

## Contents

Contents .....	1
EXECUTIVE SUMMARY .....	3
BACKGROUND INFORMATION .....	5
Site location and description .....	5
Details of proposal .....	6
Planning history of the site, and adjoining or nearby sites. ....	8
KEY ISSUES FOR CONSIDERATION .....	8
Summary of main issues .....	8
Legal context .....	8
Planning policy .....	9
ASSESSMENT .....	9
Principle of the proposed development in terms of land use .....	9
Environmental impact assessment .....	11
Urban design .....	12
Landscaping, urban greening and biodiversity.....	20
Designing out crime.....	20
Fire safety .....	21
Heritage.....	21
Archaeology.....	24
Impact of proposed development on amenity of adjoining occupiers and surrounding area.....	25
Transport and highways.....	40
Environmental matters .....	43
Energy and sustainability.....	46
Planning obligations (S.106 agreement) .....	48
Mayoral and borough community infrastructure levy (CIL) .....	54
Community involvement and engagement .....	54
Consultation responses from members of the public and local groups.....	55
Community impact and equalities assessment.....	59
Human rights implications .....	61
Positive and proactive statement .....	61
Positive and proactive engagement: summary table .....	61
CONCLUSION .....	61

BACKGROUND INFORMATION .....61

BACKGROUND DOCUMENTS .....62

APPENDICES.....62

AUDIT TRAIL.....62

Item No.	Classification:	Date:	Meeting Name:
6.2	OPEN	12 December 2023	Planning Committee B (Major Applications)
Report title:	<b>Development Management planning application:</b> Application 22/AP/4006 for: Full Planning Application  <b>Address:</b> 38-42 SOUTHWARK BRIDGE ROAD SE1 9EJ  <b>Proposal:</b> Demolition of the existing redundant office building (Class E) and the construction of a replacement building to deliver additional office (Class E) floorspace along with other associated works.		
Ward(s) or groups affected:	Borough and Bankside		
From:	Director of Planning and Growth		
Application Start Date: 24/11/2022		PPA Expiry Date:	
Earliest Decision Date: 23/02/2022			

## RECOMMENDATION

1. That planning permission is granted subject to conditions, the applicant entering into an appropriate legal agreement, and referral to the Mayor of London.
2. In the event that the requirements of paragraph 1 above are not met by 12th June 2024 the director of planning be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 197.

## EXECUTIVE SUMMARY

3. This application proposes the demolition of an office building, retention of existing basement and construction of a part six, part eight-storey building with roof plant and lift overrun. The proposal includes new cycle parking facilities, internal delivery and servicing area accessed from Southwark Bridge Road, soft landscaping and new external amenity terraces. The proposal would deliver an uplift in employment floorspace.

4.	Use class	Existing sqm	Proposed sqm	Change +/-
	Use E (g)	13,675.4	16,917.0	+ 3,315.6
	Affordable workspace Use Class E (g)	0	1,308	+1,308
	Job creation	Previous use supported approx. 20 FTE jobs	855 FTE jobs	+835 FTE jobs

5. The existing building on the site is vacant. It was most recently used as a backup disaster recovery centre for businesses unable to use their usual office for safety reasons. However, it is understood that the building has not been in use for this purpose since the Covid-19 pandemic. It is five-storeys on Southwark Street with a setback sixth storey, and six-storeys on Southwark Bridge Road. To the rear of the site are five-storey residential blocks of the Peabody Estate. The surrounding areas of the south, west and north are predominately commercial buildings.
6. The principle of the proposed development in terms of land use is supported. The uplift in employment floor space including affordable workspace would contribute to meeting an identified growth opportunity in this location and importantly provide employment on a site, which has not been used for active employment since 2000. The proposal would also deliver benefits such as job creation and training opportunities for local residents.
7. The urban design and architecture is supported, providing a high standard of design and materials (subject to conditions). The elevations have a modern, engaging character that should bring a distinctive architecture to the wider street block. The additional height is comfortably scaled within the wider townscape. Its scale, stepped roof profile and detailed design of the ground floor combine well to form a suitably restrained landmark building within its local context, whilst the site layout and design of the colonnaded entrance provide for an improved public realm and with good activation and animation of the street scene.
8. Demolition and construction would be carefully managed and monitored to reduce impact on neighbouring residents, which are close to the site. There would be a reduction in daylight and sunlight for some of the residents of the Peabody flats to the west but their outlook would be improved because of the planting that is proposed on the building. This impact is considered acceptable, on balance. The soft landscaping proposals, high biodiversity net gain, high quality architectural design, and improved privacy controls, and hours of use controls would also provide some benefits to neighbouring residents in terms of outlook and privacy, comparative to the existing office building condition. These measures would be secured through planning conditions.
9. The development would have no impact on protected views and limited impact on the settings of heritage assets, generally due to the site's orientation and the intervening distance. There is harm to the setting of the Thrale Street CA caused by the visual intrusion of the distinctive lift overrun within the roofscape. However, the harm is less than substantial and of a distinctly minor order, and should be balanced by the planning benefits of the scheme.
10. The proposed development would not have an unacceptable impact on the public transport network or TLRN, subject to improvements to the walking and cycling environment, to be secured through the S106 and planning conditions.
11. The development would be car free and would deliver an uplift in cycle parking for future occupiers of the site and visitors. All servicing and delivery activities would take place within a dedicated service bay. The existing dropped kerb access onto site would be replaced with a new access further north along

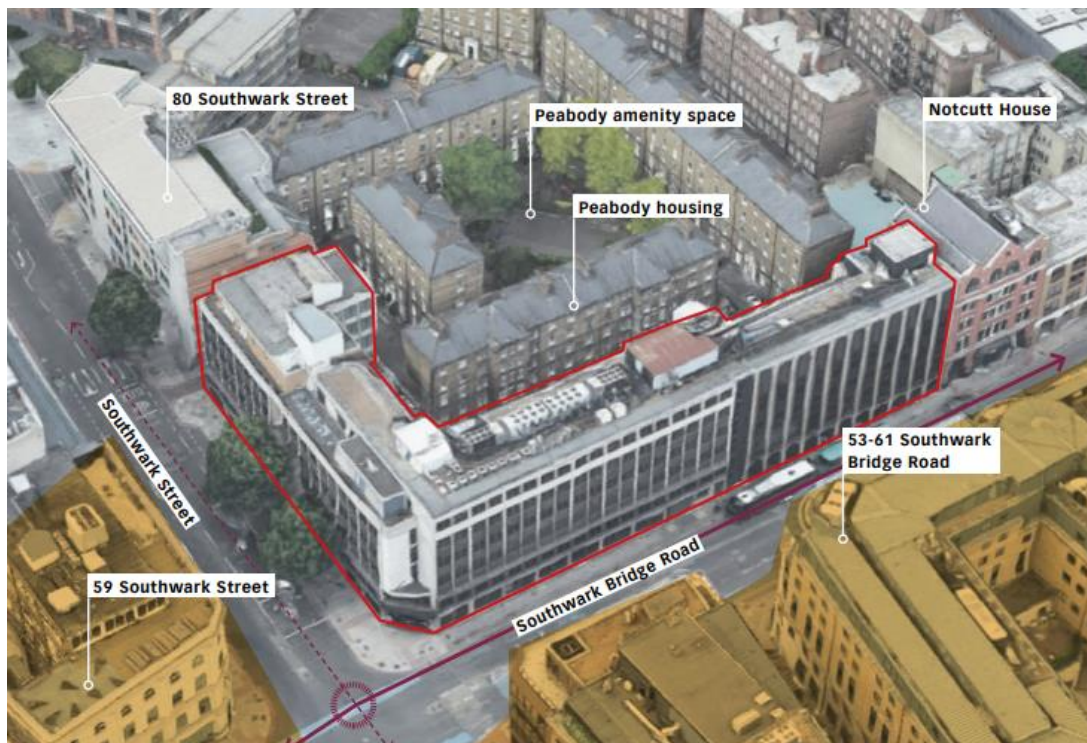
Southwark Bridge Road.

