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Item No. 5.2	Classification: Open	Date: 8 March 2023	Meeting Name: Planning Committee
Report title:	<p>Development Management planning application: Application 22/AP/3049 for: Full Planning Application</p> <p>Address: 160 BLACKFRIARS ROAD, LONDON SE1</p> <p>Proposal: Minor material amendments by variation of Condition 1 'Approved Plans' and Condition 30 'Number of Hotel Bedrooms' of planning permission ref. 20/AP/0556 (Erection of an eight storey building with basement, comprising a hotel (Class C1), flexible commercial or community unit (Class B1/D1), retail floorspace (Class A1/A3), creation of public space, landscaping and associated works. Works to the existing office building at ground and roof levels (including a new rooftop terrace, balustrades and PV panels); elevational alterations; and alterations associated with the creation of a new entrance on the Blackfriars Road elevation).</p> <p>The proposed changes are to:</p> <ul style="list-style-type: none"> • increase the number of hotel bedrooms by 53 to 222 with revised layout; • make changes to the design (including changes to the footprint and massing by extending into the south-eastern corner near to the Webber Street boundary and into the northern corners behind the office building, and changes to windows) that result in an increase of 292sqm GEA of hotel floorspace; • revise the red line application site to take in part of the ground floor of the existing building; • increase the affordable workspace area by 96sqm; • revise the existing ground floor office, and the layout of the hotel entrance and reception area; amend the frontage to the courtyard space; • and amend the energy strategy. 		
Ward(s) or groups affected:	Borough and Bankside		
From:	Director of Planning and Growth		
Application Start Date	13/09/22	PPA Expiry Date	n/a
Earliest Decision Date	14/10/22		

RECOMMENDATIONS

1. That an amended planning permission be granted subject to revised conditions

to those imposed on the 2020 permission, and the completion of a deed of variation to the original legal agreement.

2. That in the event that the requirements of paragraph 1 above are not met by 8 June 2023, the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 174.

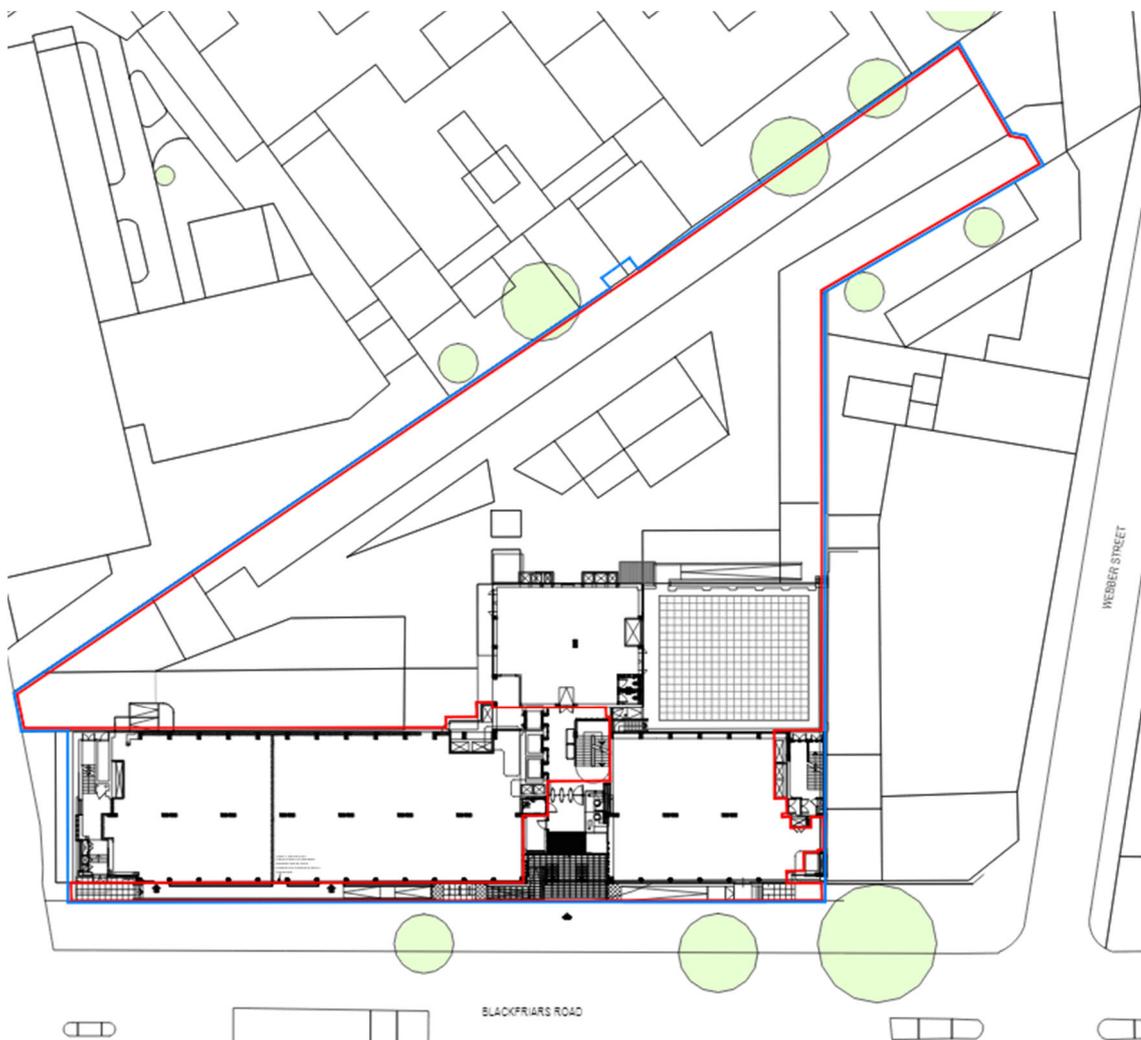
EXECUTIVE SUMMARY

3. This minor material amendment (section 73) application seeks changes to a hotel-led scheme that was approved permission by ref. 20/AP/0556 in September 2020. It seeks to increase the number of hotel rooms, make changes to the footprint and appearance of the building, and alter the ground floor layout.
4. Eight objections were received from the community including objections to a hotel on this site, the increased numbers of hotel rooms the changes to the design, how the site would be better used by other uses, the impact on neighbour amenity and increased transport effects from having more hotel rooms. One comment in support was received. Internal and external consultees did not raise objections to the proposal.
5. While the proposed hotel rooms are smaller than the approved scheme as part of the redesign to include more rooms, the overall quality of the accommodation would remain acceptable and the hotel reception would continue to provide publicly accessible facilities. The public benefit of the new courtyard would remain as the approved scheme, and an enlarged affordable workspace and community unit is proposed. The proposed amendments do not substantially increase the massing of the hotel building and it retains the architectural style of the approved building; the scheme remains of an acceptable design that would not harm the townscape. The impacts on daylight and sunlight to surrounding properties are similar to those of the approved scheme. No additional transport mitigation measures (such as financial contributions, highway works and management plans) are necessary beyond those secured in the 2020 permission.
6. The proposed conditions have updated those on the 2020 permission to reflect the changes proposed, the conditions that have been partly approved for works at the front of the site, and to reflect the recently adopted development plan policies. A deed of variation would be necessary to amend certain clauses and definitions within the 2020 section 106 agreement.
7. Subject to the completion of a deed of variation and the recommended conditions, the application is recommended for approval to grant planning permission for the revised scheme.

BACKGROUND INFORMATION

Site location and description

8. The application site is the existing office building, rear car park and service yard located at 160 Blackfriars Road. The existing nine-storey building is known as Friars House, and is occupied by Class E retail uses at ground floor level and Class E office space on all upper levels. The existing building is broadly 'T' shaped and extends along the Blackfriars Road frontage of the 0.42 hectare triangular plot. There is a large car park (67 parking spaces) and service yard to the rear on the eastern side, which is accessed from Pocock Street and extends to the south-east, up to the rear of the Webber Street properties.
9. The site's main elevation fronts Blackfriars Road, and is bound by Pocock Street to the north; Manna Ash House (student halls of residence) to the north east; Friars Primary Foundation School to the east; and The Priory and Blackfriars Foundry to the south on Webber Street.

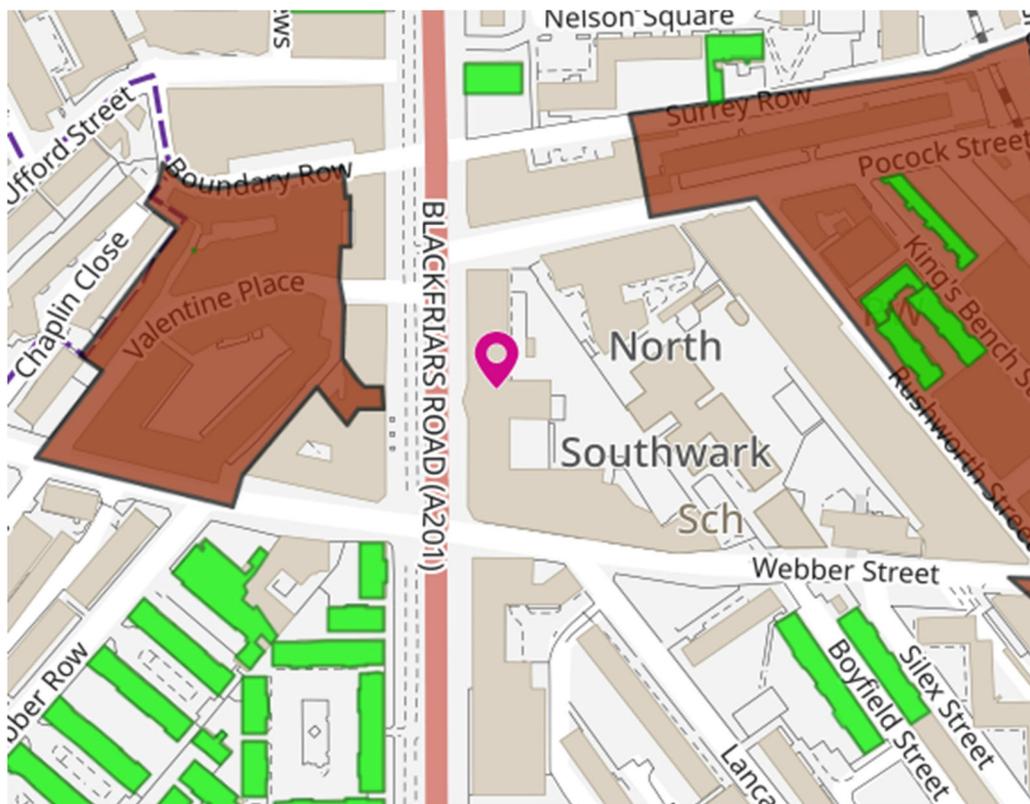


Site plan (north is to the left)

10. The area comprises a variety of building heights and uses, as well as a mix of modern and heritage buildings. To the north of the site, Globe View House has ten storeys (in residential use) and to the north-east Manna Ash House has eight

storeys (student housing and ground floor offices). The school to the east has single storey buildings and playgrounds. To the east and south on Rushworth Street and Webber Street the buildings are typically lower rise, in the region of three- to five-storeys in height that provide office and residential uses. The recently constructed residential-led buildings on Rushworth Street are six- and eight-storeys.

11. The site is to the south of, and separate from, the established tall buildings cluster at the northern end of Blackfriars Road.
12. The site forms the majority of Southwark Plan site allocation NSP17 'Friars House, 157-168 Blackfriars Road'. The site is within the Central Activities Zone, the Bankside and Borough district town centre, the Bankside, Borough and London Bridge Opportunity Area, and South Bank Strategic Cultural Quarter. It is also within the air quality management area and flood zone 3.
13. Blackfriars Road is a classified A road with a cycle superhighway and several bus routes which, together with the proximity of both Waterloo East railway station and Southwark Underground station, give the site a high PTAL of 6B indicating an excellent level of access to public transport.



Map of the site (with pin) and nearby heritage assets

14. The site is not located within a conservation area nor are there any listed buildings nor structures within the application site. It is close to two conservation areas, the Valentine Place Conservation Area 30m to the west, and the King's Bench Conservation Area 50m to the north-east (shown in brown in the diagram above). The Blackfriars Foundry (on the corner with Webber Street) is a building

of townscape merit. The site is close to the following listed buildings, shown in green on the diagram above:

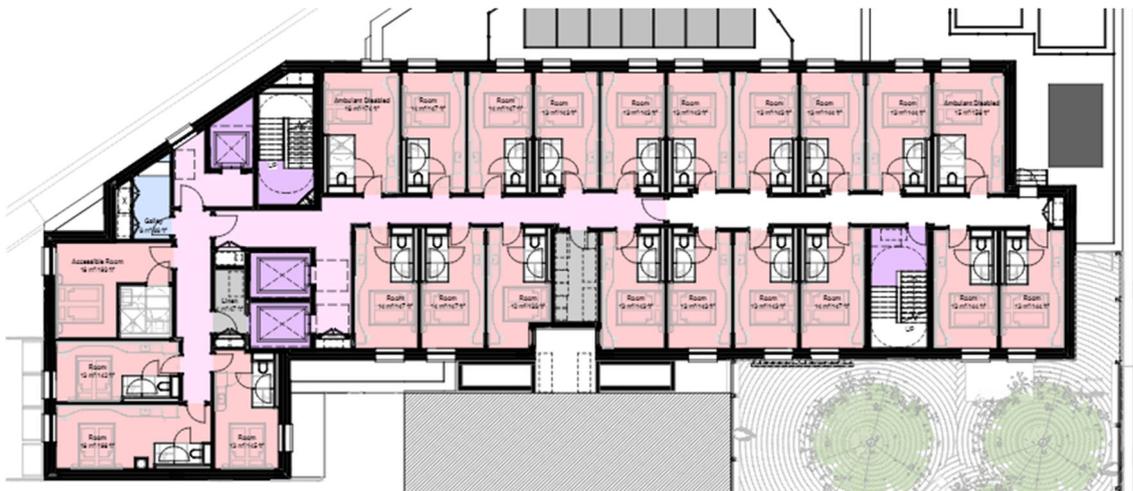
- The grade II listed Former Sons of Temperance Friendly Society Building, 60m to the north on Blackfriars Road.
- The grade II listed Blackfriars Settlement and its railings on Surrey Row and Nelson Square, 100m to the north-east.
- The grade II listed Ripley, Chadwick and Merrow Houses on Rushworth Street (100m to the east of the site), and the Drapers Almshouses on Glasshill Street (130m to the east).
- The grade II listed Albury House and Clandon House – 50m to the south-east of the site on Boyfield Street.
- The grade II listed Peabody Buildings – 40m to the south-west of the site on Blackfriars Road.

Details of proposal

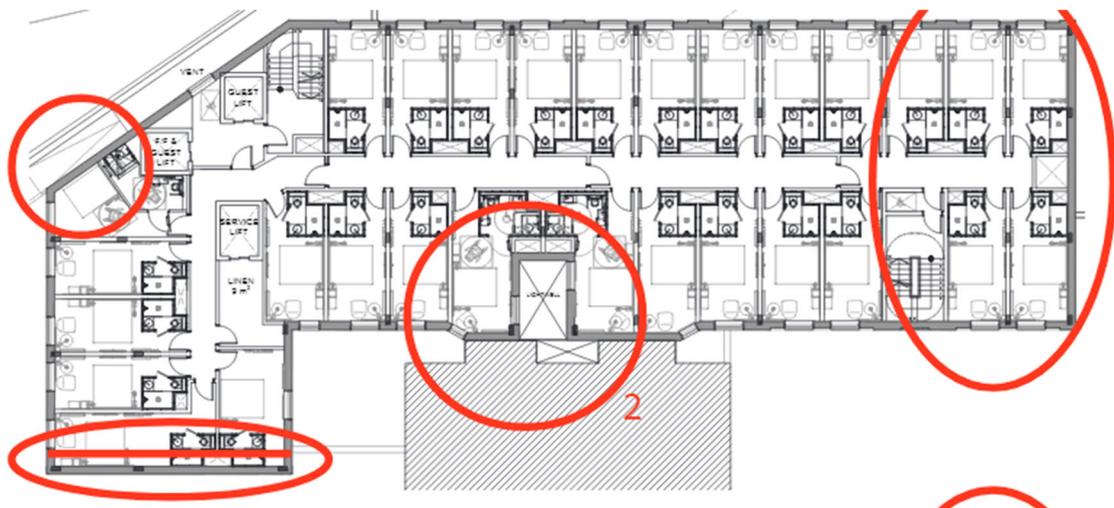
15. This minor material amendment application seeks to make revisions to the permission for a hotel-led scheme on this site, approved by reference 20/AP/0556. The proposed changes are to the physical form of the approved hotel building, its interior layout and to make changes to the ground floor of the existing office building. The 2020 permission has been implemented for the works to the Blackfriars Road frontage in May 2022. Work has not started for the hotel building and there are pre-commencement conditions and planning obligations that remain to be discharged before these works can lawfully commence.
16. Since the 2020 permission was granted, the intended hotel operator has changed (from Ruby Hotels to Motel One) which has led to a revised detailed design of the hotel to suit Motel One's requirements. The main changes proposed in this application are summarised here:
 - 1) An increase in the number of hotel bedrooms from 169 to 222.
 - 2) Revisions to the internal layout, the footprint and massing of the hotel building.
 - 3) Changes to the external appearance from the revised massing, and additional windows.
 - 4) Changes to the ground floor layout of the hotel entrance, lobby and reception.
 - 5) Increase in the size of the flexible affordable workspace and community use unit.
 - 6) Amendments to the layout around the new public courtyard.
 - 7) Revised energy strategy.
17. These proposed revisions will be each be described in more detail.
18. 1) An increase in number of hotel bedrooms from 169 to 222 (adding 53 bedrooms) is sought, which is achieved mainly by revising the internal layout of each floor of the approved hotel building, but also with increases in the footprint and massing of the building. A typical floor of the approved scheme would have provided 23 hotel bedrooms; this would increase to 29 bedrooms on a typical

floor of the proposed scheme. The number of bedrooms on the ground floor would increase from 11 to 23. The external changes are described below alongside floorplan diagrams.

19. 2) Changes are proposed to the footprint and massing of the approved hotel building. While the overall width of the hotel building remains the same (at 48m) and depth remains the same (14.5m), the irregular shape of the approved floorplan of the first floor upwards would be squared off. In floorplan terms these are circled in the images below and include;
- infilling a nook on the north-eastern side (circled in the top left of the image);
 - for the northern end to extend 1m closer to the rear of the office building (circled bottom left in the image);
 - to change the lightwell created where the hotel building touches the office building (ringed in the centre of the image); and
 - to infill the south-eastern corner (shown on the right of the image) from first to sixth floor levels. This infill measures 2.8m wide by 6.0m deep, and 18.2m high above the ground floor roof.



A typical floorplan of the approved scheme

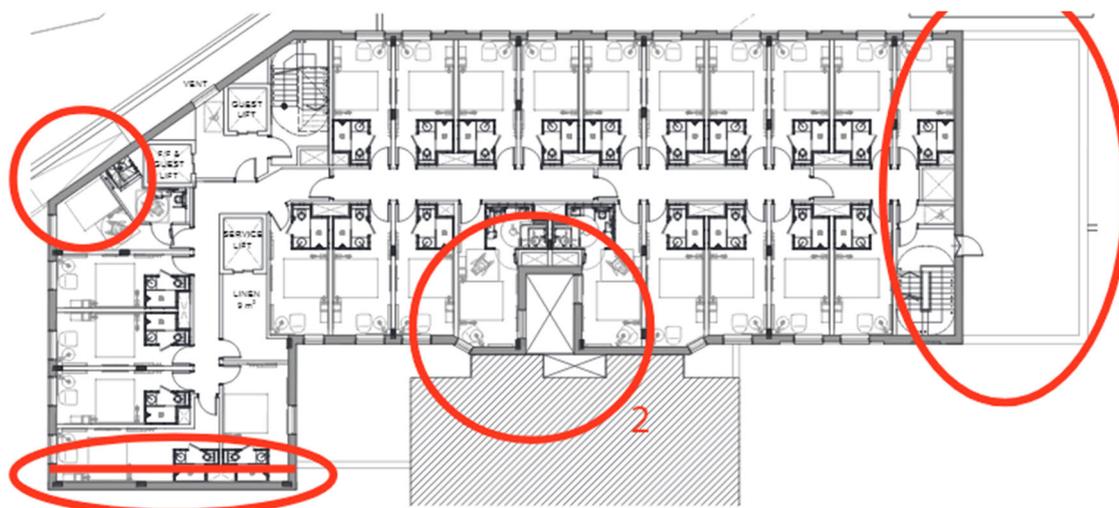


Proposed floorplan with the changes circled

20. On the seventh floor the southern end of the building would extend 60cm further, as shown by the right-hand circle below.



