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Item No. 5.1	Classification: Open	Date: 8 March 2023	Meeting Name: Planning Committee
Report title:	<p>Development Management planning application: Application 22/AP/1602 for: FULL PLANNING APPLICATION</p> <p>Address: Red Lion Court, 46-48 Park Street, London SE1 9EQ</p> <p>Proposal: Demolition of the existing building above ground and part-basement and redevelopment of the site to provide an 11-storey stepped building with rooftop plant, plus a two storey basement, providing office, retail, restaurant and wellness uses alongside external terraces, landscaping, public realm works, new plant equipment, internal loading bays, cycle parking spaces and other associated works.</p> <p>For information: The proposed building would have a maximum height of 11 storeys (46.7 metres above Ordnance Datum, approx 41.6 metres above ground level). The development as a whole comprises:</p> <ul style="list-style-type: none"> - 32,036 square metres GIA of office (Class E) floorspace; - 338 square metres GIA of restaurant (Class E) floorspace; - 229 square metres GIA of retail (Class E) floorspace; - 105 square metres GIA of wellness use (Class E) floorspace; -1 wheelchair accessible car parking space; and -168 short-stay cycle spaces and 719 long-stay cycle spaces. 		
Ward(s) or groups affected:	Borough and Bankside		
From:	Director of Planning and Growth		
Application Start Date	6 May 2022	Application Expiry Date	5 August 2022
Earliest Decision Date	16 May 2022	Time extension:	

RECOMMENDATION

1. a) That planning permission be granted, subject to conditions, referral to the Mayor and the applicant entering into an appropriate legal agreement by no later than the 31 May 2023.

- b) In the event that the requirements of (a) are not met by the 31 May 2023 that the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 307 of this report.

EXECUTIVE SUMMARY

Commercial GIA:

Use Class	Existing	Proposed	Change +/-
Class E(g)(i) (offices / workspace)	17,335sqm	28,596sqm	+11,261sqm
Class E(a) (Retail)	0sqm	229sqm	+229sqm
Class E(b) (Restaurants)	0sqm	338sqm	+338sqm
Class E(e) (Wellness Centre)	0sqm	105sqm	+105sqm

Environmental:

CO2 Savings beyond part L Building Regs	49% - Non-domestic
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	Existing	Proposed	Change +/-
Urban Greening Factor	0	0.35	+0.35
Surface water runoff rates (1 in 100 year)	153.1 l/s	4.5 l/s	-148.6 l/s
Green/Brown Roofs	0sqm	1,264sqm	+1,264sqm
Cycle parking spaces	0	719 Long stay 167 Short stay	+886 total

CIL and S106 (Or Unilateral Undertaking):

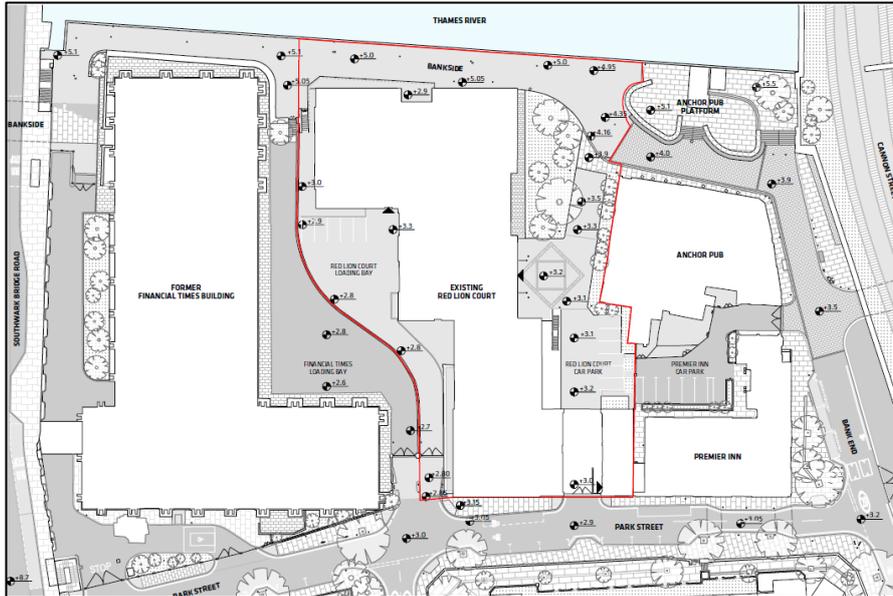
CIL net of relief (estimated)	£1,464,237
MCIL net of relief (estimated)	£3,098,179
S106	£855,851

BACKGROUND INFORMATION

Site location and description

2. The application site comprises a seven storey building (plus basement) originally constructed in 1989. It has an existing E(g)(i) class use (offices). It is known as Red Lion Court and had been occupied by Lloyds until they vacated the building in 2021.
3. The entire property has since been let on a meanwhile use to Aspire Via Studio who are a unique property-based charity, sourcing and managing artist's studios and event spaces.
4. The site includes a section of the Thames Path, a publicly accessible pedestrian footpath along the south bank of the River Thames. Pedestrian access to the existing Red Lion Court building is provided from Park Street to the south of the site and from the Thames Path on Bankside to the north of the site. Pedestrian access to the existing Red Lion Court building is also possible via a secure access arrangement with no general public access to or through the Red Lion Court area of the site. Vehicular access to the existing Red Lion Court building is provided from Park Street to the south of the site at two points via a secure gated arrangement. These provide access to the land around the building, to 13 car parking spaces and for servicing and deliveries
5. The building immediately to the east of the site is the Anchor Bankside public house, a Grade II Listed Building. Immediately to the south-east is the Premier Inn Hotel. To the west is the 'Financial Times (FT) building' at 1 Southwark Bridge Road. The site is bound by the River Thames to the north, Park Street and the adjoining Porter Street, which is largely residential, with a combination of terraced houses and low-rise apartment buildings to the south.

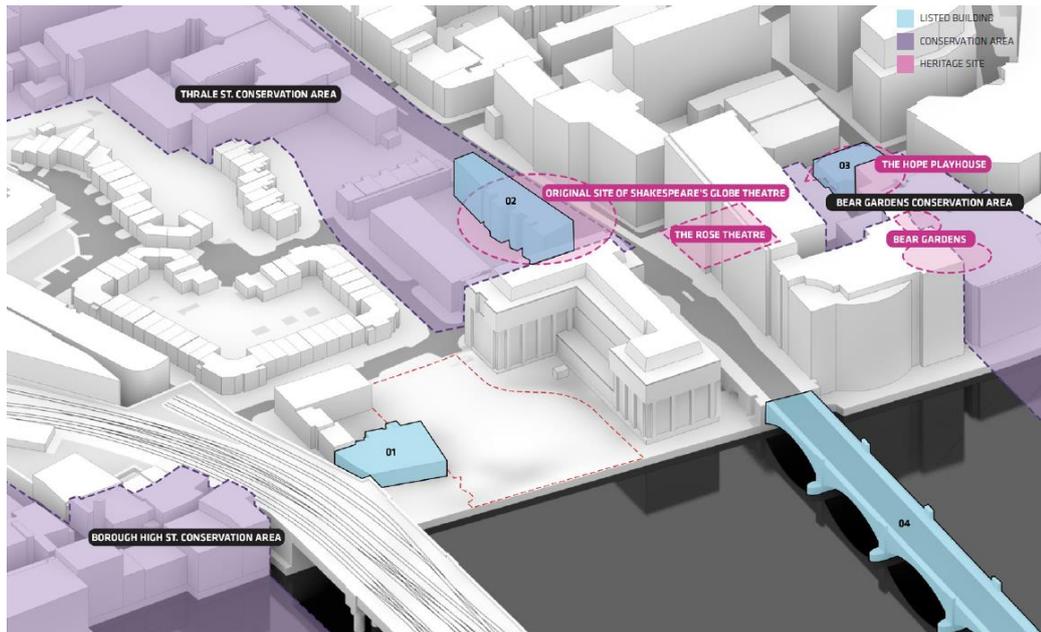
Map: Site Plan



6. The existing building is not listed and is not located within a Conservation Area but is located near several designated heritage assets. The site is located within close proximity of the Grade II listed Southwark Bridge, Anchor Terrace (1 Southwark Bridge Road), Anchor Public House (1 Bankside) and Union Works. The Bear Gardens Conservation Areas is located to the west, the Thrale Street Conservation Area is located to the south east and the Borough High Street Conservation Area is located to the east. The site is located within close proximity to the internationally important Globe Theatre and Rose Theatre, both scheduled ancient monuments.

7. The site is within the following policy designations:
 - Bankside and the Borough Area Vision;
 - Central Activities Zone (CAZ);
 - Thames Policy Area;
 - Bankside and Borough District Town Centre;
 - Bankside, Borough and London Bridge Opportunity Area;
 - North Southwark and Roman Roads Archaeological Priority Area;
 - South Bank Strategic Cultural Quarter Strategic Cultural Area;
 - Better Bankside BID Area;

Image: Heritage assets



Key

1. Anchor Pub
2. Anchor Terrace
3. Union Works
4. Southwark Bridge

8. The site is in Flood Zone 3. The site is also within the following protected views:

- Local View 1: The London panorama of St Pauls Cathedral from One Tree Hill;
- Local View 2: The linear view of St Pauls Cathedral from Nunhead Cemetery;
- Background Assessment Area of the LVMF view 1A.2 - Alexandra Palace Viewing Terrace to St Paul's Cathedral; and
- Background Assessment Area of the LVMF view 3A.1 - Kenwood Viewing Gazebo to St Paul's Cathedral.

9. The site is allocated within the Southwark Plan (2022) as part of a joint allocation with the FT building. The site requirements of Site Allocation NSP06 "1 Southwark Bridge Road and Red Lion Court". The site requirements for this site allocation are:

Redevelopment of the site must:

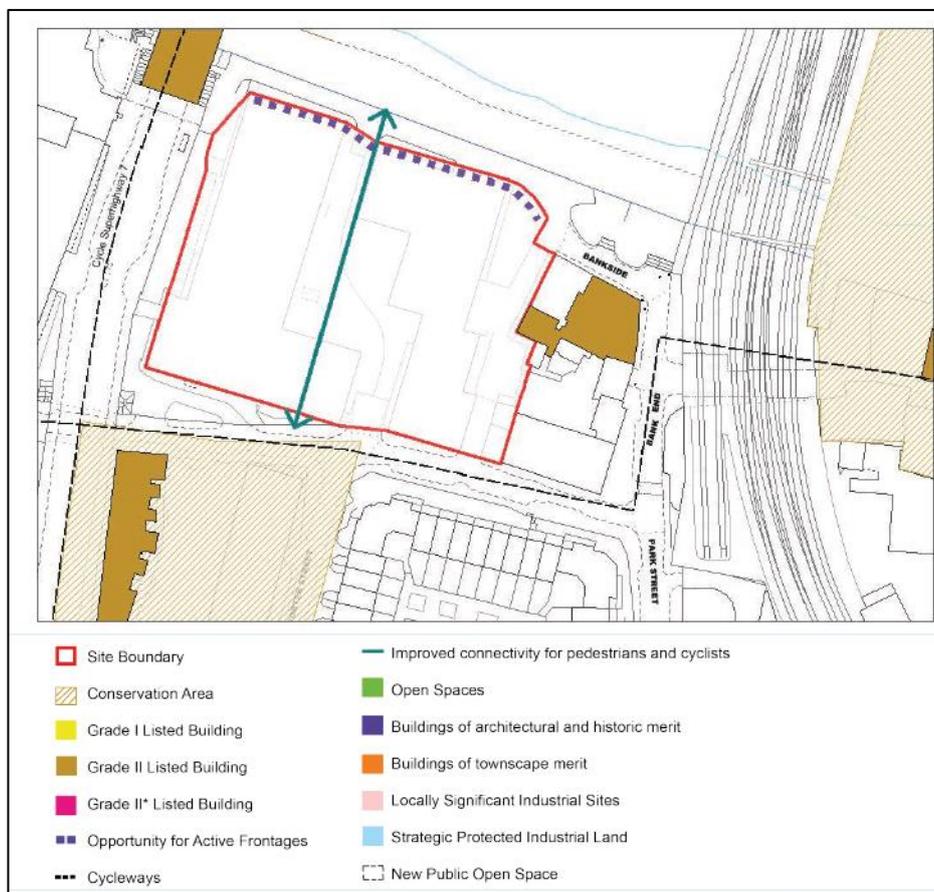
- Provide at least the amount of employment floorspace (E(g), B class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater; and

- Enhance the Thames Path by providing public realm and active frontages with ground floor retail, community or leisure uses (as defined in the glossary); and
- Provide new north-south green links; and
- Provide new open space of at least 15% of the site area - 1,183m².

Redevelopment of the site should also provide new homes (C3).

10. The site allocation also states that any redevelopment should provide a new link from Park Street to the Thames Path and improvements to the Thames Path.

Map: Site allocation in Southwark Plan



11. Transport for London's (TfL) Public Transport Accessibility Level (PTAL) provides a score of 1-6b to rate areas within London and their accessibility to public transport options. A score of 1 represents the lowest accessibility with 6b being the best locations of accessibility to public transport. The subject site is rated as 6b on the PTAL system indicating excellent accessibility to public transport.
12. The River Thames and the embankment located immediately north of the site is designated as a Site of Importance for Nature Conservation (SINC).

Details of Proposal

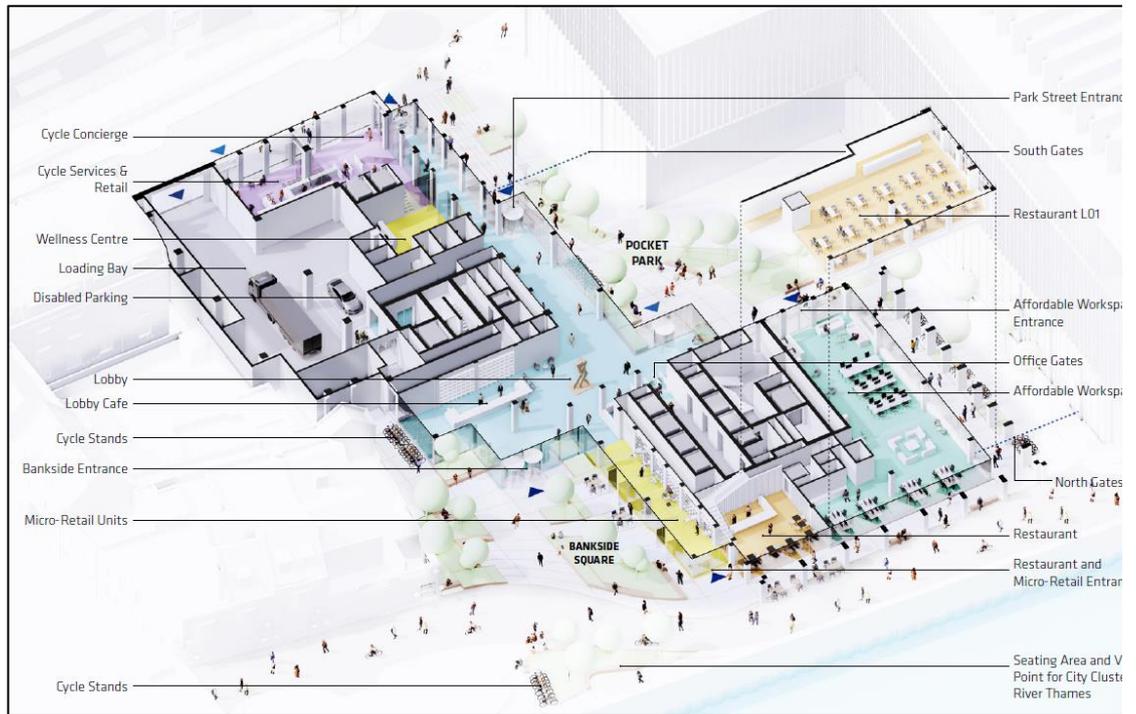
13. Planning permission is sought for the demolition of the existing building on site and redevelopment to provide a 11-storey plus basement building providing office, retail, restaurant and wellness uses. The development would provide landscaping, public realm works, new plant equipment, cycle parking spaces and other associated works.

14. In terms of the split in the commercial use, the development would provide:

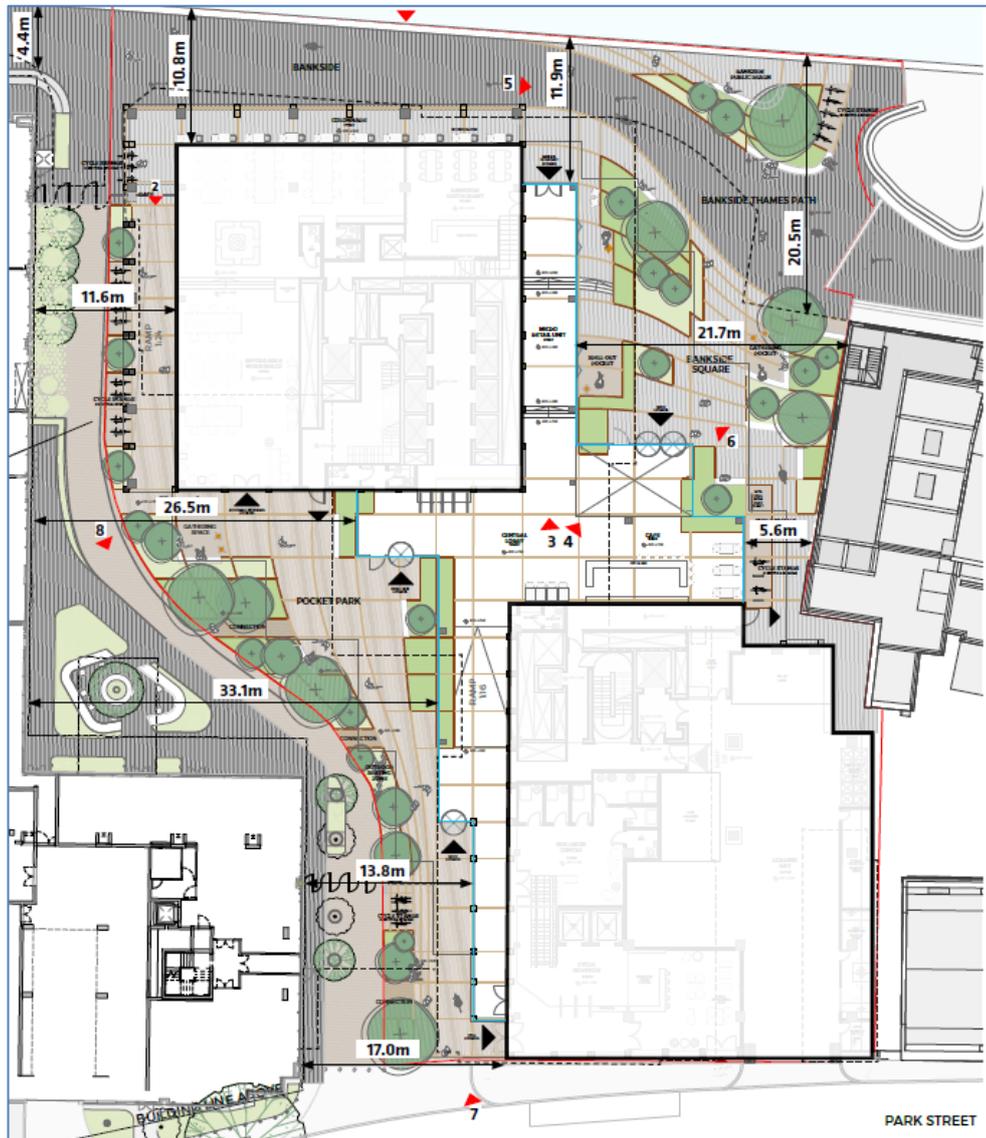
Class use	GIA Floor area (sqm)
Class E(g)(i) Office	28,596
Class E(a) Retail	229
Class E(b) Restaurants	338
Class E(e) (Wellness Centre)	105
Total	29,268

15. The plant room would be 3,697sqm, giving a total of 32,965sqm. The office floorspace will include a policy compliant level of affordable workspace at 10% of the gross floorspace.
16. The scheme proposes significant landscaping and public realm works to improve and enliven the spaces around building by increasing the size of the Thames Path and north-south through route. At ground level, the lifted mass provides two new, generous public spaces linked together by the building's lobby. At the North a new 'Bankside Square' is created adjacent to the Grade II listed Anchor Pub. At the south, in conjunction with the neighbouring former Financial Times building, a centralised landscaped space would be created in association with a new north-south route through the site. New internal routes also link the Bankside and Park Street via an extensive, clear glazed, ground floor lobby flanked with micro-retail units at the north and wellness centre and Cycle Services Hub at the south.
17. Improvements to public realm and pedestrian experience surrounding the site will be delivered including the conversion of the existing service yard to publicly accessible space, the opening of a pedestrian route between Park Street and Bankside, an addition of a new publicly accessible square at the northeast of the site, improved footway widths on Park Street and an expansion of the Bankside Path.