12. The development would achieve a 14% on-site reduction of carbon emissions against the 2021 Part L baseline through Be Lean and Be Green measures (equivalent to 50% onsite reduction against the previous 2013 Part L baseline). A financial contribution would be secured through the S106 to offset the remaining tonnes of carbon and deliver a net carbon zero development.
13. The proposal is informed by a Whole Life Cycle (WLC) Assessment and Circular Economy Statement (CES) that will assist in reducing the development's embodied carbon footprint and sustainable waste management. The development is targeting a BREEAM score of 85.28% that would achieve an 'Outstanding' rating, in addition to a high biodiversity net gain of over 10%, and an Urban Greening Factor of 0.3.

## BACKGROUND INFORMATION

### Site location and description

14. The site is an L-shaped plot on the north west corner of Southwark Street and Southwark Bridge Road junction. There is an office building on the site rising to five-storeys along Southwark Street with a setback sixth storey, and six-storeys along Southwark Bridge Road. The building is currently vacant but was most recently used as a backup disaster recovery centre for businesses unable to use their usual office for safety reasons. However, it is understood that the building has not been in use for this purpose since the Covid-19 pandemic.



*Image 1: Aerial view of the site (outlined in red) looking west. Thracle Street Conservation Area highlighted in yellow.*

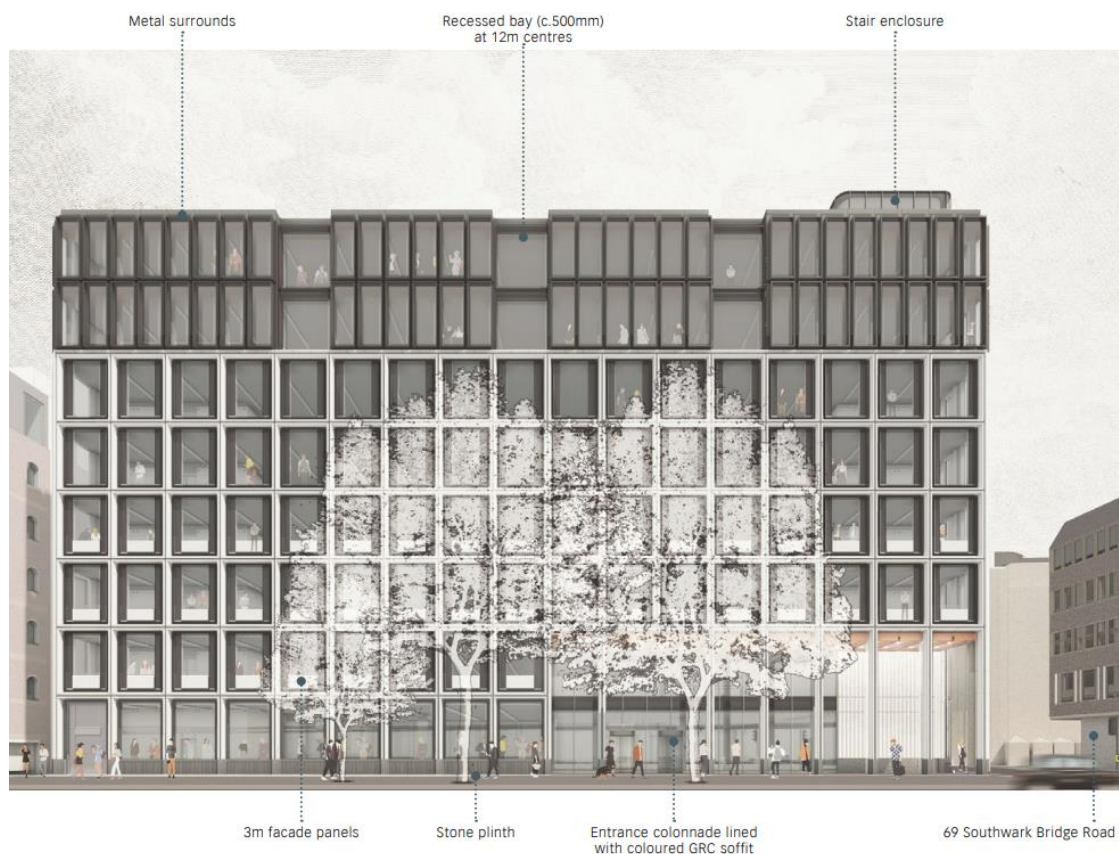
15. The site is surrounded by a mix of land uses with varied heights, characters and appearance. Immediately to the west of the site are 5-storey residential blocks

(Block A, I, K) within Southwark Street Peabody Estate. Also to the west of the site is a vacant commercial building with the planning permission granted for additional height. To the south of the site are commercial buildings, and to the east are hotels and commercial buildings.

16. The site is well connected and scores a high public transport accessibility level (PTAL) of 6b. London Bridge, and Southwark and Borough Underground stations are all within walking distance and there are various bus stops nearby, including on Southwark Street and Southwark Bridge Road. Cycle Superhighway 7 runs parallel to the site along Southwark Bridge Road. An existing vehicular access from Southbridge Road serves a loading bay and car park in the basement of the building.

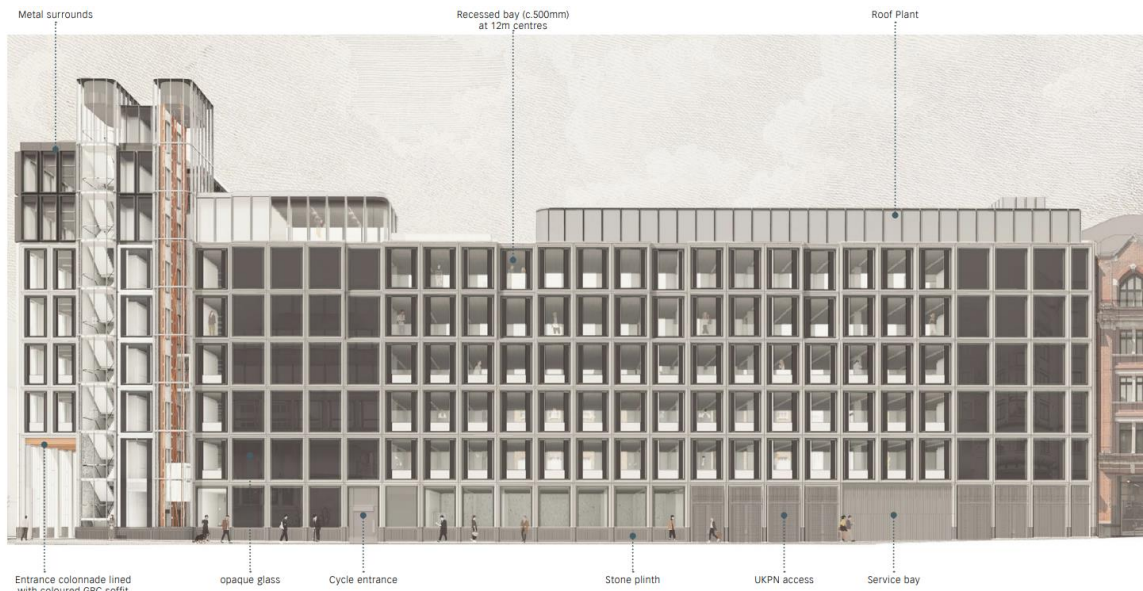
## Details of proposal

17. This application seeks planning permission for demolition of the existing building above ground and construction of a new part 8, part 6 office building with roof plant and lift overrun, cycle parking facilities, delivery and servicing area, external terraces and retention of the existing basement. The application would increase the total amount of commercial floorspace from 13,675.4 sqm GIA to 16,991 sqm GIA. The entire floorspace would be of Use Class E(g) use.