Approved seventh floor plan



Proposed seventh floor plan

21. 3) The proposed changes to the floorplans described above have associated changes to the external appearance from the revised massing, particularly to square off the south-eastern corner of the first to sixth floor, and because the increased number of bedrooms requires more windows around the building. The roof plant enclosure would extend on the north-eastern side to follow the revised floorplan above. The maximum height of the building at 28.1m does not change from the approved scheme.
22. The visuals below of the approved and proposed schemes indicate the changes as seen from the rear of the site within the adjoining school grounds (which are not publicly accessible) and from the Blackfriars Road frontage at the junction with Webber Street.



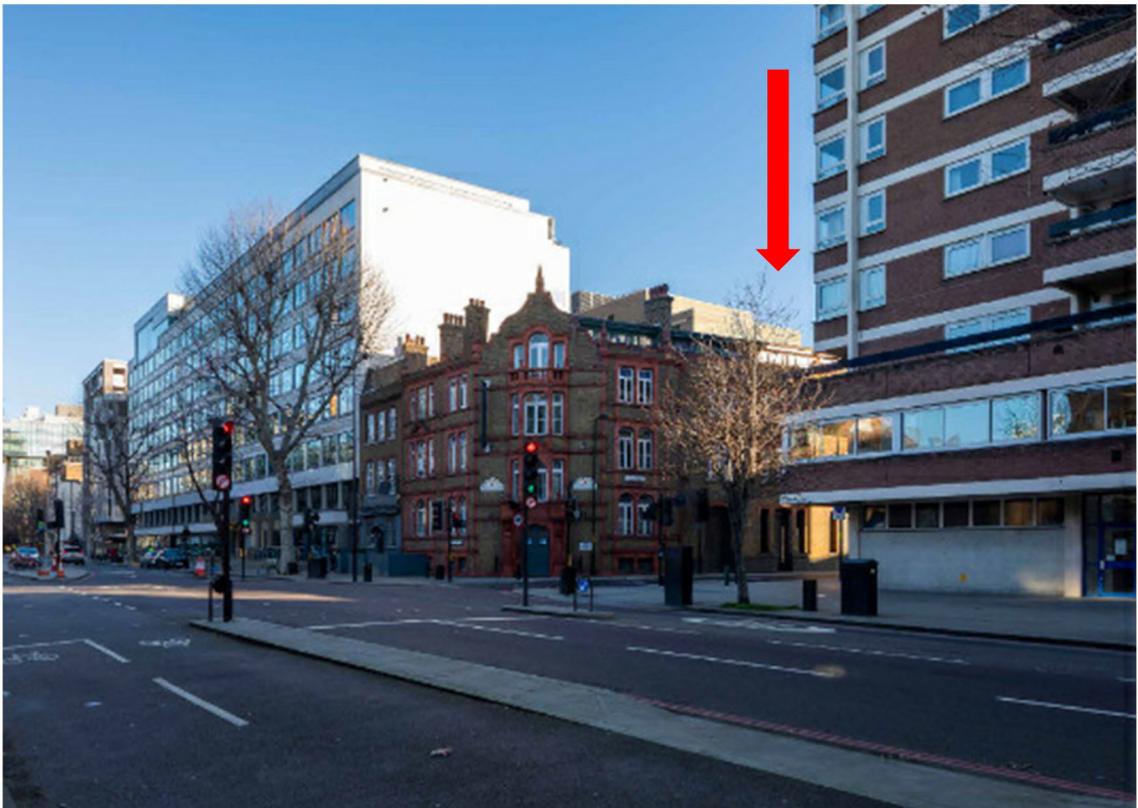
Approved scheme as viewed from within the adjoining school's grounds



Proposed scheme viewed from the same school location, showing the additional width of the eastern façade (at the left-hand end), additional windows and enlarged roof plant

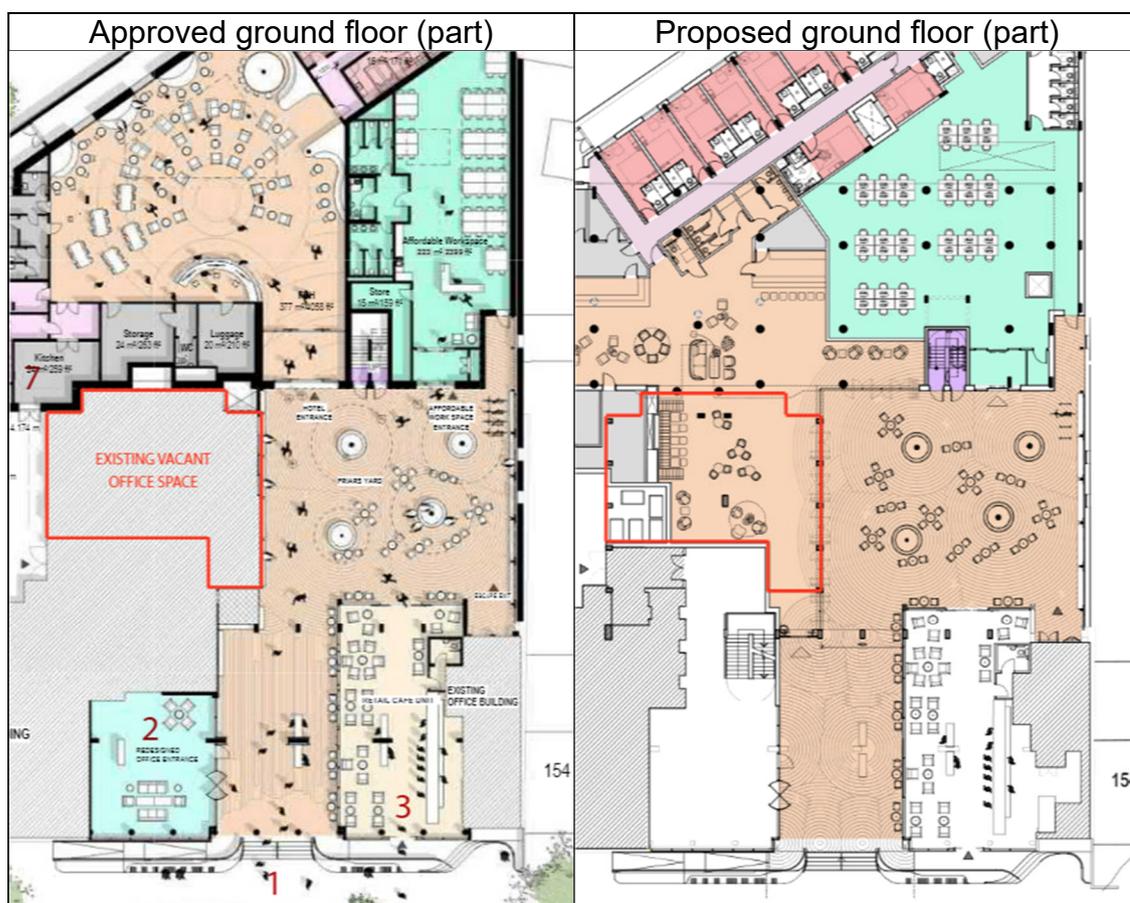


Approved scheme viewed from the southern side of the Blackfriars Road/Webber Street junction



Proposed scheme viewed from the same location, showing the greater massing above the roof of Blackfriars Foundry (on the right-hand side)

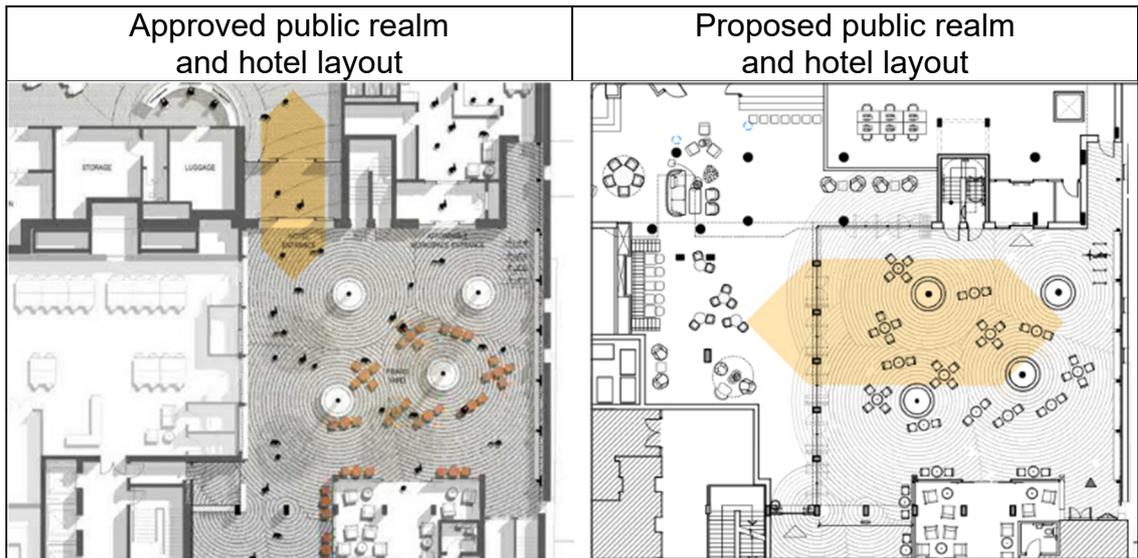
23. 4) The proposed revisions to the ground floor layout would revise the hotel entrance, lobby and reception, and provide more active frontage to the public courtyard.
24. Part of the ground floor of the existing office building (135sqm) would be incorporated within the hotel reception, as indicated by the red line in the drawings below, and which requires a small change to the application site boundary to include this area. It would allow the hotel's front door to move closer to the street frontage, and the hotel reception area would open onto two sides of the public courtyard created behind the existing office building. Some of the proposed additional hotel bedrooms would be located on the ground floor, so that the hotel reception area and back of house facilities are reshaped. The existing offices again would have a reception area at the street frontage.



25. 5) As part of the ground floor changes, the flexible affordable workspace or community use unit would increase in size from the approved 223sqm to 319sqm (an increase of 96sqm). This is shown in the top right of the each of the two diagrams above, in its approved and proposed sizes.
26. In the approved scheme this unit was approved as a flexible use to be either Class B1 or Class D1 use, and the s106 agreement requires it to be affordable workspace if used as Class B1 with a preferred tenant Artists' Studio Company (ASC). As part of the current application, the flexible use of this unit would remain and the applicant would like to list Affordable Workspace Partnership (AWP) as

an eligible tenant. AWP is a subsidiary company of ASC, and deliver bespoke and affordable designer-maker workstations for fashion designers, textile designers, furniture designers, product designers and illustrators.

27. 6) The approved scheme included a new public courtyard at the rear of the existing building, which provided access to the hotel and flexible use unit. In the current scheme, the size and shape of the courtyard remains as approved (430sqm). The revised layout means the hotel reception would look onto two sides of the courtyard, and the reception's retractable façades can be opened up in good weather. Instead of a planted green wall on the northern side, first floor level planters are now proposed.



28. The CGI visuals of the approved and proposed scheme can be compared.



Approved scheme's courtyard, hotel entrance and green wall



Proposed scheme's courtyard, planting and openable façades

29. 7) An energy strategy is proposed for this scheme, which was revised during the application. The approved scheme is required by a planning obligation to accord with its approved energy strategy. This s73 application has provided a new energy strategy that takes account of the proposed amendments to the hotel building. The revisions result in a 62.4% reduction on Part L 2013. However due to the increased number of hotel bedrooms, the modelled hot water demand for the proposal is higher than it was for the approved scheme, so that the overall carbon emissions from the regulated load is higher and the percentage reduction is not as good as the approved scheme. Due to the high hot water loads, the scheme does not achieve a 15% carbon reduction target from “be lean” measures.
30. As well as these 7 main amendments being sought, there are other smaller changes to the approved scheme being proposed, such as:
- The hotel basement has a smaller footprint at its northern end and again would provide plant, switching rooms, staff rooms and changing rooms.
 - The existing basement of the office building would again provide two blue badge car parking spaces for the hotel. The approved car lift would no longer be proposed and instead the existing car park ramp used.
 - With the changes to the ground floor internal layout of the single storey part of the hotel building, smaller rooflights are proposed which allow a larger area of green roof planting.
31. The changes to the floor areas of the scheme would be amended as follows:

	Approved Scheme (20/AP/0556)		Proposed Scheme	
	GEA (sqm)	GIA (sqm)	GEA (sqm)	GIA (sqm)
Class C1 (Hotel)	6,614	5,956.1	6,906	6,400
Class E (Office Use)	330.1	311	469	434
Class E (Flexible Retail Use)	171.1	154.9	171	155
Total	7,115.2	6422	7,546	6,989

Amendments during the application

32. An amended energy strategy was received for this application which improved the carbon savings from 59.3% to 62.4%, and increased the area of PV panels from 100sqm to 170sqm.
33. Revised drawings were provided to clarify:
 - The roof plan was amended to show the roof plant enclosure at the same southern extent as the approved enclosure, rather than the originally proposed increase of 1.3m.
 - Further information about the cycle parking and planters provided, and more staff cycle parking included.

Consultation responses from members of the public and local groups

34. 8 objections were received raising issues mainly regarding: the hotel use; there being no need for a hotel; the proposed increase in the number of rooms bringing greater numbers of visitors, movement and vehicles; how the site would be better used for other uses; the harm to neighbour amenity from loss of daylight, outlook and disturbance; and the increased size of the proposed building with it being out of character for the area. One comment in support was received. There were no objections from internal and statutory consultees. A more detailed summary of the consultation responses is set out in the later section from Paragraph 182.

Planning history of the site, and adjoining or nearby sites

35. The relevant planning history of the application site is set out in Appendix 3. The most relevant decision is 20/AP/0556 which was approved by the July 2020 Planning Committee. The permission was for:

Erection of an eight storey building with basement, comprising a hotel (Class C1), flexible commercial or community unit (Class B1/D1), retail floorspace (Class A1/A3), creation of public space, landscaping and associated works. Works to the existing office building at ground and roof levels (including a new rooftop terrace, balustrades and PV panels); elevational alterations; and alterations associated with the creation of a new entrance on the Blackfriars Road elevation.

36. There was an earlier hotel scheme proposed in application ref. 18/AP/1215 which was refused by the October 2018 Planning Committee for six reasons relating to: 1) the absence of a completed s106 agreement; 2) an over-dominance of visitor accommodation in the locality; 3) a hotel being contrary to the uses required by site allocation NSP15 of the draft Southwark Plan; 4) the unacceptable impact on the amenity of adjoining occupiers due to loss of daylight and sunlight, and overshadowing; 5) the hotel would include poor quality visitor accommodation as there were bedrooms with no access to natural light and ventilation; and 6) adverse impact on townscape due to excessive height relative to the existing Blackfriars Road frontage, the tall building not being at a point of landmark significance nor a focal point. The description for that refused application was:

Erection of a 10 storey building (40.23m AOD) with basement, comprising a 220 bedroom hotel with ancillary restaurant (Class C1); flexible office space (Class B1); retail units (Class A1/A3); creation of public space; landscaping and associated works. Works to the existing building at ground and roof levels (including a new rooftop terrace, enclosure and PV panels); elevational alteration; creation of a new entrance and the installation of an architectural feature along the Blackfriars Road elevation.

37. The refusal was appealed and dismissed by the Planning Inspectorate. Of the council's six reasons for refusal, the Inspector dismissed the appeal only due to the harm the proposal tall building would cause to the character and appearance of the area and harm to the setting of Blackfriars Foundry. Following that appeal decision a revised, lower proposal (no longer a tall building at 8-storeys) was submitted in application ref. 20/AP/0556, which was approved after the July 2020 Planning Committee.

38. The planning history of the site includes recent condition details that have been approved to allow the street frontage works of the 2020 permission to start. A separate planning application for changes to the elevations of the office building was approved in February 2023 (ref. 22/AP/3402) for:

Alterations to the facades of the office building with removal of the cladding, introduction of a fire escape door at roof level and upgrading the existing plant equipment (including addition of louvres).

39. Advertisement consent has been recently granted in December 2022 (ref. 22/AP/3704) for:

Installation of 6 no. illuminated fascia signs on the canopy along Blackfriars Road.

40. An application proposing the installation of two pergolas to the roof of the existing office building was recently submitted in February 2023, ref. 23/AP/0381, which is not yet valid and will be assessed on its own merits.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

41. The ability to vary an extant planning permission is set out in section 73 of the Town and Country Planning Act 1990 (as amended). Unlike an application for 'non-material changes' (a section 96a application), an application under section 73 results in a new permission being issued, although the time given to implement the permission remains unchanged, and is not extended as a result of any section 73 permission. While a local planning authority should take into consideration all relevant matters, including current policies at the point it determines a section 73 application, it must also take into account the scope of the changes being requested, and the status of the permission in terms of how far construction has progressed.
42. The main issues to be considered in respect of the application are those set out in the report for the 2020 application listed below. However as a minor material amendment application to an implemented permission, the correct focus needs to be on the changes proposed, rather than reassessing the whole development against current planning policies and material considerations. Section 73 requires the local planning authority to look at the changes proposed by the amendments to the conditions and not to "re-visit" the principles on which the original permission was determined and granted.
43. The issues to be assessed focus on those raised by the proposed changes:
 - Principle of the proposed development in terms of land uses;
 - Environmental impact assessment;
 - Design and heritage;
 - Quality of accommodation;
 - Impact on the amenities of occupiers of adjoining properties;
 - Impact of adjoining and nearby uses on occupiers and users of the proposed development;
 - Archaeology;
 - Sustainable development implications;
 - Trees, landscaping and ecology;
 - Transport and highways issues;
 - Planning obligations and Community Infrastructure Levy (CIL);
 - Other matters;
 - Community involvement and engagement;
 - Community impact, equalities assessment and human rights.
44. These matters are set out in detail in the 'Assessment' section of this report.

Legal context

45. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the

development plan comprises the London Plan (2021) and the Southwark Plan (2022). Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) requires decision-makers determining planning applications for development within Conservation Areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. Section 66 of the Act also requires the Authority to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.

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

Planning policy and material considerations

47. The statutory development plans for the borough comprise the London Plan (2021) and the Southwark Plan (2022). The National Planning Policy Framework (2021) constitute material considerations but are not part of the statutory development plan. A list of policies and material considerations which are relevant to this application is provided at Appendix 2. Any policies which are particularly relevant to the consideration of this application are highlighted in the report.
48. The site is located within the:
- Central Activities Zone (CAZ)
 - Air Quality Management Area (AQMA).
 - Bankside, Borough and London Bridge Opportunity Area
 - Bankside and Borough district town centre
 - South Bank Strategic Cultural Quarter
 - Flood zone 3.

ASSESSMENT

Principle of the proposed development in terms of land uses

Relevant policy designations and appeal decision

49. The site is within the Central Activities Zone (CAZ), the Bankside, Borough and London Bridge Opportunity Area and the Bankside and Borough district town centre.
50. The relevant London Plan (2021) policies include GG2 'Making the best use of land' and SD1 'Opportunity Areas' which seek to enable the development of brownfield land particularly in Opportunity Areas to realise their growth and regeneration potential, and support development which creates employment opportunities. Policy SD4 'The CAZ' in part B acknowledges the nationally and internationally significant office function of the CAZ which should be supported and enhanced. Part E of policy SD4 acknowledges the unique concentration of cultural, arts, entertainment and tourist functions that should be promoted and

enhanced (with the supporting text noting that tourism facilities including hotels are strategic functions of the CAZ), and in part F the policy supports its retail functions. Similarly policy SD6 'Town centres and high streets' suggests commercial activities and hotels in town centre locations should be enhanced and promoted. Policy SD7 'Town centres: development principles and DPDs' sets out the town centre first approach for main town centre uses.

51. The Southwark Plan (2022) policies relevant to the proposed land uses are summarised as follows:
 - P30 Office and business development – in the CAZ, Opportunity Areas and town centres requires the retention or increase in the amount of employment floorspace in Class B uses.
 - P31 Affordable workspace – supports and requires the provision of affordable workspace on schemes proposing 500sqm GIA or more of employment floorspace.
 - P35 Town and local centres – ensures main town centre uses are located in town and local centres, are of a scale and nature that is appropriate to the role and catchment of the centre, and retains retail use or replace with an alternative use that provides a service to the public.
 - P41 Hotels and other visitor accommodation – requires the design, scale, function, parking and servicing arrangements to respond positively to local character and protect amenity of the local community and hotel visitors, and to provide at least 10% of the total floorspace as ancillary facilities.
 - P47 Community uses – supports new facilities that are accessible for all members of the community.

52. The site is within the Blackfriars Road Area Vision AV.04, which includes reference to development providing “new employment floorspace to meet a range of commercial needs including new offices and workspaces, hotels and shops”.

53. The application site forms the majority of allocated site “NSP17 Friars House 157-168 Blackfriars Road” which also includes some of the adjoining Webber Street properties to the south. The allocation requirements are framed to assume a full redevelopment of Friars House. It includes a requirement for redevelopment to:
 - provide at least the amount of employment floorspace (B class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater; and
 - provide active frontages with ground floor retail, community or leisure uses on Blackfriars Road.

