant.

229. Once completed, the development would have the potential to generate up to 800 full time jobs. This effect would be beneficial at local and borough level. In terms of local spending associated with the completed development, the proposal would have the potential to generate between £1.7 million and £2.2 million. Given the site is close to amenities, shops and transport links, it could be expected for much of this to be spent in the local economy. The new employees accommodated by the development would have a minor beneficial effect on the local economy through this additional spending. No mitigation measures are required in this instance.

## **Energy and sustainability**

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

## Whole life cycle and carbon capture

232. Policy SI 2 – Minimising Greenhouse Gas Emissions of the London Plan requires developments to calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken that would serve to reduce life-cycle carbon emissions.
233. Whole Life Cycle carbon emissions are those associated with the construction, use and eventual deconstruction of a development over its whole life cycle, considering impacts of construction materials, along with their repair, maintenance and replacements, as well as regulated and unregulated operational carbon emissions. A Whole Life Carbon Assessment and GLA Template was submitted.
234. The submission considers the life cycle of materials and the carbon reduction potential of material and design interventions. The submission details the minimum recycled content of proposed materials and looks at end of life

scenarios they can have the lowest possible embodied carbon.

235. The GLA have requested further clarification on design approach, scheme audits, operational waste, post construction report and end-of-life strategy and have requested that a condition be imposed to secure a post construction report. The applicant is providing the additional information requested by the GLA and this will be resolved prior to the Stage II referral. The relevant condition would also be secured on any consent issued.

### Carbon emission reduction

236. As previously stated, the London Plan requires a minimum 35% carbon reduction whilst the Southwark Plan requires a minimum 40% carbon reduction on site. Both policies accept that the difference between these targets and 100% can be balanced through a financial contribution to the carbon offset fund. The proposed energy strategy would result in an overall annual carbon reduction of 42.6% relative to the current 2013 Part L2A target emission rate (TER) for the building, using SAP10 carbon numbers. This would be accompanied by a carbon offset payment of £232,009.64 which would bring the development to carbon zero and achieve the aims of the policies of both the London Plan and the Southwark Plan. More detail on the strategy to achieve the 42.6% carbon reduction is set out below:

### Be Lean (use less energy)

237. The development would incorporate a range of passive and active design measures that would reduce carbon emissions through energy efficient design and construction. Passive measures would include:

- Positioning of the building to take advantage of solar gains such as having the core to the south to avoid excessive gain;
- Façade optimisation;
- Low water consumption fittings.

238. Active measures would include:

- The use of Air Sourced Heat Pumps (ASHP) to provide cooling and heating to the building;
- Digital Building Management System and metering to monitor and control building services and enable optimum operation;
- EC/DC motors for fan coil units;
- Ventilation heat recovery;
- Low energy lighting;
- Use of low energy white goods; and
- High efficiency lifts/elevators.

239. Measures under this category would result in a 17.4% reduction in carbon emissions which would exceed the 15% requirement set out in the London Plan.

### Be Clean (supply energy efficiently)

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

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

241. The proposed development will employ the use of air source heat pumps (ASHP) to provide space heating and cooling to the building. Full details of this technology and how it will ultimately be applied would also be secured as part of an updated site wide energy strategy to be secured as part of the legal agreement.
242. Measures under this category would result in a 25.2% reduction in carbon emissions. This would bring the total carbon reduction to 42.6% which is positive and well in excess of the policy requirement.

### Be Seen (Monitor and review)

243. The London Plan asks developers to monitor energy use during occupation and to incorporate monitoring equipment to enable occupants to monitor and reduce their energy use. In accordance with London Plan policies it is appropriate to secure post completion monitoring within the s106 agreement. The applicant has confirmed that the development would be metered and that a building management system would be utilised. As built, the applicant commits to updating the contextual and energy performance data onto the Be Seen portal and would confirm that the metering installation is installed and correctly calibrated. When operational, the applicant commits to submitting energy performance data annually for at least 5 years and where performance differs from estimated performance then they would identify the cause and take action where necessary. These commitments would be secured in the legal agreement.

### Circular economy

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

hierarchy.

6. How performance will be monitored and reported.

245. The applicant proposes the following key commitments and targets in order to meet the requirements of policy SI 7 of the London plan 2021:

- 246.
- Development to demonstrate tangible sustainability measures to include health and wellbeing for the occupants, energy solutions and water saving features;
  - Aspire to be a low carbon building for both operation and embodied carbon for construction;
  - Exceed targets of carbon emission savings, reducing water consumption and use of virgin materials, wherever possible;
  - Maximise the use of reused, upcycled or recycled materials;
  - Aspire to close the loop of waste generation during construction by specifying recycled content and reused materials, and upcycling materials wherever possible and working with the supply chain for improved efficiencies;
  - Set out a Sustainable Procurement Plan and challenging supply chain to source and deliver lower carbon materials to the site;
  - Aim for a 95% diversion of construction waste from landfill (non-hazardous);
  - Rationalise the grid structure to promote pre-fabrication and modularization;
  - Optimise material use and use whole life-cycle carbon analysis for assisting decision-making process;
  - Design for ease of disassembly from concept design;
  - Develop a site waste management strategy during building's In-Use phase;
  - Achieve 65% recycling rate for municipal waste by 2030, and allocating storage spaces for collection of waste and;
  - Implement a waste collection strategy for the development to maximise recycling.

247. It is noted that the GLA have requested additional information/clarification on Circular Economy and this will be finalised with the GLA prior to any Stage II referral.

### Overheating

248. London Plan Policy SI4 Managing heat risk and Southwark Plan policy P69: Sustainability standards set out the cooling hierarchy that should be followed when developing a cooling strategy for new buildings. The hierarchy is as follows:

- Minimise internal heat generation through energy efficient design; then
- Reduce the amount of heat entering the building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
- Manage the heat within the building through exposed internal thermal mass and high ceilings; then

- Use passive ventilation; then
- Use mechanical ventilation; then
- Use active cooling systems (ensuring they are the lowest carbon options).

249. The steps set out in the hierarchy have been applied to the proposed development in sequence and systematically as part of the design process and is set out below in sequential order:

*Minimise internal heat generation through energy efficient design*

250. Glazing ratio optimised throughout the building to provide enough daylight and solar control glass applied to minimise solar gains. LED lighting is proposed to reduce internal heat gains.

*Reduce the amount of heat entering the building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls*

251. The glazing ratio has been derived by data-driven design in limiting solar gains and managing daylight levels and respond to the solar exposure and façade orientation. Also, external shading elements have been dimensioned to assist in providing shading without significantly increasing embodied carbon. Urban greening strategies on ground level will contribute to additional shading and creating a microclimate that will contribute to reducing the urban heat island effect.

*Manage the heat within the building through exposed internal thermal mass and high ceilings*

252. A minimum of 3.5m of floor to ceiling height is proposed to the office areas.

*Use passive ventilation*

253. Mechanical ventilation is proposed for this development.

*Use mechanical ventilation*

254. Highly efficient mechanical ventilation with heat recovery is proposed for fresh air supply all year round.

*Use active cooling systems (ensuring they are the lowest carbon options)*

255. All previous measures contributed to reducing the peak cooling demand and decreasing the size of fan coil units for thermal comfort as well as using efficient heat pumps with waste heat recovery opportunity.

## **BREEAM**

256. Southwark Plan Policies P69 requires the development to achieve BREEAM 'excellent'. A BREEAM Pre-assessment report has been undertaken based on

the illustrative scheme which demonstrates that an “excellent” standard can be achieved which meets the policy requirement and is therefore acceptable. As such an appropriate condition should be imposed on any consent issued in order to secure this standard.

### Planning obligations (S.106 agreement)

257. London Plan Policy Df1 and Southwark Plan Policy IP3 advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. These policies are reinforced by the Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:

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

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

Planning Obligation	Mitigation	Applicant Position
Archaeology	£11,171	
Carbon offset	£232,009.64	
Employment during construction	Provide 30 jobs, 30 short courses and 7 construction industry apprentices for Southwark residents or make a payment of £144,000	
Employment in the development	Provide 56 sustained jobs for unemployed Southwark residents or make a payment of £240,800	
Transport for London	Healthy Streets - A contribution is sought towards the Healthy Streets scheme.  Cycle hire scheme membership should be provided for 10% occupancy.	Still under discussion with the applicant and would be finalised as part of any Stage II referral to the Mayor.
Transport (site specific)	A contribution may be required to public transport improvements	Still under discussion with the applicant and would be finalised as

	<p>and is still subject to discussions with TfL.</p> <p>Improvements to footways around the site will be secured.</p> <p>DSP Bond - £80,000</p> <p>The legal agreement should secure a Construction Environmental Management Plan, Construction Method Statement, Service Management Plan and Delivery Consolidation Strategy, Travel Plan.</p>	part of any Stage II referral to the Mayor.
Trees	Not specifically required unless unforeseen issues prevent trees from being planted or they die within five years of completion of the development in which case a contribution will be sought - £10,000 per tree.	
Admin fee	2% of the total of all financial contributions.	