*Image 2: Illustrative view of Southwark Street elevation (proposed).*





*Image 3: Illustrative view of Southwark Bridge Road elevation (proposed).*



*Image 4: Illustrative view of corner junction with Southwark Street and Southwark Bridge Road (proposed).*

18. The tallest building elevation would front Southwark Street and would measure 35.120 metres (AOD) to the top of parapet, and 39.905 meters (AOD) to the top of the lift overrun on the corner of Southwark Street and Southwark Bridge Road. The elevation fronting Southwark Bridge Road would measure 31.370 metres (AOD) to the top of the parapet.

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

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

## **KEY ISSUES FOR CONSIDERATION**

### **Summary of main issues**

20. The main issues to be considered in respect of this application are:
- Principle of the proposed development in terms of land use;
  - Environmental impact assessment
  - Urban design
  - Landscaping, urban greening and ecology;
  - Designing out crime;
  - Fire Safety;
  - Heritage;
  - Archaeology;
  - Impact of proposed development on amenity of adjoining occupiers and surrounding area;
  - Transport and highways;
  - Environmental matters;
  - Energy and sustainability;
  - Planning obligations (S.106 undertaking or agreement)
  - Mayoral and borough community infrastructure levy (CIL)
  - Consultation responses and community engagement
  - Community impact, equalities assessment and human rights
21. These matters are discussed in detail in the 'Assessment' section of this report.

### **Legal context**

22. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance, the development plan comprises the London Plan 2021 and the Southwark Plan 2022. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications for development within Conservation Areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. Section 66 of the Act also requires the Authority to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest, which they possess.
23. There are also specific statutory duties in respect of the Public Sector Equalities Duty, which are highlighted in the relevant sections below and in the overall assessment at the end of the report.



## **Planning policy**

24. The statutory development plan for the Borough comprise the London Plan 2021 and the Southwark Plan 2022. The National Planning Policy Framework 2023 and emerging policies constitute material considerations but are not part of the statutory development plan. A list of policies, which are relevant to this application are provided in Appendix 2. Any policies, which are particularly relevant to the consideration of this application, are highlighted in the report.
25. The site is subject to the following policy designations:
  - Archaeological Priority Area: North Southwark and Roman Roads (Tier 1)
  - Bankside and The Borough Area Vision
  - Central Activities Zone (CAZ)
  - London View Management Framework (Wider Setting Consultation Area) for Alexandra Palace viewing terrace to St Paul's Cathedral (1A)
  - South Bank, Bankside and London Bridge Specialist Cluster
  - The Bankside and Borough District Town Centre
  - The Borough and London Bridge Opportunity Area
26. The site is within Flood Zone 3 as identified by the Environment Agency flood map, which indicates a high probability of flooding however, it benefits from protection by the Thames Barrier.
27. The site is not part of a conservation area but is adjacent to and bounded by the Thrale Street Conservation Area to the east.

## **ASSESSMENT**

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

#### Re-provision and increase of Class E(g) employment floor space

28. Chapter 6 of the National Planning Policy Framework (NPPF) states that planning decisions should help to create conditions in which businesses can invest, expand and adapt. It states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
29. The application site sits within the Central Activities Zone (CAZ), which is an internationally renowned central London business district with high potential for commercial growth.
30. The Southwark Plan Strategic Policy SP4 sets a target of delivering 460,000sqm of new office floorspace between 2019 and 2036 (equating to c.35, 500 jobs). The policy sets out that 80% of new offices would be delivered in the CAZ and at least 10,000 new jobs would be provided in the Borough, Bankside London Bridge Opportunity Area. The Southwark Plan Policy P30 protects against the loss of existing employment floor space in the CAZ.

31. The London Plan Strategic Policy GG2 requires development to explore the potential for the intensification of the use of land, promoting higher density development, particularly in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. The London Plan Policy SD5 requires offices to be given greater weight relative to new residential development in the CAZ, with some exception including wholly residential streets or predominately-residential neighbourhoods. The London Plan Policy E1 supports improvements to the quality, flexibility and adaptability of office space through new office provision and refurbishment.
32. Therefore, the proposed increase in employment floor space on this site is supported in terms of land use. It would contribute to meeting an identified growth opportunity in accordance with Chapter 6 of the NPPF, London Plan Policies SD4, SD5 and E1, and Southwark Plan Policies SP4 and P30.

#### Job creation

33. The applicant has advised that the building's previous use as a backup disaster recovery centre generated approximately 20 jobs. The proposed development would generate 855 FTE jobs, which represents an uplift against the previous and potential use of the existing office building.
34. Southwark Plan Policy P28 requires development of this type to deliver training and job opportunities for local residents. 85 jobs would be secured for unemployed Southwark residents lasting a minimum of 26 weeks. Jobs would also be created during the construction process providing a minimum of 27 jobs for unemployed Southwark residents, 27 short courses and 6 construction industry apprenticeships during the construction phase of development. This would be secured through the S106 alongside a financial contribution to offset any shortfall in on site provision during construction and operational phases.

#### Affordable workspace

35. London Plan Policy E2 (D) requires proposals for new employment floorspace greater than 2,500sqm (GEA) to consider the scope to provide a proportion of flexible workspace or smaller units suitable for micro, small and medium sized enterprises. London Plan Policy E3 supports the use of planning obligations to secure affordable workspace for office use below market rates for development purpose such as:
- 1) for specific sectors that have social value such as charities, voluntary and community organisations or social enterprises
  - 2) for specific sectors that have cultural value such as creative and artists' workspace, rehearsal and performance space and makerspace
  - 3) for disadvantaged groups starting up in any sector.
  - 4) supporting educational outcomes through connections to schools, colleges or higher education
  - 5) supporting start-up and early stage businesses or regeneration.