54. It also states that redevelopment of the site “should provide new homes” (but gives an indicative residential capacity of 0 homes), and acknowledges that the hotel permission ref. 20/AP/0556 is relevant to the site.

55. Turning to the relevant appeal decision on this site for the 2018 hotel proposal, that scheme was refused for six reasons, including two that related to the hotel use:

Reason for refusal 2) *“The proposed development would lead to an over dominance of visitor accommodation in the locality which would detract from the vitality of the area and harm the local character, and would reduce the potential for other services and uses to be provided for the benefit of residents and visitors. As such the proposal would be contrary to saved policy 1.12 – Hotels and Visitor Accommodation of the saved Southwark Plan (2007) and policy SP10 ‘Jobs and businesses’ of the Core Strategy 2011”.*

Reason for refusal 3) *“The development of a hotel would be contrary to the requirements of site allocation NSP15 of the draft submission version of the New Southwark Plan 2017 which does not list hotels as a required or accepted use. Development of the site for a hotel would remove the potential of the site to deliver new homes, for which there is an acute need in the borough, and which are an acceptable use under the draft site allocation. As such, the development fails to comply with the site allocation within the draft submission New Southwark Plan”.*

56. These reasons were not upheld by the Inspector in the appeal decision. For reason 2, the Inspector concluded that *“a single additional hotel on the appeal site would not tip the balance for the nearby area such as to amount to a significant change in character for this locality. Both on its own, and in combination with other existing and permitted developments, the addition of one further hotel on the appeal site would not unduly compromise the balance of local land uses.”*
57. In terms of the draft site allocation reason 3, the Inspector stated that: *“There is no scheme to demonstrate that the car park alone could be suitable for any significant amount of housing development and the owners have expressly ruled out redevelopment for housing. The existing office has been recently refurbished, and is unlikely to be redeveloped soon, so there is very little prospect of housing development on the site in the foreseeable future. While there could be conflict with the allocation in emerging policy NSP15 of the draft submission version of the New Southwark Plan 2017, which stipulates that development proposals for the wider site should include housing, as this is unlikely to happen, even over a 15 year timespan, and as the policy is far from adoption, this conflict should be given limited weight.”*
58. When assessing the 2020 application for a hotel, the recent appeal decision was taken into consideration by officers and the Planning Committee when recommending and granting permission for a hotel-led development on this site, with no proposed housing.

Hotel

59. The 2020 permission is extant and once the relevant pre-commencement conditions have all been discharged can be implemented for the hotel at the rear of the site. The proposed changes in the current application have mainly come about due to a change in the intended hotel operator for this site. The planning system cannot control the particular operator who runs a hotel, and the 2020

permission was not restricted to a particular company. The currently proposed operator is Motel One, who describe themselves as “a design driven, affordable luxury brand” and “an international hotel brand with a strong European presence...pride themselves on outstanding quality, design and price propositions. High quality buildings and interior design are central to their brand.”

60. Since the 2020 permission was granted, the development plan policies have changed with the adoption of the London Plan in 2021 and Southwark Plan in 2022. These new development plan policies nevertheless still given support for hotels. As set out above, policies SD4 ‘The CAZ’ and SD6 ‘Town Centres’ of the London Plan support the provision of tourist facilities within the CAZ as one of its strategic functions, and within town centre locations, as this application site is located within. The proposal accords with these London Plan policies, adopted since the 2020 permission.
61. The current scheme has to be considered against the new Southwark Plan policy relating to hotels, but acknowledged that the 2020 permission was granted and has been implemented so that the principle of a hotel on this site is not being revisited. Policy P41 “Hotels and other visitor accommodation” of the Southwark Plan is worded as follows:

“1. Development for hotels and forms of visitor accommodation must ensure the design, scale, function, parking and servicing arrangements respond positively to local character and protect the amenity of the local community and visitors to the hotel.

2. A minimum of 10% of the total floorspace must be provided as ancillary facilities in hotel developments that incorporate a range of publicly accessible daytime uses and offer employment opportunities.

Reasons

Southwark welcomes new hotels new hotels, particularly those which contribute to employment growth and offer employment opportunities for local people. We have delivered one of the highest numbers of hotel rooms in London to meet London’s visitor accommodation needs and demand for hotels continues to grow in central London. Proposals that also incorporate a range of day time activities which provide additional employment floorspace will be considered favourably as they provide additional employment and encourage more use of buildings by residents, workers and visitors. Such uses may include hotel receptions, café and restaurants, conference facilities and meeting rooms, salons and other ancillary supporting space that can be made available for use by the local community as well as visitors staying at the hotel.”

62. In terms of the aspects listed in part 1 of policy P41, the assessment of the design, parking and servicing arrangements for the proposed revisions are set on in detail later on in the report, but are each found to be acceptable. The scale and function of the proposed hotel building would remain similar to that of the approved scheme. A similar massing of hotel building and similar ground floor layout and access arrangements are proposed, although the number of hotel rooms within the new building has increased from the approved 169 bedrooms to 222, and so would intensify the hotel use of the site.

63. The 222 bedrooms in the current scheme are more than the 220 bedrooms of the appeal scheme. However the appeal decision found the addition of a hotel on the site acceptable and that it was in a different character area to the concentration of accommodation towards the river and around Waterloo station, without comment that 220 bedrooms would be too intensive for this site. The approved scheme had fewer bedrooms because of the lower building height, rather than any policy limit on the number of hotel rooms.
64. There is no planning policy that sets targets or caps on the number of hotel rooms for the borough or this part of the borough, and so the increase in bedroom numbers by itself is not a change resisted by policy. The impacts of the additional hotel rooms and the consequences from the design changes are considered in the later topics of this assessment section. There is no planning policy that sets room sizes, nor suggests an acceptable density of hotel rooms. As set out in a later section the quality of the hotel accommodation is acceptable. The increased number of hotel rooms would result in more trips by pedestrians, public transport and vehicles, and likely result in more servicing trips; these transport impacts are considered later in this assessment and found to be acceptable with mitigation measures in place. The impact on neighbour amenity is also considered below and found to be acceptable.
65. To conclude on part 1) of Southwark Plan policy P41, the principle of the hotel use has been established by the 2020 permission, and the addition of more hotel bedrooms to the approved scheme in a revised design is considered to not cause harm to the local character, nor to harm the amenity of the local community and visitors to the hotel.
66. In terms of part 2) of policy P41, the approved scheme provided a hotel reception area of 350sqm, which was 5.3% of the total floorspace of the hotel. The current scheme proposes a hotel reception area of 382sqm, which represents 5.5% of the current hotel proposal, and would include a bar for guests, visitors and the community, areas with seating and tables which open out onto the public courtyard, wifi, and ancillary toilet facilities. These facilities within the reception would be publicly accessible and support jobs within the hotel. While the 5.5% provision does not achieve the minimum 10% of the total floorspace required by policy P41 part 2), it is of a similar and slightly larger proportion as the approved scheme. As noted in the report for the 2020 application, the proposal continues to also include a separate affordable workspace and community unit, public realm and replacement retail unit that add further activity to a site with a variety of uses. This proposal as revisions to an extant permission is considered to have given sufficient regard to the requirement of policy P41.

Office use and the flexible unit

67. The current proposal takes in more of the ground floor of the existing office building than was included in the approved scheme. This would remove 135sqm of existing office space at the rear of the building, to incorporate it into the hotel reception.

68. This loss of office space in the current application would be balanced by the flexible affordable workspace and community unit being created as part of the approved scheme and further expanded by the current proposal to 319sqm. While this unit has a flexible use, its increased size is considered sufficient to prevent a net loss of office floorspace across the site. The existing office would have a new office reception on the northern side of the central entrance, to improve the quality of its reception.
69. The increased size of the flexible affordable workspace and community unit is a benefit of the current proposal. It would be in the same part of the site, accessed from the public courtyard, and its enlarged floorplan served by rooflights. The applicant has been in discussions with the preferred tenant of this unit, and a subsidiary, about the revised design. The preferred tenant was included in the 2020 s106 agreement as Artists' Studio Company (ASC), and a subsidiary of ASC called Affordable Workspace Partnership (AWP) may take on the unit. AWP provide affordable designer-maker workstations for start-up fashion designers, textile designers, furniture designs, illustrators and product designers, and the enlarged unit could provide 40 workstations. The unit may also hold regular public exhibitions, and provide desk space for Living Bankside community group. The applicant would like to change the definition of "eligible tenants" to reference AWP. This change is agreeable to the local economy team, and would be included in the deed of variation. The unit would be offered at the same affordable rental and fit out terms as set out in the 2020 s106 agreement.

Retail and the introduction of Class E

70. The size and location of the shop unit in the frontage building remains as the approved scheme. To ensure the replacement retail unit at the base of the existing building remains as a shop within the broad range of Class E uses, and to comply with policy P35 part 2), a condition is proposed to ensure this Class E use is restricted to retail, as Class E(a), (b) or (c).

Environmental impact assessment

71. The scale of the revised proposal does not reach the minimum threshold of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) to trigger the need for an EIA. The proposal's location and its nature remain the same as the earlier application, and do not give rise to significant environmental impacts in this urban setting sufficient to warrant an EIA. This is the same conclusion as reached for the 2018 application and the 2020 application for similar scales of hotel development on the same site.

Design and heritage

72. The NPPF emphasises the importance of good design and states in paragraph 126 that: "*Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development to communities.*" Policies within chapter 3 of the London Plan require a design-led approach to site capacity, good and inclusive design, and achievement of the

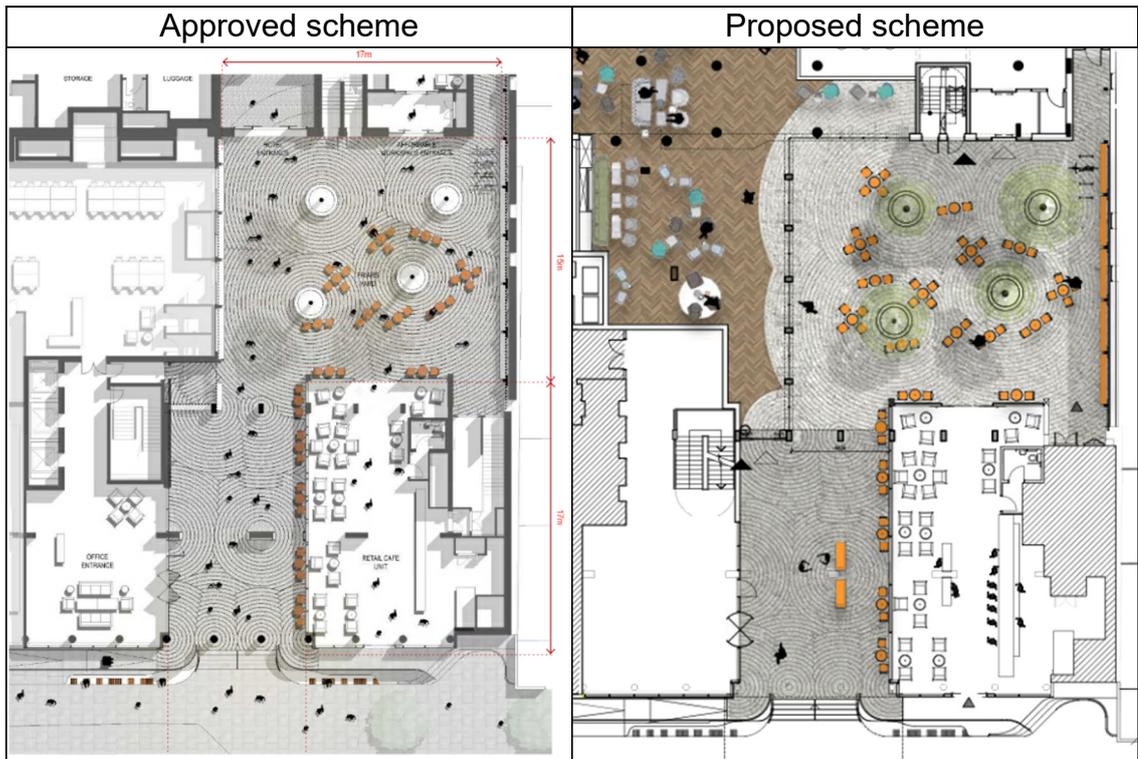
high standards of fire safety. In the Southwark Plan, policies P13 sets out the principles of urban design, P14 details the design quality considerations, P19 seeks to conserve or enhance the setting of listed buildings and P20 seeks to conserve or enhance the setting of conservation areas.

Site context

73. This section of Blackfriars Road contains a variety of building heights and uses, as well as a mix of modern and heritage buildings. The site is to the south of, and separate from, the established tall buildings cluster at the northern end of Blackfriars Road. Globe View House to the north of the site is a 10-storey residential building, Manna Ash House to the north-east is an 8-storey student housing scheme with offices, and the single storey school to the east. Buildings on Rushworth Street further to the east include recently completed 6- and 8-storey schemes, while the Webber Street properties as a mix of offices and residential are generally 3- to 5-storeys high.

Site layout

74. The site layout remains broadly in line with the approved scheme with the new hotel building sitting behind the retained frontage building and enclosing the eastern side of the new public courtyard (the same size and shape). The access to the proposed hotel by pedestrians (visitors and staff) remains as the approved scheme, in the centre of the Blackfriars Road frontage, although the front door of the hotel has been moved closer to the frontage. Servicing would again be carried out in the rear car park, access from the Pocock Street gate.
75. The proposed changes to bring the hotel front door closer to the pavement, making it more prominent and extending the hotel reception alongside the courtyard. The northern side of the courtyard (which is the left-hand side of each diagram below) would include more glazing, and a retractable façade that allows the hotel to open out onto the courtyard. This would give a more active façade than in the approved scheme, allow for more activation of the courtyard and natural surveillance.



Height, scale and massing

76. The 2020 permission granted a large extension building that was subservient to the larger frontage office building and would read as part of a coherent and enlarged whole. The reduced scale of the 2020 building from the appeal tall building scheme was such that the upper parts of the building would only just be visible above the Foundry when viewed from Blackfriars Road and the western part of Webber Street, at a much reduced height and massing than the refused scheme. The approved scheme was considered not to dominate nor take away from the presence of this heritage building in the way that the previous appealed proposal did.
77. The top floor roof height of the 8-storey proposal remains the same as the approved scheme. As can be seen on the comparison images below, the proposed amendments would slightly increase the visible massing of the hotel building above the eastern end of the roof of Blackfriars Foundry, more than that of the 8-storey approved scheme. However the height of this additional massing is comparable with the approved scheme, albeit wider. The scale and appearance of this additional massing is considered to preserve the setting of the Foundry.



Comparison visuals of the approved and current schemes

78. The wider massing of the proposal would be most obviously seen in views from the east of the site, i.e. within the school grounds. This is not a public view and the visuals show that the proposed changes do not significantly increase the scale and massing of the proposal.
79. The proposed amendments to increase the floorplans are considered not to significantly change the massing and bulk of the proposal from the approved scheme.

Architectural design and materials

80. With the increased number of bedrooms and extended floorplan, more windows are proposed to each floor, for example the eastern elevation was approved with 11 windows to a typical floor and is now proposed to have 13, and the northern elevation was approved with 3 windows per typical floor and is now proposed to have 5. The proportion and style of the windows matches those of the approved scheme, continuing the architecture of the approved scheme, which is welcomed.
81. The proposed materials of the hotel building remain as they were in the approved scheme as brick façades, recessed windows, concrete lintels and decorative brickwork features. The conditions on the 2020 permission that relate to the materials for the hotel building and detailed drawings of particular details would be re-imposed on a new permission. For these reasons, the scale, architecture and materials of the proposal are considered acceptable and the quality of the detailing would be continued through to the completed development by the imposed conditions.

Heritage

82. The approved 2020 scheme was considered to preserve the setting of heritage assets in the local area, being shielded in many views by the taller office block on the site and by neighbouring buildings. The same conclusion is reached on these proposed amendments.
83. The proposal would again not be visible in views from Valentine Place Conservation Area and Kings Bench Conservation Area.
84. The widening of the building by infilling the south-eastern corner would not be prominent in views from other heritage assets in the area. The revised proposal would not affect the ability to identify and appreciate the grade II listed buildings of Albury House and Clandon House (to the south-east), the Peabody Estate (to the south-west) nor the Former Sons of Temperance building (to the north).
85. In terms of non-designated heritage assets, the visibility of the (taller) appeal scheme over the top of the Blackfriars Foundry was the focus of much of the appeal consideration and decision. As set out earlier in the report, the proposed amendments would increase the visible massing of the hotel over the eastern end of the Foundry roof, however, the changes are considered to continue to preserve the setting of the Foundry.

Designing out crime

86. The Met Police consultation response commented that there is nothing within the proposed amendments that would negatively impact upon the potential for crime and antisocial behaviour. The Secured by Design condition of the 2020 permission would be re-imposed on the new decision.

Fire safety

87. One adopted policy area that is additional to when the 2020 application was considered is that of fire safety, and policies D12 and D5 of the London Plan in particular. The applicant has provided a fire safety statement, which in line with the policy requirement and draft London Plan Guidance is written by a suitably qualified assessor and sets out: the proposed building's construction; the means of escape (including one evacuation lift, and refuge spaces within the stair core); the features incorporated to reduce the risk to life; fire-fighting access from Blackfriars Road and rear servicing yard for people and vehicles to park next to the building; and how future changes to the design would be considered. An additional condition is proposed to require compliance with this submitted fire statement.

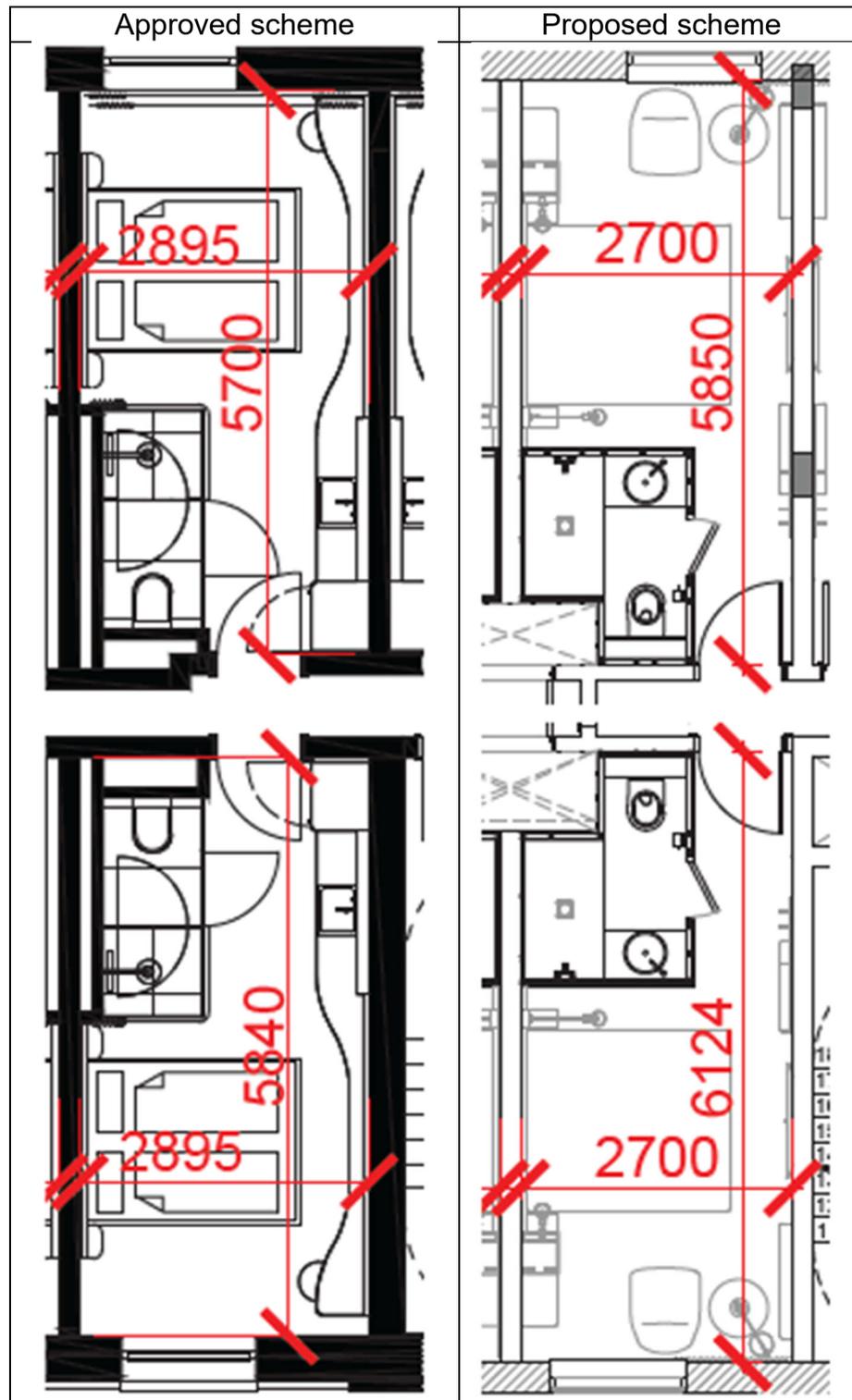
Quality of accommodation

88. To remind the Planning Committee of how the quality of accommodation was considered in the previous applications, the 2018 application was refused for a

reason that related to the quality of accommodation as some 23% of the proposed hotel rooms had no window:

Reason for refusal 5) *“The proposed hotel would include poor quality and substandard visitor accommodation as a result of providing hotel rooms with no access to natural light and ventilation. As such the proposed development would be contrary to Policy 4.5 - London’s Visitor Infrastructure of the London Plan (2016) and the guidance contained within section C which seeks to improve the range and quality of visitor accommodation.”*

89. However, the appeal decision did not agree this was a reason to refuse planning permission stating *“the size and lack of windows alone should not be a bar to this development”* and so did not dismiss the appeal for this reason. In the approved 2020 scheme, two ground floor hotel bedrooms had rooflights to provide daylight and all other bedrooms had a window.
90. In the current scheme, a total of 11 rooms (4 ground floor rooms and 1 room per floor on first to seventh floors) each rely on a window to a lightwell to provide their only source of daylight and a limited outlook. These form 5% of the proposed hotel rooms, far fewer than the 23% of the appeal scheme which the Inspector found acceptable. All other rooms have a window to provide daylight and an outlook.
91. As with the approved scheme, some of these windows look onto the existing office building at a short distance and so would have a limited outlook. At the ground floor, the additional bedrooms and revised layout mean 15 windows would look onto the eastern boundary wall at a distance of 2m. Unlike the approved scheme, four bedrooms in the southerly end of the ground floor would have windows facing onto the Webber Street properties; these windows would need to be screened or obscure glazed to prevent views up to the residential properties that are only 9m away. This would increase the total number of bedrooms with limited outlook to 30, or 14% of the proposal. Details of how these southerly windows are to be treated would be required by an additional condition.
92. As the appeal decision did not support the council’s reason for refusal when there were more rooms without a window, the increased number of rooms relying on a lightwell or having limited outlook is not considered to be a reason for refusal.
93. This revised scheme would provide 22 accessible hotel rooms (10%) to accord with the relevant British Standard as required by London Plan policy E10 part H.1. All rooms would have accessible entrances and lift access.
94. The bedroom sizes in the proposed scheme are 15.8sqm to 16.5sqm, and so are slightly smaller than the approved scheme which had rooms between 16.5sqm to 16.9sqm. The hotel bedrooms are 15cm to 28cm shorter than the approved layouts, and 19cm narrower. All have an en-suite shower room. The diagrams below provide a comparison of two typical room layouts in each scheme.