Image: Block layout

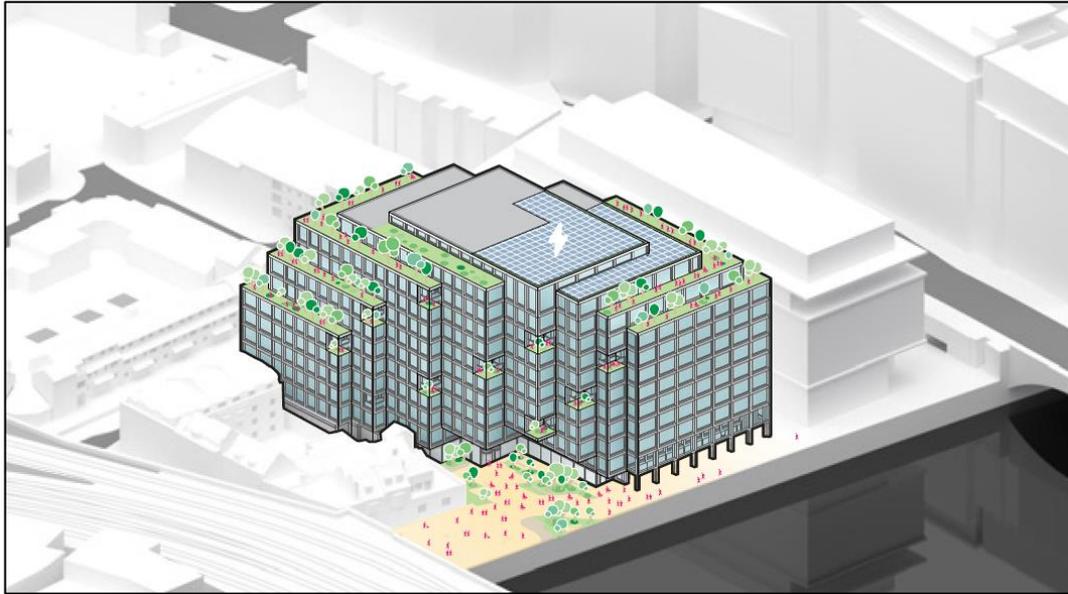


Plan: Indicative Site Plan



18. The proposed development is arranged, in massing terms, as a series of 'jumping' blocks of differing sizes that opens up the ground plane to create a series of new, enhanced publicly accessible urban spaces. The lifted upper floors would sit over the ground floor level and provides the enhanced public spaces and routes through. The building and façade treatment employs a simple, standardised grid that accentuates the building's stepped massing. It has a repeated stepped form and quasi-symmetry.
19. The overall form delivers a significant expanse of external terraces; each one landscaped and forming amenity in connection with the workspace within the building. A series of pocket terraces are also deployed throughout, ensuring that each level has access to the outdoors.

Image: Stepped massing



20. Servicing would be made entirely within the off-street loading bay, which is accessed from Park Street. The site offers one accessible parking space located off the loading bay. The designated bay will be marked, have a clear circulation zone and ramped to access the central lobby. Taxi drop-off will be available along Park Street, near the southern entrance.
21. There are two basement levels. The scheme will retain part of the existing basement and will re-use the majority of the existing piles, which is beneficial in relation to embodied carbon. The existing basements will be deepened across the whole building footprint to incorporate two levels. The basement will also be extended in an area (404sqm) to the east of the current basement retaining wall. Basement 02 is entirely dedicated to building services whilst Basement 01 contains the end-of-trip cycle facilities including short and long stay parking, male and female changing rooms, building security and staff rooms.

Revisions and Amendments

22. Negotiations were undertaken following review of the application and comments made by consultees.
23. In line with the changes detailed above, revised documents regarding elevations, and floor plan drawings were submitted along with revision to various supporting documents. The changes were considered to be minor and therefore did not require a second round of consultation.

Consultation responses from members of the public

24. This application was subject to one round of formal consultation, which was carried on 20 May 2022.

25. At the time of writing, a total of 107 consultation responses had been received from members of the public and local businesses and organisations. 102 representations received objected to the scheme with 5 in support. Some of the objections were from the same address.
26. Objections
The main issues raised by residents objecting to the proposed development are set out below:
27. Land Use - Given the already excessive redevelopment in this area it would seem unnecessary to provide additional office space when so much is available in this area giving a danger of oversupply resulting in dead space. There might not be a need post-pandemic. There is no need for the retail or wellness centre as there are others nearby. There is no provision of affordable housing.
28. Officer response: The principle of the uses are acceptable and is discussed in the report.
29. Height - The development is too high and bulky on the Park Street side, despite the 'stepped' design. The Park Street facade to be overbearing and out of scale with the residential user and neighbouring Anchor PH/hotel. It is considered to be overdevelopment of the site overwhelming the local residential estate in height, size and mass. Minimal thought has been given to this side of the development, with the focus being along the northern, western and eastern facades. The proposal takes no account of the adjacent listed buildings the enjoyment of which from adjacent areas is entitled to protection. The proposed structure intrudes on protected views of St Pauls.
30. Officer response: This is discussed under the height and design sections of the report.
31. Architecture and design – Question why the proposal is largely glass, instead of the (more suitable/sympathetic to the area) brick of the existing building. The existing Red Lion Court building has architectural appeal providing a bridge between the modern buildings adjoining on its west side and the historic buildings on its East side. Redeveloping this site as proposed would destroy the feel and be out of character of this part of Park street and the adjoining Anchor Inn and Clink street.
32. Officer response: The existing building being redeveloped with a more contemporary design is considered to be acceptable along this part of the riverfront. The proposed building does use bricks for parts of the building. More is discussed in the design sections of the report.
33. Heritage – the new building is even more out of scale with the Anchor Pub. As a tall glass box it will have considerably less "evident relationship" than the current building

34. Officer response: The impacts on the nearby heritage assets are covered in the Heritage section of this report. The impact is less than substantial harm, but great weight and, in accordance with the NPPF, should be balanced against the planning benefits of the scheme.
35. Overshadowing – In an area already starved of sky, the overbearing nature of the development (significantly taller and bulkier than the current building on the site along the Park Street facade) will further steal any sense of sky from neighbouring residents. There will be loss of natural light to neighbouring residents.
36. Officer response: The submitted daylight and sunlight assessment demonstrates there would not be a significant loss of natural light to the nearby residents.
37. Impact on resident's amenity – In effect this will bring the bulk of the development closer up against Park Street. This infilling will result in an impact on the privacy in neighbour's garden, and reduce the sense of openness currently enjoyed. Concerned about increased overlooking and loss of privacy from this significant difference to the footprint of the current building on the site. The proposed terraces would lead to overlooking.
38. Local residents have suffered continued extensive noise, dust, traffic disruption, blocked roads by construction traffic over the past 3 years due to redevelopment around Old Theatre Court in Park Street and immediately surrounding roads, culminating particular in the redevelopment of No 1 Southwark bridge road, it would seem intolerable for local residents to be subjected to this antisocial environment for a further two or three years and greater pollution and noise resulting from servicing such buildings in the future. It is causing physical and mental disturbance. Should the Council approve this then should at minimum approve plans only with a delayed start of 4 years to allow some respite for local residents.
39. The expansion and connection from Park Street to the Thames footpath is not wanted by local residents as it increases footfall out of hours, and bathroom seekers and noise at night. There would be increased anti-social activities.
40. Officer response: This is discussed in detail under the amenity section of the report. A detailed construction environmental management plan would be secured post-permission to ensure the environmental effects are minimised. The new route would be closed after certain hours, limiting the footfall out of hours.
41. Transport and traffic - The infrastructure around this is inappropriate for servicing and supporting more office and retail space with narrow roads with low bridges providing the only access for traffic. Lack of car parking in the area would lead to further congestion.
42. Officer response: This is discussed under the Transport section of the report.

43. Impact on existing businesses - this form of development will have an unacceptable overbearing impact on the hotel. It is inevitable that the Premier Inn hotel would be subjected to unacceptable amenity impacts from this proximity during the construction of the building as currently proposed, with noise and dust being of particular concern to the hotel's operators. Increase in proximity to the existing hotel and the proposed development brings windows, roof and 'pocket' terraces (with glazed balustrades) very close to the site boundary where they will overlook the bedrooms on that side of the hotel. The proposed development will cause problems of overlooking, loss of privacy and disturbance to the hotel bedrooms. There is no justification for building so close to the hotel beyond the developer's desire to overdevelop the site. Premier Inn does not agree that its guests should not have a reasonable expectation of daylight/sunlight in this location. Some form of extract will be required from the loading bay and that this will be discharging into a space close to hotel bedroom windows. These vehicle exhaust fumes are therefore likely to have an unacceptable impact on air quality for both the Premier Inn hotel and the Anchor public house.
44. The Noise Impact Assessment fails to consider noise created by vehicles manoeuvring within the loading bay.
45. Officer response: This is discussed in the report. There would be limited overlooking to the hotel. The air quality assessment and noise impact assessment have been assessed by the Environmental Protection Team (EPT) and found to be acceptable.
46. Lack of consultation - Engagement with the local community has been poor and residents never received a reply to their concerns.
47. Officer response: The applicant has carried out a series of public consultation events prior to the submission of the application. Officers have also sent consultation letters and published this in the local press.
48. Environment - ignores the impact of demolishing existing sound buildings. There would be negative impact on the climate change of constant rebuilding. Question the sustainability of the new building when the existing Red Lion Court still has a lifespan.
49. The Council should charge the developer a sum of money if the building does not last longer than the existing. There would be pollution from the development's construction. The parts of the green space which are under the building cannot be considered genuine green/open spaces as they will not flourish in practice.
50. Officer response: The re-use of the existing building to increase floorspace is not possible in this instance. The applicant has submitted an energy strategy, whole life cycle assessment and Circular Economy statement to ensure the impact on climate change is minimised.

51. Other – request that any permitted development rights should be removed which might in the future accommodate any desire to add stores to the consented scheme without the express grant of planning permission. There is negligible community gain and no benefits for local residents. There is no social regeneration.
52. Officer response: A condition can be imposed to limit the uses proposed.
53. Support
4 responses (including amenity group) are supportive of the development and a summary of their responses are set out below:

The development will greatly improve footfall and custom for local businesses. As well as enhancing the aesthetics along this section of the river. Believe that the proposals for Red Lion Court will significantly improve this area of the Thames Pathway, providing new spaces for the whole community to use – including attractive new outdoor areas – and will make a major contribution to the local economy. This will be to the benefit of the Globe and local businesses and residents alike. The Rose Theatre Trust would like to endorse the proposals of the Red Lion Project.

Consultation responses from amenity groups

54. Better Bankside
Better Bankside welcomes the proposals to improve the quality and accessibility of the public realm around the building. We are pleased to see permeability from the riverside enhanced, and the high-quality approach proposed in terms of proposed materials and planting. We support proposals to deliver additional urban greening through the inclusion of a variety of planting in different parts of the site and will also include ecological enhancements at roof level and through the inclusion of habitat elements such as bird boxes for priority species. We would welcome further information on the sustainable drainage strategy for the public realm spaces and suggest that this could be conditioned when permission is granted.
55. We warmly welcome the inclusion of a secure cycle park within Red Lion Court to encourage active travel. In particular, the shower and changing facilities as well as cycle repair and maintenance which can create opportunities to engage more people in cycling. We encourage the developer to consider the influence of Red Lion Court for promoting cycling in the area more holistically.
56. We support the expansion for the pedestrian route from the Thames Pathway and Park Street. We promote the use of active signage to encourage the use of the through route to Park Street, and any additional greening or place-making to make that route safe, accessible and cohesive with the surrounding public realm. We would encourage further exploration of a through route on the border with the Anchor and Premier Inn Hotel.
57. We would welcome conversations with the developer on how the Green Logistics Centre could support Red Lion Court's logistics and opportunities to

include zero-emission last-mile logistics. Due to Red Lion Court's riverside location, we would like to see the potential of river freight for deliveries and servicing included in the developer's plans. We would be interested in conversations with the developer about how construction materials can be delivered to site in ways that reduce the environmental impact of their logistics. We are encouraged by Red Lion Court's commitment to sustainability through net zero construction and operation of the building.

58. Officer response: The group supports the scheme and much of the above have been discussed

KEY ISSUES FOR CONSIDERATION

Summary of main issues

59. The main issues to be considered in respect of this application are:
- The principle of the proposed development in terms of land use;
 - Affordable workspace;
 - Design, layout, tall building, heritage assets including views;
 - Public realm, landscaping and trees;
 - Impact of proposed development on amenity of adjoining occupiers and surrounding area;
 - Transport;
 - Noise and vibration;
 - Sustainable development implications;
 - Ecology;
 - Air quality;
 - Archaeology;
 - Fire safety;
 - Water resources and flood risk;
 - Land contamination;
 - Equalities and human rights;
 - Statement of community involvement.

Legal context

60. 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.
61. 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.

EQUALITIES

62. The Equality Act (2010) provides protection from discrimination for the following protected characteristics: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership. Section 149 of the Equality Act 2010 places the Local Planning Authority under a legal duty to have due regard to the advancement of equality in the exercise of its powers, including planning powers. Officers have considered this in the assessment of this application and Members must be mindful of this duty, inter alia, when determining all planning applications. In particular Members must pay due regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act; and
 - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
 - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
63. As set out in the Essential Guide to the Public Sector Equality Duty (2014), “the duty is on the decision maker personally in terms of what he or she knew and took into account. A decision maker cannot be assumed to know what was in the minds of his or her officials giving advice on the decision”. A public authority must have sufficient evidence in which to base consideration of the impact of a decision.
64. There are a large number of existing black and ethnic minority businesses in the local area, which would not be directly affected by the proposed development. However, the impact of the development would increase footfall in the local area and could create a number of opportunities for these existing businesses.

Other Equality Impacts

65. Proposed enhancements to the streetscape on the Thames footpath and would prioritise the movement of pedestrians and promote healthier, active lives in accordance with the Southwark Plan aspirations.
66. The proposed development would provide a mix of commercial uses. The commercial facilities in the scheme would be provided to modern design standards, including compliance with the regulations on accessibility. The proposed development would generate additional opportunities for local employment. Furthermore, the 10% Affordable Workspace proposed will be secured through the S106 Agreement.
67. The proposal would be designed to ensure safety and security is maximised to reduce any potential for crime. Linkages into and sightlines across the site would be improved and buildings will be designed to meet Secure by Design standards, as discussed later in the report.

68. The proposal includes the provision of new public realm area, which would increase the level of high-quality accessible pedestrian routes available in the area. This feature will have a number of positive benefits, especially for those who are mobility impaired. The improvements to the public realm would encourage more active travel, which would improve health and quality of life.

Conclusion on Equality Impacts

69. The proposed development would not result in any adverse equality impacts in relation to the protected characteristics of religion or belief and race as a result of the proposed development incorporating improved commercial in E Use Class. Notwithstanding that the development would result in a significant change to the site, Officers are satisfied that equality implications have been carefully considered throughout the planning process and that Members have sufficient information available to them to have due regard to the equality impacts of the proposal as required by Section 149 of the Equality Act 2010 in determining whether planning permission should be granted.

Environmental Impact Assessment

70. Due to the scale of the scheme, a request for a formal screening opinion to determine whether the development constitutes an Environmental Impact Assessment (EIA) development as defined by the Town and Country Planning EIA Regulations 2017 was submitted to the Council in November 2021.
71. The request (Ref: 21/AP/4003) was considered under Schedule 2, 10(b) Urban Development Projects of the EIA Regulations. It was considered that proposals would not exceed the threshold identified within Schedule 2 (10b). Nevertheless, Regulations make it clear that proposals can be screened in any event, because they could have significant environmental effects even if they do not exceed the thresholds.
72. Based on the consideration of the proposals against the requirements set out in Schedule 3, it was considered that the development is unlikely to cause potentially significant effects and that any minor effects which are considered to be not significant in EIA terms and outlined above will be appropriately addressed and mitigated within the technical inputs submitted as part of the planning application and through design of the site. As such it was concluded that an EIA was not required in support of the application for this development.

Principle of development in terms of land use

73. The existing building is currently being used by an arts charity as a meanwhile use, having been occupied previously by Lloyds (banking group) in 2021. The lawful existing use of the building all land within its curtilage is, therefore, Class E (Commercial, Business and Service). More specifically, it falls within the Class E(g)(i) subcategory (Offices to carry out any operational or administrative functions)

Designations

Bankside and the Borough Area Vision

74. The vision in the New Southwark Plan (Southwark Plan 2022) notes that the Bankside and Borough are part of the London Central Activities Zone and the Bankside, Borough and London Bridge Opportunity Area delivering 10,000 new jobs and the Bankside and Borough District Town Centre. Site allocations in Bankside and the Borough will deliver at least 166,000sqm (gross) new offices and employment workspaces and around 0.3ha new open space.

Bankside, Borough and London Bridge Opportunity Area

75. The London Plan 2021 designates Bankside, Borough and London Bridge as one of twelve Opportunity Areas in Central London. It notes that this particular Opportunity Area holds considerable potential for intensification and scope to further develop its strategic office provision. This is reflected in Policy SD1(Opportunity Areas), which sets a target of 5,500 new jobs over the next 20 years.
76. Policy SP4 of the NSP states that most new development will happen in the Opportunity Areas and Action Areas, with Policy SP4 viewing them as the key locations for yielding new employment opportunities. Policy P30 of the Southwark Plan states that opportunity areas should evolve to incorporate new types of flexible business workspace and accommodate sectors such as the creative and cultural industries and the digital economy.

Central Activities Zone (CAZ)

77. The site is located within the CAZ, which covers a number of central London boroughs and is London's geographic, economic, and administrative core. The London Plan, and in particular Policy SD1, recognises the well-established long term demand for office space within the CAZ and promotes office provision within this policy area.
78. Strategic Policy SP4 of the Southwark Plan recognises that the CAZ is an international destination for business headquarters, small businesses, tourism and transportation that is entwined with historic communities with local services, open spaces and excellent transport links.

Bankside and Borough District Town Centre

79. As well as being within the CAZ, the site is part of the Bankside and Borough District Town Centre. The Southwark Plan sets out strategic targets over the next 20 years to deliver at least 460,000 square metres of new office space in CAZs and in town centres along with at least 84,000 new jobs. In the CAZ and town centres, Policy P30 of the Southwark Plan expects development proposals to retain or increase the amount of employment floorspace on site.

South Bank Strategic Cultural Quarter

80. The application site lies within the South Bank Strategic Cultural Area. Strategic Cultural Areas have been designated in order to protect and enhance the provision of arts, culture and tourism uses. Development of the tourism sector has significant local economic benefits through employment, regeneration and visitor spending in other local businesses. While the proposed development does not include any visitor facilities the new and improved publicly-accessible spaces will be of value to visitors, and as such the designation and applicable policies are relevant considerations in the determination of this application.
81. The principle of redevelopment of the site for a new building to provide modern and fit-for-purpose office and retail uses would support the role and functioning of the CAZ and the Bankside and Borough District Town Centre. It is also consistent with the policies for the Opportunity Area and the NSP Area Vision, and in delivering new high quality publicly-accessible spaces in this area popular with tourists.
82. The conformity of the proposal with the adopted site allocation is discussed below, and thereafter the acceptability of each use is considered in turn.

NSP Site Allocation NSP06

83. Together with the FT building located immediately to the west, the application site forms site allocation NSP06 under the Southwark Plan. Specifically with respect to land uses, the allocation requires redevelopment of the two sites to:
- Provide at least the amount of employment floorspace (E(g), B class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater; and
 - Enhance the Thames Path by providing public realm and active frontages with ground floor retail, community or leisure uses (as defined in the glossary); and
 - Provide new north-south green links; and
 - Provide new open space of at least 15% of the site area - 1,183m².
84. The allocation sets out an expectation that new development should also deliver new homes (C3 class).
85. With regard to public space requirements, the allocation states that any redevelopment should provide a new link from Park Street to the Thames Path and improvements to the Thames Path. Redevelopment should also provide links to Cycle Super Highway 7 on Southwark Bridge Road.

Assessment of conformity with site allocation

86. It is recognised that the proposal would not deliver any housing. Nevertheless, the development fulfils the 'must' requirements set out in the site allocation. It would re-provide and increase the quantum of employment floorspace (priority in the CAZ) on the site and provide the public realm improvements envisaged.

If housing were prioritised in the site allocation it would have stated that housing “must” be provided.

87. The application provides an uplift in office space of 11,261sqm GIA. The total floorspace uplift across all uses (i.e. office and retail) would be 11,933sqm GIA. This uplift of employment floorspace and the creation of a new restaurant and micro-retail units facing the Thames Path is consistent with the land use expectations of the allocation.
88. The scheme also provides the link from Park Street to the Thames Path. In total, the public realm area would be 1,930sqm (which excludes the central lobby and includes the colonnade areas). Together with the FT proposal this would exceed the 15% of the site area and in accordance with the site allocation requirements.
89. In summary, the proposed mix of uses responds appropriately to the objectives of the site allocation. The following section of this report assesses the mix of uses for conformity with the relevant policies of the adopted development plan.

Proposed uses

90. In order to support the vibrancy and vitality of the CAZ, London Plan policies SD4 and SD5 promote mixed use development, including housing, alongside increases in office floorspace. Policy SD5 is clear, however, that new residential development should not compromise the strategic functions of the CAZ. The Mayor’s Central Activities Zone SPG contains additional guidance on maintaining an appropriate mix of uses within the CAZ, setting out the weight that should be afforded to office use and CAZ strategic functions relative to residential.
91. Policy P30 of the Southwark Plan notes that the CAZ and Opportunity Areas as appropriate for accommodating the significant growth needed to meet business demand. Together, these policies require development proposals at the very least to maintain, but where possible increase, existing levels of business floor space to enhance the offer, vitality and long term vibrancy of central London.