36. The policy recognises that this need is particularly important in areas where cost pressures could lead to the loss of affordable workspace for micro, small and medium sized enterprises such as around the CAZ.
37. Southwark Plan Policy P31 requires developments proposing 500sqm GIA or more employment floorspace to:
- Deliver at least 10% of the proposed gross employment floorspace as affordable workspace on site at discount market rents; and
  - Secure the affordable workspace for at least 30 years;
  - Provide affordable workspace of a type and specification that meets current local demand; and
  - Prioritise affordable workspace for existing small and independent businesses occupying the site that are at risk of displacement. Where this is not feasible, affordable workspace must be targeted for small and independent businesses from the local area with an identified need; and
  - Collaborate with the council, local businesses, business association's relevant public sector stakeholders and workspace providers to identify the businesses that will be nominated for occupying affordable workspace.
38. The application proposes to deliver 1,308sqm of affordable office floorspace equating to 10% of the total floor area, excluding the existing basement floor area, which is to be retained. This approach complies with Policy P31, which applies to all new floorspace that would be created by the development. The affordable workspace would be located at the basement level 1, with provision of shared workspaces, offices and meeting rooms, and with equal access to utilities and ancillary services, shared with the market rent tenants on the upper levels. It is expected that by virtue of the size, the workspace would be suitable for one operator; however, it would be flexible for multiple users.
39. Details of the affordable workspace offer would be secured through the S106, in accordance with the requirements set out in Southwark Plan Policy P31 and London Plan Policies E2 and E3.
40. Principle of land use conclusion
41. For the reasons set out above, the proposal complies with the local development plan in relation to land use policy. The GLA are supportive of the proposed land use in their Stage 1 Report. This redevelopment of a vacant building would provide a higher quality office development that would better meet modern standards and accessibility requirements, provide affordable workspace and deliver jobs and training opportunities. Therefore, the principle of development in terms of land use is acceptable for this application.

## **Environmental impact assessment**

42. An Environmental Impact Assessment Screening Opinion was not requested prior to the submission of this application. Schedule 2 of the EIA regulations identifies urban development projects, which the proposed development could be described as. However, the proposal would not include more than 1 hectare

21 of urban development, it would not include more than 150 dwellings, and the overall area of the development would not exceed 5 hectares. The site is not located in a sensitive area as defined by the Regulations. In addition, it has been determined that the development is unlikely to have a significant effect upon the environment by virtue of its nature, size or location based upon a review of the Schedule 3 selection criteria for screening Schedule 2 Development. Therefore, it is concluded that an Environmental Impact Assessment is not required.

## **Urban design**

### Layout

43. The new building would repeat the current L-shaped layout, continuing to follow the urban grain of the existing context and bringing strong definition to the street edges in Southwark Street and Southwark Bridge Road. However, the new entrance would be much larger, pulled away from the corner junction and positioned further west along Southwark Street. The façade line at the entrance would be recessed 4.5metres from the pavement edge and set beneath a tall colonnade that runs half the length of the street frontage onto Southwark Street. The colonnade opens as one side onto Southwark Bridge Road. The layout provides a generous public realm around the building's main entrance onto Southwark Street, which is a busy pedestrian thoroughfare. The colonnaded design has a strong visual presence, reinforcing Southwark Street as the primary commercial street. The colonnade is visible to and accessible from Southwark Bridge Road, ensuring the entrance remains legible from this side of the street.
44. The colonnade would be closed off at its western end by the ground floor offices. It would be partly glazed at this point rather than infilled with a solid panel, which should be sufficient to ensure good informal surveillance of the return. The colonnade functions more as a generous entrance portico than as a pedestrian route, and such it is unnecessary that it runs the full length of the street frontage. There is opportunity for this return to accommodate a secondary entrance to the ground floor offices in the future, were they to come forward as a separate office unit or as a public entrance to a café ancillary to the main office use, which is a typical feature of modern offices. A condition confirming the treatment of the return façade is suggested to assist in exploring a better use of this part of the colonnade.
45. The proposed layout on Southwark Bridge Road acts as more of a secondary building frontage. This approach is largely unchanged from the current layout arrangements, with the off-street servicing bay positioned in a similar location, and a single pedestrian entrance giving access to the end-of-journey facilities. As above, there is opportunity here for another office entrance in the future for occupiers requiring a separate entrance.
46. At the rear, the layout again makes use of the full depth of the building's narrow plot, building up to the rear boundary wall onto the Peabody Estate at ground floor level. The proposed 1st to 3rd floor levels are widened and brought onto the same rear building line, with the uppermost floors above recessed. The designs

look to optimise the building footprint and ensure decent floorplates, which is welcome in general from a building design perspective, subject to massing and amenity.

#### Scale, Height and Massing

47. The new building can be split into two primary volumes; an eight-storey volume onto Southwark Street, with a setback roof terrace above; and a six-storey volume onto Southwark Bridge Road, but with a setback rooftop plant enclosure and short 'pavilion' block. The building pivots around the main access core, which sits immediately behind the colonnade and visually separates the two volumes. The core is a part of the building's architecture, expressed as a distinct element that flanks onto Southwark Bridge Road and projects well above the main parapet lines on both street elevations.
48. The general built form is well-considered, providing regular floorplates and flexible accommodation within both volumes, with the core's massing designed to articulate the building's roof profile and provide a notable local landmark. The increase in building scale, both in terms of height and massing, is well-handled, aimed at delivering uplifts in the quality and quantum of modern office floorspace, balanced with responding to the local townscape and amenity constraints of the site. The design approach of focussing the increase in storeys onto Southwark Street is rational, whilst the increased massing within the Southwark Bridge Road volume is well-handled.
49. Looking at the existing and proposed heights in detail, whilst the existing building is generally six storeys in height (c.20m), it currently presents as five storeys (c.17m) onto Southwark Street, with an additional setback storey. The setback and breaks in massing of the top floor generally work well in nearby oblique views from the west, although the full extent of the building's six-storey height becomes evident when viewed at the junction with Southwark Bridge Road and in middle distance views. The building's primary scale of six storeys (20m) is read along the length of its Southwark Bridge frontage, including the later extension, and presents a uniform parapet line along the street and a coherent streetscape. Open rooftop plant and two overruns add c.3m to the overall building height, but are positioned well back from the parapet edge and cannot be seen from the public realm
50. In comparison, at eight full storeys onto Southwark Street the replacement building measures c.31m to parapet height; the increase in height comprising the improved floor/ceiling heights, as well as the two additional storeys. Above this, a setback balcony encloses a rooftop amenity space that adds a further 1m to the height. The secondary core adds a further 3m at the building's west end, whilst the main access core and lift overruns at its east end takes the building to its maximum envelope height of c.36m above grade. At these heights, the building constitutes a tall building.
51. On Southwark Bridge Road, the scheme is generally for six replacement storeys, albeit of improved floor/ceiling heights, raising the general parapet height by 7m to c.24m compared to the current building. The proposed design maintains an

evident shoulder line along its street frontage. In this instance, a short rooftop pavilion adjacent to the main core and discreet rooftop plant enclosure (incl. secondary core) are visible above the parapet line, adding 3.5m and 2.5m, respectively, to the building's overall height along Southwark Bridge Road, although this part of the building remains below the tall building's threshold.