95. There is not a minimum hotel room size set in policy or guidance, and in view of the relatively small reduction in size compared with the approved scheme, the proposed layout is considered not to cause a material reduction in the quality of the visitor accommodation.

96. An acoustic report was submitted, which concludes that the design would achieve acceptable internal noise levels and vibration, including the likely impacts from the proposed mechanical plant.
97. In conclusion, the proposed amendments are considered to result in an acceptable standard of accommodation and amenity for visitors. The proposal would comply with this element within part 1) of policy P41 of the Southwark Plan and London Plan policy E10.
98. In terms of the other uses proposed on the site, the replacement retail unit at the base of the frontage building would retain the same layout as approved. The office reception would again be at the corner next to the central entrance, and while the massing of the hotel building would sit in front of the windows on the rear façade, the overall quality of the existing office building would remain good. The flexible use unit would be in the same location with front windows and rooflights to provide daylight. The quality of these aspects of the proposal are considered acceptable.

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

99. The 2018 hotel scheme was refused by the council because of the unacceptable impact on the amenity of adjoining occupiers due to loss of daylight and sunlight, and overshadowing. In the appeal decision, the Inspector commented that the nursery area of the adjacent primary school would be affected by a loss of daylight and a reduction in sunlight. The decision notes "*While these matters are not sufficient to outweigh the general benefits of a substantial development in a prime location, they nonetheless add slightly to the harm I have identified.*" The appeal was not dismissed for neighbour amenity reasons. The approved 2020 scheme was for a lower building than the appeal scheme, reducing the scale of the proposal and the impacts to neighbouring properties to be acceptable. The 2020 permission was subject to conditions relating to noise and use of the terrace, in the interest of protecting neighbouring amenity.

Outlook and privacy

100. The proposed amendments at the northern side of the hotel are considered not to cause a significant change to the outlook of Globe View House, due to the separation distance across Pocock Street. Nor is infilling the north-eastern corner and extending the roof plant alongside the student housing in Manna Ash House considered to adversely affect the outlook as while it is close to the boundary, it would be of similar massing as the approved scheme.
101. The infilling in the south-eastern corner of the hotel building would be set over 18m from the boundary with the school, and so would not adversely affect the outlook from the buildings nor the sense of enclosure in the playgrounds. More windows are proposed at the same separation distances as the approved scheme, and so would not reduce the privacy of the school.
102. This enlarged corner would be 18m from the rear of the nearest residential

building on Webber Street and would not adversely affect the residential outlook. As the additional window to this corner on each floor of the hotel sits at right angles to the rear windows of the Webber Street properties, it does not raise a privacy issue.

103. The new hotel room windows on the southern elevation at ground floor level would be only 9m from the rear windows of the Webber Street residential properties, and therefore it is considered necessary to require some form of screening or obscure glazing to protect neighbour privacy. The cycle store in this corner has been expanded and further details of this (as no elevations have been provided) to ensure it remains low on the shared boundary would be required by condition.
104. The enlarged south-eastern corner of the building would be closest to the windows in the commercial Blackfriars Foundry building. The flank wall would be continued at the approved 7.6m separation to allow outlook from the commercial neighbour, and again the proposal has no windows in the upper floors of its southern façade to prevent overlooking.
105. By extending the north-western part of the hotel building 1m closer to the rear façade of the existing offices on the site, the proposed building would be 9.8m from the office windows. No hotel windows are proposed to that flank. The proposed changes would not cause harm to the amenity of the existing offices.

Daylight

106. The daylight testing of the current proposal uses the BRE's tests on the vertical sky component (VSC) to the centre of a window, and the no sky line (NSL) daylight distribution. While the BRE guidance was revised in 2022, these tests to existing neighbouring properties remain the relevant tests.
107. The reported passes and fails for the windows and rooms of surrounding residential properties in the 2020 scheme can be compared to the test results of the current proposal as set out in the tables below. NB, as more windows in Tadworth House were teste the total number of windows changes.

VSC impacts in approved 2020 scheme

	Total windows tested	Windows that pass	Windows that fail
Globe View House	110	102	8
The Bell	17	17	0
The Priory	27	27	0
Bridgehouse Court	36	36	0
The Crown	8	8	0
Tadworth House	91	88	3
Sharpley Court	12	12	0
Total	301	290 (96.3%)	11 (3.7%)

VSC impacts with the current proposal (changes underlined)

	Total windows tested	Windows that pass	Windows that fail
Globe View House	110	102	8
The Bell	17	17	0
The Priory	27	<u>25</u>	<u>2</u>
Bridgehouse Court	36	36	0
The Crown	8	8	0
Tadworth House	<u>102</u>	99	3
Sharpley Court	12	12	0
Total	<u>312</u>	<u>299 (95.8%)</u>	<u>13 (4.2%)</u>

NSL impacts in approved 2020 scheme

	Total rooms tested	Rooms that pass	Room that fail
Globe View House	56	47	9
The Bell	13	13	0
The Priory	15	15	0
Bridgehouse Court	12	12	0
The Crown	4	4	0
Tadworth House	44	44	0
Sharpley Court	12	6	6
Total	156	141 (90.4%)	15 (9.6%)

NSL impacts with the current proposal (changes underlined)

	Total rooms tested	Rooms that pass	Room that fail
Globe View House	56	<u>46</u>	<u>10</u>
The Bell	13	13	0
The Priory	15	15	0
Bridgehouse Court	12	12	0
The Crown	4	4	0
Tadworth House	44	44	0
Sharpley Court	12	6	6
Total	156	140 (89.7%)	16 (10.3%)

Globe View House

108. 8 windows fail the VSC test, the same number as in the 2020 scheme, with

reductions between 24.8-38.2% which are up to 2% greater than the impacts of the approved scheme. These windows have very low existing daylight levels of 2.2-4.84% VSC value due to their recessed location and a projecting balcony above. These windows would experience a slightly greater percentage loss of daylight with the proposed (up to a further 2% loss) than the approved scheme. The further daylight reduction on the low existing VSC values is unlikely to be noticeable to occupiers, nor significantly harm the amenity of these units.

109. For the NSL test one extra room now fails the daylight distribution test to give a total of 10 rooms, compared with the approved scheme where 9 rooms failed on the first, second and third floors. This additional room is a combined living kitchen dining room to a fourth floor flat, served by windows that are recessed behind a projecting balcony above; in the approved scheme would have experienced a 16.8% reduction and with the current scheme would have a 21.7% reduction, slightly above the 20% reduction suggested to be “noticeable”. The room retains daylight to 70% of the room. The reduction in daylight distribution would not cause significant harm to the amenity of this flat.

The Bell

110. All of the 17 windows tested pass the VSC test and all 13 rooms pass the NSL test, so the proposal would not cause a significant reduction in daylight.

The Priory

111. Some windows and rooms would experience reduced daylight levels, and slightly greater reductions than the approved scheme. Two of the 27 windows fail the VSC test, which is two more failures than in the 2020 scheme. These two windows would retain good VSC values of 20.5 and 23.3% and so the quality of accommodation would not be significantly harmed. All the rooms pass the NSL test.

Bridgehouse Court

112. As with the approved scheme, the windows and rooms assessed would experience some reductions but all pass the VSC and NSL tests.

The Crown

113. As with the approved scheme, the tested windows and rooms all pass the VSC and NSL tests.

Tadworth House

114. In the approved scheme, three windows failed the VSC test. These three windows again fail as they have low existing VSC values (1.86-3.03%) being in a recessed balcony. This means that the reductions of less than 1% VSC represent a high percentage loss. These rooms pass the NSL test so when taken together the proposal would not have a significantly harmful impact.

Sharpley Court

115. All the tested windows on the second floor of Sharpley Court pass the VSC test, and therefore the windows on the higher floors would also pass. Six of the tested rooms would fail the NSL test, the same number as failed in the consented scheme, which is due to the deep rooms in the layout of these flats. The

percentage reductions to these six living/kitchen/dining rooms range from 24.8% to 37.2% in this proposed scheme, compared with the 20.8-34.5% of the approved scheme, due to the increased massing of the proposal.

116. The officer report on the 2020 scheme stated *“When considered with the compliant VSC levels to the windows, and noting that the Inspector did not dismiss the taller appeal scheme for this reason, the impact of the development on Sharpley Court’s daylight is considered not to be a justifiable reason for refusal of this scheme. It is noted below that it would retain good sunlight levels.”* Officers’ conclusion is the same in this revised scheme.
117. Two further properties were tested. A new residential development, Hambridge House on Webber Street has been completed since the 2020 scheme was approved. The flats within Hambridge House have not had detailed daylight tests undertaken as it passes the simple 25 degree test, and so would not experience a noticeable change in daylight.
118. Daylight tests were carried out for the adjacent Friars Primary School, which is the east of the site. Four windows (two windows in two rooms) of the 34 tested would experience a percentage reduction in VSC of 22-39%, however the other windows serving these two rooms would not experience a noticeable reduction in VSC, so that the rooms overall would retain an acceptable level of daylight. These VSC reductions are very similar to those that would occur with the approved scheme (which had VSC percentage reductions of 21.3-38.4%).
119. One of these school rooms would also fail the NSL test, (seeing a 26.3% reduction in daylight distribution) but retaining daylight to 73.8% of its area and so would retain good daylight levels. As was done for the 2020 application, the ADF test was repeated for six school rooms which shows the current proposal has a very similar impact as the approved scheme. The resulting ADFs from the proposed scheme would be: 2.72; 0.17; 2.71; 3.89; 4.33; and 4.40%. These compare with the approved scheme’s impacts that would be 2.76; 0.17; 2.72; 3.94; 4.40; and 4.41% and would not be a noticeable reduction in daylight to the school rooms.

Sunlight

120. The submitted sunlight assessment of the proposal uses the same annual probable sunlight hours test as carried out for the 2020 scheme. The surrounding residential properties were tested for the sunlight hours to windows that face within 90 degrees of south. A window would fail the sunlight test where all three criteria are met:
 - The window would receive less than 25% of annual probable sunlight hours or 5% of winter hours; and
 - It would experience more than a 20% reduction in current hours and;
 - The absolute reduction in annual hours would be more than 4%.
121. When compared with the approved scheme, the results for the APSH are the same with all rooms passing. For the 2020 scheme, the approved development would have the following impacts:

	Total rooms tested	Rooms that pass both annual and winter hours tests	Rooms that fail annual hours	Rooms that fail winter hours
Globe View House	55	55	0	0
The Bell	-	-	-	-
The Priory	4	4	0	0
Bridgehouse Court	-	-	-	-
The Crown	4	4	0	0
Tadworth House	13	13	0	0
Sharpley Court	12	12	0	0
Total	89	89 (100%)	0 (0%)	0 (0%)

122. The current proposal would have the following impacts:

	Total rooms tested	Rooms that pass both annual and winter hours tests	Rooms that fail annual hours	Rooms that fail winter hours
Globe View House	56	56	0	0
The Bell	-	-	-	-
The Priory	4	4	0	0
Bridgehouse Court	-	-	-	-
The Crown	4	4	0	0
Tadworth House	14	14	0	0
Sharpley Court	12	12	0	0
Total	90	90 (100%)	0 (0%)	0 (0%)

123. While windows would experience a reduction in annual probable sunlight hours throughout the year and/or during the winter, these reductions are not sufficient to fail the APSH. The proposal would have an acceptable impact in sunlight terms to neighbouring residential properties.

124. The proposal would not cause a significant loss of sunlight to the Friars Primary School's windows.

Overshadowing of amenity spaces

125. The shadowing impact of the proposal on 21 March (the spring equinox) has been undertaken for the neighbouring school's outside spaces, using the BRE guidance for the sun on ground test.
126. The results demonstrate that the school's main nursery space would continue to receive at least two hours of sunlight on 21 March, changing from the current 68% to 55%, as happened with the approved scheme. As at least half of this area retains two hours of sun on ground, this accords with the BRE criteria. The main playground on the eastern side of the school would continue to receive good sunlight levels too.
127. In the dismissed appeal, the Inspector noted that the loss of daylight and sunlight to the school were "*not sufficient to outweigh the general benefits of a substantial development in a prime location*". Officers consider that the daylight, sunlight and overshadowing impacts to the school from this revised scheme continue to be acceptable and would not materially harm the operation of the school nor the use and enjoyment of the spaces.

Conclusion on daylight and sunlight

128. The impacts of the proposal are of a similar scale as the approved scheme. The proposal would have an acceptable impact on the daylight, sunlight and overshadowing of surrounding residential and school properties.

Noise and vibration

129. The increased number of hotel rooms and larger size of the affordable workspace and community unit are likely to lead to more people (hotel guests, staff and visitors) coming into and leaving the site as pedestrians, cyclists or in vehicles each day. The increase in the number of comings and goings by more pedestrians and vehicles to this site in this central location, designated town centre and on a main road is not considered to cause significantly more noise and disturbance to cause harm to neighbour amenity.
130. The submitted acoustic report summarises the noise monitoring from August 2022, and considers that the noise levels from the proposed roof plant at the closest residential neighbours can achieve the council's criteria. Attenuators would be required to the air handling units and acoustic screens around the roof plant to mitigate the noise to an acceptable level. EPT reviewed this new report, and consider that the conditions on the 2020 permission would sufficiently address the impacts.
131. Therefore, as with the 2020 permission, conditions are recommended regarding plant noise (including testing results), the kitchen ventilation, noise from amplified music, hours of use of the roof terrace on the existing office building, no use of the flat roofs of the hotel, opening hours of the restaurant/café use, servicing hours and external lighting are all proposed in the interest of protecting neighbour

amenity from noise, odour and light pollution. A construction environment management plan was required by a planning obligation and would continue to be required for the hotel development.

Impact of adjoining and nearby uses on occupiers and users of the proposed development

132. As with the approved scheme, it is not anticipated that there would be any conflict of neighbouring uses (office, retail, student housing, school and residential) that would adversely impact upon occupiers of the proposed hotel, retail, office or community spaces.

Archaeology

133. The proposed amendments do not raise new or additional archaeology impacts. The conditions on the 2020 permission would be imposed on the new decision, updated to reflect the condition parts already discharged. The obligation for a payment for monitoring and advice (in line with the council's S106 and CIL SPD) secured in the 2020 s106 agreement would not be affected.

Sustainable development implications

Construction management

134. The requirement for a construction management plan that was secured in the 2020 legal agreement would continue to apply to this revised development.

Water resources

135. Thames Water in the initial consultation response raised no objection in terms of waste water network capacity and requested a condition regarding water network capacity to serve the proposal. Following further communications between the applicant and Thames Water it has been clarified that there is water capacity to serve the proposal, and Thames Water removed the condition request. The comments from Thames Water on the approved scheme were included as an informative on the decision and would be copied over on a new permission.

Flood risk

136. The site is located in flood zone 3 which is defined as having a 'high probability' of river and sea flooding and accordingly the applicant has submitted a flood risk assessment. The hotel would have ground floor level hotel bedrooms, as the approved scheme did. A short statement of conformity on flood risk and drainage was provided, which concludes the scheme amendments result in no change in flood risk at the site, and that the flood risk assessment of the 2020 application remains valid. The Environment Agency was consulted on this application and did not raised any objection, subject to a condition regarding the finished floor level, as with the 2020 permission.

Sustainable urban drainage

137. The submitted statement of conformity concludes that as the proposed scheme retains the massing and form of the approved development (with the changes being mainly internal to the building), the surface water drainage strategy of the 2020 application remains valid. The conditions on the 2020 permission relating to drainage, investigation work and basement impact assessment would be carried over to a new permission.

Land contamination

138. The proposed changes would not affect the groundworks of the approved scheme. The same contamination condition would be re-imposed, and updated to reflect the parts of the condition that have been discharged.

Air quality

139. The proposed changes do not raise material air quality issues, with the additional rooms leading to a small increase in vehicle movements. As with the approved scheme, the removal of most of the on-site car parking would assist in improving air pollution and electric vehicle charging points would again be required by a condition. Another condition regarding details of the ventilation of the hotel rooms (given the proximity to Blackfriars Road) would also be copied onto a new permission.

Light pollution

140. The proposed changes do not raise light pollution issues. The condition from the permission requiring details of any external lighting would be included on a new permission.

Whole life cycle and carbon capture

141. At the time of the assessment of the 2020 application, the whole life carbon aspect in the current London Plan policy SI2 “Minimising carbon emissions” part F was not a policy requirement, and no conditions in this regard were imposed. The limited changes to the scale of the building and to its fabric in the amendments proposed, when compared with the approved scheme, are considered not to warrant the imposition of conditions regarding whole life carbon.

Carbon emission reduction

142. The approved scheme incorporated energy efficiency measures, air source heat pumps, PV panels and a range of “be lean” measures to give an overall carbon reduction of 67% on Part L 2013, which exceeded the minimum 35% on-site reduction required by the London Plan (2016). At that time, the London Plan’s

zero carbon requirements did not apply to non-residential buildings, so no carbon offset financial contribution was secured in the 2020 permission to address the 95.5 tonnes of remaining annual carbon emissions.

143. An energy strategy has been provided with this current application, and was revised during the assessment of the proposal to improve the proposed carbon savings. It sets out how a 62.4% reduction in carbon savings would be achieved for the revised scheme. Due to the increased number of hotel rooms leading to a higher hot water demand (and therefore the resulting carbon emissions), the modelling of the current scheme results in a larger baseline carbon emission for the regulated energy uses at 341 tonnes – compared with 293 tonnes of the approved scheme. While there is a proposed increase in number of rooms, the applicant states that the energy use per room is equal to that of the approved scheme. The applicant states that as the 2020 permission has been implemented, the scheme has been registered using the 2013 Building Regulations, rather than the 2021 Regulations, and the energy strategy uses the 2013 Regulations to provide a ready comparison with the approved scheme.

Be Lean (use less energy)

144. The proposal would include within its construction: thermal elements that achieve better u-values than required for Building Regulation compliance; higher performing glazing; low air permeability rates; efficient heating system; controlled ventilation with heat recovery; and energy efficient lighting. However despite these “be lean” measures, using the modelling method set by the GLA there would be no overall carbon savings compared with a modelled baseline scheme due to the hot water demand for the increased size of the hotel. The hot water demand in the modelling represents 82% of the overall regulated load, and so outweighs the “be lean” measures the scheme would incorporate.
145. The proposals fails to accord with London Plan policy SI2 “Minimising greenhouse gas emissions” in part C which states that “*non-residential development should achieve 15 per cent [reduction] through energy efficiency measures*”. The failure to comply with this part of the London Plan policy must be considered alongside the overall carbon reductions that significantly exceed the minimum 35% on-site reduction requirement of the London Plan and 40% of the Southwark Plan, and the payment of a carbon offset payment which together would achieve the net zero carbon requirement of the full policies.