Job Creation

92. The proposed scheme will deliver in the region of in the region of 6,654 new full time equivalent jobs in the first ten years of occupation. This include commitments to local employment and training initiatives, in the region of 880 jobs (or 88 full-time equivalent) through the construction process and over the construction phase, 10 years of estate management and 10 years of occupation.
93. The Council’s Local Economic Team (LET) advised that a development of this size and with the proposed employment densities would be expected to deliver 68 sustained jobs to unemployed Southwark residents, 68 short courses, and take on 17 construction industry apprentices during the construction phase. A development of this size and with the proposed employment densities would be

expected to deliver 214 sustained jobs for unemployed Southwark Residents at the end phase. The LET supports the application. If any of these expectations were not to be achieved, financial contributions would be sought in accordance with the Council's Planning Obligations and CIL SPD. An Employment, Skills and Business Support Plan would also be secured through the S106 Agreement.

Affordable Workspace

94. Policy E2 of the London Plan requires large-scale development proposals to incorporate flexible workspace suitable for micro, small and medium sized enterprises. Policy E3 deals specifically with affordable workspace. The policy states "In defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose". The policy identifies the circumstances in which it would be appropriate to secure affordable space. Part B of the policy specifically identifies the CAZ as an important location for securing low cost space for micro, small and medium sized enterprises.
95. Policy P31 (Affordable Workspace) of the Southwark Plan includes a requirement for development proposing over 500sqm of employment space to include 10% of the proposed gross new employment floor space as affordable workspace on site. The affordable workspace should be secured for at least 30 years, respond to local demand and prioritise existing businesses.
96. The proposed development would deliver 28,596sqm of improved employment floorspace (office only in this instance and excluding plant). The applicant therefore proposes 2,860sqm of affordable workspace, equating to 10% of the total floorspace. This is located on the ground, first and part second floor of the building. The employment space has been designed to be flexible so that it could accommodate a range of different unit sizes and shared workspaces. Details of a specialist workspace provider could be secured through a s106 planning obligation. In addition, the S106 obligation regarding fit out discussed above would also apply to of the affordable workspace.
97. It is proposed to offer the affordable workspace at a discounted market rate, commencing at peppercorn rent and increasing incrementally to no greater than 75% market value, on the following basis:
 - 0-6 months – peppercorn rent
 - 7-13 months – 25% market rent
 - 14-23 months – 50% market rent
 - 24 months thereafter – 75% market rent
98. This would be secured over a 30-year period in accordance with Policy P31. The design and specification will be bespoke to suit the customer base and will aim to create an atmosphere conducive to start-up businesses. The spaces will target small and independent businesses from the local area, with a focus on new and start-up businesses that are vital to the future of Southwark's thriving

economy. The ground floor affordable workspace would partly be on the riverfront, benefitting from a prime active frontage. A large floor plate at first-floor level will provide flexibility and a variety of spaces to suit businesses at varying stages of growth, it will be fitted out to a Cat A specification and will have access to the cycle services. The LET and Officers support this approach.

99. The S106 Agreement will include a dedicated 'affordable workspace' schedule. This will ensure, among other things, that:
- the workspace is provided for a 30-year period at a peppercorn rent for months 0-6, and then the rest of the percentages as outlined above until the end of the affordable workspace lifetime at no more than 75% Local Open Market Rent for
 - equivalent space;
 - no more than 50% of the market rate office floorspace can be occupied until the affordable workspace has been fitted-out to the agreed specification ready for occupation;
 - a Full Management Plan and a Full Marketing Strategy, both to be secured in advance of the marketing period and first operation of the workspace;
 - the service charges payable by the tenant will be capped; and
 - the rates payable by the tenant will be capped.

Retail uses

100. Policy SD4 of the London Plan sets out a strategic priority to support the vitality, viability, adaption and diversification of Borough and Bankside, as a CAZ Retail Cluster, through retail and related uses. Together, policies E9 and SD7 of the London Plan 2021 provide support for essential convenience retail and specialist shopping in District Town Centres.
101. Policy P35 of the NSP sets out retail requirements in the context of the evolving role of District Town Centres, requiring new development to provide an active use at ground floor level in locations with high footfalls. The NSP site allocation NSP06 expects any development of this site to provide town centre uses on the Thames Path.
102. To the northeast of the development, micro-retail units and the double height entry of the restaurant provide high quality retail space at the corner of the new 'Bankside Square.' Much of this would front the Thames Path. The southern location of a new Cycle Services and Active Travel Hub animates the Park Street facade and serves building occupiers and visitors alike. The Active Travel Hub provides repair, retail and a concierge services- where visitors will be able to drop off their bike and have it parked for them. This accords with development plan policies and aspirations for the area, and as such is considered a benefit of the scheme.

Image: Ground floor uses and layout

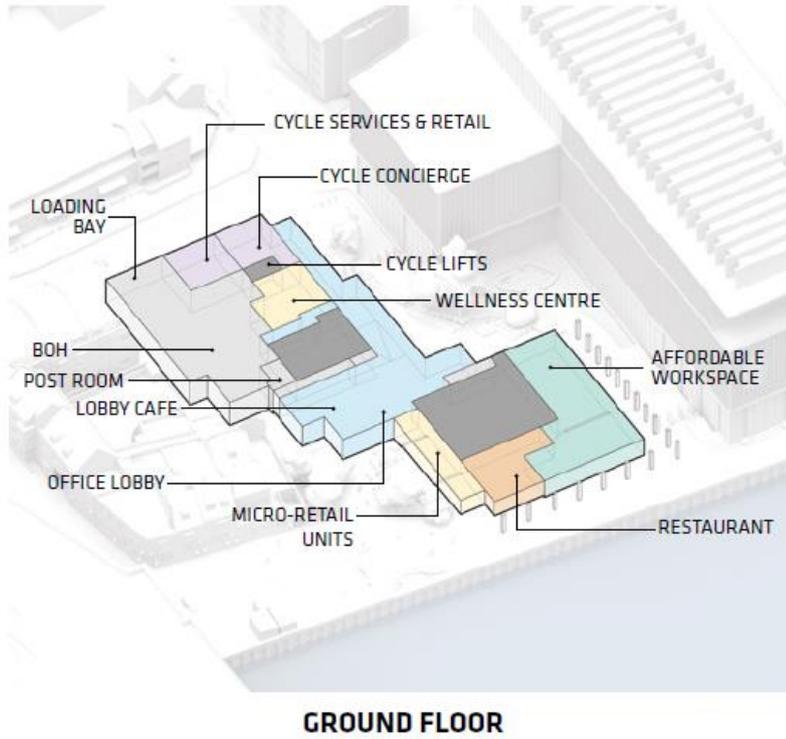


Image: View of development from the Thames Path



Image: Micro retail units facing Bankside Square



Design considerations

103. The NPPF stresses that good design is a key aspect of sustainable development and is indivisible from good planning (paragraph 124). Chapter 3 of the London Plan seeks to ensure that new developments optimise site capacity whilst delivering the highest standard of design in the interest of good place making. New developments must enhance the existing context and character of the area, providing high quality public realm that is inclusive for all with high quality architecture and landscaping. Policy HC1 advises that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail. The importance of good design is further reinforced in the Southwark Plan Policies P13 and P14 which require all new buildings to be of appropriate height, scale and mass, respond to and enhance local distinctiveness and architectural character; and to conserve and enhance the significance of the local historic environment. Any new development must take account of and improve existing patterns of development and movement, permeability and street widths; and ensure that buildings, public spaces and routes are positioned according to their function, importance and use. There is a strong emphasis upon improving opportunities for sustainable modes of travel by enhancing connections, routes and green infrastructure. Furthermore, all new development must be attractive, safe and fully accessible and inclusive for all.

Site layout

104. London Plan Policy D3 requires developments to make the most efficient use of land to optimise density, using an assessment of site context and a design-led approach to determine site capacity. This design led approach is also reflected in Southwark Plan Policy P18. In respect of site layout and public realm Southwark Plan Policy P13 requires developments to ensure that the urban grain and site layout take account of and improve existing patterns of development and movement, permeability and street widths; to ensure that buildings, public spaces, open spaces and routes are positioned according to their function, importance and use to ensure that a high quality public realm that encourages walking and cycling is safe, legible, and attractive is secured. The detailed design of all areas of public realm must be accessible and inclusive for all ages and people with disabilities as well as providing opportunities for formal and informal play and adequate outdoor seating for residents and visitors.
105. The proposal is an improvement in terms of its urban design at grade, with more activated and animated frontages. It responds to the shift in geometry of the riverside walk and creates a new entrance courtyard space open to the public, which are obvious improvements over the current. The geometry of the proposed building is similar to the existing and allows the gaps between the site and FT building and the Anchor Pub to be maintained. The layout of the scheme has been designed to allow for the public spaces to be provided and improves movement and permeability as envisaged in the Site Allocation. Further detail is discussed in the landscaping section, but it is considered that all areas of public realm would be accessible and inclusive for all ages and people with disabilities.
106. The development would step the main front building line back from the existing and introduce 3m deep colonnade which is available for pedestrian access and circulation. The GLA had commented in their Stage 1 report that the alignment of the northern edge of the building protrudes closer to the river wall than the FT Building proposals, yet the alignment of the river wall is not parallel and therefore the proposed pedestrian route is considerably narrower within the Red Lion Court site. They also commented that the 3m deep colonnade appears to include primary structural columns (of notable dimensions), entrance doors and potentially outdoor seating associated within the restaurant tenancy. As such, there is potential for a net reduction in the width of Thames Path in this location.
107. The applicant has submitted an updated Design Note, which clarifies the site layout and how the building would provide a slightly widened Thames Path. The applicant also proposes the reduction of the columns along the colonnade to improve that circulation width. The proposal widens the Thames Path in all locations except for two columns at the colonnade. There would be small

sections of the Thames Path which are intended to be stopped up in order to facilitate the redevelopment. This would be public highway maintainable at private expense. The stopping up process would be managed under a separate process post planning permission.

Plan: Thames Path frontage existing Vs proposed path line

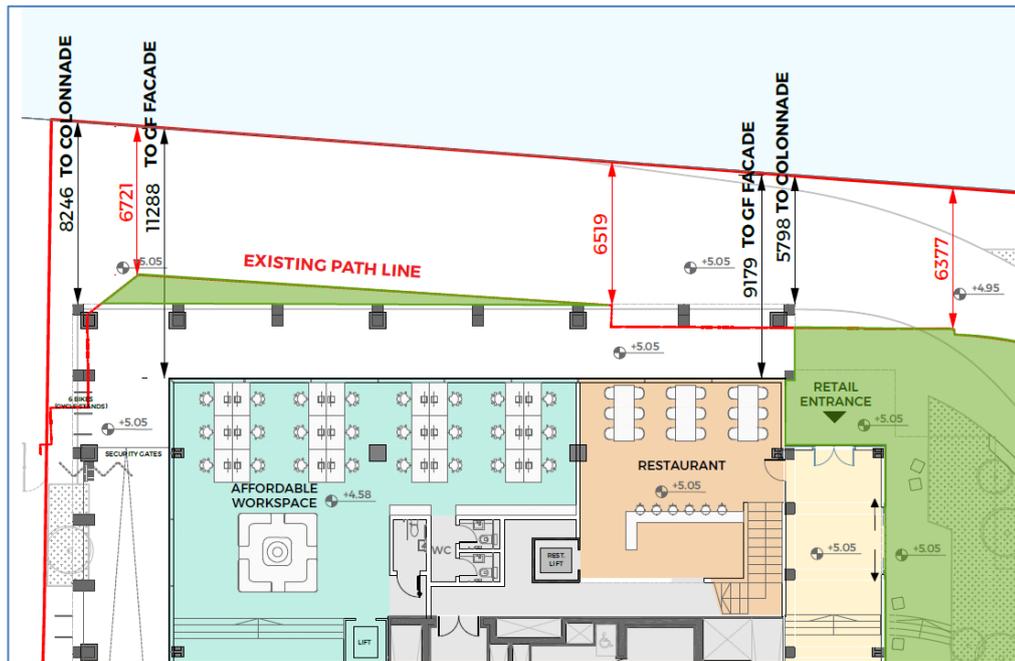


Image: Current condition – approach from the east



Image: Proposed condition - approach from the east



108. At the 'rear', it sufficiently engages with the street, as well as just about opening up the route to the new shared central garden, with its curved form suggesting an onward route through.

Height scale and massing

109. London Plan Policy D9 deals with tall buildings. The policy sets out a list of criteria against which to assess the impact of a proposed tall building (location/visual/functional/environment/cumulative). London Plan Policy D4 requires that all proposals exceeding 30 metres in height and 350 units per hectare must have undergone at least one design review or demonstrate that they have undergone a local borough process of design scrutiny.
110. Southwark Plan Policy P17 deals with tall buildings. The policy sets out a list of requirements for tall buildings of which the policy states that tall buildings must:
1. Be located at a point of landmark significance; and
 2. Have a height that is proportionate to the significance of the proposed location and the size of the site; and

3. Make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings; and
 4. Not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough views; and
 5. Respond positively to local character and townscape; and
 6. Provide a functional public space that is appropriate to the height and size of the proposed building; and
 7. Provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents where appropriate.
111. The Southwark Plan notes that the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape. It goes on further to say that the design of the development should respond to its prominent, yet sensitive setting as an arrival point into Southwark from Southwark Bridge. Redevelopment must be sensitive to the Thames Policy Area, where building heights should be lower in close the proximity to the River Thames.
112. In terms of massing, it is larger and taller than the existing building. The height would increase from 38.79m to 46.7m (maximum). This scheme followed extensive negotiation and discussions with the applicant to reduce the mass and scale. The building proposes a series of terracing around the facades to break down the scale. Importantly, it responds to the emerging shoulder line along Park Street to the 'rear' and provides a shoulder line to the front that initially responds to the FT building, stepping upwards and away. It is noted that the building would appear larger next to the Anchor Pub and when seen from the north side of Southwark Bridge Road. This will be discussed in the Heritage section of this report.
113. The applicant has made effort to minimise the impact on the listed public house by stepping further away. Furthermore, the building transitioned from being composed of seven 'blocks' to eight. The 8-block massing breaks down the closest blocks to the pub from two to three. The whole scheme is pulled back further and opens widely around the pub terrace, improving the relationship to the terrace's turret element. The lowest blocks move southwards, away from the rear of the pub. The whole front face of the closest massing block was retracted. Furthermore, the central portion of the proposed development is lifted, freeing up the ground plane and relating in height to the Anchor Pub. This lifted mass provides the two new publicly accessible spaces linked together by the building's lobby.

Image: 8 block massing

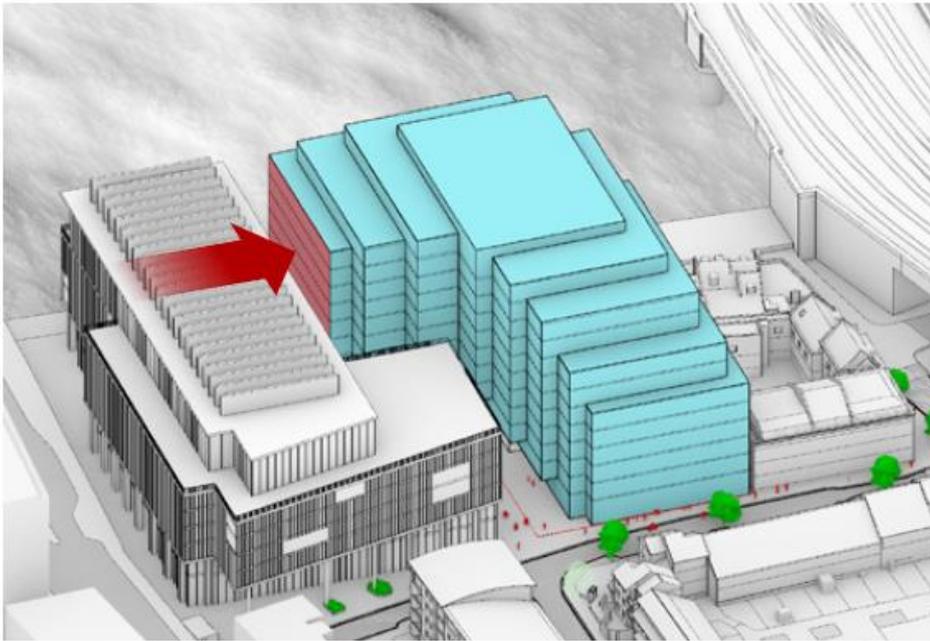


Image: View of development from river – simpler grid system



114. At the north the proposed development steps up to address the larger scale context of the former FT Building and the larger scale commercial context of the Bankside and the City cluster across the River Thames. In previous proposals before submission, discussions were also had regarding the gap between the proposed building and the FT proposal. Consequently the whole western façade in this zone receded by 1m. On the lowest two floors a double height colonnade creates further width for users of the public realm. The space is approximately 11.9m width in the colonnade and 7.5m on the upper levels.

Image: Massing set back further from FT building



115. At the south the proposed development steps down to correspond to its context along the Park Street elevation and in relation to the residential scale of the townscape. It would be 6 storeys (26.5m AOD) on the Park Street (south) elevation – a slight increase from the existing Red Lion Court building. The context elevation and 3D models illustrate the change in the scale on the Park Street frontage. Whilst the proposed building would be much larger in mass and scale, it should be noted that the Site Allocation expected this site to expand in floor area and that can only be possible with some height. Southwark needs to accommodate significant growth for offices and other workspaces which are growing in demand contributing to the central London economy and status as a world city. The Site Allocation NSP06 emphasises that sites that are within the Central Activities Zone are most in demand for delivery of offices and will be required to contribute to this growth by providing an increase in the amount of employment floorspace.

Drawing: Section drawing looking north

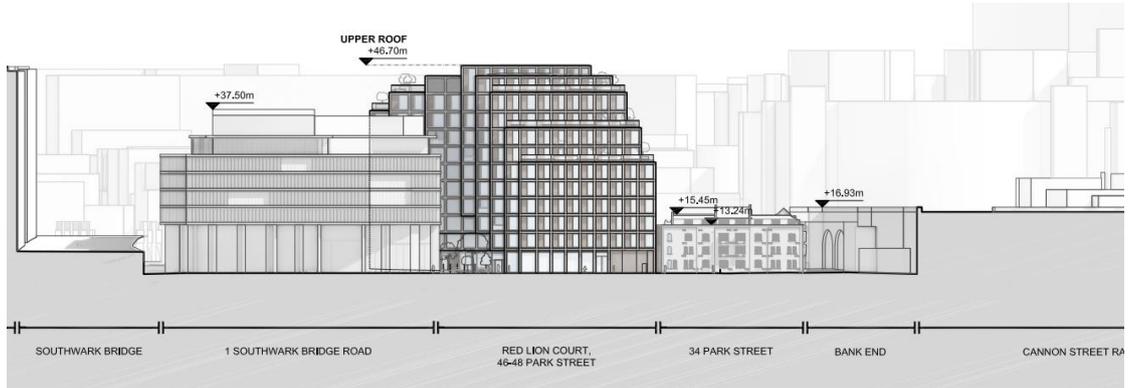


Image: Existing building massing

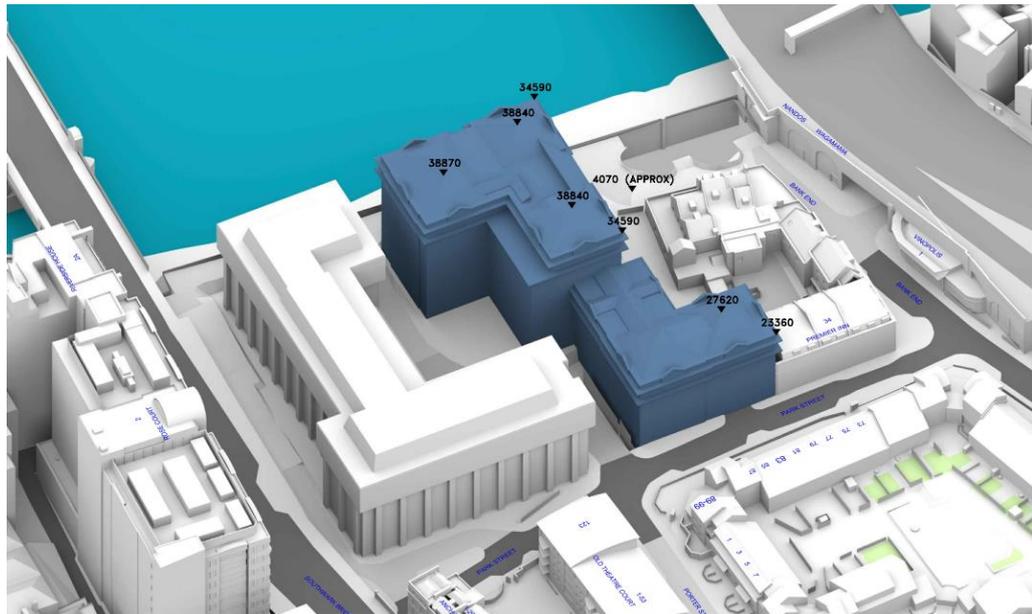
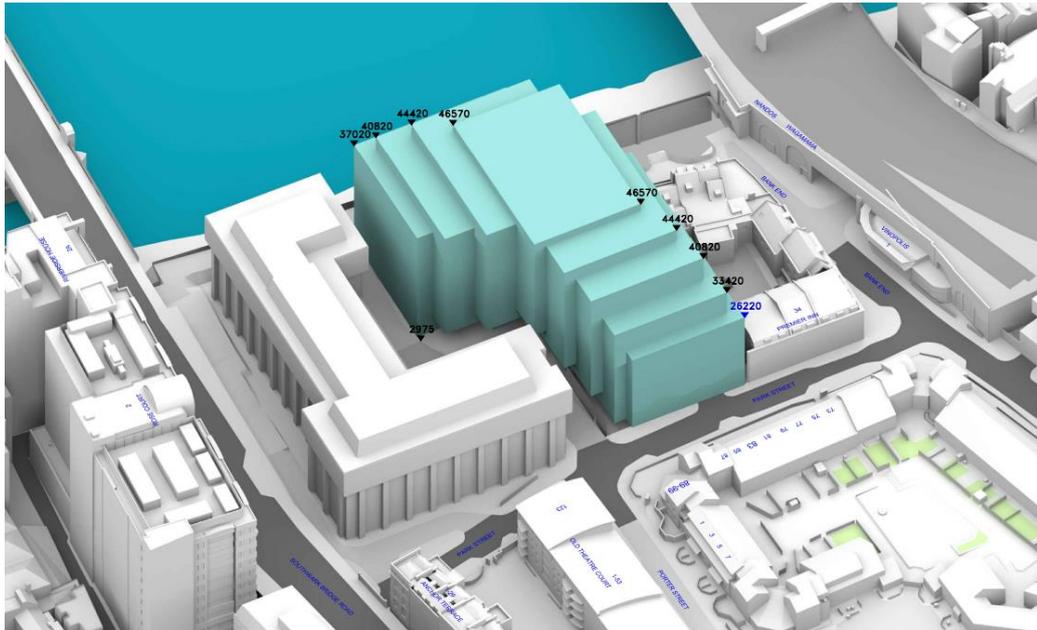


Image: Proposed massing



View: South of the site, from Porter Street



116. Overall, it is considered that whilst there is a step change in the scale and height on this site and along this frontage, the articulated massing and break down of the facade would give the appearance of a lighter form. Further analysis on the protected views is discussed in the heritage section of this report.