259. The legal agreement should secure the following strategy documents:

- Affordable Workspace Strategy - including a marketing and management strategy;
- Ecological Management Plan;
- Employment Skills and Business Support Plan;
- Landscaping Strategy;
- Site Wide Energy Strategy – including full details of Be Seen monitoring,
- Wind Mitigation Post Construction Review.

260. In the event that an agreement has not been completed by 31 March 2023, the committee is asked to authorise the director of planning to refuse permission, if appropriate, for the following reason:

261. In the absence of a signed S106 legal agreement there is no mechanism in place to mitigate against the adverse impacts of the development through contributions and it would therefore be contrary to London Plan (2021) Policies DF1 (Delivery of the Plan and Planning Obligations) T9 (Funding transport infrastructure through planning) and E3 (Affordable workspace), Southwark Plan (2022) Policies P28 (Access to employment and training), P31 (Affordable Workspace), P70 (Energy), IP3 (Community infrastructure levy (CIL) and Section 106 planning obligations), the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015), Paragraph 57 of the NPPF.

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

262. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material 'local financial consideration' in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport invests in London as a whole, primarily Crossrail. Southwark's CIL will provide for infrastructure that supports growth in Southwark. In this instance, based on information provided by the applicant, an estimated Mayoral CIL payment of £1,121,121 and a Southwark CIL payment of £1,079,156 would be due. This figure is an estimate only, and would be calculated in more detail when CIL Additional Information and Assumption of Liability forms are submitted prior to implementation.

### **Digital Connectivity**

263. London Plan Policy SI6 introduces the need for new developments to address London's requirements for enhanced digital connectivity. The policy requires development proposals to ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users, to meet expected demand for mobile connectivity generated by the development, to take appropriate measures to avoid reducing mobile connectivity in surrounding areas, and to support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure. This is repeated through policy P44 of the Southwark Plan 'Broadband and digital infrastructure'. In order to address this requirement a condition is recommended to ensure that the appropriate ducting for future connection to the full fibre infrastructure would be installed within the proposed development.

### **Community involvement and engagement**

264. The developer has submitted a Statement of Community Involvement that summarises the consultation that has taken place on the application. This includes an extensive programme of pre-application meetings in addition to consultation and engagement with key stakeholders and the wider community. A series of targeted public engagement activities have taken place to present the proposals to local residents, businesses, and stakeholders.
265. Engagement with stakeholders and the wider community has included contacting local stakeholders to invite them to a briefing and advertising the consultation

more widely by writing to 1,350 addresses inviting them to take part in the consultation. The letter included details about the proposals, how people could take part in the virtual exhibition and invited them to get in contact if they wanted to provide direct feedback about the plans. This exercise generated 15 responses and is summarised in the applicant's statement of community involvement.

266. The consultation took the form of an online virtual exhibition which provided consultees with information about the plans but also included questions and text boxes to capture feedback. The exhibition was held online and ran between 19 November and 13 December 2021. This was followed by a series of virtual presentations to local stakeholders as set out below
267.
  - 3rd December 2021 – virtual presentation with Coin Street Community Builders; and
  - 8th December 2021 – virtual presentation with Bankside Open Spaces Trust
268. Additional meetings took place in February 2021 with ward Councillors, Bankside Open Spaces Trust, Coin Street Community Builders and Living Bankside. The scheme was amended following the public engagement to reflect the feedback received.
269. As part of its statutory requirements the Local Planning Authority sent letters to surrounding residents, displayed site notices in the vicinity, and issued a press notice publicising the planning application. Adequate efforts have, therefore, been made to ensure the community has been given the opportunity to participate in the planning process. Details of consultation and any re-consultation undertaken by the Local Planning Authority in respect of this application are set out in the appendices.

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

270. No comments received.

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

271. Argiva – No objections

**Response** – Noted.

272. Environment Agency – The EA have objected on flood risk grounds, particularly regarding clarity on the proximity of the development to the flood defences.

273. **Response** – Noted. The applicant has provided the additional information requested by the EA and the EA have been re-consulted. Whilst updated comments have not yet been received from the EA officers can advise that the application would not be referred for Stage II until this issue is resolved.

274. Greater London Authority – The GLA are supportive of the development in principle and consider London Plan policies on the CAZ, opportunity areas, town

centres, office, housing, urban design, heritage, transport and sustainable development are relevant to this application. The issues are summarised below:

275. *Land use principles*: The proposed redevelopment of this brownfield site located within the CAZ, London Bridge and Bankside Opportunity Area and Town Centre for a mix of office and retail space is strongly supported.
276. *Urban design and heritage*: The urban design of the proposals is high quality and supported. Additional information is required for the heritage assessment to be concluded.
277. *Transport*: The applicant should consider additional healthy streets measures and address issues in respect of cycle parking design and quantum. The Council should appropriately secure an agreed quantum and design of cycle stores, vehicle parking, delivery and servicing plan, construction logistic plan and a travel plan.
278. *Sustainable development*: Additional information and justification is required regarding the energy strategy, whole life carbon and circular economy before compliance with the London Plan can be confirmed.
279. **Response** – The GLA have requested additional mitigation and clarity regarding Air Quality Neutral and this would be secured prior to Stage II referral in addition to the additional information requested on Whole Life Carbon and Circular Economy. The legal agreement would also secure an agreed quantum and design of cycle stores, vehicle parking, delivery and servicing plan, construction logistic plan and travel plan. A contribution towards Healthy Streets, if required, will be confirmed with TfL prior to Stage II referral in addition to contributions to public transport improvements. With regards to heritage assets, the benefits of the employment use, high quality design, improved public realm, improved connectivity and new routes, in addition to the implemented consent, which is a material consideration, are considered to outweigh any harm identified, all of which is considered to be less than substantial.
280. Heathrow Airport – No safeguarding objections but informatives recommended regarding cranes.
281. **Response** – Noted and agreed, the relevant informatives would be added to any consent issued.
282. Historic England - Historic England do not wish to offer any comments.
283. **Response** – Noted.
284. London Underground – No objections.
285. **Response** – Noted.
286. London City Airport – No objections.
287. **Response** – Noted.

288. London Fire Brigade – The London Fire Brigade (LFB) has been consulted with regard to the above-mentioned premises and have no further observations to make. It should be ensured that if any material amendments to this consultation is proposed, a further consultation may be required
289. **Response** – Noted.
290. Metropolitan Police – The Metropolitan Police consider that this development is suitable to achieve Secured By Design accreditation, and in order to assist the development with achieving Secured By Design standards, relevant conditions regarding secured by design measures and accreditation should be imposed. Additional conditions regarding hostile vehicle and blast mitigation are also recommended.
291. **Response** - Noted and agreed, the relevant conditions would be imposed on any consent issued.
292. Network Rail – No objections but the applicant is required to engage with the Asset Protection and Optimisation Team
293. **Response** – Noted. The relevant informatives would be added to any consent issued.
294. Port of London Authority – No objections. It is welcomed that the Thames path at this location would be enhanced including access to the path to maximise open space next to the river. Conditions should be imposed to secure appropriate infrastructure and live saving equipment. Licences will also be required for the refurbished and new river outfalls.
295. **Response** – Noted and agreed, the relevant conditions and informatives will be added to any consent issued.
296. Thames Water – No objections subject to relevant conditions and informatives.
297. **Response** – Noted and agreed, the relevant conditions and informatives would be attached to any consent issued.
298. Transport for London – No comments received
299. **Response** – Noted. Whilst separate comments from TfL have not been received, they have been included in the Stage I response from the GLA.
300. Westminster City Council – No comments.
301. **Response** – Noted.

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

302. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
303. The council has given due regard to the above needs and rights where relevant

or engaged throughout the course of determining this application.

304. 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.
305. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership. This development would create significant job opportunities both during construction and on completion. The provision of local apprenticeship opportunities during construction should help BAME communities. The provision of affordable workspace should help local businesses including BAME businesses.

### **Human rights implications**

306. 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.
307. This application has the legitimate aim of providing a mixed use commercial development incorporating offices and retail. 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**

308. 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.