Be Clean (supply energy efficiently)

146. The nearest heating network is approximately 800m from the site, and therefore no “be clean” savings are achieved. As with the approved scheme, the revised proposal includes a location which could be converted into a plant room for a future connection to a district heat network, should one become available.

Be Green (use low or carbon zero energy)

147. PV panels are proposed to the roof of the existing office building, and to the roof of the hotel building, as was included in the approved scheme. To help reduce

the increased carbon emissions of this revised scheme, a further 70sqm of PV panels have been incorporated, including PV panels on the roof of the ground level part of the hotel building. Air source heat pumps are proposed on the roof of the hotel within the plant enclosure. Together these renewable energies would reduce carbon emissions by 62.4%.

148. The remaining 37.6% of carbon emissions would need to be mitigated by payment of a carbon offset contribution to achieve the net zero carbon policy requirement. The remaining 128.5 tonnes per year would require a payment of £366,225 (indexed). This would be secured in the deed of variation as the 2020 permission was not required to achieve zero carbon. The legal agreement drafting would allow for a revised energy strategy to be submitted and approved, and the payment to be adjusted if the on-site carbon savings are improved.

Be Seen (monitor and review)

149. The “be seen” requirements of the London Plan would be added as a new planning obligation to any new permission. These were not required in the 2020 permission and so would be a positive change for any new permission.

	Approved scheme	Proposed scheme
Baseline carbon emissions from regulated load	293 tonnes per year	341 tonnes per year
Total savings on-site	67%	62.4%
Remaining carbon emissions	95.5 tonnes per year	128.5 tonnes per year
Carbon offset payment	None	Yes - £366,225 (indexed)
Be Seen requirements	None	Yes

Conclusion on carbon

150. The current proposal is for a scheme that has a higher baseline carbon emissions in the energy modelling than the 2020 approved scheme and its remaining carbon emissions after the be lean, be clean and be green energy measures are also larger. The reason for the increase is the larger number of additional bedrooms that this scheme is seeking, which result in higher hot water demands and mean there are no “be lean” savings. The proposal incorporates more PV panels than the approved scheme and, unlike the approved scheme, would pay a carbon offset contribution for its remaining carbon emissions and be required to undertake the “be seen” monitoring in order to address the requirements of current policy. Therefore officers consider the current proposal to sufficiently address current policy, subject to the revised planning obligations detailed later in this report.

Circular economy

151. At the time of the 2020 application, the circular economy consideration was not an adopted policy requirement (as London Plan policy requirement of part B of policy S17 Reducing waste and supporting the circular economy was not adopted

policy), and no conditions in this regard were imposed. The limited changes in the scale of the proposed building from the approved scheme, and as the materials of the hotel building remain those of the approved scheme, the current proposal is considered not to warrant the imposition of conditions.

Overheating

152. Given the nature of the hotel layout, the masonry materials of the proposal and how the windows to the upper floors would allow natural ventilation, the overheating risk assessment for this non-residential scheme found that the risk of overheating to be low.

BREEAM

153. The approved scheme includes a condition requiring an interim report on the BREEAM rating and a post-construction review within six months of occupation. This condition was based upon that discussed between the parties at the public inquiry, and did not clearly state which rating had to be achieved. Given Southwark Plan policy P69 Sustainability standards now requires an “excellent” BREEAM rating for non-residential development over 500sqm, an amended condition is proposed to make it clear that at least an “excellent” rating would need to be achieved for the hotel building.

Trees, landscaping and ecology

154. The new public realm in the approved scheme (as the courtyard to the rear of the existing building) is retained at the same size and shape in this current proposal. It would contain the same number of new trees. By replacing the approved green wall along the northern side of the courtyard, with the openable façade of the hotel reception, planters are proposed above which would provide greening. The proposed amendments would not affect the street trees along Blackfriars Road.
155. The ground floor roof of the hotel building would provide 140sqm more green roof than the approved scheme, as the area of rooflights has been reduced from the approved scheme. This would be of benefit.
156. Overall, the proposal is considered to be of the same landscape quality, provide similar urban greening and biodiversity improvement to the site, which is currently car parking. The conditions on the planning permission regarding tree protection, landscaping, biodiverse roofs and nesting bricks would be copied over to a new permission, and updated where they have been partly discharged. The obligations within the 2020 s106 agreement regarding the provision of the public realm, its maintenance and public access at all times remain unchanged.

Transport and highways

Site layout

157. The access in the centre of the Blackfriars Road frontage to the proposed hotel by pedestrians and cyclists remains as the approved scheme, with the current proposal moving the front door closer to the pavement. Servicing arrangement including refuse collection involving vehicles accessing this development's service yard from Pocock Street.

Trip generation

158. Concerning the vehicle movements from the revised proposal, officers' interrogation of comparable sites' travel surveys within TRICS travel database has revealed that it would create additional 2 two-way vehicle movements in the morning or evening peak hours, a figure that matches that of the applicant's consultants. It is estimated that the added number of deliveries would be some 3 two-way vehicle movements (2 deliveries) per day. Officers consider that the level of vehicular trips would not have any noticeable adverse impact on the prevailing vehicular traffic on the adjoining roads. The applicant's consultants suggest that the two-way service vehicle trips per day for this entire development would be reduced from 10 to 4 (8 two-way vehicle movements) because of the modified servicing method relating to the new Motel One operator.
159. The projected two-way supplementary public transport trips for this development are 9 and 12 in the morning and evening peak hours respectively. This is considered not to materially impact upon public transport capacity in the area.
160. The 2020 section 106 agreement secured highway works to repave the footway and reconstruct the Pocock Street vehicle crossover. It also secured financial contributions to improve the pedestrian environment and encourage sustainable transport modes. These contributions included £40,000 for bus countdown facilities, £68,720 for pedestrian route improvements, £20,000 for an additional crossing on Blackfriars Road, and £67,000 towards cycle hire facilities. This package of mitigation is considered sufficient for the revised proposal.

Servicing and deliveries

161. The requirements in the 2020 s106 agreement for a delivery and servicing plan and payment of a delivery and servicing cash deposit and monitoring fee would continue to apply. To reflect the increased floor area of the proposal and potential additional servicing and delivery vehicles to serve the larger hotel, an increased delivery and servicing cash deposit would be secured in the new legal agreement of £7,700 (indexed), compared with the £6,033 (indexed) secured in the 2020 s106 agreement.

Refuse storage arrangements

162. There is no change to the refuse storage at the rear of the site in this revised scheme.

Car parking

163. As with the approved scheme, two basement wheelchair car parking spaces would be available for the hotel. Instead of a car lift being installed as was approved in the 2020 permission, the applicant is proposing now to retain the existing basement ramp. No internal link was approved between the parking and the hotel. The same condition regarding the inclusive access to the basement, potentially with valet parking given the length of the car ramp, would be reimposed on any new permission.

Cycle parking and cycling facilities

164. The application proposes 16 visitor cycle spaces provided by Sheffield stands within the courtyard, and 22 long stay spaces (including 2 cargo/disabled spaces) in a mix of two-tier racks and Sheffield stands in a covered cycle store building at the rear of the site for staff. This provision exceeds the minimum of 32 spaces required by the London Plan and Southwark Plan standards, and is 10 more than the approved scheme. Further details of this store would be required by condition given its proximity to the boundary.

S106 obligations

165. The obligations in the 2020 legal agreement regarding: the s278 highway works; financial contributions towards bus countdown, pedestrian route improvements, an additional Blackfriars Road crossing and cycle hire facilities; a car parking management plan; a travel plan; a hotel management plan; a CEMP for the hotel building construction; no parking permits; a delivery and servicing plan and payment of the cash deposit, provision of the public realm, and completion of the entrance stairs/ramps would remain, and continue to apply to any new decision issued. The increased cash deposit amount of £7,700 (indexed) would be secured in a deed of variation to reflect the larger floor area of the proposal.
166. With the revised floorspace of the proposal, the delivery and servicing cash deposit would be increased to £7,700 (indexed) in a deed of variation.

Planning obligations and Community Infrastructure Levy

167. Planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. The Section 106 Planning Obligations and CIL SPD 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.
168. Following the adoption of Southwark's Community Infrastructure Levy (SCIL) on 1 April 2015, much of the historical toolkit obligations such as Education and Strategic Transport were replaced by SCIL. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight.

169. 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 2. Southwark's CIL will provide for infrastructure that supports growth in Southwark.
170. The site is located within Southwark CIL Zone 2, and MCIL2 Band 2 Zone. Based on the GIA data provided by the agent, the gross amount of CIL is approximately £1,908,988.59, consisting of £991,430.24 of Mayoral CIL and £917,558.35 of Borough CIL. It should be noted that this is an estimate, and the floor areas on the approved drawings will be checked when related CIL Assumption of Liability form is submitted, after planning approval has been obtained.
171. The 2020 permission was subject to a section 106 agreement that secured the following planning obligations to ensure the proposal complied with planning policies and securing necessary mitigation to minimise the adverse effects of the development:
- Archaeological monitoring – payment of a financial contribution of £6,778 (indexed).
 - Affordable workspace unit – to confirm to the council whether the ground floor unit is to be used as business space or a non-residential institution use. If the unit is used for Class B1 space, for it to be affordable workspace, with details of the specification of the workspace, marketing strategy, management plan, at least 30% discount on market rent levels for 30 years to be submitted for approval. Requiring a community use methodology and five years of reporting on the community use of the unit.
 - Car park management plan.
 - Construction management plan.
 - Delivery and servicing plan and payment of a delivery and servicing cash deposit and monitoring fee.
 - Employment during construction – 14 jobs for unemployed residents, 14 short course and 3 apprenticeships (and financial payment for any shortfall) and an employment, skills and business support plan.
 - Employment in the development – 11 sustained jobs and a payment for any shortfall.
 - Local procurement opportunities during construction and end use.
 - Energy strategy – to build in accordance with the energy strategy.
 - Hotel management plan – to detail taxi and coach management, minimising noise, litter and disruption.
 - Transport improvements – Payment of financial contributions (each indexed) including £40,000 for bus countdown facilities, £68,720 for pedestrian route improvements, £20,000 for an additional crossing on Blackfriars Road, £67,000 towards cycle hire facilities.
 - Provision of the on-site public realm, to be maintained and unrestricted public access.
 - Highway works – to repave the footway, reconstruct the Pocock Street

vehicle crossover and associated amendments to the traffic management order.

- Parking restriction – no CPZ permits.
- Removal of excess car parking.
- Submission of a travel plan.
- To require the works to the existing building on the site (the roof level and ground level) to be undertaken and completed prior to the occupation of the hotel.
- Administration charge at 2%, payment of £3,914.

172. With the revisions now sought, some of these obligations need to be amended to reflect the necessary mitigation and policy compliance for the minor material amendment application. The amendments would be secured in a deed of variation; the other obligations that do not need to be revised remain unaltered in their original wording in the 2020 section 106 agreement. The change in the floorspace of the proposal does not change the number of construction nor end use jobs and training required by policy. The heads of terms are set out below.

Planning Obligation	Mitigation	Applicant Position
Affordable workspace and community unit	<p>To update the ground floor unit with its increased size and to update the annex 1 drawing that identifies its location.</p> <p>To add in Affordable Workspace Partnership to the definition of “Eligible Tenant”, to allow them to take on the unit if the named “Preferred Tenant” (ASC) does not take it on.</p>	Agreed
Carbon offset	<p>Compliance with the revised energy strategy, or another energy strategy submitted and approved at a later date.</p> <p>Payment of £366,225 (indexed) financial contribution for the remaining 128.5 tonnes per year. If another revised energy strategy is approved which</p>	Agreed

	improves the carbon saving, then the contribution amount would be amended to reflect the better on-site savings. Addition of the Be Seen monitoring requirements.	
Admin fee	With the addition of the carbon financial contribution, the 2% admin fee would be increased by £7,324.50 to £11,238.50	Agreed
Transport contributions	Cash deposit for the delivery and servicing management increased to £7,700 (indexed).	Agreed

173. The associated definitions and drawings that define parts of the development within the legal agreement would need to be updated accordingly, for example to reference the increased size of the affordable workspace unit and its revised ground floor plan.
174. In the event that a deed of variation has not been completed by 8 June 2023, the committee is asked to authorise the director of planning and growth to refuse permission, if appropriate, for the following reason:

In the absence of a signed legal agreement there is no mechanism in place to secure development plan compliance (such as carbon offset contribution), mitigation of the transport effects and the benefits of the increased size of the affordable workspace and community unit. It is therefore contrary to policies E3 Affordable workspace, SI2 Minimising greenhouse gas emissions, T4 Assessing and mitigating transport impacts and DF1 Delivery of the Plan and Planning Obligations of the London Plan (2021); P31 Affordable workspace, P50 Highway impacts, P70 Energy, IP2 Transport infrastructure, IP3 CIL and section 106 planning obligations of the Southwark Plan (2022); and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015 as amended).

Other matters

175. The conditions imposed on the 2020 application would be amended and updated on a new decision to take account of the scheme changes proposed. Where the conditions have already been discharged (for the Blackfriars Road frontage works) the wording would be revised to reflect the details already approved. The

reasons for the conditions have been updated to reference the adopted London Plan and Southwark Plan, rather than the superseded policies that were in place at the time of the 2020 permission.

176. Where new policy requirements are now in place, such as fire safety, circular economy and whole life carbon, additional conditions are included in the recommendation to address these current policies.
177. The planning obligations in the 2020 s106 agreement that are not affected by the proposals, such as those relating to employment and training in construction, local procurement, and employment in the end use, would continue to apply to a new planning permission.

Community involvement and engagement

178. A Statement of Community Involvement was submitted with the application, summarising the engagement carried out by the applicant in July 2022 prior to submission. The engagement methods used had regard to the council's Development Consultation Charter and a completed engagement summary was also provided. The engagement included two stakeholder meetings, updates to ward councillors, a dedicated project website, a flyer distributed to over 2,000 addresses around the site to promote the project website, posters displayed on the site, an in-person drop-in event held near to the site (attended by four people) and an online webinar (attended by one resident).
179. The applicant received 7 feedback surveys, 3 emails and had 78 visits to the project website. The feedback survey asked four questions, with yes/no/don't know options. Further feedback raised a variety of topics: questioned the impact of the increased number of rooms on local services, infrastructure, public transport and roads; potential noise disturbance; what the impacts are to daylight and sunlight; that there is already significant hotel provision in the area; and the need for the sustainability improvements to deliver tangible benefits.
180. Three rounds of pre-application discussions were held about proposed changes with the planning department, and the three written responses have been published on the planning register.
181. On receipt of the application, the council advertised it by press notice, four site notices, and sending over 300 neighbour letters. The consultation responses received have been considered and are summarised in the section below. Eight objections and one support comment were received from members of the public. Consultation responses from internal council departments and external organisations did not raise issues with the proposed amendments, subject to conditions being imposed again.

Consultation responses from members of the public and local groups

182. The 8 objections received raise the following summarised points:

183. Hotel use

- Permission for the hotel should be removed altogether. The area is already oversaturated with hotels. There is no need for another hotel. All the large hotel chains are in the surrounding streets. The council originally said hotels would be along the riverfront. The permission should never have been agreed against the objections made.
- Already a vast accommodation in Southwark and supply exceeds requirement into the 2040s.
- Perhaps the previously lined up operator realised that there is no need for more hotels. The hotel was previously "pre-let" to Ruby Hotels and Ruby would have had very significant input into what its requirements were from a construction perspective. For unspecified reasons the applicant says that the pre-let is now to "Motel-1".
- By granting the 2020 permission all the council did was add value to the land for the owners to sell on to another profit-focused investor, who now seeks to make more money at the expense of the borough's residents.
- This application has rumbled on for years, lurching from appeal to appeal. The changes are not minor or non-material.
- Conflict with local plan.

184. Other uses

- We have housing crisis and a cost of living crisis. The land will be lost for more important uses, i.e. housing stock that is desperately needed. The housing allocation was not defended by the council. If the owner refuses to use the site for housing then it should remain for community uses than be lost forever for a pointless hotel.
- A large supermarket with a wide range of essential goods is needed instead.

185. Hotel revisions

- If we must have a hotel, we do not need additional hotel rooms, or building height to the plans for this building. The existing plans will impact enormously on neighbour amenity without more hotel rooms or height.
- No one has refreshed the analysis to justify why the area needs another 53 hotel rooms or indeed, any more hotel rooms post-Covid, which has greatly changed the need and demand dynamics.
- It is returning the development to the plans originally rejected by the council in 2018 and at appeal. In 2020, the revised scaled down plan was surprisingly approved (to vast number of concerned parties' dismay), and the present proposal effectively reverts to the rejected one by stealth. The initial proposal had 220 rooms which was reduced to 169 rooms in the approval and now this amendment will increase it by over 30% back to 222 rooms.
- This cynical "minor" supplementary application by the developer restores this monstrous, unneeded and unwanted hotel proposal to its original commercial glory, adding another 53 rooms (+31%) - even more than in the original application which was refused in 2018. The plan is no better

than the rejected one in 2018, and apart from showing a desperation attempt by the developer to maximise its futile investment.

- The number of rooms was a previous reason for refusal: an increase of over 30% cannot in any meaningful sense be classed as "minor". Previous application was amended to reduce the number of rooms. If they were not allowed before they should not be allowed now - for the same reasons.
- There were already previous concerns about the quality of accommodation, but now it has been downgraded further.
- The number of windowless rooms was a reason for refusal of the 2018 scheme and these are proposed or others so close to other buildings as to be all but windowless. Questionable amount of light to the hotel rooms. Many windows on the upper floors face onto the office building, less than 15m away.
- Who would want to stay in a hotel room with no windows, other than the young who will probably be in the roof top bar/terrace.
- Over development.
- The increase in number of rooms in this development is senseless and purely for monetary gains with little regards for the local area. The proposals represent a greater negative impact that, based on previous approved proposals, is not necessary to make the development viable. The changes are substantial and should be scrutinised fully and properly.

186. Neighbour amenity

- The reduced and greenwashed proposal was granted in 2020, despite overwhelming local objection due to its egregious effect on its neighbours. Even as-is, it will now cause misery during construction and continuously in operation, having a severe effect on the physical and mental wellbeing of existing Southwark residents, permanently depriving them of daylight and peace and quiet.
- Residents will lose light and air and the demolition of the existing building and rebuilding will take years of disruption. People studying do not need the noise, dust and pollution that this proposed project would bring. It was already a polluting and disruptive proposal, long objected to by the community, in an already busy area.
- With prospective hotel residents, staff, parking, deliveries, and all the usage that must occur with a large hotel, residents' lives will become even more miserable.
- Close to adjoining properties. The site is surrounded on all sides by residential accommodation.
- Loss of privacy.
- Loss of light. Daylight was one of the reasons the first scheme was refused. Several neighbours will lose more than 5% of daylight, including Sharpley Court.
- The amendments represent an increase in already very high levels of NSL impact at Sharpley Court from the development (based on full room length). Whilst the developer states that NSL impact is reduced when analysis is run on the first 5m of the rooms, it also assumes that any impact (however severe) is acceptable on rooms beyond that depth. The fact in reality is that residents will be massively impacted by loss of light

to rooms above 5m in length, and these amendments represent an unnecessary worsening of that position. In some cases this impact approaches a 40% loss.

- Noise nuisance. This area is generally quiet at night but the plans include rooftop terrace seating that will be used at all hours and will result in evening noise. Serious consideration must be given to how to limit the impact of roof terrace use (and other foot traffic outside the hotel) on locals and the character of the area.
- Light pollution at night.
- Concern at impact on the school with the proposal being only 2m from the boundary, closer and reducing light further.
- Increase in anti-social behaviour in the area now the hotel is to be run as a cheap party hotel instead of an exclusive luxury establishment proposed.
- Since the development was approved already, this is now a damage limitation exercise to stop further negative impact to the neighbourhood. Please seriously consider if this amendment is necessary for the greater good of the people in our borough, instead of the wallets of the developers and investors.

187. Design

- These new proposals include a substantial increase to the building footprint, number of rooms, and height of some parts - as well as changes to the way the roof is used. The new height and scale of the new modification go back to the refused scheme, which was one of the concerns that lead to rejection in 2018.
- The Inspector cited concerns over the height of the hotel and the impact of the hotel on the character of the area. Despite the council planning team swallowing any convenient argument put to them, fail to see any of those concerns to have been sufficiently alleviated.
- Increase in height to parts of the proposal at the south end of the site, which the Inspector already flagged as risking being over-dominating to the traditional building in front.
- Development too high.
- Out of keeping with character of area.
- More open space needed on development.