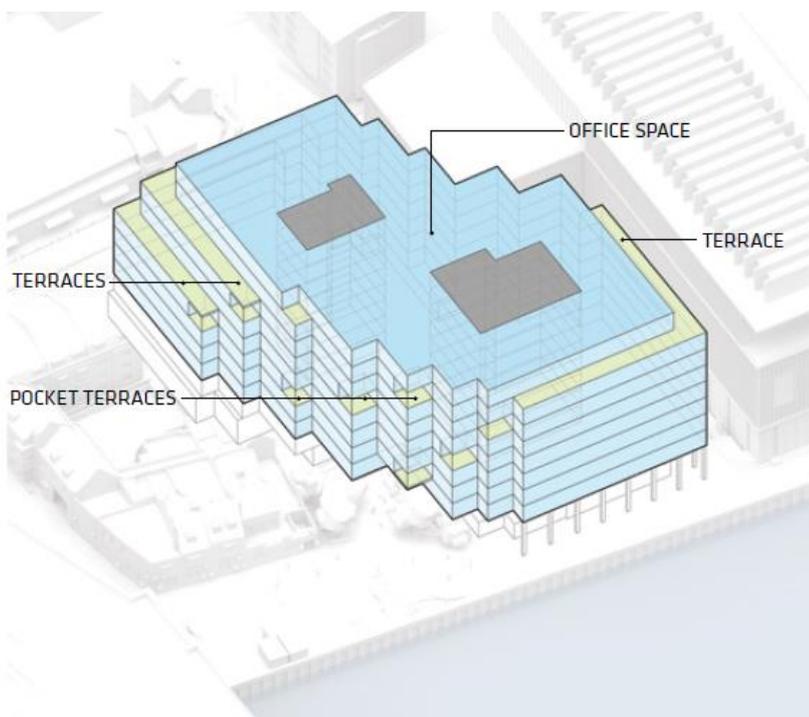
Architectural design and materiality

117. Southwark Plan Policy P14 sets out the criteria for securing high quality design. In respect of architectural design and materials the policy requires all developments to demonstrate high standards of design including building fabric, function and composition; presenting design solutions that are specific to the site's historic context, topography and constraints; responding positively to the context using durable, quality materials which are constructed and designed sustainably to adapt to the impacts of climate change.
118. The proposed massing has been conceived as a series of eight adjoining volumes that rise and fall across the site. This design concept lifts the mass at the northeast corner to create an area of public realm beside the neighbouring Anchor pub.
119. This results in a stepped profile and is accentuated by a series of terraces, which rise and fall across the top of the building. Those terraces would be animated with planting, softening the rectilinear expression of the architecture. The outer grid of the building would be composed of modules constructed off-site. Pocket terraces have been cascaded along the eastern and western façades, introducing greenery and interest in the elevations. The pocket

terraces, distributed roughly two per floor, add further depth to the facade on the largest flanks. The eastern elevation is further broken down in scale by the wrapping around of the main roof terraces.

120. The proposed volumes will be arranged in a rhythm, stepping up more steeply to the north, with shallower single storey terraces, and cascading down more gently to the south and east, with deeper terraces set at every two floors. This will result in a lower shoulder height and more visible stepping composition to the south and east where the scale of nearby buildings is lower on Park Street. To the west, the height of the lowest volume will relate more to the height of the redeveloped FT building and will gesture down to the four storey Premier Inn and residences to the east and south. The riverfront elevation will have large expanses of glass – maximising visual permeability but also responding to the northern aspect of that elevation – whilst the east and southern elevations will have inset metal panels, the breadth of which will be patterned to give the building greater opacity to the south and east.

Image: 3D massing showing terraces



121. The composition of the scheme fundamentally has a masonry grid that is consistent across the building. The outer grid will be in light coloured brickwork, in response to the predominant material locally and industrial heritage of the site, but with slender proportions and the joints between the modules expressed to acknowledge the 21st century construction of the building. There is also a secondary material proposed - the inset metallic panels will have a warm tone and will be arranged to provide shading, privacy, visual interest.

122. During the pre-application stage, Officers had wanted to see more texture and detail in the façades. The design team have studied various methods to re-introduce craft within the existing parameters of the façade design. These included variations in how the bricks are laid, all of which introduce some three-dimensionality and will enliven the masonry surfaces with light and shadow throughout the course of the day. This detail can be secured as a condition.

Image: Texture and detail in bricks and metal for the infill panels

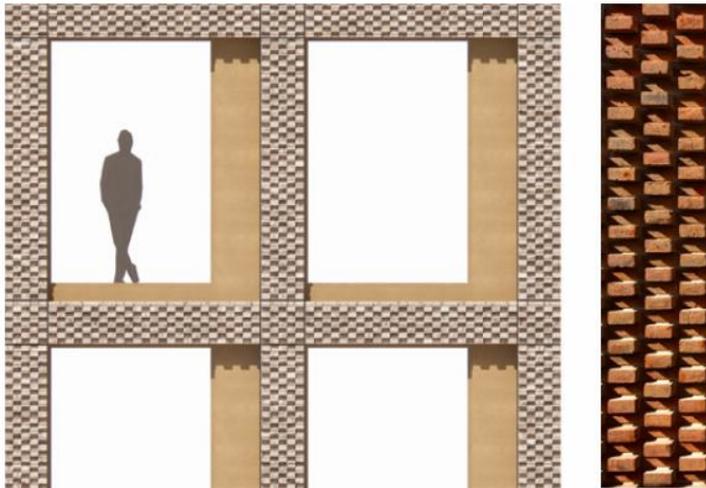


Image: Grid pattern and façade detail differences

South (metal panels)

North (no metal panels)



123. There would be suspended soffits where the massing is lifted. It is envisioned the soffits continue the material language of the main façade, with a simple brick frame and a warm metal infill panel. However, the warm metal infill will be more reflective and have a playful lighter quality.

Image: Soffits



124. It is considered that the architecture has a very strong rigour with its very regular grid, repeated stepped form, and quasi-symmetry. The elevations at this stage are well detailed. It is considered that more could be added to ensure that the front entrance is more legible, but this the landscaping and public realm detail could guide occupants and visitors. Overall, its architecture is bold, but generally sits well within the wider townscape and protected views.

Heritage considerations and impacts on protected views

125. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to consider the impacts of proposals upon a conservation area and its setting and to pay “special regard to the desirability of preserving or enhancing the character or appearance of that area”. Section 66 of the Act also requires the Authority to consider the impacts of a development on a listed building or its setting and to have “special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”.
126. Chapter 16 of the NPPF contains national policy on the conservation of the historic environment. It explains that great weight should be given to the conservation of heritage assets. The more important the asset, the greater the weight should be (paragraph 199). Any harm to, or loss of significance of a designated heritage asset should require clear and convincing justification (paragraph 200). Pursuant to paragraph 201, where a proposed development would lead to substantial harm or total loss of significance of a designated heritage asset, permission should be refused unless certain specified criteria

are met. Paragraph 202 explains that where a development would give rise to less than substantial harm to a designated heritage asset, the harm should be weighed against the public benefits of the scheme. Paragraph 203 deals with non-designated heritage assets and explains that the effect of development on such assets should be taking into account, and a balanced judgment should be formed having regard to the scale of any harm or loss and the significance of the asset. Working through the relevant paragraphs of the NPPF will ensure that a decision-maker has complied with its statutory duty in relation to Conservation Areas and Listed Buildings.

127. Development plan policies (London Plan Policy HC1 and Southwark Plans Policies P19, P20 and P21) echo the requirements of the NPPF in respect of heritage assets and require all development to conserve or enhance the significance and the settings of all heritage assets and avoid causing harm.
128. Policies HC3 and HC4 of the London Plan identify the strategic views within London and set out the assessment framework for development that will impact upon strategic views, protected vistas, and their landmark elements. Development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of strategic views and their landmark elements. They should also preserve and, where possible, enhance viewers' ability to recognise and appreciate Strategically Important Landmarks. Guidance on the management of designated views is set out within the London View Management Framework (LVMF) SPG.
129. Policy P22 of the Southwark Plan states that development should:
 1. *Preserve and where possible enhance the borough views of significant landmarks and townscape;*
 - and*
 2. *Ensure the viewing locations for each view are accessible and well managed;*
 - and*
 3. *Enhance the composition of the panorama across the borough and central London as a whole.*
130. As noted earlier in the report, the site is situated within the following protected views:
 - Local View 1: The London panorama of St Pauls Cathedral from One Tree Hill;
 - Local View 2: The linear view of St Pauls Cathedral from Nunhead Cemetery;
 - Background Assessment Area of the LVMF view 1A.2 - Alexandra Palace Viewing Terrace to St Paul's Cathedral; and
 - Background Assessment Area of the LVMF view 3A.1 - Kenwood Viewing Gazebo to St Paul's Cathedral.
131. The submission includes a Zone of Visual Influence map (ZVI) and a townscape visual impact assessment (TVIA) that provides verified images of the development when viewed from a number of locations in and around the Bankside area, as well as when viewed from within the relevant protected

panoramas and river prospects. The set of verified views is reasonably extensive, providing images from 23 locations, including 1 night-time image. A further 19 model shots are provided, showing additional locations and sequences of views.

132. The TVIA provides baseline conditions, the proposed view and cumulative scenario. Cumulative assessment has also been carried out and considers schemes in the local and wider area that are consented or have resolution to grant consent and that are likely to have a perceptible effect in combination with the proposed development. The applicant had undertaken a number of views, but Officers have focussed on the above protected views. In general, despite being c.45m tall, the development is less widely visible than its height suggests. This is in part due to the similarly large buildings located nearby, particularly to the west, but also due to the railway viaducts that run to the east and southeast of the site and the often dense, built-up form or irregular layout of the surrounding streets. The moderately tall structure is often obscured by the intervening context.
133. The ZVI indicates the building will be visible along the riverbanks nearby and in the middle distance, although mainly on the north side of the river, and from Blackfriars Bridge and onwards along Farrington Road. It would also be highly visible from the elevated mainline railway running into Cannon Street station. It would be visible from the adjacent bridges both upstream (Millennium) and downstream (London Bridge) and to a lesser extent from Blackfriars rail bridge and Tower Bridge. It will be particularly visible in the streets to the immediate south (Park Street, Porter Street and Old Maiden Lane) due to proximity and the low-rise scale of the neighbouring Park Street housing estate.
134. Beyond this, visibility of the site is sporadic, where the local townscape of the viewing point briefly opens up. In those instances from the southwest, south and southeast, the middle and long distance views generally would be glimpsed views of the rooftop with the layering of other buildings in the foreground and read as one of several large-scale buildings within the Bankside area. The impact of the glimpsed views would be minor and, given the often mixed character or quality of the local townscape, unlikely to be harmful. Nonetheless, it does remain visible in a number of nearby and more distant views, where it potentially affects protected views, the settings of designated heritage assets, and other sensitive townscape views.

Protected Views

135. LVMF view 1A.2 - Alexandra Palace Viewing Terrace to St Paul's Cathedral
Under this view, the proposed development would not be visible. It would be fully hidden by the terraced houses in the foreground. There would be no effect in the proposed and cumulative conditions.
136. LVMF view 3A.1 - Kenwood Viewing Gazebo to St Paul's Cathedral
In the proposed scenario, a sliver of the top of the proposed development would be visible to the right of the western towers of St Paul's Cathedral. It would not be visible in the wider view. It is unlikely to be noticed due to the considerable

distance of the viewpoint, the small amount which is visible and its appearance beyond existing large-scale buildings on the skyline. It would have no noticeable effect on the setting of St Paul's Cathedral. Consequently, the scale of effect is judged to be negligible and the nature of the effect would be neutral.

137. Likewise, in the cumulative scenario, due to the very minor degree of its visibility and also due to the prominence of the consented tall development seen directly beyond it the cumulative effect is judged to remain the same as the proposed development in isolation.
138. Local View 1: The London panorama of St Pauls Cathedral from One Tree Hill
The London Panorama view from the summit of One Tree Hill provides one of the best views of central London and its suburbs from one of Southwark's highest public open spaces. St Paul's Cathedral is the strategically important landmark that is the focus of the view. It is noted that the foreground foliage presently obscures the Cathedral, but the silhouette of its dome and spire is discernible.
139. The proposed development would be in the foreground of the Cathedral and its upper levels conceal a small portion of the southern elevation of the Cathedral. However it is entirely set beneath the Threshold Plane defined in the Southwark Plan for the view. The applicant notes that the Threshold Plane, as defined in the Southwark Plan, allows for further concealment of that lowest part of the Cathedral which has limited visibility and significance in the view. The proposed development is set below the landmark parts of the Cathedral. In the telephoto view, where the proposed development is visible, the stepped volumes of the proposed massing and the light-coloured brickwork reduce the presence of the proposed development in the view. As it blends with existing layers of urban development in the foreground of St Paul's, it is not likely to be seen by the naked human eye. The magnitude of impact would be negligible and the Cathedral would remain the focus of the view. The nature of the effect is judged to be 'neutral' because the proposed development will preserve the view and the viewer's ability to recognise and appreciate St Paul's Cathedral within the wider panorama.
140. In the cumulative scenario, there would be change to the view overall as a result of the number and scale of consented developments in the view. However, the consented schemes which appear near to the proposed development in the view would be set lower on the skyline and are not likely to be noticed, due to their position within a part of the view already characterised by dense layers of rooftops. The cumulative effect is therefore judged to remain the same as the Proposed Development in isolation.
141. Local View 2: The linear view of St Pauls Cathedral from Nunhead Cemetery
The view is from within the Grade II* Registered Nunhead Cemetery and outward views from this part of the Cemetery are fully screened by mature trees which dominate almost all of the Cemetery. The view provides a tight, focussed view of St Paul's Cathedral from one of Southwark's most historic locations that is fully framed by mature trees. St Paul's Cathedral is set prominently in the centre of the view.

142. The proposed development would appear in the foreground of the body of St Paul's, set well beneath the western towers and the dome and peristyle of the Cathedral. All the key features of the Cathedral identified in the policy would all remain clearly visible. As in the view from One Tree Hill, only the upper levels of the proposed development would be visible and they would be seen as part of the existing layers of urban development in the foreground of St Paul's. The stepped volumes of its mass will soften its presence in the views and will accommodate greenery on its terraces. The brick-clad outer frame will be light in colour and slender in appearance, also reducing its prominence in the view. It is considered that the development would not appear intrusive, unsightly or prominent in the view. Whilst it would obscure a small part of the body of the Cathedral, the full silhouette of the Cathedral and its western towers would remain visible and it would be fully set beneath the Threshold Plane defined in the Southwark Plan. The viewer's ability to recognise and appreciate St Paul's Cathedral will be fully preserved. To conclude, the scale of the effect would be minor and the nature of the effect would be neutral. There would be no added effect in the cumulative condition so the effect would be the same as for the proposed development in isolation.
143. Regarding the river prospects, the submitted ZVI confirms that the replacement building would not be seen from upstream in the protected views from Waterloo Bridge (LVMF 15.B) and the Southbank (LVMF 16.B) or beyond, being obscured from view by intervening buildings. Similarly, the development is unlikely to be seen from Blackfriars Bridge and only marginally visible from Blackfriars Station/ rail bridge, albeit the river prospects from here are not designated as protected views. Nonetheless, the townscape impact is considered neutral.
144. The views from Southwark Bridge towards the development, which is a protected river prospect (LVMF 12.B.1) is the most overt riverside view of the development. The protected view is panoramic, with a focus on Southwark Cathedral, although the development would sit beyond the edges of a viewing cone towards the cathedral. The impact would be on the stretch of riverfront generally between Southwark Bridge and Cannon Street station railway bridge. Overall, the townscape impact is moderate and of some harm, the key issue being the adjacency of the listed public house. Many of the other views not outlined above, but which are key river prospects have been analysed and it can be summarised that the impact would be neutral.

View: Southwark Bridge: downstream



View: Southwark Bridge south



145. Overall, the new building has no or little impact on the long distance protected views and river prospects. Where visible in closer-by river prospects and townscape views, it has a minor or moderate effect, with its architecture having generally a modestly positive effect on the townscape.

Heritage Assets

146. The ZVI confirms that the development would not affect views from within Parliament Square and therefore would not affect the settings of the Palace of Westminster and Westminster Abbey a World Heritage Sites. It would be visible from the Tower of London, although this would be limited to the ramparts of the Outer Curtain Wall and adjacent riverwalk (part of the Liberties), where it would be seen in the distance as one of many large riverfront buildings and therefore have a neutral impact. Importantly, it would not affect the significant views from within the castle grounds (Inner Ward) and the forecourt to the White Tower and scaffold site in particular.
147. Whilst the site is close to the site of the original Globe and the development involves basement extensions, it would not affect the theatre ruins, which are subterranean and located beneath the neighbouring Anchor Terrace in Park Street. In terms of the remains of Winchester Palace in Clink Street, the views submitted demonstrates that the proposed replacement Red Lion Court building would not be visible in the backdrop to the scheduled monument, being obscured from view by the existing building context of Clink Street.
148. Regarding listed buildings and structures, the closest are several Grade II listed canon bollards in Bank End, adjacent to the Anchor Pub and railway viaduct. The development would not affect the settings of the bollards, which comprises the street form and groundscape of Bank End, which are unaltered.
149. The heritage asset mainly affected is the Anchor pub itself, which is Grade II listed and is experienced as a traditional corner public house on the Thames foreshore within a built-up section of central London. Its significance derives from its surviving architecture and its historical interest, being a longstanding riverfront pub with a close association with the former Anchor brewery that occupied much of the adjacent area, and its group value with the nearby anchor Terrace. Its riverfront setting is part of the pub's large popularity among visitors to the area. The existing Red Lion Court and nearby FT building impact upon its riverfront setting, jutting forward of the existing pub and truncating Bankside as a former roadway.
150. Whilst the stepped footprint and cantilever of the replacement building set the building slightly westwards from the public house, it does not alter the relationship within the street scene onto the remaining Bankside highway and the pub's relationship to the riverfront itself. The replacement building is however significantly larger, rising higher and more significantly stepping rearward, with its silhouette overwhelming the diminutive corner pub, which would no-longer be partly seen against the skyline. This is considered detrimental, although towards the lower range of less than substantial harm.
151. In the proposed development, whilst the stepped form can be read, the juxtaposition becomes more abrupt. The silhouette of the pub is unchanged and its impact on its heritage setting neutral, although the townscape condition is uneasy and regarded as moderately harmful. The replacement Red Lion Court would no longer appear coming to ground, but seen to climb above the

pub. The impact, however, is to the pub's pastiche extension rather than the more significant, historic elements of the pup, with its riverfront setting remaining unaffected, and is therefore a matter of townscape harm, with the impact on the heritage setting remaining neutral.