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

### **Positive and proactive engagement: summary table**

Was the pre-application service used for this application?	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**

310. The redevelopment of the site to provide a large scale commercial scheme is supported by current development plan policies as is the principle of a taller building. The principle of the development has been established by the implemented consent which is a material consideration. The development would result in a substantial increase in jobs and employment opportunities due to the provision of high quality office accommodation and a substantial increase in commercial floorspace on a central, sustainable, highly connected brownfield site. The development has the potential to provide up to 800 jobs on a site that benefits from the highest levels of public transport availability. Sustainable transport is promoted through the provision of extensive and high quality cycling facilities including parking, showering facilities, changing rooms and an automated cycle store.
311. The design of the new building, which is taller than the consented building, is considered to be of the highest quality and will make a substantial, positive contribution to the skyline of London and the cluster of tall buildings at the northern end of Blackfriars Road. The building would have limited impacts on views and would not materially impact any LVMF views. There would be limited impact on identified heritage assets and any harm identified would be less than substantial and significantly outweighed by the benefits of the scheme. The public realm would achieve an UGF of 0.45 which exceeds policy requirements and maximises the landscaping potential. The new public realm is a key design feature of the new development as well as the wider Bankside Yards consent

and is considered to be a significant benefit of the scheme, greatly improving what was previously a hard landscaped site with little public space or landscaping.

312. The development would incorporate affordable workspace offered at a 51% discount on market rent levels which is fully supported by both London Plan and Southwark Plan policies and is considered to be a positive element of the scheme.
313. The proposal would not give rise to significant harm to neighbouring amenity by way of overlooking, loss of privacy, noise or disturbance. Whilst there would be some harm to the views of some nearby heritage assets, this is considered to be less than substantial harm which would be significantly outweighed by the wider benefits of the proposal such as significant employment benefits, the provision of affordable workspace, greatly enhanced public realm, improved pedestrian and visual connectivity and the provision of a high quality building that would make a valuable contribution to the townscape.
314. The development would achieve Carbon Zero status through a combination of an in lieu payment and a 42.6% carbon reduction on site. The on-site carbon reduction of 42.6% alongside the scheme being expected to achieve BREEAM 'Excellent' would result in an energy efficient and sustainable building.
315. Developments of this size and nature have the potential for significant environmental impacts and therefore an Environmental Statement has been submitted. The impacts identified in the Environmental Statement have been assessed and taken into account and should be considered in determining the application. No impacts of a significant scale have been identified which are not capable of being mitigated through detailed design, through conditions, or through provisions in the S106 agreement.
316. The application is considered to be in compliance with the development plan, and emerging documents, when read as a whole, and It is therefore recommended that planning permission be granted, subject to conditions, the timely completion of a S106 Agreement and referral to the Mayor of London.

## BACKGROUND

### BACKGROUND DOCUMENTS

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

## APPENDICES

No.	Title
Appendix 1	Recommendation (draft decision notice)
Appendix 2	Relevant planning policy
Appendix 3	Planning history of the site and nearby sites
Appendix 4	Consultation undertaken
Appendix 5	Consultation responses received.

## AUDIT TRAIL

<b>Lead Officer</b>	Stephen Platts, Director of Planning and Growth	
<b>Report Author</b>	Terence McLellan, Team Leader	
<b>Version</b>	Final	
<b>Dated</b>	3 January 2023	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
<b>Date final report sent to Constitutional Team</b>		4 January 2023

## Appendix 1: Recommendation

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

This document is not a decision notice for this application.

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<b>Applicant</b>		<b>Reg. Number</b>	22/AP/2295
<b>Application Type</b>	Major application		
<b>Recommendation</b>	GRANT subject to Legal Agreement (GLA)	<b>Case Number</b>	1390-245

### Draft of Decision Notice

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

Construction of a lower ground, upper ground and 18 storey building comprising Use Class E (office and retail) floorspace incorporating internal amendments to part of the existing site-wide basement at levels B1 and B2 and all landscaping, public realm and highways improvements together with all associated and ancillary works.

The application is accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Electronic Copies of the ES and NTS are available free of charge. Hard copies would have an associated printing charge. To request a copy, please contact [hello@triumenv.co.uk](mailto:hello@triumenv.co.uk)

Ludgate House 245 Blackfriars Road London Southwark

#### In accordance with application received on 28 June 2022 and Applicant's Drawing Nos.:

Existing Plans

Proposed Plans

## Other Documents

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

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

Reason:

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

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

3. Prior to works commencing, including any demolition, an Arboricultural Method Statement shall be submitted to and approved in writing by the Local Planning Authority. a) A pre-commencement meeting shall be arranged, the details of which shall be notified to the Local Planning Authority for agreement in writing prior to the meeting and prior to works commencing on site, including any demolition, changes to ground levels, pruning or tree removal. b) A detailed Arboricultural Method Statement showing the means by which any retained trees on or directly adjacent to the site are to be protected from damage by demolition works, excavation, vehicles, stored or stacked building supplies, waste or other materials, and building plant, scaffolding or other equipment, shall then be submitted to and approved in writing by the Local Planning Authority. The method statements shall include details of facilitative pruning specifications and a supervision schedule overseen by an accredited arboricultural consultant. c) Cross sections shall be provided to show surface and other changes to levels, special engineering or construction details and any proposed activity within root protection areas required in order to facilitate demolition, construction and excavation. The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations contained in the method statement. Following the pre-commencement meeting all tree protection measures shall be installed, carried out and retained throughout the period of the works, unless otherwise agreed in writing by the Local Planning Authority. In any case, all works must adhere to BS5837: (2012) Trees in relation to demolition, design and construction and BS3998: (2010) Tree work - recommendations. If within the expiration of 5 years from the date of the occupation of the building for its permitted use any retained tree is removed, uprooted is destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the Local Planning Authority.

Reason: To avoid damage to the existing trees which represent an important

visual amenity in the area, in accordance with The National Planning Policy Framework 2021 Parts 8, 11, 12, 15 and 16; Policies G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; and policies of The Southwark Plan 2022: P56 Protection of amenity; P57: Open space; P58: Open water space; P59: Green infrastructure, P66 Reducing noise pollution and enhancing soundscapes, P13: Design of places; P14: Design quality; P15: Residential design, P20: Conservation areas; P21: Conservation of the historic environment and natural heritage and P60 Biodiversity.

#### 4. Tree protection - foundation design

Before any work hereby authorised begins (excluding demolition), details of the foundation works and podium levels to be used in the construction of this development, showing sufficient rooting space and drainage, shall be submitted to and approved in writing by the Local Planning Authority. Details shall include the use below ground rootcell type systems to provide for long term tree growth and retention. The development shall not be carried out otherwise than in accordance with any such approval given.

##### Reason

To ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of local biodiversity, in addition to the attenuation of surface water runoff in accordance with the National Planning Policy Framework 2021; Policy G5 - Urban Greening and G7 -Trees and Woodlands of the London Plan 2021; and Policies P13 - Design of Places and P61 - Trees of the Southwark Plan 2022.

#### 5. Drainage Strategy

The development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed.

Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community.

#### 6. Archaeological Mitigation

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

Reason: In order that the details of the programme of works for the archaeological mitigation are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with the NPPF 2021; Policy HC1 - Heritage Conservation and Growth of the London Plan 2021; and Policy P23 - Archaeology of the Soutwark Plan 2022.

## 7. Contamination

Prior to the commencement of any development

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

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

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

Reason: In order that the details of the programme of works for the archaeological mitigation are suitable with regard to the impacts of the

proposed development and the nature and extent of archaeological remains on site in accordance with the NPPF 2021; Policy HC1 - Heritage Conservation and Growth of the London Plan 2021; and Policy P23 - Archaeology of the Southwark Plan 2022.

## 8. Environmental Management Plan

No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to and approved in writing by the Local Planning Authority. The approved statement shall be adhered to throughout the construction period. The Statement shall provide for:

the parking of vehicles of site operatives and visitors;

loading and unloading of plant and materials;

storage of plant and materials used in constructing the development;

the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;

wheel washing facilities;

measures to control the emission of dust and dirt during construction;

a scheme for recycling / disposing of waste resulting from demolition and construction works

Reason:

To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with Policy P56 'Protection of amenity' of the Southwark Plan (2022), and the National Planning Policy Framework (2021).

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

9. **HARD AND SOFT LANDSCAPING** Before any above grade work hereby authorised begins, detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings (including cross sections, available rooting space, tree pits, surfacing materials of any parking, access, or pathways layouts, materials and edge details), shall be submitted to and approved in writing by the Local Planning Authority. The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use. The planting, seeding and/or turfing shall be carried out in the first planting season following completion of building works and any trees

or shrubs that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the equivalent stem girth and species in the first suitable planting season. Planting shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction and BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf).

Reason: So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2021; Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P56 (Protection of Amenity), Policy P57 (Open Space) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

10. Prior to works commencing above grade, full details of all proposed tree planting shall be submitted to and approved in writing by the Local Planning Authority. This will include tree pit cross sections, planting and maintenance specifications, use of guards or other protective measures and confirmation of location, species, sizes, nursery stock type, supplier and defect period. All tree planting shall be carried out in accordance with those details and at those times.