188. Transport

- Increase to number of rooms will have a knock on effect for things like servicing traffic and noise on Pocock Street. The increase is very substantial and warrants greater scrutiny. It will mean 30% more servicing and deliveries through a single narrow entrance on a residential street.
- The impact of all the heavy traffic on the corner of Blackfriars Road and Webber Street will be a disaster. It is already a dangerous and noisy corner. The hotel will have many comings and goings.
- The traffic consultants for the developer stated they would support measures to mitigate traffic concerns, however these plans do not incorporate a request for the relevant changes to traffic on surrounding roads to be made to stop heavy goods construction and operating vehicles

rat running through them. The Inspector considered rat running as a reason to dismiss the appeal. No conditions have been applied about the traffic by planning officers.

- Inadequate parking provision.
- Inadequate access.
- Increase in traffic.
- Loss of parking.
- Traffic on highways.
- It will cause chaos on the roads and disruption for the local school.

Officer response: rat running was not a specific reason for the appeal scheme being dismissed, only mentioned in the appeal decision as one of the matters raised in addition to the main appeal topics. The s106 requires the construction management plan to include measures to restrict the use of Valentine Place, which would continue to be a requirement of the amended scheme.

189. Other topics

- Strain on existing community facilities.
- Affect local ecology.
- General dislike of proposal.
- Increase of pollution.
- Information missing from plans.
- Not enough info given on application.

190. Consultation

- The applicants want to impose their change of heart in occupier to the detriment of local residents. Objecting to the various iterations has taken a considerable toll on various local residents. It is not acceptable that this further back and forth seemingly at the whim of the prospective occupier takes a yet larger toll and causes yet more anguish. It should be treated for what it is - an abuse of the planning process. Given the significant changes proposed, at the very least there should be a further open planning meeting where residents can raise their objections.
- Sickened and incensed by this new application and it should be refused, with an inquiry opened into how the 2020 grant was justified.
- The consultation by the developer was not properly designed, as people could only comment on the developer's own conclusions, and not the proposals themselves. The open day was during the emergency warning for extreme heat. There is a significant risk the responses do not properly represent the views and interests of locals.
- Planning website not working so proper consultation has not actually taken place.

Officer response: The application was advertised from September (by letters, site notices and press notice) and all comments received before this report was finalised have been summarised above.

191. One comment in support was received from a neighbour that the new team behind the proposal has been engaging and transparent and working with the

neighbour to ensure a boundary that suits them and the neighbour. Supports the plan to regenerate the disused car park and to build a hotel with the enlarged affordable workspace as part of the plan.

Consultation responses from external and statutory consultees

192. **Environment Agency** – there is no change of position, with the response to the previous application unchanged, which asked for the inclusion of a condition regarding ground floor finished floor level on any permission.
193. **Met Police** – there is nothing within the amendments sought that would negatively impact upon the potential for crime and antisocial behaviour at this location. Refer back to the response to the initial application for this site which details some of the likely Secured by Design and crime prevention requirements as well as a request for a condition if permission is granted.
194. **Thames Water** – has no objection in terms of combined waste water, but in its first consultation response identified an inability of the existing water network infrastructure to accommodate the needs of this proposal. Therefore the initial response requested a condition be added to any planning permission to prevent occupation until all water network upgrades to serve the development have been completed or an infrastructure phasing plan has been agreed. However following further correspondence with the applicant, Thames Water has removed the request for a condition and now raises no objection in terms of water network capacity. Other comments can be used as informatives.
195. **Transport for London** – the proposed amendments do not significantly alter construction logistics, deliveries and servicing and the frontage on Blackfriars Road, which are the key concerns of TfL due to the adjacency of the TLRN. Expect the approved construction logistics plan and delivery and servicing plan to be updated if necessary to reflect the changes proposed, to 'carry forward' and continue to apply. The number of bedrooms, and therefore logically the trip generation for the hotel, is proposed to increase by c 30%. The council may consider it appropriate to uplift relevant s106 contributions secured for the extant permission accordingly. The canopy proposed at the hotel entrance on Blackfriars Road which may require an oversail licence from TfL if it extends over the public highway boundary.

Consultation responses from internal consultees

196. **Environmental protection team** – reviewed the proposed changes and the revised noise report. The conditions on the 2020 permission would address and control EPT relevant issues. No major concerns from the proposed amendments to the scheme.
197. **Flooding team** – reviewed the statement of conformity on flood risk and drainage and has no objections to the amendments.
198. **Highways development management** – no comment.

199. **Local economy team** – There is an overall increase in space of 408sqm GEA, which would not justify an increase in construction jobs from the approved scheme. The affordable workspace will be secured through a section 106 legal agreement and will ensure that the proposal assists businesses in the local area. Construction phase jobs and training, end use jobs comments on the 2020 application continue to apply.

Community impact and equalities assessment

200. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
201. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
202. 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.
203. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership. The proposed revisions to the approved scheme are considered not to raise equalities considerations. The proposal continues to provide accessible bedrooms and inclusive access to the new public realm and buildings. The impacts upon neighbouring properties, including the school, are similar to those of the approved scheme. The new public realm would be usable

by members of the public at all times, and the hotel reception would provide public facilities. The construction phase, the hotel and flexible use unit would provide job opportunities.

Human rights implications

204. 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.
205. This application has the legitimate aim of seeking revisions to a permission for a hotel-led scheme. 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

206. The council has published its development plan 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.
207. 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 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?	No

CONCLUSION

208. The proposed amendments would intensify the approved hotel use of the site, in

a building that is of broadly the same scale and architecture as the approved scheme. The proposed hotel rooms are smaller than the approved scheme, however the overall quality of the accommodation would remain acceptable, and the hotel reception again would provide facilities open to the public. It would have similar impacts on neighbour amenity, transport and highways. A larger affordable workspace/community unit would be provided, at the same rental terms as the approved scheme.

209. The increased number of bedrooms results in a higher carbon emission (due to the larger hot water demand) than the approved scheme and while the application proposes more PV panels, its percentage reduction is less than the approved scheme. To achieve the net zero carbon requirement of current policy, a financial payment is proposed, which was not a requirement of the 2020 permission. The public courtyard would remain as approved, and further green roof planting provided.
210. It is therefore recommended that the amended planning permission be granted, subject to the revised and additional conditions set out in the recommendation, and completion of a deed of variation to secure the changes to the 2020 legal agreement.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Environment, Neighbourhoods and Growth, 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 1214 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Recommendation (draft decision notice)
Appendix 2	Relevant planning policies and material considerations
Appendix 3	Relevant planning history
Appendix 4	Consultation undertaken
Appendix 5	Consultation responses received

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth	
Report Author	Victoria Crosby, Team Leader	
Version	Final	
Dated	23 February 2023	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance and Governance	No	No
Strategic Director, Environment, Neighbourhoods and Growth	No	No
Strategic Director of Housing	No	No
Date final report sent to Constitutional Team		23 February 2023

RECOMMENDATION

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

This document is not a decision notice for this application.

Applicant	160 BFR Holdco Ltd	Reg. Number	22/AP/3049
Application Type	S.73 Vary/Remove Conds/Minor Alterations		
Recommendation		Case Number	1390-157

Draft of Decision Notice

The variation is AGREED (subject to completion of legal agreement) for the following development:

Minor material amendments by variation of Condition 1 'Approved Plans' and Condition 30 'Number of Hotel Bedrooms' of planning permission ref. 20/AP/0556 (Erection of an eight storey building with basement, comprising a hotel (Class C1), flexible commercial or community unit (Class B1/D1), retail floorspace (Class A1/A3), creation of public space, landscaping and associated works. Works to the existing office building at ground and roof levels (including a new rooftop terrace, balustrades and PV panels); elevational alterations; and alterations associated with the creation of a new entrance on the Blackfriars Road elevation).

160 Blackfriars Road London Southwark SE1

In accordance with application received on 1 September 2022 and Applicant's Drawing Nos.

Time limit for implementing this permission and the approved plans

1. The development shall be carried out in accordance with the following approved plans:

GA ELEVATION WEST PROPOSED L(00) 156 REV A received 01/09/2022
 GA ELEVATION NORTH PROPOSED L (00) 158 REV A received 01/09/2022
 GA ELEVATION SOUTH PROPOSED L (00) 159 REV A received 01/09/2022
 GA ELEVATION SERVICE YARD NORTH PROPOSED L (00) 160 REV A received 01/09/2022
 GA ELEVATION GROUND FLOOR SINGLE STOREY PROPOSED L (00) 161 REV A received 01/09/2022
 GA ELEVATION FRONT L (00) 171 REV A received 01/09/2022
 BLACKFRIARS ENTRANCE ELEVATION FOR INFORMATION
 LRW_8258_L(00)171A received 13/09/2022

HOTEL ENTRANCE PROPOSED ELEVATIONS PLANNING
LRW_8258_L(00)172A received 13/09/2022
EAST ELEVATION PROPOSED PLANNING LRW_8258_L(00)157C received
19/12/2022
GA SECTION AA PROPOSED L (00) 162 REV A received 01/09/2022
SECOND LEVEL GA PLAN L (00) 165 received 01/09/2022
THIRD LEVEL GA PLAN L (00) 166 received 01/09/2022
FOURTH LEVEL GA PLAN L (00) 167 received 01/09/2022
SIXTH LEVEL GA PLAN L (00) 169 received 01/09/2022
GA SECTION FF PROPOSED L (00) 170 received 01/09/2022
FIRST LEVEL GA PLAN L (00) 152 REV A received 01/09/2022
SEVENTH FLOOR GA PLAN L (00) 154 REV A received 01/09/2022
FIFTH LEVEL GA PLAN LRW_8258_L(00)168A received 13/09/2022
BASEMENT LEVEL GA PLAN LRW_8258_L(00)151B received 28/11/2022
ROOF PLAN LRW_8258_L(00)155C received 28/11/2022
PLANTER DETAIL LRW_8258_L(00)176 received 28/11/2022
GROUND FLOOR GA PLAN PLANNING LRW_8258_L(00)150D received
19/12/2022

Reason:

For the avoidance of doubt and in the interests of proper planning.

2. The development hereby permitted shall be begun no later than 1 September 2023.

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. INCLUSIVE ACCESS TO BASEMENT

Prior to any below ground works hereby authorised being undertaken, a detailed plan showing step free access from the basement car parking area to ground floor level of the hotel and workspace/community use unit, and detailing any valet parking arrangements shall be submitted to and approved in writing by the Local Planning Authority. The development shall be constructed in accordance with the approved details.

Reason:

To ensure that disabled people and the mobility impaired have appropriate means of access and egress to the basement parking areas in accordance with the National Planning Policy Framework (2021), D5 Inclusive access of the London Plan (2021) and P13 Design of places and P55 Parking standards for disabled people and the physically impaired the Southwark Plan (2022).

4. ARCHAEOLOGICAL FIELDWORK

Prior to any below ground works hereby authorised being undertaken, the applicant shall:

A. Implement the programme of archaeological evaluation (initial investigative trial trenching) in accordance with the written scheme of investigation (WSI) approved by ref. 21/AP/0861 unless an alternative WSI is submitted to and approved in writing by the Local Planning Authority;

B. Report on the results of these evaluation works as approved by the Local Planning Authority in ref. 21/AP/2740 or an alternative report submitted to and approved in writing by the Local Planning Authority;

C. The implementation of a further programme of archaeological work, known as archaeological mitigation. Archaeological mitigation can involve a range of possible options, including: preservation of archaeological remains by record (archaeological excavation and removal); and/or in situ (preservation on the site by design or by the implementation of an approved preservation regime); or further options to investigate, monitor (watching brief), model or sample archaeological deposits. This further programme of archaeological work shall be in accordance with a second (Stage C) written scheme of investigation (WSI) for archaeological mitigation, which shall be submitted to the Local Planning Authority for approval in writing.

Reason:

To ensure the preservation of archaeological remains by record or in situ, to identify and record any features of archaeological interest discovered during the works, and in order to mitigate the impact of the works on the archaeological resource, in accordance with the National Planning Policy Framework (2021), HC1 Heritage conservation and growth of the London Plan (2021), and P14 Design quality and P23 Archaeology of the Southwark Plan (2022).

5. BASEMENT AND FOUNDATION DESIGN

Prior to any below ground works hereby authorised being undertaken, a detailed scheme showing the complete scope and arrangement of the basement and foundation design, and all associated subterranean groundworks, including the construction methods shall be submitted to and approved by the Local Planning Authority. The submitted documents should show how archaeological remains will be protected by a suitable mitigation strategy. The development shall only be carried out in accordance with the approval given.

Reason:

In order that all below ground impacts of the proposed development are known and an appropriate protection and mitigation strategy is achieved to preserve archaeological remains by record and/or in situ in accordance with HC1 Heritage conservation and growth of the London Plan (2021), P14 Design quality and P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework (2021).

6. SITE CONTAMINATION

a) The site investigation and risk assessment shall be completed in accordance with the scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site as approved by ref. 21/AP/0696 unless an alternative site investigation and risk assessment is submitted to and approved by the Local Planning Authority:

i) The Phase 1 (desk study, site categorisation; sampling strategy etc.) shall be submitted to the Local Planning Authority for approval before the commencement of any intrusive investigations.

ii) Any subsequent Phase 2 (site investigation and risk assessment) shall be conducted in accordance with any approved scheme and submitted to the Local Planning Authority for approval prior to the commencement of any remediation that might be required.

b) In the event that contamination is present, 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 will 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 works 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.

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

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

Reason:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with P64 Contaminated land and hazardous substances of the Southwark Plan (2022) and the National Planning Policy Framework (2021).

7. BASEMENT IMPACT ASSESSMENT

No below ground works shall commence until suitable investigations are undertaken to determine the ground and groundwater conditions (including levels) at the site and a Basement Impact Assessment (BIA) have been submitted to and approved in writing by the Local Planning Authority. This should include groundwater flood risk mitigation measures as required, with the measures constructed to the approved details. The BIA shall assess if the lowest level of the basement will be above, or below the groundwater levels recorded from the ground investigations. The BIA shall consider fluctuations in groundwater levels and the risks this can pose to the site and shall include a plan of the basement area within the boundary of the site, with any known (investigated) basements and subterranean structures adjacent to the site. This is to see if there may be a risk of obstructing groundwater flows which could potentially cause a build up of pressure on the upstream side of the subterranean structures.

Further guidance on preparing BIA can be found in appendix to our SFRA 2016 here:

<https://www.southwark.gov.uk/environment/flood-risk-management/strategic-flood-risk-assessmentsfra-chapter=2>

The development shall be carried out in accordance with the approved details.

Reason:

To minimise the potential for the site to contribute to changes in groundwater conditions and any subsequent flooding in accordance with the Southwark Strategic Flood Risk Assessment (2016), the National Planning Policy Framework (2021), SI12 Flood risk management and SI13 Sustainable drainage of the London Plan (2021) and P14 Design quality and P68 Reducing flooding risk of the Southwark Plan (2022).

8. TREE PROTECTION

1) Prior to works commencing, including any demolition, for the hotel or workspace/community unit an Arboricultural Method Statement including an Arboricultural Survey of the trees near the eastern and southern boundaries of the site 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.

2) The approved works including any demolition, on the Blackfriars Road frontage alterations (including the ramps, stairs, retaining walls, ground level balustrade, entrance canopy), shall be undertaken only in accordance with the Arboricultural Method Statement and details approved by ref. 21/AP/1974 unless an alternative Statement and cross sections are submitted to and approved in writing by the Local Planning Authority.

3) 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.

4) 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), G1 Green infrastructure, G5 Urban greening, G6 Biodiversity and access to nature and G7 Trees and woodlands of the London Plan (2021) and P13 Design of places, P60 Biodiversity and P61 Trees of the Southwark Plan (2022).

9. SECURED BY DESIGN

a) The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific security needs of the development, in accordance with the principles and objectives of Secured by Design. Details of these measures shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the relevant parts of the development in part i) or part ii) below and shall be implemented in accordance with the approved details prior to occupation:

i) for the hotel or workspace/community unit;

ii) for the office entrance, public realm or the Blackfriars Road frontage alterations (including the ramps, stairs, retaining walls, ground level balustrade, entrance canopy) as approved by ref. 21/AP/3094 unless other details are submitted to and approved in writing by the Local Planning Authority.

b) Prior to first occupation of the development a satisfactory Secured by Design inspection must take place and the resulting Secured by Design certificate submitted to and approved by the Local Planning Authority.

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: the National Planning Policy Framework (2021), D11 Safety, security and resilience to emergency of the London Plan (2021), P16 Designing out crime of the Southwark Plan (2022).

Permission is subject to the following Grade Condition(s)

10. MATERIAL SAMPLES

a) Prior to above grade works commencing for those parts of the development comprising the hotel, workspace/community unit, sample panels of all external facing materials (including the brickwork styles, brick, bonding, coursing to the hotel and workspace/community unit) to be used in the carrying out the relevant part of the development shall be made available for inspection on site and approved in writing by the Local Planning Authority; the development shall not be carried out otherwise than in accordance with any such approval given. The materials for the office entrance and retail unit shall be undertaken in accordance with the details approved by ref. 21/AP/2095 unless other details are submitted to and approved in writing by the Local Planning Authority.

b) The Blackfriars Road frontage alterations (including those parts of the development comprising the ramps, stairs, retaining walls, ground level balustrade, entrance canopy and roof level balustrade), shall be carried out in accordance with the details and samples of all external facing materials approved by refs. 21/AP/2095 and 22/AP/2577, unless other details are submitted to and approved in writing by the Local Planning Authority.

Reason:

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

11. DETAILED DRAWINGS

Prior to above grade works commencing for the hotel, workspace/community unit, section detail-drawings at a scale of at least 1:10 through:

- the facades;
- parapets; and
- heads, cills and jambs of all openings

to be used in the carrying out the relevant part of this permission shall be submitted to and approved by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any such approval given.

The facades of the office entrance and retail unit, entrance ramps and stairs on the Blackfriars Road frontage shall be constructed in accordance with the detailed drawings approved in ref. 21/AP/2096 and 22/AP/2614 unless details are submitted to and approved by the Local Planning Authority.

Reason:

In order that the Local Planning Authority may be satisfied as to the quality of the design and details in accordance with the National Planning Policy Framework (2021), D4 Delivering good design of the London Plan (2021), and P13 Design of places and P14 Design quality of the Southwark Plan (2022).

12. HARD AND SOFT LANDSCAPING

a) The hard and soft landscaping scheme showing the treatment of the alterations to the Blackfriars Road frontage (including cross sections, surfacing materials, layouts, and edge details), shall be undertaken in accordance with the detailed approved by ref. 21/AP/2097 unless other details are 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.

b) Prior to above grade works commencing for the hotel, workspace/community unit (whichever is first) detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings and not addressed by part a) above (including cross sections, surfacing materials of any pathways, layouts, materials and edge details), tree pits in the new public realm, green walls and raised planters around the courtyard, 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.

c) 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 same size 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 the National Planning Policy Framework (2021), D8 Public realm, G1 Green infrastructure, G5 Urban greening, G6 Biodiversity and access to nature and G7 Trees and woodlands of the London Plan (2021) and P13 Design of places, P59 Green infrastructure, P60 Biodiversity and P61 Trees of the Southwark Plan (2022).

13. ROOFS FOR BIODIVERSITY

- a) Prior to above grade works commencing for the hotel, workspace/community unit, details of 783sqm of 'biosolar' green roofs and blue roofs to the hotel building hereby approved shall be submitted to and approved in writing by the Local Planning Authority. The green roofs shall be:
 - o biodiversity based with extensive substrate base (depth 80-150mm);
 - o laid out in accordance with agreed plans; and
 - o 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).
- b) The 'biosolar' green roofs to the retained office building shall be carried out in accordance with the details approved by ref. 21/AP/2751 unless other details are submitted to and approved in writing by the Local Planning Authority. The green roofs shall be:
 - o biodiversity based with extensive substrate base (depth 80-150mm);
 - o laid out in accordance with agreed plans; and
 - o 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).
- c) The green and blue roofs 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 development shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.
- d) Discharge of this condition will be granted on receiving the details of the green and blue roofs and Local Planning Authority 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 G1 Green infrastructure, G5 Urban greening and G6 Biodiversity and access to nature of the London Plan (2021), P13 Design of places, P59 Green infrastructure and P60 Biodiversity of the Southwark Plan (2022).

14. SWIFT NESTING BRICKS

Prior to above grade works commencing for the hotel or workspace/community unit, details of Swift nesting bricks, shall be submitted to and approved in writing by the Local Planning Authority. No fewer than 12 nesting bricks shall be provided and the details shall include the exact location, specification and design of the habitats. The 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 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 features and mapped locations and Southwark Council agreeing the submitted plans, and once the nest features are installed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the nest 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 G1 Green infrastructure, G5 Urban greening and G6 Biodiversity and access to nature of the London Plan (2021), and P59 Green infrastructure and P60 Biodiversity of the Southwark Plan (2022).