152. Moving southwards, only the foremost volume of the replacement building is seen, which by comparison is taller but not so wide as the existing Red Lion Court building. In this oblique view, the layered form is seen at roof level only, with the new building read coming to ground and calmer in appearance. Importantly, its reduced footprint reveals more of the adjacent pub, with its modern side extensions more visible. In this instance, there is an improvement to the sense of its riverside position, albeit the impact is distinctly minor and more a case of a townscape improvement, with the new architecture an obvious enhancement of the view.
153. Southwark Bridge itself is Grade II listed and therefore is a matter of focus, its significance being its architecture and historical interest as an example of early 20th century riparian infrastructure and group value with other listed Thames bridges. Whilst the proposals being a marked change in the form and appearance of the application building, overall its setting characterised by the riverwalk and immediate backdrop of large commercial buildings at its bridgehead remains. The impact on the heritage setting similarly remains neutral further south along the bridge.
154. The other key heritage asset in the immediate locality is Anchor Terrace, the Grade II listed former brewery offices. The terrace is located further to the west of Red Lion Court and is mainly viewed within the context of Southwark Bridge Road and its approach to the bridgehead. Its significance is as a surviving Georgian terrace with a high compositional form, its historical association with the riverside brewery and group value. Only parts of the roof of the existing Red Lion Court are visible in the backdrop to the rear of the terrace. Whilst the upper floors of the replacement building would be much more visible, the wireline indicates that the building would remain to the rear and would be set much lower than the terrace, where it would read as part of a layered backdrop. Its modern design would offer visual interest, but not to the extent of being disruptive. The terrace's street elevation and compositional form would be unaffected, as would its historical association and group value. Overall, the impact would be neutral.
155. In terms of other listed buildings within the wider context, the building of highest significance is the Grade I listed Southwark Cathedral, which is over 250m eastwards from the site, but is notable in the raised view from the bridgehead of Southwark Bridge over Park Street. The replacement building will be seen within the foreground in the vista towards the cathedral. Though taller than the existing Red Lion Court, the replacement building will maintain the current building line and would initially continue the height of the extended FT building before stepping down to a similar height to the modern building opposite, maintaining a balanced enclosure to the view. Though more glazing would be apparent, the architecture would remain calm and not strident in this view, and would have a neutral impact on the appearance of the heritage asset.

156. In terms of other listed buildings in the vicinity, as referenced above, the dense built up character of Clink Street obscures the development when seen within the street setting of the Grade II listed Winchester Wharf.
157. The development is more evident in the backdrop to the Grade II listed terrace houses in Park Street at Nos. 20-24, appearing on the skyline in the same location as the current building, though notably taller. Nonetheless, it would remain at a sufficient distance not to dominate or disrupt the setting of the terrace, with the Georgian townhouses and their fine architectural detailing remaining primarily in the view. Similarly, there would be no impact on the setting of the further Georgian townhouses at Nos. 21 and 23 Park Street or nearby at Cromwell Flats, 5-8 Redcross Street, which are Grade II listed Victorian philanthropic housing with shops. The development would also be visible in the backdrop to the Grade II listed Georgian terraced housing of No.55-59 Thrale Street, though again, the development would appear on the skyline at a sufficient distance not to dominate or disrupt the setting.
158. Lastly, the application site is outside a conservation area. It is close by to the Borough High Street conservation area and Thrale Street conservation area. The significance of the conservation areas is generally the historic street patterns and traditional scale and architecture, comprising mainly mid-rise warehousing and commercial offices, ecclesiastical buildings and occasional low-rise residential buildings, with little or no public open space. Within these conservation areas, the street pattern and dense urban form generally restrict outward views towards the site, with the intervening distance and building context further limiting any impact.
159. Elsewhere, due to the intervening distance, built up context and/or orientation of the street pattern, the development would not be seen in outward views from the Bear Street conservation area and only marginally glimpsed on the skyline from the Tooley Street conservation, which sit further away to the west and east of the site, preserving their setting
160. Overall, for the most part the development has a neutral or occasionally beneficial impact on the local townscape, its high architectural quality being evident in close and middle distance views. The building will form a notable and engaging riverside development, and though larger than the current building, its layered form will generally mediate well its sense of scale, stepping down towards the riverfront and Park Street at the rear.
161. The development has little or no impact on strategic views and where seen, generally a neutral or modestly positive impact on the settings of nearby listed buildings and structures, and a neutral impact on the settings of surrounding conservation areas. The notable exception, however, is in Bank End and its relationship to the neighbouring Grade II listed Anchor pub, where its form and scale form a strong juxtaposition to the diminutive heritage asset, detracting from its setting. The impact is less than substantial harm and, in accordance with the NPPF, should be balanced against the planning benefits of the scheme.

Design Review Panel

162. The proposals were reviewed by the Council's Design Review Panel (DRP) at the pre-application stage in January 2022. The scheme was generally welcomed by the panel.
The panel acknowledged the positives of the scheme in working within the height constraints of the protected viewing plane; the strong design aspiration of animating the ground floor; and stepped massing to break down the scale of the building and provision of outdoor public space and green terraces.
163. The panel, however, felt that the quantum of development proposed was compromising key aspects of the design. The stepping of the building at the upper levels such that it projects over the public realm to the north and south of the building feels overbearing and compromises the quality of these spaces. The relationship to the listed pub feels unresolved and the panel felt that the massing needed to be set back to give the pub more breathing space. The air gap between the FT building has been reduced at the upper levels which will compromise the quality of light for both buildings. Too much development is being asked of the site, impacting on its neighbours, its quality of workspace and the quality of the new open spaces.
164. The applicant has made minor amendments to respond to the DRP comments. These include reassessing the blocks and massing, the landscaping and public realm and pulling back from the neighbouring buildings. The detailed architecture, elevational treatment and materiality have also been further explored. Officers are satisfied with the adjustments made.

Secure by Design

165. Policy D11 of the London Plan 2021 require development proposals to reduce opportunities for crime and create and maintain safe internal and external environments.
166. The Metropolitan Police Design Adviser had commented on the scheme and it was noted that the designers have considered security and crime prevention measures, and believe that this will result in a positive impact upon the development from a safety and security perspective. Continued liaison with a designing out crime officer will enhance this. The design of the development has considered opportunity for natural surveillance, incorporates excellent lines of site and the development should 'activate' this area. The design adviser also provided comments on the landscaping and these comments will be taken on board when landscaping details are submitted for approval.
Advice on accessibility within the building is also provided. The Police design adviser is confident that certification can be attained. To ensure certification is ultimately achieved, the imposition of a 'Secured by Design' condition is recommended.

Landscaping and biodiversity

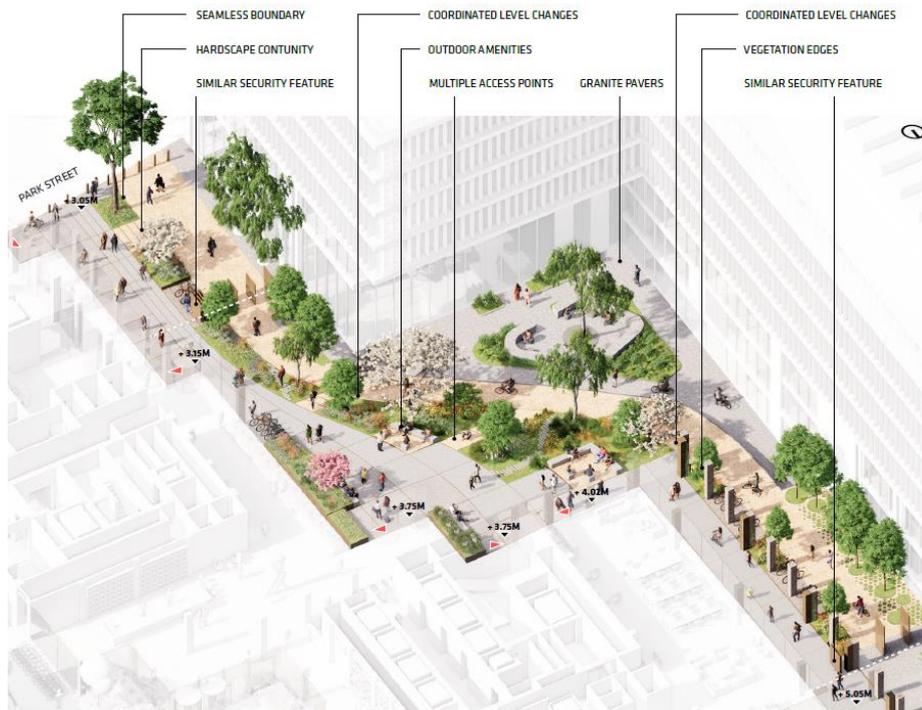
167. The proposal would deliver a number of public realm benefits and plays a major part in the delivery of the site allocation aspirations. The Thames Path would be widened and would open up a route between Park Street and the Thames Path for the public.
168. Additional open space is proposed on the west side of the building, with the gardens and route through to the Thames Path made available to the public during the daytime. This open space would offer attractive soft landscaping and street furniture in a contemporary design. Outside of the hours of public access, metalwork gates would provide closure to the open space. The gates are put in place to provide a level of protection towards the residential areas and is a feature that is expected by the local residents. It is expected that the location of the security gates proposed match the security gates and proposed closed times of the neighbouring site (open only between 8am to 8pm to the public). The final detailing of the gates and hours would be secured by condition.
169. The site allocation aspirations was to a north-south pedestrian link created. Due to the different site ownerships, it was anticipated that this would be delivered in two halves. The FT building development proposed the pedestrian route flanking the common boundary, which sets up opportunities for any development on the Red Lion Court land to create an adjacent green space or new secondary pedestrian routes off.

Plan: Approved FT proposal ground floor



170. When the two schemes come forward, it is envisaged that this would appear as one larger public space, which would be unified. Details of the hard landscaping and levels would be secured via a condition and a public realm specifications would also be required in the s106 agreement (similar to the FT permission).

Image: Future public space when both developments complete



171. The s106 associated with the FT proposal was for the submission and approval of a Joint Design and Management Framework. This would ensure that the developer (Owner) would use reasonable endeavours to cooperate with the developer of the FT development to produce and submit to the Council for approval a Joint Design and Management Framework in respect of the Pocket Park at the western boundary and where necessary amend the Public Realm Specification. The indicative landscaping material palette is similar to that proposed on the FT site and this will be refined at a later stage.
172. The details of the management and maintenance arrangements between the two developers to ensure that the new public realm along the boundary will operate for optimum public use by ensuring that closure dates, opening hours, security and gating arrangements across both sides of the boundary are fully co-ordinated.
173. The applicant has completed a sunlight and overshadowing analysis on the public realm areas. The BRE suggests that for a garden or amenity area to appear adequately sunlit throughout the year, no more than half (50%) of the area should be prevented by buildings from receiving two hours of sunlight on the 21st of March.
174. The new public route through between the proposed development and the Former FT Building in situ currently enjoys 2 hours of sun on ground to 28.5% of its area on 21st March. When both the proposed development and the consented scheme at the FT Building are in place, the level of the 2-hour sun on ground

would increase slightly to 20.30% of its area on 21st March. This shows that the schemes improve the levels of sunlight this space will enjoy.

175. In terms of the new Bankside Square and the Bankside Path, this amenity space would enjoy 2 hours of sun on ground to 51.1% of its area on 21st March with the consented FT schemes and the proposed Red Lion Court developments in place. This space will therefore meet the BRE guidelines criteria and can be considered to enjoy good light levels.
176. The baseline ecological survey identified the site as possessing high potential to support nesting birds, moderate potential to support pollinating invertebrates and low potential for foraging bats within the site's zone of influence. No further surveys were recommended and the Council's own Ecology Officer has confirmed this. A number of ecological enhancements were recommended and conditions would ensure these are secured.

Urban Greening and trees

177. Policy G5 of the London Plan 2021 encourages major developments to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. The policy also recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding E(g) iii uses).
178. 6 existing trees exist within the site. The findings indicate that the existing trees are categorised into categories B and C (3 No. category B and 3 No. category C trees). The proposed development would adopt the reintroduction of trees to reinstate similar existing tree species within the proposed public realm. The tree planting proposals (indicative showing 38 in total) appear to offer a wide range of native species, including Lime, Birch, Rowan, Apple and cherry species. As well as a variety of height structure, colour and texture.
179. The Council's Tree officer has not raised any objections to the loss of the trees. Officers would assess canopy cover at time of planting plus 25 year projections. Tree growth will be limited under the cantilevered parts, but it is possible to condition species, pit design and available soil and maintenance. The mitigation strategy would provide an increase in vegetation and is supported. Using the GLA UGF methodologies, a score of 0.35 would be achieved, which exceeds the 0.3 target score. Green walls are proposed as part of the greening strategy, but given the fire risks Officers would request that this be removed and a condition could secure this. This does not lower the UGF significantly.
180. There would be a requirement for minimum soil volume for any tree, which could be conditioned. Irrigation and establishment will be key with landscaping and a condition would need to include a specific landscape management plan.

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

181. Policy P56 (Protection of amenity) of the Southwark Plan states that developments should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users. This includes privacy and outlook impacts, overlooking or sense of enclosure, loss of daylight and sunlight, and unacceptable noise from developments.

Impact of the proposed use

182. The site and its surrounding area comprises predominantly commercial, retail, cultural and tourist uses. The existing Red Lion Court building is in office use and when redeveloped would be intensified with its enlarged floorspace. The adjoining FT building is (and will be when extended) in office use and the proposal would not compromise this use. The introduction of the other uses (retail and wellness centre) would not impact negatively on the adjoining uses. The Anchor public house would not be restricted by these uses. When this proposed development is complete, it would complement and enhance the two combined sites, as envisaged in Site Allocation NSP06.
183. The Premier Inn hotel is located to the south east of the site, which is a C1 class use. The hotel has raised objections that the proposal would impact on their business by reason of its proximity to their building. This is discussed further below, but in terms of the proposed use it would not restrict the hotel use.
184. Letters of support have been submitted by nearby theatres and restaurants, emphasising the benefits of the proposed use and the improved public spaces.
185. There are residential uses to the south, but this proposed development does not introduce any noise generating use that differs from this South Bank area.

Daylight and sunlight impacts

186. The following section of this report details the potential daylight, sunlight, and overshadowing impacts of the proposed development on surrounding residential properties. This analysis is based on guidance published by the Building Research Establishment (BRE).

BRE Daylight tests

187. The BRE report gives criteria and methods that are explained subsequently for calculating daylight and sunlight effects on surrounding receptors as a result of the proposed development.
188. Diffuse daylight is the light received from the sun, which has been diffused through the sky. Even on a cloudy day, when the sun is not visible, a room will continue to be lit with light from the sky. This is diffuse daylight. Diffuse daylight calculations should be undertaken to all rooms within domestic properties,

where daylight is required, including living rooms, kitchens and bedrooms. The BRE guide states that windows to bathrooms, toilets, storerooms, circulation areas and garages need not be analysed. These room types are non-habitable and do not have a requirement for daylight.

189. The BRE guideline tests undertaken for this daylight assessment are the Vertical Sky Component (VSC), and Daylight Distribution (DD). The VSC test calculates the angle of vertical sky at the centre of each window and plots the change between the existing and proposed situation. The target figure for VSC recommended by the BRE is 27%, which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE also advises that VSC can be reduced by about 20% of its original value before the loss is noticeable. In other words, if the resultant VSC with the new development in place is less than 27% and/or less than 0.8 times its former value, then the reduction in light to the window is likely to be noticeable.
190. The distribution of daylight within a room can be calculated by plotting the 'no skyline'. The no skyline is a line that separates areas of the working plane that do and do not have a direct view of the sky. Daylight may be adversely affected if, after the development, the area of the working plane in a room that can receive direct skylight is reduced to less than 0.8 times its former value.

BRE Sunlight Tests

191. When assessing sunlight, the BRE recommends that the Annual Probable Sunlight Hours (APSH) received at a given window in the proposed case should be at least 25% of the total available, including at least 5% in winter. Where the proposed values fall short of these, and the absolute loss is greater than 4%, then the proposed values should not be less than 0.8 times their previous value in each period (i.e. the proportional reductions should not be greater than 20%). The BRE guidelines state that '...all main living rooms of dwellings, and conservatories, should be checked if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are less important, although care should be taken not to block out too much sun'. The APSH figures are calculated for each window, and where a room is served by more than one window the contribution of each is accounted for in the overall figures for the room. The acceptability criteria are applied to overall room based figures.

Overshadowing

192. Section 3.3 of the BRE guidelines describes the method of assessment of the availability of sunlight within garden/amenity spaces. This relates to the proportion of shading on March 21st. The BRE criteria for gardens or amenity areas are as follows:

'It is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity space should receive at least two hours of sunlight on 21 March. If as a result of a new development an existing garden or amenity space does not meet the above, and the area which can receive two

hours of sunlight on 21 March is less than 0.8 times its former value, then the loss of amenity is likely to be noticeable.'

193. This report considers the daylight and sunlight effects of the proposed development under 2 scenarios:

1) The Existing Scenario – The assessments are undertaken with the surrounding properties as they stand today.

2) The Cumulative Proposed Scenario – The assessments are undertaken with the surrounding properties as they stand today with the exemption of the Former FT building which is being considered based upon the consented scheme.

194. Where appropriate to each building, the above tests have been run against the following scenarios:

- a. Existing vs. Proposed (With Balconies);
- b. Existing vs. Proposed (Without Balconies);
- c. Existing vs. Cumulative Proposed (With Balconies);
- d. Existing vs. Cumulative Proposed (Without Balconies).

This follows the BRE guidelines advice and has been used to understand the impact of the proposals rather than any effect the balconies and roof overhangs have on the levels of daylight enjoyed.

195. The applicant has tested the nearest residential units close to the development site and their impacts are discussed below.

Map: Properties tested



	Building Name
1	1-29 Anchor Terrace
2	123 Park Street
3	89-99 Park Street
	87 Park Street
	85 Park Street
	83 Park Street
	81 Park Street
	79 Park Street
	77 Park Street
	75 Park Street
4	73 Park Street
	Premier Inn, 34 Park Street

196. The BRE guidelines state that the standards may also be applied to any existing non-domestic building where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices. Whilst the BRE guidelines discusses the possibility of assessing hotels, Officers consider that they do not have a reasonable expectation of daylight/sunlight in this central London location where the occupants are very transient. However, the applicant has carried out an assessment on the Premier Inn hotel in any case. The Anchor Pub has been excluded from the assessments as it is understood that there is no residential accommodation.
197. 1-29 Anchor Terrace
The VSC and NSL daylight tests show that all rooms will either experience no loss of daylight or experience a small reduction which is well within the BRE recommended criteria.
198. In the cumulative scenario, the majority of rooms should experience only small additional losses of daylight that are well within the BRE guidelines. 8 rooms would experience VSC reductions that exceed the BRE guidelines (biggest loss around 31%). With regard to the daylight distribution (NSL) assessment, all rooms would experience either no loss of NSL or reductions by a maximum of 1.8% which is considered negligible. This scenario is worse, but does show that it is the FT development that would have the greatest impact on 1-29 Anchor Terrace.
199. 1-29 Anchor Terrace is located to the south of the development site and is therefore not required for sunlight assessment. There are no private gardens/balconies and therefore there was no overshadowing assessment carried out on this property. In summary, there would be minor adverse effect on daylight to a small number of room, but generally would retain good levels of daylight and sunlight when the development is completed.
200. 123 Park Street and 1 – 53 Old Theatre Court
There are no balconies serving this block of flats. The VSC and NSL daylight tests show that all rooms would either experience no losses of daylight or experience a small reduction which is well within the BRE recommended criteria. The proposed development will therefore not cause an adverse effect under this scenario.

201. Under the cumulative scenario, there will be some small losses as seen in the VSC results. 12 rooms would experience VSC reductions that exceed the BRE guidelines (7.79% to 22% over the BRE guidelines). This does show that these impacts are primarily as a result of the FT Building development (which has already been consented) rather than the proposed development. With regard to the daylight distribution (NSL) assessment, the majority of rooms would experience reductions in accordance with the BRE recommended criteria.
202. 123 Park Street and 1-53 Old Theatre Court is located to the south of the development site and is therefore not required for sunlight assessment. There are no private gardens/balconies and therefore there was no overshadowing assessment carried out on this property. In summary, there would be minor adverse effect on daylight to a small number of room, but generally would retain good levels of daylight and sunlight when the development is completed.
203. 73-99 Park Street
This is a residential development immediately located to the south of the Site with flats on the corner plots (89-99 Park Street) and terraced houses in between (73-87 Park Street). The applicant has assessed 24 windows that serve 15 rooms.
204. 88-99 Park Street (block of flats)
In terms of the VSC results, the 3 windows that experience a reduction that is greater than 20% are the windows at second floor levels facing onto Park Street. These windows experience reductions of up to 37.27% and are in part due to the relatively deep roof overhang. Further calculations without the overhangs have therefore been undertaken. The VSC assessments without the roof overhangs have been undertaken to the windows of the 2nd floor flat facing onto Park Street (where the greatest loss would be). The VSC results show that 2 of the 4 windows will experience reductions within the BRE guidelines and the remaining 2 windows will experience reductions only marginally beyond the BRE guidelines with a maximum percentage reduction of 20.97%. This therefore, shows that it is due to the presence of the roof overhang that these windows experience a slightly larger relative reduction.
205. The NSL results show that all rooms will experience either no reduction or small reductions in daylight distribution which are within the BRE guidelines.
206. In the cumulative scenario with the balconies in place, the VSC results show 6 windows will experience small reductions in daylight that are well within the BRE guidelines. These windows experience reductions of up to 37.61%. The NSL results show that the kitchen on the ground floor (facing onto Park Street) will experience a reduction of 34.2%.
207. Nevertheless, when looking at the cumulative scenario with the balconies removed, (2nd floor flat facing onto Park Street) the VSC results show that 1 of the 4 windows will experience reductions within the BRE guidelines and the remaining 3 windows will experience reductions beyond the BRE guidelines

with a maximum percentage reduction of 26.34%. This is not considered to be a significant exceedance of the BRE guidelines.