All trees and shrubs will conform to the specification for nursery stock as set out in British Standard 3936 Parts 1 (1992) and 4 (1984). Advanced Nursery stock trees shall conform to BS 5236 and BS: 4428 Code of practice for general landscaping operations.

If within a period of five years from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, or becomes, in the opinion of the local planning authority, seriously damaged or defective, another tree of the same species and size as that originally planted shall be planted at the same place in the first suitable planting season., unless the local planning authority gives its written consent to any variation.

To ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of local biodiversity, in addition to the attenuation of surface water runoff in accordance with the National Planning Policy Framework 2021; Policy G5 - Urban Greening and G7 -Trees and Woodlands of the London Plan 2021; and

11. Bird boxes

Details of bird nesting boxes shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of any above grade works hereby granted permission.

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

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

Discharge of this condition will be granted on receiving the details of the nest/roost features and mapped locations and 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); and Policy P60 (Biodiversity) of the Southwark Plan (2022).

12. Swift 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 any above grade works hereby granted permission.

No less than 24 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); and Policy P60 (Biodiversity) of the Southwark Plan (2022).

### 13. Service Management Plan

Prior to the commencement of any works above grade, a Service Management Plan detailing how all elements of the site are to be serviced (including servicing hours) has been submitted to and approved in writing by the Local Planning Authority. The plan should set out the temporary service arrangements prior to the delivery of the service entrance on Southwark Street. 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), and Policy P50 'Highway impacts' of the Southwark Plan 2022.

### 14. Green Roofs

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.

Discharge of this condition will be granted on receiving the details of the green/brown roof(s) and Southwark Council agreeing the submitted plans, and 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: To ensure compliance with the National Planning Policy Framework (2021); Policy G1 (Green Infrastructure) of the London Plan (2021), and Policy P59 (Green Infrastructure) of the Southwark Plan 2022.

## 15. Ecology Management Plan

Before any above grade work hereby authorised begins, a landscape management plan, including long- term design objectives, management responsibilities and maintenance schedules for all landscaped areas (except privately owned domestic gardens), shall be submitted to and approved in writing by the local planning authority. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

Reason:

This condition is necessary to ensure the protection of wildlife and supporting habitat and secure opportunities for the enhancement of the nature conservation value of the site. This is an mandatory criteria of BREEAM (LE5) to monitor long term impact on biodiversity a requirement is to produce a Landscape and Habitat Management Plan

16. Cycle storage

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

Reason:

To ensure that satisfactory safe and secure bicycle parking is provided and retained for the benefit of the users and occupiers of the building in order to encourage the use of alternative means of transport and to reduce reliance on the use of the private car in accordance with: Chapter 9 (Promoting Sustainable Transport) of the National Planning Policy Framework (2021); Policy T5 (Cycling) of the London Plan (2021), and policy P53 'Cycling' of the Southwark Plan 2022.

17. Materials

Details of all external facing materials to be used in the carrying out of this permission shall be presented on site and approved by the Local Planning Authority before any above grade work in connection with this permission is carried out and the development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order to ensure that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with Chapter 12 (Achieving well-designed places) of the National Planning Policy Framework (2021); Policy D4 (Delivering good design) of the London Plan (2021) and policies P13 'Design of places' and P14 'Design quality' of the Southwark Plan 2022.

18. Design mock ups

Full-scale mock-ups of the cladding to be used in the carrying out of this permission shall be presented on site and approved in writing by the Local Planning Authority before any work above grade for the relevant building in connection with this permission is carried out; the development shall not be carried out otherwise than in accordance with any such approval given. These samples must demonstrate how the proposal makes a contextual response in terms of materials to be used.

Reason:

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

19. Design section details

1:5/10 section detail-drawings through all buildings facades; parapets; balconies; heads, cills and jambs of all openings; entrance lobbies; viaduct shop frontages; the new public lifts; and roof edges to be used in the carrying out of this permission shall be submitted to and approved in writing by the Local Planning Authority before any work above grade in connection with this permission is carried out.

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

Reason:

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

20. Designing out crime

Before any above grade work hereby authorised begins, details of security measures shall be submitted and approved in writing by the Local Planning Authority. Any such security measures shall be implemented prior to occupation in accordance with the approved details which shall seek to achieve the 'Secured by Design' accreditation award from the Metropolitan Police.

Reason:

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in

exercising its planning functions and to improve community safety and crime prevention, in accordance with Chapter 8 (Promoting healthy and safe communities) of the National Planning Policy Framework (2021); Policy D11 (Safety, security and resilience to emergency) of the London Plan (2021) and P16 'Designing out crime' of the Southwark Plan (2022).

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

21. Signage strategy

The commercial unit hereby permitted shall not be occupied until a site wide signage strategy detailing alignment with the wider Bankside Yards design code shall be submitted to and approved in writing by the Local Planning Authority and thereafter implemented in accordance with the approved details.

Reason

In order to ensure that the quality of the design and details are in accordance with Chapter 12 (Achieving well-designed places) of the National Planning Policy Framework (2021); Policy D4 (Delivering good design) of the London Plan (2021) and policies P13 'Design of places' and P14 'Design quality' of the Southwark Plan 2022.

22. VENTILATION DETAILS

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

Reason

In order to ensure that the ventilation ducting and ancillary equipment will not result in an odour, fume or noise nuisance and will not detract from the appearance of the building in the interests of amenity in accordance with The National Planning Policy Framework 2021 and Policy P56 - Protection of Amenity of the Southwark Plan 2022.

23. DETAILS OF THE REFUSE STORAGE FACILITIES

Before the first occupation of the development hereby permitted begins, details of the arrangements for the storing of 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: the National Planning Policy Framework 2021 and Policy P56 - Protection of Amenity of the Southwark Plan 2022.

#### 24. DETAILS OF THE SHOWERING FACILITIES

Before the first occupation of the development, details of showering facilities to be provided for commercial space shall be submitted to and approved in writing by the Local Planning Authority and thereafter the shower facilities shall be retained and the space used for no other purpose.

Reason:

In order to ensure that satisfactory facilities are provided and retained in order to encourage the use of non-car based travel, in accordance with: Chapter 9 (Promoting sustainable transport) of the National Planning Policy Framework (2021); Policy T2 (Healthy streets) of the London Plan (2021) and policy P53 'Cycling' of the Southwark Plan 2022.

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

#### 25. Noise

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

residential premises in the same building) as measured in the residential unit.

#### Reason

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance from plant and machinery, in accordance with: Chapter 8 (Promoting healthy and safe communities) of the National Planning Policy Framework (2021); Policies D13 (Agent of change) and D14 (Noise) of the London Plan (2021) and policy P56 'Protection of amenity' of the Southwark Plan 2022.

#### 26. Hours of use

The Class E uses hereby permitted for shall not be carried on outside of the hours 7am and 11pm Mondays to Sundays.

#### Reason:

To safeguard the amenities of neighbouring residential properties in accordance with The National Planning Policy Framework 2021 and Policy P56 - Protection of Amenity of The Southwark Plan 2022.

#### 27. No roof plant

No roof plant, equipment or other structures, other than as shown on the plans hereby approved or approved pursuant to a condition of this permission, shall be placed on the roof or be permitted to project above the roofline of any part of the buildings as shown on elevational drawings or shall be permitted to extend outside of the roof plant enclosures of any buildings hereby permitted.

#### Reason

In order to ensure that no 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) and policies P13 'Design of places' and P14 'Design quality' of the Southwark Plan 2022.

#### 28. Replacement planting

Any tree or shrub required to be retained or to be planted as part of a landscaping scheme approved, either as part of this decision or arising from a condition imposed as part of this decision, that is found to be dead, dying, severely damaged or seriously diseased within two years of the completion of the building works OR two years of the carrying out of the landscaping scheme (whichever is later), shall be replaced by specimens of similar or appropriate size and species in the first suitable planting season.

Reason:

To ensure that the details of the scheme are in accordance with National Planning Policy Framework 2021; Policy G5 - Urban Greening and G7 -Trees and Woodlands of the London Plan 2021; and Policies P13 - Design of Places and P61 - Trees of the Southwark Plan 2022.

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

29. Arboricultural Site Supervision Part 1: All Arboricultural Supervisory elements to be undertaken in accordance with the approved Arboricultural Method Statement for this site, as evidenced through signed sheets and photographs. Part 2: The completed schedule of site supervision and monitoring of the arboricultural protection measures as approved in tree protection condition shall be submitted for approval in writing by the Local Planning Authority within 28 days of completion of the development hereby permitted. This condition may only be fully discharged on completion of the development, subject to satisfactory written evidence of compliance through contemporaneous supervision and monitoring of the tree protection throughout construction by the retained or pre-appointed tree specialist.