15. CYCLE STORAGE DETAILS

Prior to above grade works commencing for the hotel or workspace/community unit or the cycle store building, details (1:50 scale drawings) of the facilities to be provided for the secure and covered storage of cycles for staff and visitors including elevations of the cycle store shall be submitted to and approved in writing by the Local Planning Authority. The details as a minimum shall be in accordance with the London Plan Intend to Publish, and demonstrate how they comply with the London Cycle Design Standards (2016). The cycle parking shall be installed prior to the first occupation of the development. Thereafter the cycle

parking facilities provided shall be retained and the space used for no other purpose, and the development shall not be carried out otherwise in accordance with any such approval given.

Reason:

In order to ensure that satisfactory safe and secure cycle parking facilities are provided and retained (and that the store building does not cause harm to neighbour amenity) in order to encourage the use of cycling as an alternative means of transport to the development and to reduce reliance on the use of the private car in accordance with: the National Planning Policy Framework (2021), T5 Cycling of the London Plan (2021), P53 Cycling and P56 Protection of amenity of the Southwark Plan (2022).

16. INTERNAL VENTILATION

Prior to above grade works commencing for the hotel or workspace/community unit, full particulars and details of a scheme for the internal ventilation of the development which shall include; appropriately located plant, inlets and outlets; filtration and treatment of incoming air to ensure it meets the national standards for external air quality; plant noise output levels; and a management and maintenance plan shall be submitted to and approved by the Local Planning Authority. The development shall be carried out prior to first occupation of the hotel or workspace/community unit, operated and maintained in accordance with the approval given.

Reason:

In order that the Local Planning Authority may be satisfied that the ventilation, ducting, filtration/treatment and ancillary equipment is incorporated as an integral part of the development for this site with external air quality below the national standard, in the interests of amenity in accordance with S11 Improving air quality of the London Plan (2021), and P41 Hotels and other visitor accommodation and P65 Improving air quality of the Southwark Plan (2022).

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

17. LANDSCAPING MANAGEMENT PLAN

Prior to first occupation of the hotel or workspace/community unit (whichever is first) hereby permitted, a landscape management plan, including long- term design objectives, management responsibilities and maintenance schedules for all landscaped areas and ecological features, 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.

The scheme shall include the following elements: public realm, biodiverse roofs, green walls, bird nesting features.

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, in line with the National Planning Policy Framework (2021), D8 Public realm of the London Plan (2021) and P59 Green infrastructure of the Southwark Plan (2022). 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.

18. DETAILS OF THE REFUSE STORAGE FACILITIES

Before the first occupation of the hotel or workspace/community unit (whichever is first) hereby permitted, details of the arrangements for the storing of refuse shall be submitted to and approved in writing by the Local Planning Authority and the approved facilities shall be provided and made available for use by the occupiers of the development. 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), S17 Reducing waste and supporting the circular economy, and P56 Protection of amenity and P62 Reducing waste of the Southwark Plan (2022).

19. COMMERCIAL KITCHEN EXTRACT VENTILATION

Prior to the commencement of use of the hotel or retail unit, full particulars and details of a scheme for the extraction and venting of odours, fats and particulate matter from the cooking activities from the kitchens within that part of the development shall be 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. Any exhaust flue from the commercial kitchen shall terminate at 1m above the building eaves.

Reason:

In order to ensure that any installed ventilation, ducting and ancillary equipment in the interests of amenity will not cause amenity impacts such as odour, fume or noise nuisance and will not detract from the appearance of the building in accordance with the National Planning Policy Framework (2021), P14 Design

quality, P56 Protection of amenity and P66 Reducing noise pollution and enhancing soundscapes of the Southwark Plan (2022).

20. NOISE FROM AMPLIFIED MUSIC FROM NON-RESIDENTIAL PREMISES

Prior to the commencement of use of the Class A3 and Class D1 premises a scheme of sound insulation shall be submitted to the Local Planning Authority for approval. The scheme of sound insulation shall be installed to ensure that the LFmax sound from amplified and non-amplified music and speech shall not exceed the lowest L90 5min at 1m from the facade of nearby residential premises at all third octave bands between 63Hz and 8kHz. The scheme of sound insulation shall be constructed and installed in accordance with the approval given and shall be permanently maintained thereafter. Following completion of the development and prior to the commencement of use of the commercial premises a validation test shall be carried out. The results shall be submitted to the Local Planning Authority for approval in writing.

Reason:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities associated with non-residential premises in accordance with the National Planning Policy Framework (2021), D14 Noise of the London Plan (2021), P14 Design quality, P56 Protection of amenity and P66 Reducing noise pollution and enhancing soundscapes of the Southwark Plan (2022).

21. BREEAM

a) Prior to first occupation of the hotel or workspace/community unit (whichever is first) hereby permitted, the Local Planning Authority shall receive from the applicant and give written approval of an interim report/letter (together with any supporting evidence) from the licensed BREEAM assessor. The report/letter shall confirm that sufficient progress has been made in terms of detailed design, procurement and construction to be reasonably well assured that the development hereby approved will, once completed, achieve at least a BREEAM "Excellent" rating.

b) Within six months of first occupation of the development 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 BREEAM rating of at least "Excellent" has been met.

Reason:

To ensure the proposal complies with the National Planning Policy Framework (2021), S12 Minimising greenhouse gas emissions, S17 Reducing waste and supporting the circular economy and G5 Urban greening of the London Plan (2021) and P69 Sustainability standards of the Southwark Plan (2022).

Permission is subject to the following Compliance Condition(s)

22. RESTRICTION ON THE INSTALLATION OF 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 or a separate planning application, shall be placed on the roofs or be permitted to project above the roofline of any part of the building as shown on elevational drawings or shall be permitted to extend outside of the roof plant enclosures of any building hereby permitted.

Reason:

In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area in accordance with the National Planning Policy Framework (2021), P13 Design of places and P14 Design quality of the Southwark Plan (2022).

23. RESTRICTION ON THE INSTALLATION OF TELECOMMUNICATIONS EQUIPMENT

Notwithstanding the provisions of Part 16 of The Town & Country Planning (General Permitted Development) Order 2015 (as amended or re-enacted) no external telecommunications equipment or structures shall be placed on the roofs or any other part of a building hereby permitted, unless details of any telecommunications equipment specifically required for the hotel use only are submitted to and approved by the Local Planning Authority prior to its installation.

Reason:

In order to ensure that no telecommunications plant or equipment which might be detrimental to the design and appearance of the building and visual amenity of the area is installed on the roof of the building in accordance with: the National Planning Policy Framework (2021), P13 Design of places, P14 Design quality and P56 Protection of amenity of the Southwark Plan (2022).

24. ELECTRIC VEHICLE CHARGING

An electric vehicle charging point shall be provided to service a minimum of 50% of the car parking spaces provided for the development.

Reason:

To encourage the uptake of electric and hybrid vehicles and minimise the effect of the development on local air quality within the designated Air Quality Management Area in line with S11 Improving air quality and T6 Car parking of the London Plan (2021), P65 Improving air quality and P54 Car parking of the Southwark Plan (2022).

25. TERRACE HOURS OF USE

The roof terrace on the retained office building shall be open to office workers only, and shall not be in use after 22:00 on any day. The roof terrace shall at no time be open to or used by guests of the hotel hereby permitted.

Reason:

To safeguard the amenities of neighbouring residential properties in accordance with the National Planning Policy Framework (2021), and P14 Design quality and P56 Protection of amenity of the Southwark Plan (2022).

26. ROOFS TO BE USED ONLY IN EMERGENCY

The roofs of the hotel building hereby approved shall not be used other than as a means of escape and shall not be used for any other purpose including use as a roof terrace or balcony or for the purpose of sitting out.

Reason:

In order that the privacy of neighbouring properties may be protected from overlooking from use of the roof area in accordance with the National Planning Policy Framework (2021), and P14 Design quality and P56 Protection of amenity of the Southwark Plan (2022).

27. CLASS A3 HOURS OF USE

The commercial Class A3 use hereby permitted shall not be carried on outside of the hours of 08:00 to 23:00 on Sunday to Thursday, 08:00 to 00:00 Friday and Saturdays.

Reason:

To safeguard the amenities of neighbouring residential properties in accordance with the National Planning Policy Framework (2021), and P14 Design quality and P56 Protection of amenity of the Southwark Plan (2022).

28. SERVICING HOURS

Any deliveries or collections to the hotel and workspace/community unit shall only be between the following hours: 08:00 to 18:00 on Monday to Fridays, and 09:00 to 14:00 Saturdays. No deliveries or servicing shall take place on Sundays or Bank Holidays.

Reason:

To safeguard the amenity of neighbouring residential properties in accordance with the National Planning Policy Framework (2021), and P14 Design quality and P56 Protection of amenity of the Southwark Plan (2022).

29. RESTRICTION ON USE WITHIN THE USE CLASS HEREBY PERMITTED

Notwithstanding the provisions of Class D1 of the Town and Country Planning (Use Classes) Order and any associated provisions of the Town and Country Planning General Permitted Development Order (including any future amendment or enactment of those Orders) the use hereby permitted of the ground floor Class D1 unit shall not include any use as a place of worship, school, children's nursery or gym.

Reason:

Limited information of the precise use of the ground floor unit has been provided by the applicant, and given the broad range of uses within Class D1 the Local Planning Authority wishes to have the opportunity of exercising control over any subsequent alternative use within Class D1 particularly those that raise noise and transport issues that would require a detailed assessment, in accordance with: the National Planning Policy Framework (2021), and P56 Protection of amenity of the Southwark Plan (2022).

30. NUMBER OF HOTEL BEDROOMS

The building hereby approved shall comprise a maximum of 222 hotel bedrooms.

Reason:

To ensure that the development is carried out in accordance with the approved plans and documents and otherwise conforms to the principles of sustainable development as described in the National Planning Policy Framework (2021).

31. FLOOD RISK ASSESSMENT

The ground floor finished floor level must be set no lower than 4.27m AOD metres above Ordnance Datum (mAOD), in line with the submitted '1561 - Blackfriars Road | Flood Risk Assessment and Drainage Strategy Report' by Heyne Tillett Steel (HTS) dated February 2020; Rev C as updated by the S73 - Statement of Conformity by Heyne Tillett Steel dated 1/8/22, unless an alternative flood risk assessment is submitted to and approved by the Local Planning Authority.

Reason:

To ensure: the development is designed safely in reference to flood risk in accordance with the National Planning Policy Framework (2021), S12 Flood risk management of the London Plan (2021) and P68 Reducing flood risk of the Southwark Plan (2022).

Permission is subject to the following Special Condition(s)

32. REPORTING OF ARCHAEOLOGICAL WORK

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

Reason:

In order that the archaeological interest of the site is secured with regard to the details of the post-excavation works, publication and archiving to ensure the preservation of archaeological remains by record in accordance with P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework (2021).

33. PLANT NOISE

The Rated sound level from any plant, together with any associated ducting shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. Furthermore, the Specific plant sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific Sound levels shall be calculated fully in accordance with the methodology of BS4142:2014. Prior to the plant being commissioned a validation test shall be carried out following completion of the development. The results shall be submitted to the Local

Planning Authority for approval in writing. The plant and equipment shall be installed and constructed in accordance with the approval given and shall be permanently maintained thereafter.

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the National Planning Policy Framework (2021), D14 Noise of the London Plan (2021) and P14 Design quality and P56 Protection of amenity of the Southwark Plan (2022).

34. EXTERNAL LIGHTING

Details of any external lighting (including: design; power and position of luminaries; light intensity contours) of all affected external areas (including areas beyond the boundary of the development) shall be submitted to and approved by the Local Planning Authority prior to the installation of any such lighting. The external lighting to the Blackfriars Road frontage shall be installed and operated in accordance with the details approved by ref. 21/AP/2098 unless other details are submitted to and approved by the Local Planning Authority. Prior to the external lighting being commissioned for use, a validation report shall be submitted to the Local Planning Authority for approval in writing. The development shall not be carried out or operated otherwise than in accordance with any such approval given. Any external lighting system installed at the development shall comply with the Institute of Lighting Professionals (ILE) Guidance Note 1 for the reduction of obtrusive light (2020).

Reason:

In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with the National Planning Policy Framework (2021), and P14 Design quality, P16 Designing out crime and P56 Protection of amenity of the Southwark Plan (2022).

35. SCREENING TO WINDOWS

Prior to the commencement of the hotel or workspace/community unit development, details of how the four hotel bedroom windows at the ground floor southern elevation are to be screened or provided with obscure glazing or such other privacy measure, shall be submitted to and approved in writing by the Local Planning Authority. These windows shall be constructed in accordance with the approved details, and retained as such.

Reason:

To protect the amenity of the neighbouring residential properties on Webber Street, to comply with P56 Protection of amenity of the Southwark Plan (2022).

36. FIRE STATEMENT

The development hereby permitted shall be carried out in accordance with the Fire Planning Statement by Norman Disney and Young dated 14 November 2022, unless a revised fire statement is submitted to and approved in writing by the Local Planning Authority prior to the relevant works being carried out.

Reason:

In order to ensure that the fire safety of the proposed development has been duly considered, as required by policy D12 Fire safety of the London Plan (2021).

37. USE CLASSES

Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 and any associated provisions of the Town and Country Planning General Permitted Development Order (including any future amendment of enactment of those Orders), and notwithstanding the other uses within Class E:

- the office floorspace hereby approved shall be used for Use Class E(g)(i) office purposes only;
- the retail floorspace hereby approved shall be used for Use Class E(a), E(b) and/or E(c) retail, professional services and/or cafe and restaurant purposes only;
- the hotel floorspace hereby approved shall be used for Use Class C1 hotel purposes and ancillary reception purposes only;
- the workspace/community unit shall be used for Use Class E(g) and/or F1 purposes only (and subject to the restriction on F1 uses in condition 29).

Reason:

In order to ensure that the site provides office, retail, workspace or community and hotel uses for this site within the Central Activities Zone, Opportunity Area and town centre in line with its assessment, to comply with policies SD1 Opportunity Areas, SD4 The Central Activities Zone, SD6 Town centres and high streets, E3 Affordable workspace of the London Plan (2021), and policies P30 Offices and business development, P31 Affordable workspace, P35 Town and local centres, P41 Hotels and other visitor accommodation and P47 Community uses of the Southwark Plan (2022) and as other uses within these Classes may have different impacts than those assessed within the application.

Informatives

1 The application site falls within 'Town Centre' designation of the SSDM and the footways should be paved with granite natural stone paving slabs with 300mm wide granite kerbs. The applicant is to note that surface water from private areas is not permitted to flow onto public highway in accordance with Section 163 of the Highways Act 1980. Detailed drawings should be submitted as part of the s278 application confirming this requirement.

2 Air quality at this location does not meet the national standard for NO₂. It is recommended that any external doors are fitted with automatic closers and that any air intake for ventilation purposes is situated on the rear façade of the development or the façade furthest from emissions sources such as busy roads.

3 The applicant is advised that to discharge the cycle parking condition, TfL expects to see the proposed layout accommodating at least:

- London Plan standard quantum of cycle parking;
- At least five per cent of cycle parking should be Sheffield stands at wider spacing for larger cycles (1.8m spacing);
- A proportion of standard spaced Sheffield stands to ensure a good mix of cycle parking solutions (for all ages and abilities).
- 2500mm in front of the lowered frame of each two-tier rack.
- The cycle parking will be assessed using the latest version of policy and LCDS.

4 The applicant is advised of the following comments from Thames Water:

As required by Building regulations part H paragraph 2.36, Thames Water requests that the applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. TW would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

There are public sewers crossing or close to the development. If planning significant work near TW sewers, it is important that the applicant minimises the risk of damage. TW will need to check that the development doesn't limit repair or maintenance activities, or inhibit the services TW provides in any other way. The applicant is advised to read TW guide Working Near Or Diverting Our Pipes.

If you are planning on using mains water for construction purposes, it is important the applicant let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.

Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres per minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read TW's guide Working Near Our Assets to ensure workings are in line with the necessary processes needing to follow if considering working above or near TW's pipes or other structures.

The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read TW guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.
<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

RELEVANT PLANNING POLICIES AND MATERIAL CONSIDERATIONS

Planning policy and material considerations

National Planning Policy Framework

1. The revised National Planning Policy Framework ('NPPF') was published on 20 July 2021 which sets out the national planning policy. 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 relevant sections are:
 - Chapter 2 Achieving sustainable development
 - Chapter 6 Building a strong, competitive economy
 - Chapter 7 Ensuring the vitality of town centres
 - Chapter 8 Promoting healthy and safe communities
 - Chapter 9 Promoting sustainable transport
 - Chapter 11 Making effective use of land
 - Chapter 12 Achieving well-designed places
 - Chapter 14 Meeting the challenge of climate change, flooding and coastal change
 - Chapter 15 Conserving and enhancing the natural environment
 - Chapter 16 Conserving and enhancing the historic environment.

The London Plan 2021

2. 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
 - SD1: Opportunity Areas
 - SD4: The Central Activities Zone
 - SD6: Town centres and high streets
 - SD7: Town centres development principles and Development Plan Documents
 - D1: London's form, character and capacity for growth
 - D2: Infrastructure requirements for sustainable densities
 - D3: Optimising site capacity through the design-led approach
 - D4: Delivering good design
 - D5: Inclusive design
 - D8: Public realm
 - D10: Basement development

D11: Safety, security and resilience to emergency
 D12: Fire safety
 D14: Noise
 S1: Developing London's social infrastructure
 E1: Offices
 E2: Providing suitable business space
 E3: Affordable workspace
 E9: Retail, markets and hot food takeaways
 E10: Visitor infrastructure
 E11: Skills and opportunities for all
 HC1: Heritage conservation and growth
 G1: Green infrastructure
 G5: Urban greening
 G6: Biodiversity and access to nature
 G7: Trees and woodlands
 SI1: Improving air quality
 SI2: Minimising greenhouse gas emissions
 SI4: Managing heat risk
 SI5: Water infrastructure
 SI6: Digital connectivity infrastructure
 SI7: Reducing waste and supporting the circular economy
 SI12: Flood risk management
 SI13: Sustainable drainage
 T1: Strategic approach to transport
 T2: Healthy streets
 T3: Transport capacity, connectivity and safeguarding
 T4: Assessing and mitigating transport impacts
 T5: Cycling
 T6: Car parking
 T7: Deliveries, servicing and construction
 T9: Funding transport infrastructure through planning
 DF1: Delivery of the Plan and planning obligations.

Southwark Plan

3. The Southwark Plan (2022) has been adopted recently. It was approved by Cabinet on 7 December 2021 and proceeded to final adoption by Council Assembly on 23 February 2022. The Southwark Plan (2022) has replaced the saved policies of the Southwark Plan (2007), the Core Strategy (2011), the Aylesbury Area Action Plan (2010), the Peckham and Nunhead Area Action Plan (2014) and the Canada Water Area Action Plan (2015).
4. The earlier version, known as the New Southwark Plan was submitted to the Secretary of State in January 2020. The Examination in Public (EiP) for the NSP took place between February and April 2021. The Inspectors wrote a post hearings letter on 28 May 2021 and under Section 20(7)(c) of the Planning and Compulsory Purchase Act (2004) the Council asked the Inspectors to recommend Main Modifications to ensure the Plan is sound. The Council consulted on the Main Modifications as recommended by the Inspectors from 6 August 2021 to 24 September 2021. The Inspectors published their final report

and the Plan proceeded to adoption.

5. The Southwark Plan (2022) includes Strategic Policies, Area Visions and Development Management Policies. The most relevant strategic policies are as follows:
 - ST1 Southwark's Development Targets
 - ST2 Southwark's Places
 - SP2 Southwark Together
 - SP3 A great start in life
 - SP4 Green and inclusive economy
 - SP5 Thriving and neighbourhoods and tackling health equalities
 - SP6 Climate emergency.
6. The site is within the AV.04 Blackfriars Road Area Vision and is site allocation NSP17 Friars House, 157-168 Blackfriars Road.
7. The most relevant development management policies of the Southwark Plan are as follows:
 - P13 Design of places
 - P14 Design quality
 - P16 Designing out crime
 - P18 Efficient use of land
 - P19 Listed buildings and structures
 - P20 Conservation areas
 - P21 Conservation of the historic environment and natural heritage
 - P23 Archaeology
 - P28 Access to employment and training
 - P30 Office and business development
 - P31 Affordable workspace
 - P33 Business relocation
 - P35 Town and local centres
 - P39 Shop fronts
 - P41 Hotels and other visitor accommodation
 - P44 Broadband and digital infrastructure
 - P45 Healthy development
 - P47 Community uses
 - P49 Public transport
 - P50 Highway impacts
 - P51 Walking
 - P53 Cycling
 - P54 Car parking
 - P55 Parking standards for disabled people and the physically impaired
 - P56 Protection of amenity
 - 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
IP1 Infrastructure
IP2 Transport infrastructure
IP3 Community infrastructure levy (CIL) and section 106 planning obligations
IP6 Monitoring development
IP7 Statement of community involvement.