208. 73-87 Park Street (terraced houses)

The applicant did not have access into the properties so have assessed all windows regardless of whether they serve a non-habitable room. A total of 48 windows serving 40 rooms to this terrace of houses were assessed.

209. The VSC results show that all but 11 windows will experience small reductions in daylight that are well within the BRE guidelines. Those 11 windows that experience a reduction that is greater than 20% serve No's 87, 85, and 83 Park Street. Whilst the ground floor living rooms meet the BRE guidelines, it is the bedroom windows at first and second floor levels that would experience reductions of up to 37%. It is noted however, that these windows on both floor levels have relatively deep roof overhangs above the windows as the elevation steps slightly back at second floor level. As such, the applicant undertook further assessment with the overhangs removed. Meanwhile, the NSL results show no loss or small reductions. Furthermore, it should be acknowledged that these are bedrooms that have less expectations for daylights.

210. The VSC results with the overhangs removed show that all windows will experience reductions within the BRE guidelines. This, therefore, shows that it is due to the presence of the roof overhang that these windows experience a slightly larger relative reduction.

211. In the cumulative scenario, there are more windows that would experience reductions exceeding the BRE guidelines (13 windows and up to 41.9%). However, the NSL results only one room would exceed the guidelines and only marginally. Again, the applicant undertook an analysis of the cumulative scenario without the overhangs and this is much improved with only 3 windows will experience reductions beyond the BRE guidelines with a maximum percentage reduction of 21.75%. This is only marginally beyond the BRE guidelines.

212. It is considered that whilst there would be some reduction in daylight to the terraced houses, these would not be considered to be significant in this central London location.

213. The development is to the north of the Park Street houses and therefore no sunlight or overshadowing assessment was required.

214. Premier Inn, 34 Park Street

Whilst it is considered that the building does not have a reasonable expectation of daylight or sunlight calculations have been carried out for completeness. 26 rooms served by 40 windows were assessed.

215. 8 windows would experience VSC reductions that would be greater than the BRE guidelines. These would range from 25.19% to 39.4%. In terms of the NSL results, 6 rooms would exceed the guidelines by up to 59.7%. However, whilst these losses seem greater than the others in the neighbouring area, it

should be noted that this is a hotel where occupants are transient. Given the location of this hotel on the eastern side of the proposed development, it was only considered necessary to consider the effect of the new building as the FT building proposals will not be seen from these windows.

216. Due to the fact that the windows are not orientated within 90° of due south, sunlight APST assessments have not been carried out. There are no amenity spaces associated with the hotel and therefore no overshadowing analysis was made.

View: Park Street, corner with Bank End looking at the Premier Inn



Overshadowing of nearby amenity spaces

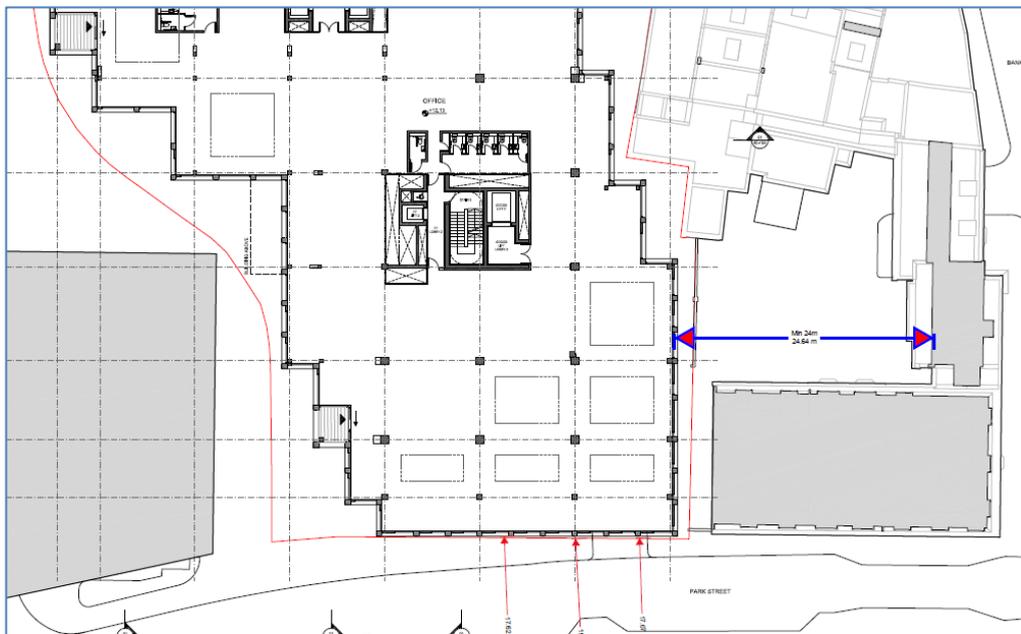
217. The Anchor Bankside's terrace is located to the north-east of the site and the results show that it would enjoy at least 2 hours of sunlight to 99.7% of its area on 21st March. Overall, this space will therefore meet the BRE guidelines criteria and should continue to enjoy good levels of sunlight throughout the year.

218. Conclusion on daylight and sunlight impacts
Following the review of the analysis, it is considered that the proposed development would result in some loss to the neighbouring residential properties, but these are not considered to have a significant detrimental impact.

Overlooking of neighbouring properties

219. In order to prevent harmful overlooking, the Residential Design Standards SPD requires proposed developments to achieve a distance of 12m between the front elevations of buildings and/or across a highway, and a minimum of 21m between rear elevations.
220. The nearest residential windows would be to the south (73-99 Park Street). The proposed building line would not go beyond what exists now. The distance between the nearest proposed window/terrace to the windows of the residential units would be at least 19m. It would be 17m to the front yard. This exceeds the above distances across a highway.
221. An objection has been received from the adjoining hotel. They argue that the increase in proximity to the existing hotel and the proposed development brings windows, roof and 'pocket' terraces (with glazed balustrades) very close to the site boundary where they will overlook the bedrooms on that side of the hotel. Nevertheless, the flank windows of the proposed building would be at 90 degrees to the northern windows at the Premier Inn, which limits direct overlooking. The hotel windows that face directly onto the proposed development would be approximately 24m, which exceeds the minimum distances. In any case, the Residential Design Standards guidelines applies to residential properties and not hotel use.

Plan: Distance between Premier Hotel western elevation and proposed building



Noise impacts

222. The proposed development also provides terraces round the upper floors which could potentially lead to privacy issues. Levels 06, 08, 09 and 10 have direct

access to terraces, with the occupiers of other floors able to use them if they are within the same tenancy. Level 10 has access to two terraces, to both the north and south of Red Lion Court. Smaller 'Pocket' terraces are located on Level 02 to 09.

223. There are various sizes of terraces, some of which wrap around the elevations in L-shaped forms. The ones to the south have been designed with more planting, to provide shading, wind protection and privacy to Park Street residents. The southern portion of the lowest Level 06 terrace will be accessible for maintenance purposes only, in order to minimise overlooking on Park Street.
224. The applicant proposes that the use of the terraces would be limited for groups/socialising/meetings. The hours that could be allowed for this kind of use could be 09:00 – 19:00 - Monday to Sunday nearest the Park Street residents. The terraces wrapping around the building along the other elevations could be used at later times. The terraces will be managed jointly by the tenants of the building and the Landlord's on-site managers. It is anticipated that security staff/building management will carry out regular checks to discourage any anti-social behaviour and control noise levels and there will be a 24-hour presence on site. Buffer zones of planting and glass balustrade that will act as acoustic screening are also proposed in order to safeguard the amenity of neighbouring residents. Officers consider that with a terrace management plan post-permission then this could manage the potential noise and disturbance from the use of these terraces.

Conclusion on amenity impacts

225. The proposed development would have some impact on the neighbouring properties, particularly to the development to the south. Nevertheless, as discussed above, the impacts would be limited and would not result in a significant adverse impact on their amenity.

Transport considerations

226. Policy P50 'Highways impacts' of the Southwark Plan 2022 seeks to ensure that developments minimise the demand for private car journeys. In addition, the policy requires developments to demonstrate that the road network has sufficient capacity to support any increase in the number of the journeys by the users of the development, taking into account the cumulative impact of adjoining or nearby development.
227. The Mayors Transport Strategy (MTS) Mayors Transport Strategy (MTS) includes three strategic challenges that are of significant importance to assessing this application.
- Vision Zero
 - Healthy Streets
 - Air Quality

Trip generation

228. The site is located in an area with excellent (6 – high) public transport accessibility level and lies within a short walking distance of London Bridge tube/train station and abuts the bus routes on Southwark Bridge Road. In terms of mode share, most of the trips to the site would be by public transport, cycling and by foot. Concerning the vehicle movements ensuing from this development proposal, the Council's own Transport Planner looked into the comparable sites' travel surveys within TRICS travel database and has revealed that the expansion of this development would generate 16 net additional two-way vehicle movements in the morning or evening peak hours. Although Officers own projected vehicular trips are higher than the forecasted 1 two-way vehicle movement in each of the peak hours by the applicant's consultants, even taking into account the likely vehicle movements emanating from other committed developments in this locality, it is considered that this development proposal would not have any noticeable adverse impact on the existing vehicular traffic on the adjoining roads.
229. Regardless, the applicant has proposed a few travel plan initiatives encompassing the provision of cycle parking and shower/changing facilities, a cycle hub and repair facility, plus sustainable transport information for the staff/patrons of this development and, promotion/monitoring of sustainable travel through the appointment of a travel plan co-ordinator.
230. In terms of delivery trips, the applicant's consultants have estimated that 106 two-way delivery vehicle movements would occur on this site per day mostly (77%) by light vans, which would be reduced to 86 (43 one-way) through a planned consolidation method and, that this development would create some 931 and 720 two-way net supplementary public transport trips in the morning and evening peak hours, correspondingly. These figures are deemed reasonable.
231. It is not considered that the scheme would generate an adverse impact on the local highway network.

Car Parking

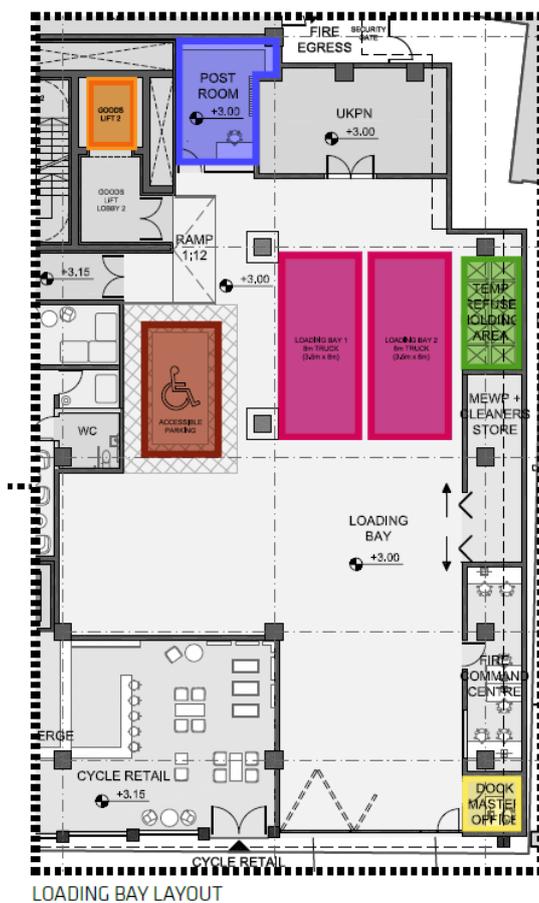
232. The existing building on the site contains an off-street parking area, accessed via Park Street, which contains six car parking spaces. The development is car-free except for 1 disabled parking space located on the ground floor, within the loading bay area as part of the proposals. This space would be provided at ground floor level within the service yard and would be accessed from Park Street.
233. The site is located within an existing Controlled Parking Zone (CPZ) and a s106 obligation would ensure that no future occupiers of the proposed development could obtain resident parking permits. There are few car club spaces in the area of this development including 2 on the opposite Porter Street and 1 on the nearby Emerson Street.

Servicing and Delivery

234. The development would be serviced from Park Street, via a fully enclosed service yard that has been relocated from existing position in order to create new publicly accessible north-south route to the west of the site. Two loading bays are proposed. Swept path analysis demonstrates that vehicles can enter and exit in forward gear.
235. All vehicles entering the site would be required to be under 8m in length. A booking system would be in place to ensure compliance and to ensure that deliveries are scheduled so as not to cause congestion along Park Street. It is also proposed that reduced delivery or servicing activity would occur within the peak hours (Mon – Sat) as set out below:
- 08:00 – 09:00
 - 15:00 – 16:00
 - 17:00 – 18:00

This would be secured in a delivery and servicing plan.

Plan: Loading Bay layout



236. It is proposed that a consolidation management strategy would be implemented for the site. This will effectively minimise the delivery vehicle trips expected to

attend the site. In addition to traditional loading bays, the proposals also include provision of two cargo bike parking bays to the north of the site on Bankside. These spaces allow for potential further reductions in the number of delivery and servicing vehicles visiting the site. It is anticipated that the consolidation strategy would be activated and implemented at the appropriate time for the building's occupation levels and this would be discussed with the Council officers once the applicant prepares their detailed DSP report to be secured by condition. It is also recommended that condition controlling the hours of servicing is required to limit noise and disturbance on nearby residents.

237. Under the managed consolidation scenario, it is envisaged there would be 43 daily servicing trips. In order to ensure that on-street servicing and deliveries do not negatively impact on the highway network, the Council is recommending that applicants enter into Delivery Service Plan Bonds against their baseline figures for all daily servicing and delivery trips. These bonds would be calculated at £100 per 500 sqm of non-residential floor-space. In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, this is not intended as a financial penalty, but as a means of mitigating any harmful impacts from the proposed development and ensuring a better quality of life for current and future residents. As such, it is considered to meet the CIL Regulations 122 test, in that it would 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.

238. The proposal is for the management of the new development to monitor the daily vehicular activity of the site both commercial and residential, quarterly for a period of 2 years from 75% occupancy. If the site meets or betters its own baseline target (43 trips) the bond will be returned within 6 months of the end of the monitoring period. If the site fails to meet its own baseline the bonded sum will be made available for the Council to utilise for sustainable transport projects in the ward of the development. The Council will retain £1,600.00 for assessing the quarterly monitoring. The bond in this instance would be £6,400 based on the non-residential floor space. The applicant has agreed to the contribution, which can be collected via the legal agreement.

Refuse and waste management

239. Waste would be collected everyday by a contractor with appropriately sized refuse vehicles under 8m in length. Waste would be stored at the second basement level and brought by Facilities Management to the loading bay area via a servicing elevator lift. There would be daily compaction of waste at the site.

240. The collection would be within the loading bay and would be collected by private refuse contractors. It is considered that the refuse strategy is satisfactory and a condition for the delivery and servicing plan will include details of waste management. It is acknowledged that the final positioning of service yard doors

would need to be refined at detailed design stage to ensure that the appropriate visibility would be achieved.

Public Transport

241. The nearest national rail station and London Underground Station is London Bridge, approximately 480 metres away, providing Jubilee and Northern line London Underground (LU) services and Thameslink, Southern and Southeastern National Rail services. The nearest bus stop is located on Southwark Bridge Road (stop BC), which is within 100m from the edge of the development site on Park Street. There are 15 bus routes within reasonable walking distance to the site (650m).
242. It is anticipated that the majority of trips to the site would be by public transport or cycle, with the last leg of public transport journeys made by foot. Council's own Transport team considers that this locality would benefit from improved bus/riverboat facilities including the provision of bus countdown at the 2 bus stops/shelters beside this site on Southwark Bridge Road. The upgrade would replace the existing bus stand with a new bus stand that would include a digital display enabling passengers to see the forecast arrival times of buses. There are two bus stands in question, so each upgrade would cost £20,000. The applicant has agreed to this contribution.
243. TfL had requested a financial contribution of £220,000 towards cycle hire stands. However, both the applicant and Council Transport officers believe that a financial contribution of £50,000 be made by the applicant to support the development of new TfL Cycle Hire stands in the local area around the site would be more reasonable. This is accepted by the applicant.

Active transport

Walking and the public realm

244. There is a generous walkway abutting the northern boundary of this site forming the riverside walk and connecting to the riverboat service along River Thames. Two steep stair accesses from Southwark Bridge Road lie at the northern and southern ends of this site plus an alternative levelled route with more gentle stairs from this road through the neighbouring Gatehouse Square/Porter Street at its southern side.
The footway next to its southern perimeter on Park Street connect easterly to London Bridge tube/train station. A signalised pedestrian crossing also lies at the immediate south-eastern side of this site on Southwark Bridge Road. This site joins with various cycle routes in this locality too including the Cycle Superhighway.
245. The Thames River Footway is a good quality walking path with places for pedestrians to rest on riverside benches. It is considered that the proposals would improve the walking environment and the proposed additional pedestrian route through the site will improve connectivity to the local area.

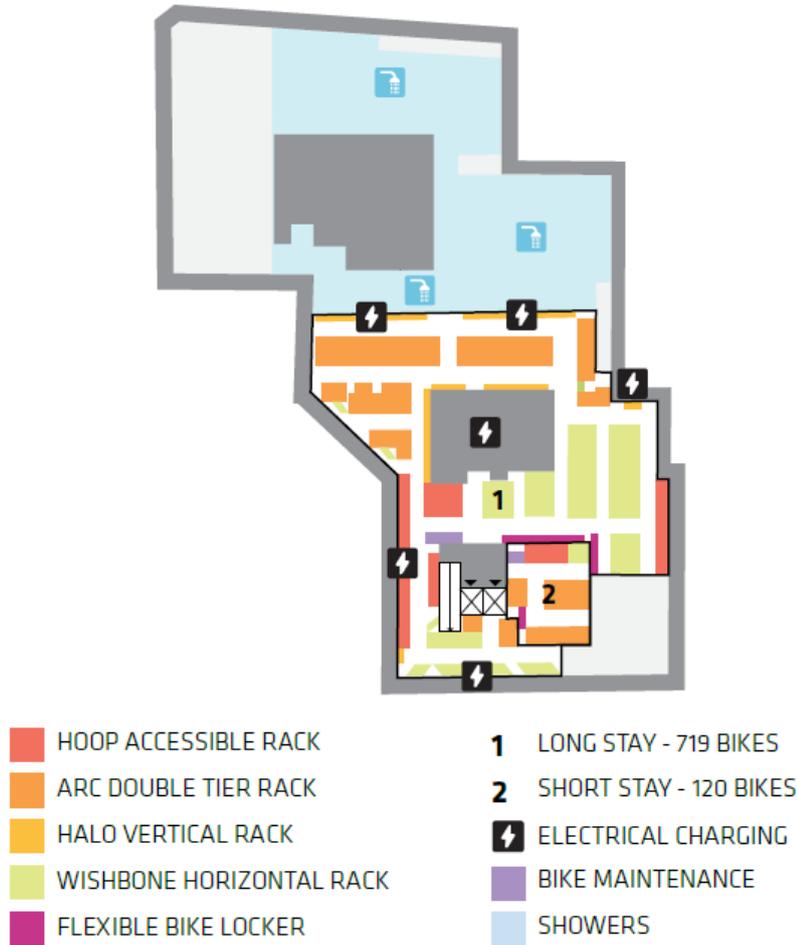
246. TfL has requested that a £18,000 contribution for a new Legible London sign/s and to enhance and map refresh of local existing Legible London signs should be secured. This request is in line with Policy T3, by supporting 'walk and cycle wayfinding improvements' in Table 10.1 and Policy T2 'Healthy Streets'. The applicant has agreed to this.
247. The applicant's own analysis of the 3 years traffic accident data occurring in the vicinity has indicated that there is significant level of serious/fatal accidents being attributed to pedestrians and pedal/motor cyclists. Hence, there is the need for improved highway safety measures to assist the vulnerable road users at this location. The active travel zone assessment by the applicant's consultants has also suggested that improved crossing for pedestrians in this area would be needed.
248. Officers have requested a number of works that the applicant should contribute towards improvements to highway safety and pedestrian routes around this development plus improved public transport/cycling facilities.

Cycling

249. London Plan Policy T5 sets minimum cycle parking standards for different uses. Southwark Plan Policy P53 sets out a higher requirement than the London Plan standards in respect of commercial parking.
250. London Plan and Southwark Plan requirements:

Land Use	London Plan		Southwark Plan	
	Long-stay	Short-stay	Long-stay	Short-s
Office Class E(c)	458	16	711	128
Retail Class E(a) and E(b)	4	36	6	36
Health Centres	2	2	2 (1 space per 5 staff)	2 (1 space staff. Min of 2 spac
Total	464	54	719	166

Plan: Indicative plan cycle provision in Basement 01



251. A total of 719 long-stay cycle parking spaces are proposed. Cycle parking will be accessed from Park Street to a dedicated cyclist entrance on the west of the building within the proposed public realm space. This entrance would be located directly off Park Street for easy access. The long-stay cycle parking contained within Basement 01 can be accessed by occupiers via a gullied stairwell and two dedicated cycle lifts behind a security line. There would be a Cycle Hub Services from this entrance and incorporates valet bicycle parking, bike maintenance, coffee bar, shop and also provides a secure entrance to the occupiers' cycle parking and welfare facilities at Basement 01. The Cycle Services has a concierge, which is envisioned as a local centre for active travellers offering a front-of-house reception facility to welcome visitors, occupiers and residents alike.
252. It is proposed that 167 short-stay cycle parking spaces be provided. A total of 48 spaces are proposed to be provide at-grade. The balance of 119 spaces will be located on the first basement with cycle access from the Park Street entrance.
253. TfL's comments were that the number of cycle spaces complies with London Plan Policy T5, but the long-stay cycle parking is not in accordance with the

London Cycle Design Standards (LCDS). This includes the provision of a minimum percentage of Sheffield Stand spaces at normal and wider spacing; stands to allow space for the use of a 'D' lock; minimum spacing between two-tier racks, greater aisle widths; more concierge and security details. TfL has also sought for direct access from the office floors to the cycle parking.