52. At eight full storeys onto Southwark Street, the building will read taller than its Victorian neighbour immediately opposite (no.56½ Southwark Street) which comprises 4 storeys with a setback 5th (c.21m), and taller than the building context to the south and east, which is generally characterised by buildings of five or six storeys (c.22-25m). However, the additional height (c.10m) is comfortable, particularly when seen from the wider public realm of the junction with Southwark Bridge Road (see model view, p.51, DAS). In addition, the change in colour tone for the final two storeys eases any strong sense of disparity, helping the uppermost massing to blend with the general roofscape. The additional height will be evident from within the nearby conservation areas to the east and south, although the impact will not be especially harmful.
53. Furthermore, the eight storeys responds to a step up in building heights that generally occurs westwards of the junction with Southwark Bridge Road. Beyond the site and no.56½ opposite, general building heights increase along Southwark Street, rising to between seven and eight storeys, albeit some with partial setbacks, and notably to 10 and 13 storeys on the north side of the street for the large office buildings of Bankside OneTwoThree and to the tall residential blocks of Neo-Bankside. Within this wider context, the proposed increase in height reads sufficiently moderate and not out of character.
54. For the most part on Southwark Bridge Road, the proposals present a uniform parapet height of six storeys along the west side of the street frontage. This is similar to the existing buildings in terms of the number of storeys, albeit c.4m taller than currently due to the revised floor/ceiling heights. The new parapet line broadly aligns with the lower outer gables of the neighbouring Notcutt House and c.2m below its taller central gable, maintaining a relatively coherent roofline along the street frontage, which is welcome. Furthermore, the development also remains reasonably well balanced in height with the terrace opposite, which is similarly mainly 6 storeys, albeit with a 5-storey cornice line and compressed floor/ceiling heights. Nonetheless, the proposed shoulder height will generally provide a consistent sense of enclosure to the street and, given the broad width of the street, maintain a coherent townscape, which is welcome.
55. In this instance, the detailed facade of the uppermost floors articulates in several places, softening the upper floor massing and parapet line without undermining the generally consistent height, which is welcome. The development will include rooftop plant will be visible above this articulated parapet line. However, the plant enclosure is sufficiently set back and discreet in appearance to ensure the primacy of the building's six-storey shoulder height is expressed clearly. Whilst the plant enclosure will pop into view above Notcutt House when seen southwards along the main road, it is not especially disruptive, being more glimpsed in the oblique views. The rooftop pavilion block is more evident, but is sufficiently detailed to read as secondary, maintaining the primacy of the six-



storey shoulder height (see views #1.8 and #1.9).

56. A notable element of the development is the tall main access core, which sits immediately behind the large foyer onto Southwark Street and presents its flank onto Southwark Bridge Road. At 36m, it rises distinctly above the building's shoulder heights onto Southwark Street (c.31m) and onto Southwark Bridge Road (c.24m), articulating the building's profile. The core is deliberately expressed, with its discrete massing and overt appearance forming an architectural feature of the building. Its detailed appearance is softened by its round-cornered form and extensive use of glazing, which gives the structure an open, lightweight design.
57. This high-level core will be overtly seen in nearby views within the local context, but will read more incidental in form rather than adding extensive rooftop bulk, and will provide the building with a distinctive silhouette. In these views, its rooftop expression is engaging and reads as a brief, taller moment within the streetscape without becoming overly dominant or unduly disruptive to the contextual scale (see views #1.2, #1.8 and #1.9), although it will be visible from within nearby conservation areas (see below). It will also be visible in middle distance views where the views are direct, but will act as a local landmark helping to define the junction of Southwark Bridge Road with Southwark Street (see views #1.5 and #1.7). Its scale, however, is not so large as to impose on the wider townscape in general
58. Regarding longer distance views, the site sits within the extended background of the wider setting consultation area of the protected panoramic view of St Pauls from Alexandra Palace (LVMF 1A). However, at 36m, the height would not exceed the plane threshold of the protected vista and would remain below the background wider setting consultation area corridor height. Therefore, the scheme would not noticeably affect this view of St Paul's Cathedral in terms of its height and massing. In addition, the development would unlikely be seen in the protected river prospects, being set some 300m south of the Thames and given the intervening building context.
59. It would be visible from Southwark Bridge, although the protected views from the bridge are upstream and downstream (LVMF 12a and b) and not directly to the south. The submitted wireline view shows the uppermost part of the Southwark Street volume and the lift overrun would be evident on the skyline, with the overrun likely to form a local landmark feature on the west side of the main road. However, in this perspective, the proposed building would appear much lower than the re-clad FT building (under construction), no.22 Southwark Bridge Road and the Rose Building in the foreground and similar in height to Anchor Terrace in the middle distance.. Furthermore, it would be seen against the backdrop of the tall towers of Two-Fifty-One and Highpoint in Elephant and Castle in the far distance (view #1.7). The compact massing and lightweight appearance of the core would negate any harmful impact.
60. Regarding the proposed scale at the rear, the new building's height and massing are deliberately profiled to respond to the amenity of the neighbouring Peabody Estate. The massing of the Southwark Street volume has a regular form. The main impact is on the Southwark Bridge Road volume, where the footprint is

extended to make almost full use of the narrow site at ground floor and lower floors, with the massing cut back where necessary above 3rd floor level is a series of terraces, designed to ease the impact on nearby residents' amenity. Regarding the design, the massing is well-handled, with the cutbacks judiciously positioned and used to provide planting and occasionally outdoor office amenity space.

61. Overall, the development is for a moderately tall building that remains sufficiently comfortable within its immediate mid-rise context and responds to the taller context of Southwark Street west of its junction with Southwark Bridge Road. Its height and massing are well-considered and do not significantly alter the established local scale. The approach of a more articulated building form, with the pop-up core and rooftop pavilion, works well to relieve the visual impacts of the proposed increased massing. In conclusion, the proposed scale is generally supported, subject to the heritage considerations.

### Tall Buildings

62. At 36m above grade, the building is regarded as a tall building for the purposes of P.17 of the Southwark Plan and policy D2 of the London Plan. The proposed development is within the Central Activities Zone, which is considered generally suitable for tall buildings.
63. The site is at a point of local landmark significance, being at the junction of Southwark Street and Southwark Bridge Road; two important thoroughfares within the borough. As a moderately tall building, its height reflects the local significance of the location, being mainly visible within the adjoining streets and only marginally visible beyond. Similarly, it is not so tall as to contribute to London's skyline, although its profiled roofline will nevertheless be engaging at the local level; and the site itself is outside of all strategic and borough views.
64. As a tall building within Southwark Street, it would sit within a local area increasing characterised by large scale and tall buildings, and as such, is not out of character; whilst the contrast in height with its immediate mid-rise neighbours to the south and east is not uncomfortable.
65. In terms of contributing to the public realm, the opportunity for new public space is constrained by the site's geometry and relatively modest size. Nonetheless, the proposed colonnade would provide additional pavement space on a busy street corner and for half of the length of its frontage onto Southwark Street, which is welcome. The public do not have access to the top of the building, which is appropriate, given the building's moderate height as a tall building; the limited opportunity for communal outdoor space for the building's occupants; and the need to protect neighbouring residential amenity as set out later in the report.
66. Regarding its design, the moderately tall building is of high architectural quality in terms of its appearance and material finishes (subject to conditions), commensurate with its scale. The functional quality of the new office accommodation is commendable, given the site constraints.

67. The position, moderate scale and thoughtful detailing of the building does not generate an uncomfortable environmental impacts in the immediate area, whilst the arrangement of the ground floor colonnaded entrance, transparent design of the main lift core and large ground floor windows would ensure a positive relationship with the adjoining public realm. The energy efficiency of the building has been considered as set out later in the report.
68. The development would have a limited impact on the historic environment, being generally located a good distance away from most heritage assets; the exception being the intrusion of the lift core within the backdrop to part of the Thrale Street CA, although the harm is minor (see earlier). Overall, the architecture would make a positive contribution to the wider townscape, given its location and engaging design.
69. Remaining policy considerations relating to safety, transport capacity, servicing, employment and construction are assessed in the relevant sections of this report and are acceptable. Overall, the proposal therefore satisfies design requirements for a new tall building within the Bankside area of the Central Activities Zone.