Reason: To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with The National Planning Policy Framework 2021 Parts, 8, 11, 12, 15 and 16; Policies G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021); Policies G5 (Urban greening) and G7 (Trees and woodland) of the London Plan (2021); Policy P13 (Design of Places), Policy P56 (Protection of Amenity), Policy P57 (Open Space) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

30. BREEAM

Before any fit out works to the commercial premises hereby authorised begins, an independently verified BREEAM report (detailing performance in each category, overall score, BREEAM rating and a BREEAM certificate of building performance) shall be submitted to and approved in writing by the Local Planning Authority demonstrating that it would be capable of achieving

of a minimum excellent rating and the development shall not be carried out otherwise than in accordance with any such approval given;

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

Reason

To ensure the proposal complies with The National Planning Policy Framework 2021; Policy SI2 - Minimising Greenhouse Gas Emissions and Policy SI3 Energy Infrastructure of the London Plan 2021; and Policy P69 - Sustainability Standards and Policy P70 - Energy of the Southwark Plan 2022.

31. Within six months of the completion of archaeological site works, an assessment report detailing the proposals for post-excavation works, publication of the site and preparation of the archive shall be submitted to and approved in writing by the Local Planning Authority and that the works detailed in this assessment report shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order that the archaeological interest of the site is secured with regard to the details of the post-excavation works, publication and archiving to ensure the preservation of archaeological remains by record in accordance with the NPPF 2021; Policy HC1 - Heritage Conservation and Growth of the London Plan 2021; and Policy P23 - Archaeology of the Southwark Plan 2022.

## **Informatives**

## Appendix 2: Relevant Policies

### National Planning Policy Framework

The revised National Planning Policy Framework ('NPPF') was published on 20 July 2021 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental. Paragraph 218 states that the policies in the Framework are material considerations, which should be taken into account in dealing with applications. The following chapters are relevant:

- Chapter 2 Achieving sustainable development
- Chapter 6 Building a strong, competitive economy
- Chapter 7 Ensuring the vitality of town centres
- Chapter 8 Promoting healthy and safe communities
- Chapter 9 Promoting sustainable transport
- Chapter 11 Making effective use of land
- Chapter 12 Achieving well-designed places
- Chapter 14 Meeting the challenge of climate change, flooding and coastal change
- Chapter 16 Conserving and enhancing the historic environment

### New London Plan 2021

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

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG5 Growing a good economy
- GG6 Increasing efficiency and resilience
- Policy SD1 Opportunity Areas
- Policy SD6 Town centres and high streets
- Policy SD7 Town centres: development principles and Development Plan Documents
- Policy SD8 Town centre network
- Policy SD9 Town centres: Local partnerships and implementation
- Policy SD10 Strategic and local regeneration
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering good design
- Policy D5 Inclusive design
- Policy D8 Public realm
- Policy D9 Tall buildings
- Policy D10 Basement development
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire safety
- Policy D13 Agent of Change
- Policy D14 Noise Policy S1 Developing London's social infrastructure
- Policy S2 Health and social care facilities
- Policy S6 Public toilets

Policy E1 Offices  
Policy E2 Providing suitable business space  
Policy E3 Affordable workspace  
Policy E8 Sector growth opportunities and clusters  
Policy E9 Retail, markets and hot food takeaways  
Policy E10 Visitor infrastructure  
Policy E11 Skills and opportunities for all  
Policy HC1 Heritage conservation and growth  
Policy HC2 World Heritage Sites  
Policy HC3 Strategic and Local Views  
Policy HC4 London View Management Framework  
Policy HC5 Supporting London's culture and creative industries  
Policy HC6 Supporting the night-time economy  
Policy G1 Green infrastructure  
Policy G5 Urban greening  
Policy G6 Biodiversity and access to nature  
Policy G7 Trees and woodlands  
Policy SI 1 Improving air quality  
Policy SI 2 Minimising greenhouse gas emissions  
Policy SI 3 Energy infrastructure  
Policy SI 4 Managing heat risk  
Policy SI 5 Water infrastructure  
Policy SI 6 Digital connectivity infrastructure  
Policy SI 7 Reducing waste and supporting the circular economy  
Policy SI 8 Waste capacity and net waste self-sufficiency  
Policy SI 12 Flood risk management  
Policy SI 13 Sustainable drainage  
Policy T1 Strategic approach to transport  
Policy T2 Healthy Streets  
Policy T3 Transport capacity, connectivity and safeguarding  
Policy T4 Assessing and mitigating transport impacts  
Policy T5 Cycling  
Policy T6 Car parking  
Policy T6.2 Office parking  
Policy T6.3 Retail parking  
Policy T6.5 Non-residential disabled persons parking  
Policy T7 Deliveries, servicing and construction  
Policy T9 Funding transport infrastructure through planning

### Southwark Plan 2022

ST1 Southwark's Development targets  
ST2 Southwark's Places  
SP2 Southwark Together  
SP3 Great start in life  
SP4 Green and inclusive economy  
SP5 Thriving neighbourhoods and tackling health inequalities  
SP6 Climate Change  
P13 Design of places  
P14 Design quality  
P16 Designing out crime  
P17 Tall buildings

P18 Efficient use of land  
P20 Conservation areas  
P21 Conservation of the historic environment and natural heritage  
P22 Borough views  
P23 Archaeology  
P28 Access to employment and training  
P30 Office and business development  
P31 Affordable workspace  
P35 Town and local centres  
P44 Broadband and digital infrastructure  
P45 Healthy developments  
P47 Community uses  
P49 Public transport  
P50 Highways impacts  
P51 Walking  
P53 Cycling  
P54 Car Parking  
P55 Parking standards for disabled people and the mobility impaired  
P56 Protection of amenity  
P57 Open space  
P59 Green infrastructure  
P60 Biodiversity  
P61 Trees  
P62 Reducing waste  
P64 Contaminated land and hazardous substances  
P65 Improving air quality  
P66 Reducing noise pollution and enhancing soundscapes  
P67 Reducing water use  
P68 Reducing flood risk  
P69 Sustainability standards  
P70 Energy  
NSP19

### Mayors SPD/SPGs

Accessible London: Achieving an Inclusive Environment (October 2014)  
The control of dust and emissions during construction and demolition (July 2014)  
Town Centres (July 2014)  
Character and Context (June 2014)  
Sustainable Design and Construction (April 2014)  
Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy (April 2013)  
London View Management Framework (March 2012)  
Planning for Equality and Diversity in London (October 2007)

### Southwark SPDs/SPGs

Design and Access Statements (2007)  
S106 and CIL (2015) S106 and CIL Addendum (2017)  
Sustainability Assessments (2007)  
Sustainable Design and Construction (2009)  
Sustainable Transport (2009)

## Appendix 3: Planning History

### Relevant Planning History

12/AP/3940 (the Bankside Yards Masterplan): Demolition of existing buildings and the construction of a mixed-use development totalling 144,622 sq. metres GEA comprising 489 flats (Class C3), 45,378 sqm (including basement) of offices (Class B1), 2,627sqm of retail (Classes A1-A5), 1,969sqm of community uses (Class D1) and 1,014sqm of gym (Class D2). New open space including formation of two new east-west routes, new public square, reconfigured vehicular and pedestrian access and works to the public highway with associated works including landscaping and basement car park for 200 cars (including 54 disabled car parking spaces) plus servicing and plant areas. Change of use of the railway arches from a nightclub to retail, gym and community uses. Configuration of the toilet block for retail uses and toilets.

The development contains of 9 new buildings:

Ludgate A: 13 storeys (62.08m AOD), Ludgate B: 49 storeys (169.60m AOD), Ludgate C: 15 storeys (73m AOD), Sampson A: 17 storeys (62.85m AOD), Sampson B: 31 storeys, (112.10m AOD), Sampson C: 27 storeys (98.30m AOD), Sampson D: 14 storeys (60.80m AOD), Sampson E: 5 storeys (24.6m AOD), Sampson F: 6 storeys (28.9m AOD). The application was approved on 28 March 2014.

16/AP/0088: Non-material changes to conditions 3-6 and 8-12 of 12/AP/390 to exclude demolition. Application was approved on 19 February 2016.

16/AP/2806: Non-material amendment to 12/AP/3940 for the reorganisation of the residential layouts to create 29 additional units within the buildings on the Ludgate site, and a related reduction of 29 units from the Sampson House site (no increase to total no.of units) and alterations to the fenestration of the west and north elevations of block LHB to incorporate winter gardens. Application was approved on 17th August 2016.

16/AP/5060: Non-material amendment to 12/AP/3940 for alterations to the layout and extent of the basement area. Approved 19 January 2017.

17/AP/0383: Certificate of Lawful Existing Development to confirm that planning permission 12/AP/3940 was lawfully implemented. Approved 29 March 2017.

17/AP/2286: Minor-material amendment for the variation of condition 2 of 12/AP/3940 to allow for amendments to two consented office buildings which comprise an additional 3 storeys to Ludgate C with design changes and a reduction of 7 storeys to Sampson D, with design changes. Application was approved on 23 November 2017.