254. The applicant had responded to the comments. Current cycle parking proposals include provision of 28 "Halo" stands. This equates to 3.9% of the total long-stay provision. These stands are considered to be accessible as they provide the required 1.8-metre spacing. A further 24 "Hoop" stands are proposed, equating to 3.3% of the long-stay spaces. These stands are designed to accommodate non-standard cycles such as tricycles. The applicant also argues that over 20% of stands are provided as "Wishbone" stands. These are effectively Sheffield stands that allow the locking of both wheels and the frame.
255. It is proposed that all stands provided within the public realm be Sheffield stands as requested. For the concierge service, two-tier stands have been proposed with spacing in accordance with manufacturer's specifications. It is not considered that wider spacing will be required, as concierge service staff will be positioning cycles within the stands, rather than visitors themselves. Officers consider the above to be acceptable.
256. The applicant has proposed a greater number of cycle parking spaces within the building to ensure it meets with the more stringent Southwark Plan standards. This has meant that some of the LCDS could not be met. Officers consider that a balance needs to be struck. Many of the proposals including the cycle services hub would encourage more users and visitors to cycle to the development. Officers do not consider that some of the LCDS shortfalls should be a reason for refusal in itself.

Construction

257. A draft Construction Management Plan (CMP) has been submitted, which sets out details of the works required to carry out the demolition, infrastructure enabling, and Construction activities involved whilst outlining their anticipated timescales and identifying the environmental impact of the works and where practicable, proposals for how these are to be mitigated. Council's own Transport officer agrees with this in principle, but has requested a number of details to be amended. It is considered that these could be secured once a final demolition and CMP is submitted post permission, which would be secured by s106 agreement.
258. TfL has stated that to align with Policy T7, given the site's location adjacent to the Thames and surrounding very narrow roads, use of the river and other sustainable modes for construction such as cargo bikes should be investigated.
259. The applicant sought advice from a qualified professional contractor who indicated that river freight would not be possible due to the tidal nature of the river, the fluvial topography under the high-water line (a bank emerges during

low tide which would mean that any barge/boat could not be located near enough to the quayside for sufficient durations of time) and the constrained nature of the Bankside River Path running between the river and the site. Officers are satisfied that this has been explored and is not feasible.

260. Due to the local traffic restrictions to the east of the site via Park Street larger vehicles that are suitable to arrive from the east will be routed to arrive in a westerly direction along Park Street and routed from the south via Redcross Way from Southwark Street. Due to the location of the development, the neighbouring properties and local road network and the priority placed upon the local residential properties, a route that links directly to and from Southwark Bridge has been proposed for heavy goods vehicles has been identified. It is proposed that primary construction access for HGV's will take place from the south of the site from Southwark Street, which is part of the TfL TLRN. Some of the comments highlighted by TfL will be taken on board when the final CMP is submitted for approval.
261. There will be a number of highway works required as a result of the development. In summary, these are listed below:
- Improved Pedestrian Connectivity:
Delivery of new Park Street footway to replace the redundant service yard vehicle crossover between 1 Southwark Bridge Road and Red Lion Court (46-48 Park Street).
 - Improved Pedestrian Pavement:
Reprovision and widening of Park Street footway along the site frontage.
 - Improved Park Street Highway:
Resurfacing of the carriageway from the eastern edge of the Red Lion Court Site up to the junction with Bank End.
 - Improved Local Area Traffic Management:
Resurfacing of the raised table on Park Street which assists with speed mitigation.
 - Pedestrian Crossing at Bank End:
Improve pedestrian crossing at eastern end of Park Street by the Junction with Bank End
 - Lighting:
Ensure that adequate lighting is provided in front of the Red Lion Court Site for pedestrians.

Conclusion on Transport

262. The development is supported because it provides improved and good quality pedestrian and cycle facilities. It reduces car dependency and would not have a significant impact on public transport services. It would have appropriate management to reduce the impact of servicing and delivery, subject to the s106 obligations and conditions.

Archaeology

263. Policy P23 of the Southwark Plan 2022 requires that applications affecting sites within Archaeological Priority Areas (APAs) will be accompanied by an archaeological assessment and a report on the results of a field evaluation of the site, including an assessment of the impact of the proposed development on the archaeological resource. The site lies within the Tier 1 'North Southwark and Roman Roads' Archaeological Priority Area (APA). This APA is the most archaeologically significant area of Southwark. The APA contains all of the borough's nine scheduled monuments and also includes archaeology of other important historic sites.
264. The existing basement occupies most of the site area, with a deeper basement to the north and shallower basement to the south with a deeper sub-basement in the middle. The basements will have removed remains associated with the medieval and later reclamation and occupation of this area and it is likely that only deep alluvial deposits could survive.
265. The Council's Archaeology Officer highlights that much of the footprint of the present building is filled with a basement level that will be expanded. Foundations will be within this expanded basement level. Part of the existing footprint of the building has been archaeologically examined, before the construction of the present Red Lion Court. The Council's Archaeology Officer has noted that the site can be managed with suitable conditions. Any site investigation works within the new area of the basement should be archaeologically monitored. It is unlikely that the landscaping works will impact upon archaeological remains, but locations of deeper impacts should be considered and controlled by condition. It is advised that conditions for archaeological evaluation, mitigation works, foundation design and groundworks should be applied to this application. The reporting condition should also report on the earlier excavations on site, and include them in any publication.
266. The site, due to its location, has the potential to offer significant public benefits to the public in terms of understanding the development of Bankside and the surrounding area between the entertainment zone of the early post-medieval theatres and the Bishop of Winchester's palace. A suitable condition to enable a level of public engagement works should also be applied to this application to ensure it meets the requirements of policy.

Environmental considerations

Flood risk and water resources

267. Policy P68 (Reducing flood risk) of the Southwark Plan states that development must be designed to be safe and resilient to flooding and finished floor levels are set no lower than 300mm above the predicted maximum water level where

they are located within an area at risk of flooding. Additionally, major development is required to reduce surface water run-off to green field run-off rates, and this must be through the application of water sensitive urban design and SUDs.

268. The site lies within Flood Zone 3 and is classified as having a high probability of flooding from tidal and fluvial sources. However, the River Thames defences protect the site up to the 1:1000 year standard and therefore the development would not be at risk of flooding from tidal and fluvial sources. In accordance with NPPF Table 2, the office, retail and commercial spaces are classified as "less vulnerable".
269. The Environment Agency (EA) was consulted but no comment has been provided. The development will include safe access and escape routes to the ground level via internal staircases and an appropriate emergency plan will be implemented. In the event of a breach, finished floor levels at or above breach level will provide flood protection. The breach levels have been taken from the Environment Agency and based upon modelled events up to 2100 to give maximum likely water levels in the event of breach with an allowance for climate change. In case of breach of flood defences, the strategy is to protect the basement by installing demountable or permanent measures with heights up to 3 metres. This would mitigate the potential cost and time of a post-flood recovery of the building. During the detailed design stage, flood resilient or resistant measures are to be considered for areas of the ground floor where the finished floor levels are below 3.30m to help make the building more resilient to surface water flooding. The design of the mitigation measures is to be progressed with further design development and a condition can be recommended.
270. Flooding from sewers
- Flooding from groundwater
 - Flooding from artificial sources (e.g. reservoirs and canals)
 - Flooding from surface water

Based on all the information available, it is considered that there is a low probability of flooding from the sewers, groundwater sources and artificial sources.

271. In terms of surface water flooding, the majority of the site would be at low risk of flooding, but the applicant note that there would be external areas within the site that might require mitigation measures. The proposal has also been reviewed by the council's flood and drainage engineer. Comments were initially provided by the engineer and more information was required including micro drainage calculations to confirm the rates for the existing and proposed site different scenarios and to confirm that the proposed attenuation volume is sufficient to attenuate the 1 in 1 , 1 in 30, 1 in 100 and 1 in 100 + climate change storm periods. Surface water runoff from the proposed development will have an attenuation tank volume of 245m³ (located in Basement 02), which is

sufficient to accommodate with no flooding to occur on site for the periods of 1 in 1, 1 in 30, 1 in 100 and 1 in 100 +40% climate change.

272. The surface water drainage system has been designed having considerations to the drainage hierarchy. Due to various reasons, a blue roof cannot be installed. However, 1,264m² green roof will be incorporated at the roof and terrace levels. Previously, the applicant planned to partially discharge to the River Thames. The applicant now proposes full discharge (4.5 l/s unchanged) to the existing public combined sewer on Park Street.
273. The existing surface runoff rate is 153.1 litres/sec. The development shall significantly reduce the surface runoff rate to 4.5l/s (1 in 100 year plus 40% climate change). This is the same as the greenfield runoff rate. A greenfield runoff rate offset of £366 per cubic metre will be secured in the event that there is a shortfall in attenuation required to limit surface water runoff, which is required by the draft AAP 11.
274. Following further information submitted by the applicant and discussions with the drainage engineer, conditions have been recommended for a final detailed drainage design including drawings and supporting calculations for approval. Consideration should be shown to the implementation of rainwater harvesting. It would also require a detailed management plan confirming routine maintenance tasks for all drainage components and the maintenance owner must also be submitted to demonstrate how the drainage system is to be maintained for the lifetime of the development.

Fire

275. Policy D12 of the London Plan 2021 expects all development proposals to achieve the highest standards of fire safety and to this end requires applications to be supported by an independent Fire Strategy, produced by a third party suitably qualified assessor.
A fire engineer registered with the Engineering Council UK through the Institute of Fire Engineers has prepared the submitted Fire statement.
276. The London Fire Brigade was consulted and confirmed they had no observations to make.
277. The Fire Statement demonstrates how the development would achieve the highest standards of fire safety, including means of escape, fire safety features and means of access for fire service personnel. The Fire Statement confirms that sprinklers would be installed for each floor. Firefighting lifts would also be designed into the development. The provision of a suitably sized evacuation lift is also proposed in line with Policy D5 of the London Plan.
278. The fire risk assessment/statement covers matters required by planning policy. This is in no way a professional technical assessment of the fire risks presented by the development. The legal responsibility and liability lies with the 'responsible person'. The responsible person being the person who prepares

the fire risk assessment/statement not planning officers who make planning decisions.

Ground conditions and contamination

279. Given the history and nature of the uses on the site, there is potential for contamination. The submitted Phase 1 Land Contamination Desk study report assessed the potential for contamination and provided preliminary information on the expected ground conditions and preliminary information on foundation options regarding the proposed development of the site. Based on historical land uses and its current operational use, the overall risk from land contamination at the site is considered to be low for the current development as the basement is to be retained where possible and extended. The existing basement floors will be demolished in order to build one further basement floor. The existing sheet pile wall which surrounds the basement is to be retained wherever possible, in these areas a new secant wall and liner wall system will be constructed in front. There is an area to the east where the basement would be extended outwards.
280. One of the future considerations highlighted in the report was there be a specialist UXO/UXB risk assessment in accordance with CIRIA Report C681 with regard to construction risk and production of a Remediation Strategy and Verification Plan.
281. The Council's EPT has reviewed this and recommended a condition to ensure further investigations be submitted and should there be any found contamination then remediation strategy be submitted and that the measures be actioned.

Air quality

282. The site is located in an Air Quality Management Area (AQMA) and an Air Quality Assessment has been submitted, which considers the air quality impacts arising from the construction and use of the development. Southwark Plan Policy P65 'Improving air quality', states that development should address the impacts of poor air quality on building occupiers and public realm users by reducing exposure to and mitigating the effects of poor air quality.
283. The assessment concludes that through good site practice and the implementation of suitable mitigation measures, the high risk of dust soiling during demolition and a medium risk during earthworks, construction and trackout activities will be minimised. With regards to fugitive PM10 emissions, where there is there is a medium risk during demolition and a low risk during earthworks, construction and trackout, again, good site practice and mitigation measures will minimise the impact. The residual effect of the construction phase on air quality is therefore not significant. Road traffic generated by the proposed development does not breach the threshold of the air quality objectives. The report did not find any unacceptable impact from air quality either to the new sensitive receptors or as a result of the development. The

proposed development is air quality neutral, therefore mitigation or additional off-setting is not required. EPT did not raise any objections on this aspect of the scheme. The backup diesel generator is also to vent at roof level as per Flue & Extract Ventilation Report which is agreeable. Mitigation measures for the construction phase has been proposed and therefore a condition to require these be adhered to is recommended. Kitchen extract is to vent at roof level which is agreeable.

Noise and vibration

284. A Noise Impact Assessment (NIA) has been submitted and reviewed by EPT. Nearby noise sensitive receptors to the site would be the residential accommodation to the south and east. The proposed plant limits in the submitted NIA are agreeable. The emergency plant noise limits however require further discussion as no information is provided on how often this plant would be tested. At a starting point EPT would request they meet the levels set out. The exact specification is not yet known condition has been recommended. The noise report refers to target levels but further assessment is required for potentially late night use of office events as well as restaurant spaces. EPT has recommended that the hours of use of the commercial terraces be limited.

Sustainable development implications

Energy

285. Policy SI2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the Mayor's energy hierarchy. Policy SI3 require consideration of decentralised energy networks, Policy SI4 deals with managing heat risk and Policy SI5 is concerned with protecting and conserving water resources and associated infrastructure. As per the carbon emission reduction policies of the London Plan 2021, the proposal would be expected to achieve zero carbon (with financial offset permitted once an on-site 35% carbon reduction against part L of the Building Regulations 2013 has been achieved).
286. Policy P70 of the Southwark Plan sets out the borough approach to ensuring that new developments tackle climate change. The approach is generally consistent with London Plan Policies but also requires new commercial developments to meet BREEAM 'Excellent'. The policy also states that non-residential developments must reduce carbon emissions by at least 40% on 2013 Building Regulations. Southwark Council's carbon offset cost is £95 for every tonne of carbon dioxide emitted per year over a period of 30 years. This is the equivalent of £2,850 per tonne of annual residual carbon dioxide emissions.
287. The applicant has submitted an Energy Statement based on the Mayor's hierarchy. This details how the targets for carbon dioxide emissions reduction are to be met. A combination of 'Be Lean' and 'Be Green' measures have been employed in an attempt to achieve the reduction in line with the GLA guidance

on preparing energy statements, P70 of the Southwark Plan 2022, and the Southwark Sustainable Design and Construction SPD.

Be Lean (use less energy)

288. 'Be lean' refers to the approach taken by the design team to maximise the positive aspects of the scheme's passive design to minimise the base energy demand of the buildings. As part of this application, key passive ('Be Lean') design features include:
- Enhanced U-values
 - The building's layout has been optimised to guarantee enough level of daylight
 - High performance glazing
 - Improved air permeability
 - Improved ventilation performance (both natural and mechanical)
 - Improved lighting and lighting controls
 - High efficiency cooling
 - Low thermal bridging
289. The development achieves a 17% reduction in overall carbon emissions over Part L, through passive design and energy efficiency measures alone.

Be Clean (supply energy efficiently)

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

Be Green (Low or Carbon Zero Energy)

291. ASHP's and Photovoltaic (PV) Panels are the green/renewable energy technologies have been considered suitable for the proposed development. The ASHP's has been suggested for the space heating. The PV panels would be placed on the roof (360sqm). The ASHP's and PV's are expected to provide a further 32% improvement over Part L 2013.
292. The overall regulated CO2 savings on site against a Part L 2013 compliant scheme are therefore 49%.
293. The proposed development complies with the London Plan CO2 savings target of 35% overall. The proposed development also complies with Southwark Plan target of 40% for non-domestic element. However, it does fall short of Southwark's Local Plan target of 100% emission reduction against Building Regulations for the domestic element.
294. The carbon shortfall of 219 tonnes CO2 per annum amounts to £624,275. The overall contribution has been agreed with the applicant, and the shortfall

amount is secured in the S106 Agreement. The S106 Agreement will also include the obligation of requiring the development to be constructed in accordance with the Energy Statement and review the feasibility of connecting to the DHN.

Overheating

295. London Plan Policy SI4 and Policy P69 of the Southwark Plan set out the cooling hierarchy that should be followed when developing a cooling strategy for new buildings. The six-step hierarchy is as follows:
- Minimise internal heat generation through energy efficient design; then
 - Reduce the amount of heat entering the building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
 - Manage the heat within the building through exposed internal thermal mass and high ceilings; then
 - Use passive ventilation; then
 - Use mechanical ventilation; then
 - Use active cooling systems (ensuring they are the lowest carbon options).
296. The proposed development has been designed to reduce cooling demand and overheating risks. Cooling is delivered to the building by highly efficient Air Source Heat Pumps.

Whole life cycle and carbon capture

297. London Plan Policy SI2 requires a calculation of whole life cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment (WLCA). This captures a development's unregulated emissions, its embodied emissions and the carbon impact of mid-life maintenance and end-of-life dismantling.
298. A Whole Lifecycle Carbon (WLC) assessment has been undertaken for the proposed development. The GLA raises no objection to the assessment. The estimated whole lifecycle carbon emissions of the proposed development have been provided. A whole life cycle monitoring report has been requested by condition.

Circular economy statement

299. Policy GG5 of the London Plan 2021 promotes the benefits of transitioning to a circular economy as part of the aim for London to be a zero-carbon city by 2050. Policy D3 requires the principles of the circular economy to be taken into account in the design of development proposals in line with the circular economy hierarchy. Policy SI7 requires referable applications to develop circular economy statements.

300. A Circular Economy Statement has been submitted and addresses those 9 core principles that the GLA has set out in their Circular Economy Statement Guidance, which includes:
- Minimising the quantities of materials used,
 - Minimising the quantities of other resources used,
 - Specifying and sourcing materials responsibly and sustainably,
 - Design for longevity, adaptability or flexibility and reusability or recoverability,
 - Design out construction, demolition, excavation and municipal waste arising,
 - Manage demolition waste,
 - Manage excavation waste,
 - Manage construction waste, and
 - Manage municipal waste.
301. A planning condition requiring a Circular Economy Statement to be agreed in writing by the Council prior to commencement of any works on site is recommended. Additionally, a special condition is to be imposed on the decision notice that requires a post completion circular economy report no later than three months following substantial completion of the final residential unit. This report will set out the predicted and actual performance against all numerical targets in the relevant Planning Stage Circular Economy Statement.

BREEAM

302. Southwark Plan Policy P69 requires developments to achieve a BREEAM rating of 'Excellent' for non-residential development over 500sqm. A preliminary BREEAM assessment for the proposed development was undertaken. The pre-assessment results demonstrate that the development is being designed to achieve a BREEAM New Construction rating of 'Outstanding', which exceeds the minimum 'Excellent' required by P69 of the Southwark Plan. This is welcomed.

Digital connectivity infrastructure

303. The NPPF recognises the need to support high-quality communications infrastructure for sustainable economic growth and to enhance the provision of local community facilities and services. To ensure London's long-term global competitiveness, Policy SI6 (Digital Connectivity Infrastructure) of the London Plan 2021 requires development proposals to:
- be equipped with sufficient ducting space for full fibre connectivity infrastructure;
 - achieve internet speeds of 1GB/s for all end users, through full fibre connectivity or an equivalent.
 - meet expected demand for mobile connectivity; and
 - avoid reducing mobile capacity in the local area.

304. A pre-commencement is attached to the decision notice that requires detailed plans to be submitted to and approved in writing by the Local Planning Authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development. This is in line with the requirements of Policy SI6 of the London Plan 2021.