### Architectural Quality

70. The building has a distinctly modern office aesthetic, comprising a strong, regular grid of mainly white pre-cast glass-reinforced concrete fins and large, vertically-proportioned metal-framed windows. The framework is sized and the elevations detailed to express a classical façade hierarchy of base, middle and top. The ground floor has a generous 5m ceiling height and equally tall window openings, and features a tall colonnaded entrance onto Southwark Street. The colonnade is partly finished in profiled pre-cast stone, whilst its soffit comprises GRC with an accent coloured pressed metal cladding, which deftly enhance the legibility of the main entrance. The precast framework is brought down to grade onto a profiled mid-grey granite plinth for robustness and a touch of elegance. The windows are anodised aluminium in a silver tone.
71. The middle section comprises five uniform floors with elevations comprising the same regular framework in pre-cast GRC and with the metal-framed windows, albeit on a 3m grid with the floor heights adjusted, and with a parapet finish. Above this, the framework for the top switches to a finer 1.5m grid and is detailed in black aluminium; the contrast giving the final two floors the appearance of a double 'attic storey'. This is further assisted by articulating the façade line by 0.5m, providing a short series of three pavilion bays. This articulation eases the detailed massing and softens the roofline's profile, which together with the tighter grid and material finishes, allows the final two storeys to read more as part of the wider roofscape within Southwark. Overall, the primary street façade designs is well-composed and engaging.
72. The same aesthetic for the base and middle are used for the Southwark Bridge Road frontage, ensuring a coherent design to the development. In this instance, however, the precast frame switches in colour to mid-grey rather than white, whilst the building's middle section forms the main shoulder height for much of the length of the street block, helping to differentiate the two main volumes and

principle street facades.

73. The facades of the 4th and 5th floors are recessed by 0.5m in a series of four shallow bays that subtly articulate the roofline and add visual interest to the building's elevation over its long stretch of street frontage. Above the 5th floor's shoulder height, a short rooftop pavilion blocks provides additional floorspace without compromising the design. The pavilion is finished in a contrasting white metalwork framework on the tighter 1.5m grid. The adjacent roof plant is set back from the edge and contained within a profiled zinc clad enclosure, minimising its appearance and ensuring that where it is visible its design is complementary. At grade, the Southwark Bridge Road street frontage includes the off-street loading bay and adjacent substation, which are finished in galvanised steel gates in patterned metalwork fins with perforated backing panels that also complement the façade's design.
74. A key feature of the architecture is the main access core, which flanks directly onto Southwark Bridge Road and is used as a design feature to both visually separate but interconnect the two main volumes, as well as give the building a distinctive vertical feature. The design is Hi-tech in its architectural style, featuring extensively glazed lobbies, glazed lift cars and visible lift-room plant. Its deliberately transparent appearance animates the tall, slender volume, and brings strong visual interest to the adjacent street scene. Its soft corner massing, deliberate design expression and clear projection above the roofline make for an appealing design and gives the structure a local landmark quality.
75. Finally, at the rear, the elevations are more restrained in their design. The ground floor is finished in stock brick to form the building's main plinth and to match in with the current boundary wall. The main building volume is set back behind a green roof along Southwark Bridge Road, above which the elevations are simply expressed with the 3m grid using white metalwork framing, featuring large windows that are fretted where required to resolve potential issues of overlooking. The upper floors tier back, creating planted terraces and occasional amenity terrace and inset balconies that are heavily planted. The rooftop plant enclosure is set further back and is finished in the profiled white zinc cladding, whilst the rooftop pavilion features the same white metal frames and 1.5m grid as the front elevation. The elevational designs are similar for the rear of the Southwark Street elevation, using the same regular 3m grid and metalwork framing, but with localised concrete panel infills to address overlooking.
76. Regarding the functional quality, the designs are for flexible, open-plan accommodation with excellent amenities. The floorplates are continuous and on a 9m grid, and have decent internal ceiling heights of c.3m. Services are contained within raised floors, whilst the ceilings finished remain exposed, with lighting tracks. The windows are floor to ceiling high, incorporating fritting at desk level for modesty screening on the lower floors and solid infill panels where full privacy is required. With 40% of the façade glazed and moderate building depths, the extensive glazing provides for excellent natural daylight penetration and good outlook, albeit the outlook is carefully controlled to the rear for amenity reasons.
77. The building features a main core and two satellite cores with ample communal WC facilities, allowing the opportunity for sub-division on each floor, as well as

on a floor-by-floor basis. It also benefits from an off-street loading bay on the Southwark Bridge frontage, with internal servicing access throughout the building at basement level. The offices are mechanically ventilated, whilst the occupants have access to outside communal space. The users enjoy good office amenities, comprising end-of-journey facilities, a large entrance foyer, balconies on several floors and two rooftop terraces. Terrace planting and green roofs add to the building's amenities. Overall, the functional quality is high and is a vast improvement compared to the current office accommodation.

78. Overall, the proposed building is considered to be of high architectural quality. The elevational designs are well-composed, with a good sense of the base, middle and top to the building, and have a robust and engaging character that is convincing. The colonnaded entrance and expressed core present distinctive, welcome features that add legibility to the architecture and townscape, although their contribution will depend on the quality of detailing and material finishes, as will that of the scheme itself. The functional quality is similarly high. The designs respond well to the surrounding contexts and provide sufficient visual interest to the main elevations fronting the highways, but also at the rear providing additional soft landscaping and improved architectural design comparative to the existing office building.
79. It is recommended that a material schedule and sample panels to be presented on site be secured via planning condition to ensure that the building materials respond positively to the surrounding context and to achieve a high quality finish, and that detailed plans and sections through the elevations (incl. core) are similarly submitted by condition for confirmation. As such, the designs present a notable improvement in architectural quality compared to the existing building(s), and as such, is welcome, meeting the design requirements of policy P14.

### Urban design conclusion

80. The scheme is well conceived and its architecture is well composed, providing a high standard of design and materials (subject to conditions). The elevations have a modern, engaging character that should bring a distinctive architecture to the wider street block. The additional height proposed is evident and whilst it contrasts with the immediate mid-rise neighbours at the junction of Southwark Street/ Southwark bridge Road, it is comfortably scaled within the wider townscape; particularly given the backdrop of Bankside OneTwoThree and other large buildings further along Southwark Street to the west. Furthermore, it maintains the visual coherency of the townscape within Southwark Bridge Road. Its scale, stepped roof profile and detailed design of the ground floor combine well to form a suitably restrained landmark building within its local context, whilst the site layout and design of its colonnaded entrance provide for an improved public realm and with good activation and animation of the street scene.
81. The scheme has no impact on protected views and has limited impact on the settings of heritage assets, generally due to the site's orientation and the intervening distance. There is harm to the setting of the Thrale Street CA caused by the visual intrusion of the distinctive lift overrun within the roofscape. However,

the harm is less than substantial and of a distinctly minor order, and should be balanced by the planning benefits of the scheme.

82. Overall, the proposed design approach is welcome, satisfying the requirements for a high quality architecture and urban design and those for a tall building. Subject to detailed conditions, the application is supported on design grounds.