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

Neighbourhood Plan

9. The South Bank and Waterloo Neighbourhood Plan was published in January 2020 and its area extends to the western side of Blackfriars Road, opposite the site.

Supplementary Planning Document and other relevant documents

10. The following Supplementary Planning Documents issued by the council are material considerations:
2015 Technical Update to the Residential Design Standards SPD (2011)
Design and Access Statements SPD (2007)
Heritage SPD (2021)
Section 106 Planning Obligations and CIL SPD (2015 and addenda).

Greater London Authority Supplementary Guidance

11. The following Supplementary Planning Documents issued by the GLA are material considerations:
Accessible London SPG (2014)
Air Quality Neutral LPG (2023)
Air Quality Positive LPG (2023)
Be Seen Energy Monitoring LPG (2021)
Character and Context SPG (2014)
Circular Economy Statements LPG (2022)
Crossrail Funding SPG (2016)
Energy Assessment Guidance (2020)
Social Infrastructure SPG (2015)
Sustainable transport, walking and cycling draft guidance (2022)
The control of dust and emissions in construction SPG (2014)
Urban Greening Factor LPG (2023)
Whole Life Carbon LPG (2022)

Emerging material considerations

Draft GLA guidance

12. To support the London Plan (2021), the GLA has drafted further London Planning Guidance (LPG) on topic areas including:
Fire Safety draft LPG
Optimising site capacity: a design-led approach draft LPG.

RELEVANT PLANNING HISTORY

Reference and Proposal	Status
<p>18/AP/1215 Erection of a 10 storey building (40.23m AOD) with basement, comprising a 220 bedroom hotel with ancillary restaurant (Class C1); flexible office space (Class B1); retail units (Class A1/A3); creation of public space; landscaping and associated works. Works to the existing building at ground and roof levels (including a new rooftop terrace, enclosure and PV panels); elevational alteration; creation of a new entrance and the installation of an architectural feature along the Blackfriars Road elevation.</p>	<p>REFUSED 19/12/18</p> <p>Appeal dismissed 14/10/19</p>
<p>20/AP/0556 Erection of an eight storey building with basement, comprising a hotel (Class C1), flexible commercial or community unit (Class B1/D1), retail floorspace (Class A1/A3), creation of public space, landscaping and associated works. Works to the existing office building at ground and roof levels (including a new rooftop terrace, balustrades and PV panels); elevational alterations; and alterations associated with the creation of a new entrance on the Blackfriars Road elevation.</p>	<p>GRANTED 27/08/2020</p>
<p>22/AP/3402 Alterations to the facades of the office building with removal of the cladding, introduction of a fire escape door at roof level and upgrading the existing plant equipment (including addition of louvres).</p>	<p>GRANTED 06/02/2023</p>
<p>22/AP/3704 Installation of 6 no. illuminated fascia signs on the canopy along Blackfriars Road.</p>	<p>GRANTED 20/12/2022</p>
<p>23/AP/0381 Installation of 2 pergolas at roof level.</p>	<p>Application submitted 10/02/2023</p>

CONSULTATION UNDERTAKEN

Site notice date: 22/09/2022

Press notice date: 22/09/2022

Case officer site visit date: 22/09/22

Neighbour consultation letters sent: 21/09/2022

Internal services consulted

Design and Conservation Team
 Transport Policy
 Environmental Protection
 Flood Risk Management & Urban Drainage
 Highways Development and Management
 Local Economy
 Community Infrastructure Levy Team

Statutory and non-statutory organisations

Environment Agency
 Thames Water
 Transport for London
 London Fire & Emergency Planning Authority
 Metropolitan Police Service (Designing Out Crime)

Neighbour and local groups consulted:

N7 Peabody Square Blackfriars Road London	8EN
13 Sharpley Court 8A Pocock St London	Flat 7 1 Valentine Row London
11 Windmill Gardens Leicester LE8 0LX	24 Sharpley Court 8A Pocock Street London
28 Pakeman House Pocock St London	Flat 73 Globe View House 29 Pocock Street
Flat 40, Pakeman House London SE1 0BH	Freeths 1 Vine Street London
1 The Priory Webber Street London	Flat 27 Globe View House 171 Blackfriars Road London
2 Murton Court Hillside Road St Albans	11 Tadworth House Webber Street London
Sharpley Court Pocock Street London	Flat 32 Sharpley Court 8A Pocock Street London
9 Sharpley Court 8A Pocock Street London	Flat 23, Sharpley Court 8A Pocock Street LONDON
20 Sharpley Court 8A Pocock Street London	Flat 5 7 Valentine Place London
2 Murton Court St Albans AL13QT	Flat 12 Sharpley Court 8A Pocock Street London
Flat 5, 7 Valentine Place London SE1 8QH	Flat 118 Rowland Hill House Nelson Square
109-115 Blackfriars Rd London SE1 8HW	Flat 12 27 Webber Street London
32 Sharpley Ct 8A Pocock Street London	67 Grosvenor St London W1K 3JN
Flat 7 57 Webber Street London	
154-156 Blackfriars Road London SE1	

Flat 1, 7 Valentine Place London SE18QH
Artist Studio Company The Chaplin Centre Taplow Thurlow Street
Studio 1 6-8 Cole Street London
28 Globe View House 171 Blackfriars Road London
Flat 2, 9 Valentine Place London SE18QH
Flat 59 Globe View House London
Flat 41, Pakeman House, Pocock Street London SE1 0BH
53 Globe View House London SE1 0FU
Flat 27 Sharpley Court 8A Pocock Street Southwark
Flat 21 Globe View House 170 Blackfriars Road
Flat 37 Globe View House Pocock Street London
Flat 29 Globe View House 171 Blackfriars Road London
Flat 6, Globe View House London SE1 8ER
6 Brookwood House London SE1 0RJ
Flat 29 Globe View House 171 Blackfriars Road London
13 Valentine Row London SE18BN
13 Bazeley House Library Street London
Flat 21 59 Webber Street London
Flat 26 Globe View House 171 Blackfriars Road
Flat 52 Globe View House 27 Pocock Street
9 Rushworth Street London Southwark
Flat 30 Sharpley Court 8A Pocock Street
Flat 79 Globe View House 29 Pocock Street
Flat 83 Globe View House 29 Pocock Street
Flat 11 59 Webber Street London
Flat 14 Globe View House 171 Blackfriars Road
Flat 2 Globe View House 171 Blackfriars Road
173B Blackfriars Road London Southwark
171A Blackfriars Road London Southwark
5 Bell House 57 Webber Street London
Suite 200B 154-156 Blackfriars Road London
Suite 201 154-156 Blackfriars Road

London
Suite 111 154-156 Blackfriars Road London
Suite G03 And G04 154-156 Blackfriars Road London
Suite G06 154-156 Blackfriars Road London
13 The Priory Webber Street London
Flat 18 Globe View House 171 Blackfriars Road
Flat 13 Globe View House 171 Blackfriars Road
Flat 6 Globe View House 171 Blackfriars Road
Flat 49 Globe View House 27 Pocock Street
Flat 46 Globe View House 27 Pocock Street
Flat 32 Globe View House 171 Blackfriars Road
Unit 3 160 Blackfriars Road London
Apartment 4 10 Rushworth Street London
Flat 25 Sharpley Court 8A Pocock Street
Flat 22 Sharpley Court 8A Pocock Street North Wing Part Seventh Floor Friars House 160 Blackfriars Road London
Flat 39 Colorama House 24 Rushworth Street
Flat 29 Colorama House 24 Rushworth Street
Flat 11 Colomara House 61 Webber Street
Flat 4 Colomara House 61 Webber Street
Flat 1 Colomara House 61 Webber Street
20 Rushworth Street London Southwark
Suite 207 154-156 Blackfriars Road London
12 Rushworth Street London Southwark
Flat 9 Sharpley Court 8A Pocock Street
Flat 16 Globe View House 171 Blackfriars Road
Flat 68 Globe View House 27 Pocock Street
3 The Priory Webber Street London
Flat 86 Globe View House 29 Pocock Street
Flat 17 Globe View House 171 Blackfriars Road
Suite G07 154-156 Blackfriars Road

London
Flat 29 Sharpley Court 8A Pocock Street
156 Blackfriars Road London Southwark
Suite G05 154-156 Blackfriars Road
London
Suite 305 154-156 Blackfriars Road
London
Suite 303 To 307 154-156 Blackfriars
Road London
Suite 309 154-156 Blackfriars Road
London
4 The Priory Webber Street London
11 The Priory Webber Street London
Flat 10 59 Webber Street London
Flat 9 Globe View House 171 Blackfriars
Road
Flat 77 Globe View House 29 Pocock
Street
Flat 76 Globe View House 29 Pocock
Street
Flat 42 Globe View House 27 Pocock
Street
Flat 29 Globe View House 171
Blackfriars Road
Unit 2 160 Blackfriars Road London
7 Bell House 57 Webber Street London
Flat 34 Colorama House 24 Rushworth
Street
Flat 9 Colomara House 61 Webber
Street
19 Rushworth Street London Southwark
Flat 24 Sharpley Court 8A Pocock Street
Flat 4 59 Webber Street London
Flat 6 59 Webber Street London
Flat 78 Globe View House 29 Pocock
Street
Flat 70 Globe View House 29 Pocock
Street
Flat 60 Globe View House 27 Pocock
Street
Flat 58 Globe View House 27 Pocock
Street
Flat 20 59 Webber Street London
Flat 5 59 Webber Street London
Flat 7 Globe View House 171 Blackfriars
Road
Suite 308 154-156 Blackfriars Road
London
Suite 113 154-156 Blackfriars Road
London
Suite 104 154-156 Blackfriars Road
London

Suite 210 154-156 Blackfriars Road
London
Unit 1 160 Blackfriars Road London
20 Pocock Street London Southwark
169 Blackfriars Road London Southwark
Suite 306 154-156 Blackfriars Road
London
5 The Priory Webber Street London
Flat 22 59 Webber Street London
Flat 12 59 Webber Street London
Retail Unit North 160 Blackfriars Road
London
Flat 37 Globe View House 27 Pocock
Street
Flat 22 Globe View House 171
Blackfriars Road
Flat 21 Globe View House 171
Blackfriars Road
1 Bell House 57 Webber Street London
Apartment 6 10 Rushworth Street
London
Flat 12 Sharpley Court 8A Pocock Street
Flat 11 Sharpley Court 8A Pocock Street
Flat 4 Sharpley Court 8A Pocock Street
Flat 37 Colorama House 24 Rushworth
Street
Flat 22 Colorama House 24 Rushworth
Street
Flat 17 Colomara House 61 Webber
Street
Flat 13 Colomara House 61 Webber
Street
Flat 12 Colomara House 61 Webber
Street
Flat 3 Colomara House 61 Webber
Street
Suite 108 154-156 Blackfriars Road
London
Suite 209 154-156 Blackfriars Road
London
173A Blackfriars Road London
Southwark
Flat 74 Globe View House 29 Pocock
Street
Suite 304 154-156 Blackfriars Road
London
Flat 1 Sharpley Court 8A Pocock Street
Flat 19 Globe View House 171
Blackfriars Road
Flat 43 Globe View House 27 Pocock
Street
Flat 12 Globe View House 171

Blackfriars Road
2 Bell House 57 Webber Street London
Apartment 7 10 Rushworth Street
London
Apartment 2 10 Rushworth Street
London
6 The Priory Webber Street London
Suite 107 154-156 Blackfriars Road
London
Part Ground And Part First Floor 1
Rushworth Street London
Flat 36 Sharpley Court 8A Pocock Street
Flat 26 Sharpley Court 8A Pocock Street
Flat 21 Sharpley Court 8A Pocock Street
Flat 16 Sharpley Court 8A Pocock Street
Suite 110 154-156 Blackfriars Road
London
Suite 112 To 133 154-156 Blackfriars
Road London
Suite 212 154-156 Blackfriars Road
London
Suite 206 154-156 Blackfriars Road
London
Suite 105 154-156 Blackfriars Road
London
Suite 106 154-156 Blackfriars Road
London
Flat 3 59 Webber Street London
Flat 69 Globe View House 27 Pocock
Street
Flat 27 Globe View House 171
Blackfriars Road
Apartment 9 10 Rushworth Street
London
Apartment 8 10 Rushworth Street
London
Flat 19 Sharpley Court 8A Pocock Street
15 The Priory Webber Street London
28 Rushworth Street London Southwark
Flat 33 Colorama House 24 Rushworth
Street
Flat 32 Colorama House 24 Rushworth
Street
Flat 24 Colorama House 24 Rushworth
Street
Flat 21 Colorama House 24 Rushworth
Street
Flat 16 Colomara House 61 Webber
Street
Flat 5 Colomara House 61 Webber
Street
Flat 8 Globe View House 171 Blackfriars

Road
7 The Priory Webber Street London
2 Surrey Row London Southwark
Apartment 1 10 Rushworth Street
London
9 The Priory Webber Street London
Flat 18 Sharpley Court 8A Pocock Street
Flat 75 Globe View House 29 Pocock
Street
Flat 12B 59 Webber Street London
Flat 40 Globe View House 27 Pocock
Street
Flat 38 Globe View House 27 Pocock
Street
Flat 23 Globe View House 171
Blackfriars Road
8 Bell House 57 Webber Street London
Suite 102 154-156 Blackfriars Road
London
Flat 23 Sharpley Court 8A Pocock Street
Flat 5 Sharpley Court 8A Pocock Street
18 Pocock Street London Southwark
1A The Priory Webber Street London
Suite 109 154-156 Blackfriars Road
London
2 The Priory Webber Street London
10 The Priory Webber Street London
Friars Primary School Webber Street
London
Flat 19 59 Webber Street London
Flat 18 59 Webber Street London
Flat 7 59 Webber Street London
Unit 4 160 Blackfriars Road London
Flat 11 Globe View House 171
Blackfriars Road
Flat 4 Globe View House 171 Blackfriars
Road
Flat 67 Globe View House 27 Pocock
Street
Flat 51 Globe View House 27 Pocock
Street
Flat 44 Globe View House 27 Pocock
Street
Flat 15 Sharpley Court 8A Pocock Street
Flat 3 Sharpley Court 8A Pocock Street
26 Rushworth Street London Southwark
Flat 36 Colorama House 24 Rushworth
Street
Flat 35 Colorama House 24 Rushworth
Street
Flat 19 Colomara House 61 Webber
Street

Flat 14 Colomara House 61 Webber Street
Flat 7 Colomara House 61 Webber Street
14 - 21 Rushworth Street London Southwark
21 Rushworth Street London Southwark
Suite 200A 154-156 Blackfriars Road London
Flat 2 59 Webber Street London
Flat 55 Globe View House 27 Pocock Street
Flat 53 Globe View House 27 Pocock Street
Madano 160 Blackfriars Road London
Flat 50 Globe View House 27 Pocock Street
Flat 45 Globe View House 27 Pocock Street
Flat 35 Globe View House 27 Pocock Street
Flat 28 Globe View House 171 Blackfriars Road
Flat 25 Globe View House 171 Blackfriars Road
12 The Priory Webber Street London
154-156 Blackfriars Road London Southwark
Suite 301 154-156 Blackfriars Road London
Friars Court Rushworth Street London
Flat 31 Sharpley Court 8A Pocock Street
Flat 10 Sharpley Court 8A Pocock Street
Flat 8 Sharpley Court 8A Pocock Street
Suite 103 154-156 Blackfriars Road London
Flat 85 Globe View House 29 Pocock Street
Flat 71 Globe View House 29 Pocock Street
Flat 59 Globe View House 27 Pocock Street
Flat 57 Globe View House 27 Pocock Street
Flat 39 Globe View House 27 Pocock Street
Flat 34 Globe View House 27 Pocock Street
6 Bell House 57 Webber Street London
Apartment 3 10 Rushworth Street London
Flat 33 Sharpley Court 8A Pocock Street

Unit 40 Colorama House 24 Rushworth Street
Flat 31 Colorama House 24 Rushworth Street
Flat 28 Colorama House 24 Rushworth Street
Flat 26 Colorama House 24 Rushworth Street
Flat 10 Colomara House 61 Webber Street
Flat 6 Colomara House 61 Webber Street
Flat 61 Globe View House 27 Pocock Street
14 The Priory Webber Street London
Flat 33 Globe View House 27 Pocock Street
Flat 10 Globe View House 171 Blackfriars Road
Flat 34 Sharpley Court 8A Pocock Street
Flat 2 Sharpley Court 8A Pocock Street
Rushworth And Friars Primary School
Webber Street London
8 The Priory Webber Street London
Flat 9 59 Webber Street London
Flat 1 59 Webber Street London
Retail Unit South 160 Blackfriars Road London
Excluding Part Ground And Part First Floor 1 Rushworth Street London
Seventh Floor 160 Blackfriars Road London
Flat 15 Globe View House 171 Blackfriars Road
Flat 3 Globe View House 171 Blackfriars Road
Flat 1 Globe View House 171 Blackfriars Road
Flat 84 Globe View House 29 Pocock Street
Flat 81 Globe View House 29 Pocock Street
Flat 72 Globe View House 29 Pocock Street
Flat 66 Globe View House 27 Pocock Street
Flat 64 Globe View House 27 Pocock Street
Flat 56 Globe View House 27 Pocock Street
Flat 47 Globe View House 27 Pocock Street

Flat 24 Globe View House 171
Blackfriars Road
Basement And Ground Floors Bell
House 57 Webber Street
Flat 32 Sharpley Court 8A Pocock Street
Flat 28 Sharpley Court 8A Pocock Street
Flat 27 Sharpley Court 8A Pocock Street
Flat 20 Sharpley Court 8A Pocock Street
Ro 43 Webber Street London
Flat 6 Sharpley Court 8A Pocock Street
172 Blackfriars Road London Southwark
Flat 23 Colorama House 24 Rushworth
Street
61A Webber Street London Southwark
Flat 38 Colorama House 24 Rushworth
Street
Flat 30 Colorama House 24 Rushworth
Street
Flat 18 Colomara House 61 Webber
Street
Flat 15 Colomara House 61 Webber
Street
Flat 8 Colomara House 61 Webber
Street
Flat 2 Colomara House 61 Webber
Street
4 Bell House 57 Webber Street London
Flat 41 Globe View House 27 Pocock
Street
Suite 208 154-156 Blackfriars Road
London
Flat 80 Globe View House 29 Pocock
Street
Flat 65 Globe View House 27 Pocock
Street
Flat 63 Globe View House 27 Pocock
Street
Flat 17 59 Webber Street London
Flat 8 59 Webber Street London
Flat 48 Globe View House 27 Pocock
Street
Flat 30 Globe View House 171
Blackfriars Road
Flat 20 Globe View House 171
Blackfriars Road
Flat 5 Globe View House 171 Blackfriars

Road
Manna House 8-20 Pocock Street
London
Suite 203 And 204 154-156 Blackfriars
Road London
Apartment 5 10 Rushworth Street
London
Suite 101 154-156 Blackfriars Road
London
Flat 13 Sharpley Court 8A Pocock Street
Suite 311 154-156 Blackfriars Road
London
Suite G02 154-156 Blackfriars Road
London
Suite 213 154-156 Blackfriars Road
London
43 Webber Street London Southwark
Flat 16 59 Webber Street London
Flat 15 59 Webber Street London
Flat 12A 59 Webber Street London
Flat 82 Globe View House 29 Pocock
Street
Flat 62 Globe View House 27 Pocock
Street
Flat 54 Globe View House 27 Pocock
Street
Flat 36 Globe View House 27 Pocock
Street
Flat 31 Globe View House 171
Blackfriars Road
3 Bell House 57 Webber Street London
Flat 35 Sharpley Court 8A Pocock Street
Flat 17 Sharpley Court 8A Pocock Street
Flat 14 Sharpley Court 8A Pocock Street
Flat 7 Sharpley Court 8A Pocock Street
Flat 14 59 Webber Street London
Flat 27 Colorama House 24 Rushworth
Street
Flat 25 Colorama House 24 Rushworth
Street
Flat 20 Colomara House 61 Webber
Street

Re-consultation: n/a

CONSULTATION RESPONSES RECEIVED

Internal services

Transport Policy
Environmental Protection
Flood Risk Management & Urban Drainage
Highways Development and Management
Local Economy
Community Infrastructure Levy Team

Statutory and non-statutory organisations

Environment Agency
Thames Water
Transport for London
Metropolitan Police Service (Designing Out Crime)

Neighbour and local groups consulted:

Flat 32 Sharpley Court LONDON SE1
OBJ
13 Sharpley Court 8a Pocock St London
11 Tadworth House Webber Street SE1
ORH
9 Globe View House 171 Blackfriars
Road London
11 Windmill Gardens Kibworth Harcourt
LE8 0LX
28 Globe View House 171 Blackfriars
Road London
Flat 5 7 Valentine Place London
Flat 23 Sharpley Court 8A Pocock Stree