18/AP/2851: Non-material amendment to planning permission 17/AP/2286 for variation of Condition 2, approved plans of planning permission 12/AP/3940. Application was approved on 12 December 2018.

20/AP/3361: Non-material amendment to change the wording of condition 12, to allow the condition to be discharged per building. Approved 16 December 2020. This permission relates to planning application 19/AP/1950 (for a variation of 18/AP/1702, which was a minor material amendment to 17/AP/2286).

21/AP/3723: Variation of Condition 1 (Approved Plans) pursuant to planning permission

18/AP/1603 for 'Redevelopment to create two levels of basement and the erection of five buildings ranging from seven to 34 storeys plus plant (heights ranging from 28.9m AOD 123.9m AOD) to provide: 341 dwellings (Class C3); 8,054sqm (GIA) of office space (Class B1); 1,436sqm (GIA) of retail floorspace (Class A1-A4); 904sqm (GIA) of cultural floorspace (Class D1/D2); 16,254sqm (GIA) hotel with up to 126 rooms (Class C1); new open space; reconfigured vehicular and pedestrian access; highway works; landscaping; basement car park for 107 cars (including 29 disabled car parking spaces), plus servicing and plant areas; and works associated and ancillary to the proposed development'. The proposed amendments include: increase in height to 15 (equivalent) storeys; increase in Class E floorspace; amendments to detailed design, scale and massing; enabling works; servicing; public realm and other associated changes ancillary to the development. Under Consideration.

22/AP/0332: Non material amendment to planning permission ref. 18/AP/1603 dated 22nd December 2020 for 'Redevelopment to create two levels of basement and the erection of five buildings ranging from seven to 34 storeys plus plant (heights ranging from 28.9m AOD 123.9m AOD) to provide: 341 dwellings (Class C3); 8,054sqm (GIA) of office space (Class B1); 1,436sqm (GIA) of retail floorspace (Class A1-A4); 904sqm (GIA) of cultural floorspace (Class D1/D2); 16,254sqm (GIA) hotel with up to 126 rooms (Class C1); new open space; reconfigured vehicular and pedestrian access; highway works; landscaping; basement car park for 107 cars (including 29 disabled car parking spaces), plus servicing and plant areas; and works associated and ancillary to the proposed development'. The amendment seeks the following: to amend the description of development and add three new conditions to the planning permission to reference the number of residential units, non-residential floor space and car parking spaces (including disabled) capable of being provided within the approved development. Approved 8th March 2022.

## Appendix 4: Consultation undertaken

**Site notice date:** n/a.

**Press notice date:** 28/07/2022

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

**Neighbour consultation letters sent:** 03/08/2022

### Internal services consulted

Archaeology  
Community Infrastructure Levy Team  
Design and Conservation Team [Formal]  
Local Economy  
Ecology  
Environmental Protection  
Highways Development and Management  
Urban Forester  
Transport Policy  
Section 106 Team

### Statutory and non-statutory organisations

Environment Agency  
Historic England  
London Fire & Emergency Planning Authority  
London Underground  
Natural England - London & South East Region  
Network Rail  
Metropolitan Police Service (Designing Out Crime)  
Thames Water  
Transport for London

### Neighbour and local groups consulted:

Flat 40 River Court Upper Ground	1 Stamford Street London Southwark
Flat 78 River Court Upper Ground	17 Falcon Point Hopton Street London
Flat 70 River Court Upper Ground	16 Falcon Point Hopton Street London
Flat 75 Rennie Court 11 Upper Ground	82 Falcon Point Hopton Street London
Flat 69 Rennie Court 11 Upper Ground	70 Falcon Point Hopton Street London
Flat 56 Rennie Court 11 Upper Ground	58 Hopton Street London Southwark
Flat 40 Rennie Court 11 Upper Ground	Flat 60 Gallery Lofts 69 Hopton Street
Flat 62 69 Hopton Street London	8 Blackfriars Road London Southwark
Flat 56 69 Hopton Street London	7 Blackfriars Road London Southwark
Flat 52 69 Hopton Street London	6 Blackfriars Road London Southwark
Flat 11 69 Hopton Street London	5 Blackfriars Road London Southwark
43 Falcon Point Hopton Street London	Shop 1 Blackfriars Station Hopton Street
42 Falcon Point Hopton Street London	53 Falcon Point Hopton Street London
31 Falcon Point Hopton Street London	Falcon Point Hopton Street London
27 Falcon Point Hopton Street London	Advertising Right Bus Shelter 01280264

Adjacent To Blackfriars Road Southwark Street London  
Picocell 9689 52 Hopton Street London  
Picocell 5915 3-7 Stamford Street London  
Flat 54 69 Hopton Street London  
Flat 24 69 Hopton Street London  
65 Hopton Street London Southwark  
69 Hopton Street London Southwark  
50 Hopton Street London Southwark  
Third Floor 71 Hopton Street London  
31 Rennie Street London Southwark  
Managers Flat Founders Arms 52 Hopton Street  
Fourth Floor 71 Hopton Street London  
Flat 92 Rennie Court 11 Upper Ground  
Unit 2 65 Hopton Street London  
Flat 47 Gallery Lofts 69 Hopton Street  
108 Bankside Lofts 65 Hopton Street London  
104 Bankside Lofts 65 Hopton Street London  
37 Falcon Point Hopton Street London  
Second Floor 71 Hopton Street London  
Flat 3 Rennie Court 11 Upper Ground  
81 Falcon Point Hopton Street London  
Flat 27 Rennie Court 11 Upper Ground  
Flat 57 Rennie Court 11 Upper Ground  
504 Bankside Lofts 65 Hopton Street London  
304 Bankside Lofts 65 Hopton Street London  
315 Bankside Lofts 65 Hopton Street London  
209 Bankside Lofts 65 Hopton Street London  
606-607 Bankside Lofts 65 Hopton Street London  
Public Convenience Hopton Street London  
Flat 48 River Court Upper Ground  
Flat 16 River Court Upper Ground  
Flat 51 River Court Upper Ground  
Flat 99 Rennie Court 11 Upper Ground  
Flat 66 Rennie Court 11 Upper Ground  
Flat 50 Rennie Court 11 Upper Ground  
Flat 33 Rennie Court 11 Upper Ground  
410 Bankside Lofts 65 Hopton Street London

Flat 59 Rennie Court 11 Upper Ground  
1 Falcon Point Hopton Street London  
Flat 72 69 Hopton Street London  
Flat 33 69 Hopton Street London  
Flat 95 Rennie Court 11 Upper Ground  
Flat 76 Rennie Court 11 Upper Ground  
Flat 71 Rennie Court 11 Upper Ground  
Flat 68 Rennie Court 11 Upper Ground  
39 Falcon Point Hopton Street London  
Flat 8 River Court Upper Ground  
Flat 2 Rennie Court 11 Upper Ground  
Flat 1 Rennie Court 11 Upper Ground  
Flat 80 River Court Upper Ground  
Flat 74 River Court Upper Ground  
Living Accommodation The Doggetts Blackfriars Road  
110 Bankside Lofts 65 Hopton Street London  
106 Bankside Lofts 65 Hopton Street London  
105 Bankside Lofts 65 Hopton Street London  
505 Bankside Lofts 65 Hopton Street London  
503 Bankside Lofts 65 Hopton Street London  
414 Bankside Lofts 65 Hopton Street London  
406 Bankside Lofts 65 Hopton Street London  
312 Bankside Lofts 65 Hopton Street London  
308 Bankside Lofts 65 Hopton Street London  
Flat 55 River Court Upper Ground  
Flat 27 River Court Upper Ground  
Flat 26 River Court Upper Ground  
Flat 24 River Court Upper Ground  
Flat 2 River Court Upper Ground  
Flat 86 River Court Upper Ground  
Flat 64 River Court Upper Ground  
Flat 62 River Court Upper Ground  
Flat 97 Rennie Court 11 Upper Ground  
Flat 88 Rennie Court 11 Upper Ground  
Flat 36 Rennie Court 11 Upper Ground  
Flat 34 Rennie Court 11 Upper Ground  
Flat 30 Rennie Court 11 Upper Ground  
Flat 23 Rennie Court 11 Upper Ground  
Flat 19 Rennie Court 11 Upper Ground