### **Landscaping, urban greening and biodiversity**

83. Policy G5 of London Plan requires major application proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design. Paragraph 8.5.2 of the policy emphasises the benefit of urban greening on amenity, particularly in the most densely developed parts of the city where traditional green space is limited.
84. The site, at present, is all hard surface and scores an Urban Greening Factor (UGF) of 0. Redevelopment of the site would offer an opportunity to enhance biodiversity and ecological resilience on site. The proposal would be in compliance with the policy target to achieve an UGF score of 0.3 through the following measures:
- Intensive green roofs with substrate minimum settled depth of 150mm;
  - Climbers rooted in soil on sixth floor; and
  - Permeable gravel and concrete paving on pedestals with a blue roof below.
85. The council's ecologist is satisfied that no further surveys are required. The application would achieve a minimum Biodiversity Net Gain (BNG) of 200%, which far exceeds the recommended 10% uplift. Habitat types that are proposed include green roof, planters and sustainable urban drainage features. The biodiversity mitigation strategy as set out in the BNG report, and monitoring would be secured through planning condition. This will assist in refining the net gain design and mitigation to ensure that effective measures are delivered for future development.
86. Planning conditions are also recommended to secure details of the green roofs, 12 swift bricks, 6 invertebrate habitats, and a landscape management plan for the vertical greening, roof terraces, landscaping and ecological features.
87. The application proposes to retain the existing street trees on Southwark Street that are managed by TfL. An Arboricultural Method Statement is recommended to be secured through planning condition for pruning requirements and to protect the trees during the demolition and construction phase of development, in accordance with London Plan Policy G7 and Southwark Plan Policy P61.

### **Designing out crime**

88. A Crime Prevention Statement has been submitted setting out the measures that have been incorporated for this development to create a safe and secure environment in accordance with Southwark Plan Policy P16 and London Plan



Policy D11. This includes measures such as on site security and operational management teams, good natural surveillance, CCTV, lighting, and intruder alarm systems. Access into the building would be controlled and there would be a dedicated cycle entrance and a service yard entrance. The Metropolitan Police Designing Out Crime Officer has reviewed the submission, confirming that there have been discussions with the applicant's team on design requirements and recommendations for this development. A planning condition is recommended to require Secured By Design security measures to be implemented and to seek accreditation for this.

## **Fire safety**

89. Policy D12 of the London Plan (2021) requires all major development to submit a Fire Statement, addressing all criteria outlined by the policy. Paragraph 3.12.9 of Policy D12 explains that Fire Statements should be produced by someone who is "third-party independent and suitably-qualified". The council considers this to be a qualified engineer with relevant experience in fire safety, such as a chartered engineer registered with the Engineering Council by the Institution of Fire Engineers, or a suitably qualified and competent professional with the demonstrable experience to address the complexity of the design being proposed. This should be evidenced in the fire statement. The council accepts Fire Statements in good faith on that basis. The duty to identify fire risks and hazards in premises and to take appropriate action lies solely with the developer.
90. A Fire Statement has been submitted which was prepared by a suitably qualified third-party assessor, Affinity Fire Engineering. The statement provides details relating to means of escape and evacuation strategy, features that reduce the risk to life, access for fire service personnel and equipment, and provision for fire appliances.
91. The applicant submitted an updated Fire Statement to also address the GLA Stage 1 report, which highlighted that the statement lacked detail in relation to building construction and ensuring that potential future building modifications would not compromise fire safety and protection measures. In addition, further assessment was requested for fire risk associated with green infrastructure to prevent the use of combustible materials on external elevations.

## **Heritage**

92. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to consider the impacts of proposals upon a conservation area and its setting and to pay "special regard to the desirability of preserving or enhancing the character or appearance of that area". Section 66 of the Act also requires the Authority to consider the impacts of a development on a listed building or its setting and to have "special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses". The NPPF (2023) provides guidance on how these tests are applied, referring in paras 199-202 to the need to give great weight to the conservation of the heritage asset (and the more important the asset, the greater the weight); evaluate the extent of harm or loss of its significance; generally refuse consent where the harm is substantial; and, where necessary, weigh the harm against the public benefits of the scheme. Para 203

goes on to advise taking into account the effect of a scheme on the significance of a non-designated heritage asset.

93. The site is not within a conservation area and there are no listed buildings within or adjoining this site. However, the east side of Southwark Bridge Road forms the boundary of the Thrale Street conservation Area (CA), which is centred on nearby Thrale Street and wraps southwards to include the corner buildings on the south side of Southwark Bridge Road opposite the site. The nearby railway bridge marks the northern boundary of the Union Street CA, which is 80m south of the site. Beyond these, the Borough High Street CA is 200m to the east and Bear Gardens CA is 170m to the north. The nearest listed buildings are c.100m from the site and include no.55-59 Thrale Street, 49 and 51-53 Southwark Street to the east; 52 Southwark Bridge Road to the south; and Anchor Terrace in Southwark Bridge Road to the north. All are statutory Grade II listed. Anchor Terrace is also notable for sitting above the original Globe Theatre, a scheduled monument.
94. The applicant has prepared a Heritage Statement to assess the impact on the proposed development on the surrounding heritage assets, in accordance with the NPPF, London Plan Policies HC1, D3 and DP, and Southwark Plan Policies P19, P20 and P21. This has been updated in response to the GLA Stage 1 report, in relation to assessing harm to the Thrale Street CA.
95. Overall, it is agreed that the proposed development would not harm the settings and significance of nearby listed buildings, and for the most part would preserve and enhance the character and appearance of the nearby conservation areas. In terms of the scheduled monument, the remains of the Globe are below ground and, whilst the proposals include basement excavation works, the application site is sufficiently remote from the monument to have no direct effect. Regarding the listed buildings, when looking directly at the heritage assets, the application building is located either at a sufficient distance or orientated away from the site not to intrude in the immediate backdrop to the listed building. Where visible, it is seen some way to one side of the heritage asset and its ordered architecture and neutral colours ensure that its appearance is not visually disruptive (e.g., views #1.2-1.3, #1.5-1.7).
96. Looking at the conservation areas, Bear Gardens CA and Borough High Street are sufficiently distant not to be unduly affected by the proposals, given the urban grain and mid-rise scale of the intervening building context. The main conservation area affected is the adjacent Thrale Street CA. Its significance is as a notable example of a 19th century townscape, characterised by grand industrial and commercial buildings of Southwark Street and Southwark Bridge Road, and contrasting simpler domestic character of 18th Century Thrale Street. The former features heavily articulated buildings typically of four to six storeys, with a consistent building line, which provides containment to the street and ensures a strong street frontage. This contrasts with the smaller scale and pared back domestic quality of the three storey 18th century terraced houses in Thrale Street, with their narrow frontages. The key views are the principal roads of Southwark Street and Southwark Bridge Road, and along Thrale Street.
97. The submission includes verified townscape views within each of the three street scenes, demonstrating how the development would sit within each. Views #1.8

and #1.9 along Southwark Bridge Road show the replacement of the outdated, generic office building with a building of higher architectural quality. Whilst the development is taller and includes the distinctive core popping up in the townscape, the street frontage provides a consistent façade line and overt shoulder height, maintaining a sufficiently balanced enclosure of the townscape. As such, the setting remains unaffected in these views and the character and appearance of the conservation area is preserved.