Planning obligations (Section 106 Undertaking or Agreement)

305. Southwark Plan Implementation Policy IP3 and Policy DF1 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. IP3 of the Southwark Plan Aims to ensure that any potential adverse impact that makes a proposed development unacceptable will be offset is mitigated by using planning conditions in the first instance. Additionally, and where they meet the required tests, Section 106 legal agreements that either a) mitigates the impact or b) pay the council a financial contribution to enable the council to will be used to mitigate the impact. 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

306. The application would be supported by the following Section 106 obligations:

Planning obligation	Mitigation	Applicant's position
Local Economy and Workspace		
Employment (Construction phase)	68 sustained jobs to unemployed Southwark residents, 68 short courses, and take on 17 construction industry apprentices during the construction phase, or meet the Employment and Training Contribution. The maximum Employment and Training Contribution is £328,100 (£292,400 against sustained jobs, £10,200 against short courses, and £25,500 against construction industry apprenticeships).	Agreed

<p>Employment (End use)</p>	<p>214 sustained jobs for unemployed Southwark Residents at the end phase.</p> <p>The maximum Employment in the End Use Shortfall Contribution is £920,200 (based on £4300 per job).</p> <p>Skills and employment plan to the Council.</p>	<p>Agreed</p>
<p>Affordable workspace</p>	<p>Minimum 10% affordable workspace in Class E(g)(i) use at</p> <ul style="list-style-type: none"> • 0-6 months – peppercorn rent • 7-13 months – 25% market rent • 14-23 months – 50% market rent • 24 months thereafter – 75% market rent <p>Appointment of workspace coordinator</p> <p>Achieve minimum fit-out specification and submission of workspace strategy. Produce and submit an Affordable Workspace Marketing Plan.</p>	<p>Agreed</p>
<p>Affordable workspace tenant eligibility</p>	<p>Eligible tenants shall be, as per the definition given in the NSP, from a specific sector that has a social, cultural or economic development purpose. This would include:</p> <ul style="list-style-type: none"> - charities, voluntary and community organisations or social enterprises; - creative and artists' workspace; - rehearsal and performance space and makerspace; - occupiers for disadvantaged groups starting up in any sector; - occupiers in support of educational outcomes through connections to 	<p>Agreed</p>

	<p>schools, colleges or higher education;</p> <ul style="list-style-type: none"> - existing businesses in Southwark who need to relocate; - small businesses located in Southwark; and - start-ups or small businesses otherwise identified by the workspace provider to be agreed with the council. <p>The Affordable Workspace Provider will retain discretion over the selection of the eligible tenants that take leases within the affordable workspace areas.</p>	
Transport and Highways		
Public Transport Infrastructure Contribution	<ul style="list-style-type: none"> • Bus countdown facilities contribution of £40,000 • A contribution towards the provision, extension and/ or maintenance of a TfL Cycle Hire Docking Station £50,000 • A £18,000 contribution for a new Legible London sign/s and a map refresh of local existing Legible London signs 	Agreed
Highway works	s.278 works with the highway authority for highway works listed above, upgrade street lighting and traffic management change.	Agreed
Parking permit restriction	This development would be excluded from those eligible for car parking permits under the CPZ operating in this locality.	Agreed
Blue Badge Holder Parking Space	One Blue Badge Holder Parking Spaces which must be constructed prior to Occupation	Agreed

Construction management plan review and monitoring	Monitoring of Demolition and Construction Management Plan	Agreed
Delivery and Service Plan	Delivery and service plan monitoring of £16,730 with £1,600 retained.	Agreed
Energy, Sustainability and the Environment		
Futureproofing for connection to District Heat Network (DHN)	Prior to development, an Energy Strategy must be approved setting out how the development will be designed and built so that it will be capable of connecting to the District CHP in the future.	Agreed
Achieving net carbon zero	An off-set payment of £624,275 Review and re-calculation of on-site savings following detailed design stage Be Seen Monitoring	Agreed
Archaeology monitoring/ supervision fund	Contribution towards cost of providing technical archaeological support (£11,171 for schemes over 10,000sqm) £95,675 towards protecting, promoting and enhancing heritage assets within the vicinity, but in particular the Hope Theatre and bear baiting theatre.	Agreed
Achieving Greenfield rates	(£366 per cubic metre shortfall against greenfield run off rates)	Agreed
Open space		
Public realm	Public realm delivery and management, including hours of access.	Agreed

	<p>Prior to implementation, the developer is to submit a Public Realm Specification for all areas of publicly accessible realm. The Public Realm Specification shall demonstrate that the publicly-accessible realm has been designed to an adoptable standard (in accordance with the SSDM).</p> <p>Delivery of public realm prior to occupation of employment space.</p> <p>Joint Design Management and Framework with FT developer.</p>	
Public realm hours of access	<p>The publicly-accessible route shall be open between 08:00hrs and 20:00hrs every day of the week including Bank Holidays.</p> <p>All other areas of publicly-accessible realm within the application site shall be open 24 hours a day every day of the week including Bank Holidays.</p>	
Other obligations		
Detailed design clauses	Securing of BJARKE INGELS GROUP Architects to deliver detailed design unless otherwise agreed in writing.	Agreed
Administration fee	Maximum contribution to cover the costs of monitoring these necessary planning obligations, calculated as 2% of total sum. (excluding the DSP and those contributions that are either separate monitoring contributions or a monitoring contribution is already being collected for this particular obligation)	Agreed

307. The S106 heads of terms agreed would satisfactorily mitigate against the adverse impacts of the proposed development. In the event that a satisfactory legal agreement has not been entered into by 31 May 2023, it is recommended that the director of planning and growth refuses planning permission, if appropriate, for the following reason:

“The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of affordable workspace and mitigation against the adverse impacts of the development through projects or contributions in accordance with Policy IP3 ‘Community infrastructure levy (CIL) and Section 106 planning obligations’ of the Southwark Plan (2022), and London Plan (2021) policy DF1 ‘Delivery of the Plan and Planning Obligations’, as well as guidance in the council’s Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015)”.

Mayoral and Southwark Community Infrastructure Levy (CIL)

308. 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 investments in London as a whole, primarily Crossrail, while Southwark’s CIL will provide for infrastructure that supports growth in Southwark.
309. The site is located within Southwark CIL Zone 1 and MCIL2 Central London zone. Based on the existing floor areas provided in the agent’s CIL Form1 (GIA Info) dated 28-Apr-22 and their Area Schedule, the gross amount of CIL is approximately £4,562,416 consisting £3,098,179 of Mayoral CIL and £1,464,237 of Borough CIL. It should be noted that this is an estimate, and the floor areas on approved drawings will be checked when related CIL Assumption of Liability Form is submitted, after planning approval has been obtained.

Other matters

310. None

Statement of community involvement

311. Consultation was carried out by the applicant prior to the submission of the planning, and during the consideration of the application. The consultation undertaken was carried out with the local community and key stakeholders from the area. This is summarised in the tables below, which are taken from the submitted Statement of Community Involvement.

Table: List of meetings and events

Events/Publicity	Date	Attendees	Notes
Public Consultation Stage 1			
Newsletter	27 th September 2021	Delivered to over 1,700 local addresses	
Pop up sessions on Thames Pathway	Friday 8 th October 2021, 1pm – 4pm • Saturday 9 th October 2021, 10am – 1pm	91 people engaged.	Support for more green spaces and places to socialise – such as cafés. There was also support for public realm improvements and riverside seating.
Consultation website at www.redlioncourt.com	27 th September 2021 for 6 weeks	Online surveys 38 responses to survey	Strong support for enhancements to the Thames Pathway and public realm improvements • A particular desire for genuinely ‘green’ public realm • The desire for new social spaces, such as cafés and restaurants • Support for more office and creative spaces • Questions regarding the suitability of a taller/modern looking building in the location
Public Consultation Stage 2			
Seek feedback on the emerging proposals for the Site			
Newsletter	5 th November 2021	Delivered to over 1,700 local addresses	

<p>door-to-door canvassing of residents on or around Park Street</p>	<p>15th November 2021</p>	<p>112 addresses were visited over the course of the session, with 31 residents engaging in conversations with the team.</p>	<p>Key concerns/priorities for consideration within the design process included impacts on neighbours (both visually and in terms of noise/disruption etc.), as well as support for local employment and community space.</p> <p>Support for more green spaces and improvements to the public realm, as well as for new shops</p>
<p>Two drop-in sessions. These took place at The Bridge Café, 73-81 Southwark Bridge Road</p>	<p>Wednesday 8th December 2021 Saturday 11th December 2021</p>	<p>13 attendees at the two drop-in sessions. These included representatives from Bankside Open Spaces Trust, Shakespeare's Globe and the Former FT Building development team.</p>	
<p>Consultation website at www.redlioncourt.com</p>		<p>18 responses to online survey</p>	<p>Support for small businesses and affordable workspace, potentially for community use</p> <ul style="list-style-type: none"> • Support for retail uses at ground floor – with shops preferred over bars and restaurants • Support for the proposed approach to improving pedestrian connections

			<ul style="list-style-type: none"> • Questions regarding the impact of the proposals on neighbours' amenity. • Concern about the height of the building.
Public Consultation Stage 3 Seek feedback on the detailed proposals for the Site			
Newsletter update and advert of events	3 rd February 2022	Delivered to over 1,700 local addresses	
Pop-up event was held on-site on the Thames Pathway	12 th March 2022	84 people engaged	
Drop-in session took place at The Bridge Café, 73-81 Southwark Bridge Road	16 th March 2022	10 attendees	
Consultation website at www.redlioncourt.com		27 responses to online survey	<p>Strong support for the proposed expansion of pedestrian routes and creation of public spaces around the building – with questions regarding the management of footfall at busy periods</p> <ul style="list-style-type: none"> • Support for the creation of small retail spaces at ground floor level – with suggestions including a café/social space and wellness centre • Support for the delivery of high

			<p>quality workspace on the Site – including affordable workspace</p> <ul style="list-style-type: none"> • A mix of opinion on the proposed design approach – with some indicating support and others raising questions regarding the appropriateness of the proposed building to the local context and potential impacts on neighbours. • Proposed building would negatively impact the character of the area and the setting of the Anchor Pub.
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312. A number of key local stakeholders were also contacted via separate letters at each stage of the consultation process. Separate meetings were also held with the local stakeholders and councillors.
313. The final stage of the public consultation had included ‘you said, we did’ sections on key themes and presented to key local resident groups. The applicant had summarised the feedback and how they have responded to those. The project email address will remain open to receive feedback on the proposals for Red Lion Court. The applicant has continued to engage with the local community and residents and the nearby groups. In the event that the application is approved, the applicant will continue to engage with interested residents and stakeholders throughout the detailed design and construction processes. This is welcomed.
314. As part of its statutory requirements, the Council sent letters to surrounding residents, issued a press notice publicising the planning application and displayed notices in the vicinity of the site. Adequate efforts have, therefore, been made to ensure the community has been given the opportunity to participate in the planning process.
315. Details of consultation undertaken by the Local Planning Authority in respect of this application are set out in the appendices. The responses received are summarised in an earlier part of this report. The main ‘Assessment’ part of this report addresses the issues raised.

Human rights implications

316. This planning application engages certain human rights under the Human Rights Act 1998 (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.
317. This application has the legitimate aim of delivering commercial development. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

Conclusion on planning issues

318. This application would bring into productive and optimised re-use of this currently vacant building, providing a complementary mixture of office and retail uses that would support the role and vibrancy of the Central Activities Zone and the Borough and Bankside District Town Centre. It would also provide a policy-compliant level of affordable workspace suitable for new and small businesses. The number of full time employees would increase on the site.
319. The proposed interior spaces and terraces have been designed to achieve separation distances sufficient to protect the privacy of all nearby residential properties. The proposed office and retail uses are not especially noise generating such that, with further protections secured in the form of management plans and hours of use controls, it is highly unlikely that nearby residents would experience noise disturbance. Conditions securing a construction management plan would also control noise and dust emissions. The proposal would cause daylight impacts in excess of the BRE guidance to a relatively small number of surrounding properties. However, in most cases the resulting daylight levels would not be uncommon for central London and in all instances the degree of change would not cause harm to the occupiers' amenity.
320. The tall building proposal would sit comfortably within the background context of Bankside. With its active frontages and new publicly-accessible external spaces, the development would provide a more engaging and animated building at street level, create greater public permeability, and bring valuable greening and biodiversity benefits to this part of the South Bank. The proposal would provide cycle parking on site and upgrade the public realm, which would improve the pedestrian experience along Bankside and Park Street. It satisfies the requirements of the Site Allocation NSP06.
321. It is considered that this development proposal would not have any noticeable adverse impact on the existing vehicular traffic on the adjoining roads. The applicant's Delivery and Servicing Plan sets out a sound strategy for minimising net additional vehicle movements to and from the site, a key part of which is to consolidate deliveries. Notwithstanding, and as a precautionary measure, a

bond will be secured so that highways impacts arising from deliveries and servicing can be monitored over the course of the first two years of operation. Other transport and highway mitigation measures would also be secured.

322. The proposed landscaping results in an increased UGF score of 0.35 meeting the London Plan target. Furthermore, biodiversity proposals would result in a net gain. The submitted biodiversity report concludes the development would lead to a gain of 349%.
323. The scheme would be designed to minimise environmental effects and adequate mitigation measures would be in place, which would be secured by conditions. The scheme would achieve 49% carbon emission reduction site-wide against a Building Regulations compliant scheme. It would also achieved an 'Outstanding' BREEAM rating, which exceeds the minimum of 'Excellent'.
324. It is therefore recommended that planning permission be granted subject to conditions, referral to the GLA and the applicant entering into a Section 106 Legal Agreement under the terms as set out above.

Consultation responses from external and statutory consultees

325. Greater London Authority (GLA) had made the following comments based on the scheme originally submitted. The GLA would provide any further comments in the Stage II report.

Below are the key issues:

- The principle of the use is strongly supported. London Plan Policy E1 supports an increase in the current stock of offices in certain locations, such as the CAZ. The space has been designed to be let to a single tenant or split for multiple tenancies. The scheme also secures affordable workspace.
- The other uses proposed would play an important role in the character and function of the Zone as a vibrant mixed-use area, ensuring activity and vitality at different times of the day and week. The other uses are supported.
- Neither the FT building or this site would provide residential uses as per the site allocation. On balance, the benefits offered by the provision of high-quality CAZ office floorspace and affordable workspace is considered to outweigh the non-provision of residential floorspace in this circumstance. As such, the proposed redevelopment of the site without residential floorspace remains supportable in strategic planning terms.
- Southwark's Local Plan identifies the site as being in a location suitable for tall buildings. As such, the proposal for an 11-storey building complies with the locational aspects of Part B of Policy D9.
- The design of the development should respond to its prominent, yet sensitive setting as an arrival point into Southwark from Southwark Bridge; and that redevelopment must be sensitive to the Thames Policy

Area, where building heights should be lower in close proximity to the River Thames.

- The Strategic Views have been tested and it would fully comply with the View Management Guidance set out for all relevant LVMF and London Borough of Southwark (LBS) Borough Views.
- The design of the colonnade needs to maximise views through it.

- Southwark Council should secure the proposed fire safety measures through appropriate conditions.
- The THVIA concludes that the proposed development would have no or negligible impact on the relevant LVMF Protected Vistas. The proposal would have a minor, neutral impact on LVMF River Prospect 10A.1 from Tower Bridge due to its distance and scale, resulting in little visibility in the view. It would have a major, beneficial effect on LVMF River Prospect 12B.1 from Southwark Bridge.
- Subject to the technical clarification sought, the proposed development is considered to maintain a viewer's ability to recognise and appreciate strategic landmarks and would not harm the character and composition of strategic views.
- The level of harm to the setting of the Grade II Listed Anchor Public House would be less than substantial. GLA Officers consider that the public benefits could (where appropriately secured) outweigh the less than substantial harm.
- Clarifications and supporting information on various aspects of the energy strategy and overheating is required.
- Connection to the network should be prioritised and evidence of active two-way correspondence with the network operator should be provided.
- The applicant has provided results that fall within the Whole Life Cycle benchmarks and has reasonably explained the reasons for any divergences from the WLC benchmark.
- Further consideration of Circular Economy principles is required.
- The surface water drainage strategy for the proposed development does not comply with Policy SI13 of the London Plan. The Applicant should confirm whether surface water pumping is required and aim to avoid this; confirm the inclusion of rainwater harvesting; and provide hydraulic calculations and a drainage strategy plan.
- Further information is required to determine compliance with London Plan air quality policies and conditions have been recommended.

Officer comment: Most of the comments above have been discussed in the main body of the report. The applicant had also addressed the majority of these (including those not listed above). The applicant has submitted the various supporting documents required by the GLA. A design document was submitted post these comments and notes amendment to the proposals to minimise the inset structural colonnade columns that sit behind the façade grid at ground level. This would also enable the corner columns to be eliminated, improving visibility and sense of space as well as increasing the size of the public realm offering and physical circulation space. No response on a have been provided by the GLA following this. They did however confirm that no further information

currently required on energy, whole life carbon or circular economy matters. The applicant also produced an updated Air Quality Assessment for the GLA, but the Council's own EPT officer had not raised any objections to the scheme. It is noted that there are a few matters that will need to be conditioned or agreed within the s106. Conditions for cycle parking and conditions regarding WLC, CES and Energy have been secured by condition.

326. Transport for London have made the following comments:

- A £18 000 contribution for a new Legible London sign/s and to enhance and map refresh of local existing Legible London signs should be secured.
- The development when considered in isolation is unlikely to have any unacceptable adverse residual impacts on the London Underground or bus network, however the Council would be supported in securing funding for bus capacity as a s106 pool with other developments in the area.
- To mitigate increased demand in an area of very high use a s106 contribution of £220 000 should be secured for a new cycle hire docking station or extended existing docking stations if a new docking station cannot be provided on site.
- An electric vehicle charging point should be provided for the disabled persons' parking bay.
- 719 long-stay cycle parking spaces are proposed, which accords with the minimum standards of Policy T5. Currently, the long stay cycle parking is not in accordance with the London Cycle Design Standards (LCDS), which is also a requirement of Policy T5. . Design amendments are required prior to determination in order to deliver a policy compliant scheme.
- In this instance it is accepted that the site is constrained and managed short stay provision for the office in the basement would be appropriate.
- The management regime should be explained and secured in a cycle parking management plan.
- The site access may have to be widened to accommodate servicing vehicles. To ensure that all servicing activity can be provided on site, measures to ensure that only vehicles with a maximum length of 8m will be servicing the site should be provided.
- Deliveries by cargo bike and small electric vans should be maximised, with overall number of vehicle trips minimised.
- It should be ensured that the proposed electric vehicle charging point is rapid charging and active from the outset.
- To align with Policy T7, given the site's location adjacent to the Thames and surrounding very narrow roads, use of the river and other sustainable modes for construction such as cargo bikes should be investigated.
- Safety of cyclists on NCN 4 on Park Street should be paramount and specific management measures explained in the CLP, along with measures to ensure the safety of pedestrians, noting that the northern footway of Park Street is proposed to be closed during construction.

- The measures set out in the Travel Plan proposed are not sufficient to encourage a modal shift towards active travel. It is recommended that further measures are proposed, e.g., free Santander Cycle Hire membership should be made available for a proportion of employees for each initial occupier for at least three years (in line with local policy).
- It is recommended that employees receive free or discounted repairs, particularly for small repairs such as punctured tyres.
- A full travel plan, which should be submitted for approval by the Council should be secured by condition/s106 agreement.

Office Comment: Much of the above have been discussed in the main section of the report. The applicant had sent a response to go through some of the details in particular the cycle parking standards and that has been found acceptable. In terms of the contributions and conditions requested, these would be secured. However, Officers consider that a £50,000 is more reasonable.

London Underground/DLR Infrastructure Protection was consulted and confirmed no comments to make.

327. Environment Agency was consulted but no comments were received.

328. Historic England:

Historic England provides advice when our engagement can add most value. In this case we are not offering advice.

329. Metropolitan Police Design Advisor:

A meeting was held with the design team dealing with this development at which the principles of Secured by Design were discussed. It is encouraging to see that the designers have considered Secured by Design, this will result in a positive impact upon the development from a safety and security perspective. Continued liaison with a designing out crime officer will enhance this. The design of the development has considered opportunity for natural surveillance, incorporates excellent lines of site and the development should 'activate' this area. These are all excellent crime prevention measures. The area around the site is to be landscaped as part of the planned re development. Planted areas should be well lit and not planted too densely as weapons are often stashed in dense planting.

330. The bottom of tree canopies should be maintained to be no lower than 2m and ground planting should not be allowed to grow any higher than 1m to ensure good lines of sight across the development are maintained. Any seating areas should not be under cover and should be designed in such a way to discourage rough sleeping, which is prevalent in this area. The gates that will be used to secure the landscaped area between 8pm and 8am are a positive addition that should assist with reducing the opportunity for crime and ASB between those hours. To be considered a 'secure' boundary these gates should be a minimum of 1.8m in height with no horizontal fixings that could be used as a climbing aid.

331. In relation to the office space, users should only be able to access the floor on which they work (unless a tenant has rented several floors for their business). There should be a concise delivery strategy, ideally one that removes the need for delivery persons to pass any further into the building than reception or service areas.

Officer Comment: This is noted and conditions securing Secure by Design measures are recommended.

332. London Fire Brigade was consulted but confirmed no observations to make.

333. Thames Water had made the following comments:

- With the information provided Thames Water has been unable to determine the waste water infrastructure needs of this application Requested that a condition be added.
- with regard to foul water sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.
- With regard to surface water drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection.
- This site is affected by wayleaves and easements within the boundary of or close to the application site. Thames Water will seek assurances that these will not be affected by the proposed development. The applicant should undertake appropriate searches to confirm this.
- There are public sewers crossing or close to the development. If planning significant work near our sewers, it's important that the developer minimize the risk of damage.
- Thames Water do not permit the building over or construction within 3m of water mains.
- The proposed development is located within 15m of our underground water assets and as such would like an informative attached to any approval granted.
- Water Comments. Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water requested that a condition in relation to additional flow/phasing plan be added to any planning permission.
- The applicant should fully explore discharge of SW to the River Thames, which is stated as both possible, pending conversations with the relevant authorities and the more sustainable solution than the combined network in the Drainage Strategy Report, but is not proposed (page 8). Because the north portion of the site already discharges to the river via gullies, it is likely physically possible, especially with the proposed SuDS. When the applicant can provide evidence that discharging surface water to the river is either proposed or has been fully explored and rejected due to factors outside the applicant's control, Thames Water will have no objection to this application. Regarding pumped foul drainage, we

support the applicant's efforts to minimise the amount of pumping required.

Officer Comment: The above is noted.

334. The advice received from other Southwark Officers has been detailed in the relevant sections contained within this report.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

335. N/A

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Environment, Neighbourhoods and Growth Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 5729 Council website: www.southwark.gov.uk

APPENDICES

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

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth	
Report Author	Wing Lau, Team Leader	
Version	Final	
Dated	17 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		17 February 2023