Flat 71 69 Hopton Street London  
Flat 22 69 Hopton Street London  
7 Falcon Point Hopton Street London  
50 Falcon Point Hopton Street London  
4 Falcon Point Hopton Street London  
29 Falcon Point Hopton Street London  
11 Falcon Point Hopton Street London  
61 Falcon Point Hopton Street London  
Street Record Rennie Street London  
First Floor 71 Hopton Street London  
4 Blackfriars Road London Southwark  
109 Bankside Lofts 65 Hopton Street  
London  
107 Bankside Lofts 65 Hopton Street  
London  
201 Bankside Lofts 65 Hopton Street  
London  
Flat 91 Rennie Court 11 Upper Ground  
Flat 24 Rennie Court 11 Upper Ground  
Bankside Hotel 2 Blackfriars Road  
London  
9 Falcon Point Hopton Street London  
Flat 44 Rennie Court 11 Upper Ground  
Flat 4 Rennie Court 11 Upper Ground  
30 Falcon Point Hopton Street London  
28 Falcon Point Hopton Street London  
Flat 23 69 Hopton Street London  
69 Falcon Point Hopton Street London  
63 Falcon Point Hopton Street London  
Flat 98 Rennie Court 11 Upper Ground  
Flat 64 Rennie Court 11 Upper Ground  
49 Falcon Point Hopton Street London  
36 Falcon Point Hopton Street London  
33 Falcon Point Hopton Street London  
Flat 39 River Court Upper Ground  
Flat 36 River Court Upper Ground  
Flat 22 Rennie Court 11 Upper Ground  
Flat 12 Rennie Court 11 Upper Ground  
60-62 Hopton Street London Southwark  
Flat 18 River Court Upper Ground  
Flat 1 River Court Upper Ground  
412 Bankside Lofts 65 Hopton Street  
London  
309 Bankside Lofts 65 Hopton Street  
London  
215 Bankside Lofts 65 Hopton Street  
London  
Flat 50 Gallery Lofts 69 Hopton Street  
413 Bankside Lofts 65 Hopton Street

London  
301 Bankside Lofts 65 Hopton Street  
London  
Flat 43 River Court Upper Ground  
Flat 29 River Court Upper Ground  
Flat 23 River Court Upper Ground  
Flat 87 River Court Upper Ground  
Flat 81 River Court Upper Ground  
Flat 76 River Court Upper Ground  
Flat 67 River Court Upper Ground  
Flat 85 Rennie Court 11 Upper Ground  
Flat 31 Rennie Court 11 Upper Ground  
Flat 29 Rennie Court 11 Upper Ground  
Flat 13 Rennie Court 11 Upper Ground  
Flat 35 69 Hopton Street London  
Flat 14 69 Hopton Street London  
55 Falcon Point Hopton Street London  
47 Falcon Point Hopton Street London  
40 Falcon Point Hopton Street London  
34 Falcon Point Hopton Street London  
3 Falcon Point Hopton Street London  
25 Falcon Point Hopton Street London  
22 Falcon Point Hopton Street London  
21 Falcon Point Hopton Street London  
13 Falcon Point Hopton Street London  
76 Falcon Point Hopton Street London  
65 Falcon Point Hopton Street London  
62 Falcon Point Hopton Street London  
58 Falcon Point Hopton Street London  
56 Hopton Street London Southwark  
Apartment 222 1 Blackfriars Road  
London  
Part Ground Floor Sampson House 64  
Hopton Street  
Flat 69 Gallery Lofts 69 Hopton Street  
Flat 48 Gallery Lofts 69 Hopton Street  
Total Fit Gym 1 Blackfriars Road London  
24 Falcon Point Hopton Street London  
Flat 65 River Court Upper Ground  
Flat 74 Rennie Court 11 Upper Ground  
Flat 63 69 Hopton Street London  
80 Falcon Point Hopton Street London  
Flat 90 Rennie Court 11 Upper Ground  
26 Falcon Point Hopton Street London  
51 Falcon Point Hopton Street London  
Flat 32 Rennie Court 11 Upper Ground  
Flat 6 River Court Upper Ground  
306 Bankside Lofts 65 Hopton Street  
London

310 Bankside Lofts 65 Hopton Street  
London  
307 Bankside Lofts 65 Hopton Street  
London  
302 Bankside Lofts 65 Hopton Street  
London  
214 Bankside Lofts 65 Hopton Street  
London  
211 Bankside Lofts 65 Hopton Street  
London  
208 Bankside Lofts 65 Hopton Street  
London  
Flat 52 River Court Upper Ground  
Flat 47 River Court Upper Ground  
Flat 84 River Court Upper Ground  
Flat 73 River Court Upper Ground  
Flat 58 River Court Upper Ground  
Flat 93 Rennie Court 11 Upper Ground  
Flat 82 Rennie Court 11 Upper Ground  
Flat 38 Rennie Court 11 Upper Ground  
Flat 26 Rennie Court 11 Upper Ground  
Flat 41 69 Hopton Street London  
56 Falcon Point Hopton Street London  
Blackfriars Railway Bridge Bankside  
London  
Shop 2 Blackfriars Station Hopton Street  
Flat 62 Rennie Court 11 Upper Ground  
Flat 5 Rennie Court 11 Upper Ground  
Flat 42 Rennie Court 11 Upper Ground  
12 Falcon Point Hopton Street London  
Flat 53 69 Hopton Street London  
Flat 13 69 Hopton Street London  
60 Falcon Point Hopton Street London  
Flat 87 Rennie Court 11 Upper Ground  
Flat 79 Rennie Court 11 Upper Ground  
Flat 34 River Court Upper Ground  
Flat 18 Rennie Court 11 Upper Ground  
407 Bankside Lofts 65 Hopton Street  
London  
303 Bankside Lofts 65 Hopton Street  
London  
Sampson House 64 Hopton Street  
London  
603 Bankside Lofts 65 Hopton Street  
London  
409 Bankside Lofts 65 Hopton Street  
London  
203 Bankside Lofts 65 Hopton Street  
London

Doggetts Coat And Badge Blackfriars  
Bridge Blackfriars Road  
Flat 38 River Court Upper Ground  
Flat 21 River Court Upper Ground  
Flat 69 River Court Upper Ground  
Flat 59 River Court Upper Ground  
Flat 96 Rennie Court 11 Upper Ground  
Flat 94 Rennie Court 11 Upper Ground  
Flat 89 Rennie Court 11 Upper Ground  
Flat 70 Rennie Court 11 Upper Ground  
Flat 63 Rennie Court 11 Upper Ground  
Flat 53 Rennie Court 11 Upper Ground  
Flat 39 Rennie Court 11 Upper Ground  
Flat 28 Rennie Court 11 Upper Ground  
Flat 21 Rennie Court 11 Upper Ground  
Flat 73 69 Hopton Street London  
Flat 34 Gallery Lofts 69 Hopton Street  
43 Holland Street London Southwark  
45 Falcon Point Hopton Street London  
38 Falcon Point Hopton Street London  
2 Falcon Point Hopton Street London  
84 Falcon Point Hopton Street London  
72 Falcon Point Hopton Street London  
Flat 51 And 55 69 Hopton Street London  
Blackfriars Station Hopton Street London  
Flat 31 River Court Upper Ground  
Flat 58 Rennie Court 11 Upper Ground  
14 Falcon Point Hopton Street London  
Flat 53 River Court Upper Ground  
Flat 17 River Court Upper Ground  
Flat 78 Rennie Court 11 Upper Ground  
Flat 61 69 Hopton Street London  
111 Bankside Lofts 65 Hopton Street  
London  
Flat 8 Rennie Court 11 Upper Ground  
Flat 54 Rennie Court 11 Upper Ground  
Flat 43 69 Hopton Street London  
Flat 36 Gallery Lofts 69 Hopton Street  
Flat 16 69 Hopton Street London  
74 Falcon Point Hopton Street London  
Apartment 223 1 Blackfriars Road  
London  
Flat 28 River Court Upper Ground  
Flat 25 Rennie Court 11 Upper Ground  
Flat 15 Rennie Court 11 Upper Ground  
Flat 82 River Court Upper Ground  
Flat 77 River Court Upper Ground  
605 Bankside Lofts 65 Hopton Street  
London

601-602 Bankside Lofts 65 Hopton Street London  
512 Bankside Lofts 65 Hopton Street London  
404 Bankside Lofts 65 Hopton Street London  
Atm Outside Doggetts Ph Blackfriars Road London  
Flat 40 Gallery Lofts 69 Hopton Street Street Record Invicta Plaza London  
213 Bankside Lofts 65 Hopton Street London  
Advertising Right Corner Of Blackfriars Road Stamford Street London  
702-703 Bankside Lofts 65 Hopton Street London  
103 Bankside Lofts 65 Hopton Street London  
513 Bankside Lofts 65 Hopton Street London  
403 Bankside Lofts 65 Hopton Street London  
204 Bankside Lofts 65 Hopton Street London  
Flat 50 River Court Upper Ground  
Flat 3 River Court Upper Ground  
Flat 14 River Court Upper Ground  
Flat 79 River Court Upper Ground  
Flat 72 River Court Upper Ground  
Flat 86 Rennie Court 11 Upper Ground  
Flat 77 Rennie Court 11 Upper Ground  
Flat 67 Rennie Court 11 Upper Ground  
Flat 9 Rennie Court 11 Upper Ground  
Flat 7 Rennie Court 11 Upper Ground  
Flat 55 Rennie Court 11 Upper Ground  
Flat 52 Rennie Court 11 Upper Ground  
Flat 49 Rennie Court 11 Upper Ground  
Flat 46 Rennie Court 11 Upper Ground  
Flat 43 Rennie Court 11 Upper Ground  
Flat 20 Rennie Court 11 Upper Ground  
Flat 11 Rennie Court 11 Upper Ground  
Flat 31 69 Hopton Street London  
Flat 21 69 Hopton Street London  
The Mad Hatter 3-7 Stamford Street London  
75 Falcon Point Hopton Street London  
Viewing Lounge 3 Blackfriars Road London  
Unit 1 65 Hopton Street London

Blackfriars Bridge South Garden  
Blackfriars Road London  
32 Falcon Point Hopton Street London  
408 Bankside Lofts 65 Hopton Street London  
Street Record Blackfriars Road London  
23 Falcon Point Hopton Street London  
Flat 49 River Court Upper Ground  
Flat 60 Rennie Court 11 Upper Ground  
15 Falcon Point Hopton Street London  
Flat 46 69 Hopton Street London  
Flat 84 Rennie Court 11 Upper Ground  
44 Falcon Point Hopton Street London  
Flat 44 River Court Upper Ground  
Flat 41 River Court Upper Ground  
Flat 30 River Court Upper Ground  
Flat 25 River Court Upper Ground  
Flat 20 River Court Upper Ground  
Flat 68 River Court Upper Ground  
Flat 66 River Court Upper Ground  
804 Bankside Lofts 65 Hopton Street London  
704 Bankside Lofts 65 Hopton Street London  
508 Bankside Lofts 65 Hopton Street London  
402 Bankside Lofts 65 Hopton Street London  
314 Bankside Lofts 65 Hopton Street London  
902 Bankside Lofts 65 Hopton Street London  
802-803 Bankside Lofts 65 Hopton Street London  
604 Bankside Lofts 65 Hopton Street London  
506-507 Bankside Lofts 65 Hopton Street London  
502 Bankside Lofts 65 Hopton Street London  
411 Bankside Lofts 65 Hopton Street London  
202 Bankside Lofts 65 Hopton Street London  
Flat 42 River Court Upper Ground  
Flat 4 River Court Upper Ground  
Flat 32 River Court Upper Ground  
Flat 19 River Court Upper Ground  
Flat 13 River Court Upper Ground

Flat 83 Rennie Court 11 Upper Ground  
Flat 80 Rennie Court 11 Upper Ground  
Flat 72 Rennie Court 11 Upper Ground  
Flat 6 Rennie Court 11 Upper Ground  
Flat 16 Rennie Court 11 Upper Ground  
Flat 42 69 Hopton Street London  
Flat 32 69 Hopton Street London  
8 Falcon Point Hopton Street London  
48 Falcon Point Hopton Street London  
35 Falcon Point Hopton Street London  
10 Falcon Point Hopton Street London  
79 Falcon Point Hopton Street London  
78 Falcon Point Hopton Street London  
32 56 Hopton Street London  
Picocell 35438 Sampson House 64  
Hopton Street  
Cycle Hire Docking Station Hopton  
Street London  
9 Blackfriars Road London Southwark  
Arbor House 255 Blackfriars Road  
London  
5 Falcon Point Hopton Street London  
18 Falcon Point Hopton Street London  
Flat 37 River Court Upper Ground  
Flat 12 River Court Upper Ground  
Flat 75 River Court Upper Ground  
1001 Bankside Lofts 65 Hopton Street  
London  
Flat 85 River Court Upper Ground  
205 Bankside Lofts 65 Hopton Street  
London  
Flat 47 Rennie Court 11 Upper Ground  
Bon Voyage Blackfriars Station Hopton  
Street  
57 Falcon Point Hopton Street London  
Flat 60 River Court Upper Ground  
Flat 57 River Court Upper Ground  
Flat 73 Rennie Court 11 Upper Ground  
46 Falcon Point Hopton Street London  
41 Falcon Point Hopton Street London  
Flat 35 Rennie Court 11 Upper Ground  
Flat 54 River Court Upper Ground  
Flat 71 River Court Upper Ground  
501 Bankside Lofts 65 Hopton Street  
London  
210 Bankside Lofts 65 Hopton Street  
London  
Bt Kiosk Outside The Doggett Coat And  
Badge Blackfriars Road London

Railway Bridge Southwark Street London  
Mad Hatter Hotel 3-7 Stamford Street  
London  
River Court Upper Ground London  
Rennie Court 11 Upper Ground London  
112 Bankside Lofts 65 Hopton Street  
London  
901 Bankside Lofts 65 Hopton Street  
London  
701-801 Bankside Lofts 65 Hopton  
Street London  
509-510 Bankside Lofts 65 Hopton  
Street London  
415 Bankside Lofts 65 Hopton Street  
London  
405 Bankside Lofts 65 Hopton Street  
London  
401 Bankside Lofts 65 Hopton Street  
London  
313 Bankside Lofts 65 Hopton Street  
London  
Flat 7 River Court Upper Ground  
Flat 35 River Court Upper Ground  
Flat 11 River Court Upper Ground  
Flat 10 River Court Upper Ground  
Flat 61 River Court Upper Ground  
Flat 65 Rennie Court 11 Upper Ground  
Flat 61 Rennie Court 11 Upper Ground  
Flat 48 Rennie Court 11 Upper Ground  
Flat 45 Rennie Court 11 Upper Ground  
71 Hopton Street London Southwark  
Flat 64 69 Hopton Street London  
Flat 45 69 Hopton Street London  
Flat 44 69 Hopton Street London  
Flat 12 69 Hopton Street London  
54 Hopton Street London Southwark  
52 Falcon Point Hopton Street London  
19 Falcon Point Hopton Street London  
73 Falcon Point Hopton Street London  
68 Falcon Point Hopton Street London  
59 Falcon Point Hopton Street London  
67 Hopton Street London Southwark  
Flat 38 Gallery Lofts 69 Hopton Street  
102 Bankside Lofts 65 Hopton Street  
London  
511 Bankside Lofts 65 Hopton Street  
London  
64 Falcon Point Hopton Street London  
Flat 83 River Court Upper Ground

Flat 41 Rennie Court 11 Upper Ground  
67 Falcon Point Hopton Street London  
Flat 14 Rennie Court 11 Upper Ground  
54 Falcon Point Hopton Street London  
Picocell Gln8238 3-7 Stamford Street  
London  
Flat 51 Rennie Court 11 Upper Ground  
Flat 37 Rennie Court 11 Upper Ground  
20 Falcon Point Hopton Street London  
83 Falcon Point Hopton Street London  
77 Falcon Point Hopton Street London  
71 Falcon Point Hopton Street London  
66 Falcon Point Hopton Street London  
Flat 81 Rennie Court 11 Upper Ground  
6 Falcon Point Hopton Street London  
Flat 46 River Court Upper Ground  
Flat 10 Rennie Court 11 Upper Ground  
Flat 22 River Court Upper Ground  
Flat 15 River Court Upper Ground  
Flat 63 River Court Upper Ground  
115 Bankside Lofts 65 Hopton Street  
London  
113 Bankside Lofts 65 Hopton Street  
London  
311 Bankside Lofts 65 Hopton Street  
London  
207 Bankside Lofts 65 Hopton Street

London  
Ground Floor 71 Hopton Street London  
Blackfriars Bridge Blackfriars Road  
London  
Flat 65 Gallery Lofts 69 Hopton Street  
Founders Arms 52 Hopton Street  
London  
101 Bankside Lofts 65 Hopton Street  
London  
1101 Bankside Lofts 65 Hopton Street  
London  
705 Bankside Lofts 65 Hopton Street  
London  
305 Bankside Lofts 65 Hopton Street  
London  
212 Bankside Lofts 65 Hopton Street  
London  
Railway Arch 1 Invicta Plaza London  
206 Bankside Lofts 65 Hopton Street  
London  
114 Bankside Lofts 65 Hopton Street  
London  
Flat 9 River Court Upper Ground  
Flat 56 River Court Upper Ground  
Flat 5 River Court Upper Ground  
Flat 45 River Court Upper Ground

**Re-consultation:**

## **Appendix 5: Consultation responses received**

### **Internal services**

Archaeology  
Design and Conservation Team [Formal]  
Ecology  
Highways Development and Management  
Urban Forester  
Transport Policy

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

Environment Agency  
London Underground  
Network Rail  
Metropolitan Police Service (Designing O  
Thames Water

### **Neighbour and local groups consulted:**

London River House Royal Pier Road Gravesend, Kent