98. In view #1.3, looking west along Thrale Street, the period domestic building line both sides of the street, with the current building terminating the view. The current building sits relatively quietly, although its exposed rooftop plant clutters the roofscape and Blackfriars One is notable in the backdrop. Although taller, the replacement building nonetheless remains well-scaled in this view, its shoulder height aligning with those of the period properties in the foreground. Its elevations have a different, more modern office aesthetic that remain sufficiently calm and well-ordered, resulting in a coherent townscape. The rooftop plant is pushed to one side and enclosed, providing a tidier roofscape, with Blackfriars One slightly more evident. Although the improvements are welcome, the effects on the setting and heritage significance are marginal, preserving the character and appearance of the adjacent conservation area.
99. The main change is seen within Southwark Street, although more notably looking westwards out of the conservation area (views #1.1 and #1.2) rather than eastwards into the conservation area (view #1.4). In the westward views, the consistent building line and strong parapet line formed by the period properties on the north side of Southwark Street (nos.44/46-56/58) are evident, as are their decorative facades. The current building is glimpsed, below parapet level.
100. In view #1.1, the new development reads continuous with the building line of the historic context, whilst the building's 6-storey shoulder height with its light colour respond to the datum height set by the strongly expressed parapets of the period properties. The proposed uppermost (7th and 8th) storeys are evident above this, whilst the core overrun is also glimpsed, presenting an element of high-level massing, albeit its muted colour tones and finer-grained appearance help to ease the impact, blending to a degree within the current mansarded roof forms. Nonetheless, an element of rooftop bulk remains, intruding within the roofscape. Their presence is more pronounced closer-by (view #1.2), with the additional scale and stepped roof profile more evident at the end of the terrace. At this point, however, the stacked mansard roof form of Pentagon House (no.52-54) can be seen, as can the junction with Southwark Bridge Road, with the proposed development reading more as part of a separate street block. On balance, the high-level bulk remains, adding clutter and detracting from the roofscape, causing a degree of harm to the setting and this view of the conservation area. The harm is less than substantial and of distinctly low order, and can be weighed against the planning benefits of the scheme, including the building's improved architectural qualities.
101. Looking briefly at the Union Street CA, the development will be seen from its sub-area #5, in Southwark Bridge Road, south of the railway bridge. Its heritage significance is derived from the terraces of mid-19th century domestic houses that sit on the back edge of the pavement and follow the roadway as it bends; and the alignment of their roofline parapets, cornices and storey heights; and

their repetitive vertical fenestration. The view northwards along the main road is mainly contained by the railway bridge that closes the view, with the larger-scale context of Southwark Street and Southwark Bridge Road (north) seen beyond. In view #1.5, at Marshalsea Road, the wireline shows the building will appear beyond the railway bridge, but as part of the backdrop of buildings that includes Bridge Court (nos.73-81) Southwark Bridge Road) and No.1 America Street near the junction with Southwark Street, appearing similar in height in this perspective. The building's corner architecture and core overrun will be visible, providing something of a local landmark, although its lighter, more delicate appearance will not detract from the heavy cast-iron architecture of the railway bridge in the foreground. Further northwards, the building is largely obscured by the local context, with its distinctive overrun lost within the fretwork of the bridge itself (View #1.6). Overall, the development will have little impact on the setting, preserving the character and appearance of the conservation area.

102. In conclusion, despite the increase in scale, the development would have limited impact the historic environment, being outside the viewing corridors or below the general threshold levels of protected strategic and borough views, or sufficiently distant and distinct from the settings of the nearest listed buildings and wider conservation areas. However, it will be present in views from the adjacent Thrale Street conservation area, albeit for the most part its visibility will not affect the heritage setting. The exception is in Southwark Street, looking westwards, where it presents an element of high-level bulk that is marginally harmful. Overall, the development accords with heritage policies P.19 and P.21 of the Southwark Plan, but does not fully comply with policy P.21 and P13(2) in terms of its impact on the Thrale Street conservation area. The harm, however, is of low order and, in accordance with the NPPF, should be considered against the planning benefits of the scheme, including the highly architectural quality of the replacement building.

## **Archaeology**

103. The site is located within the North Southwark and Roman Roads Tier 1 Archaeological Priority Area (formerly known as Borough, Bermondsey and Rivers Archaeological Priority Zone), where is known, or strongly suspected, to contain heritage assets of national importance. A desk based assessment and supplementary deposit model has been submitted to enable consideration of the potential of the site. There are clear impacts upon buried archaeological remains from the present structure, which includes multiple basement depths. At the corner of Southwark Street there is potential for surviving archaeological materials and below Southwark Bridge Road block four truncated remains of roman channel management and the lower levels of land reclamation dumps and structures. In other areas of the site, geo archaeological material may also survive.
104. The Archaeologist has requested early consideration to determine how to investigate and record any archaeological remains that would be removed by the proposed development. They consider that these remains are likely to survive below the current basements and their evaluation and subsequent mitigation

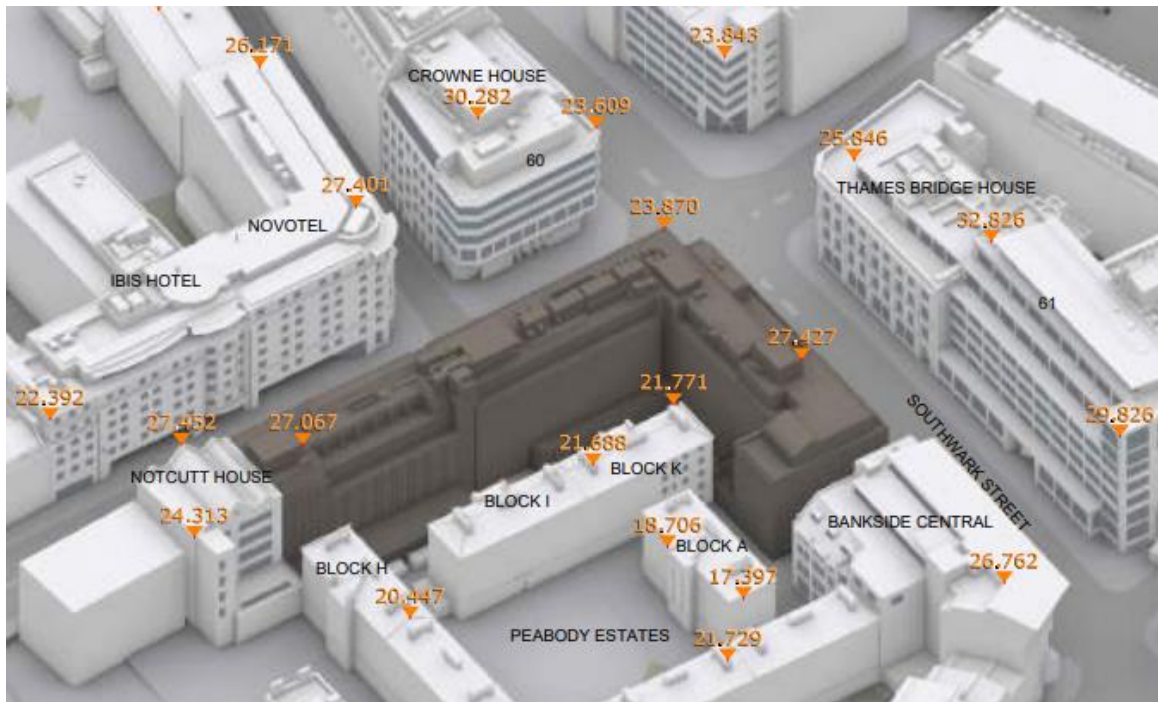
should be programmed in construction of the scheme. Therefore, planning conditions are recommended to carry out archaeological evaluation, mitigation and reporting. A financial contribution of £11,171 would also be sought through the S106 agreement to support the council's effective monitoring of archaeological matters.

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

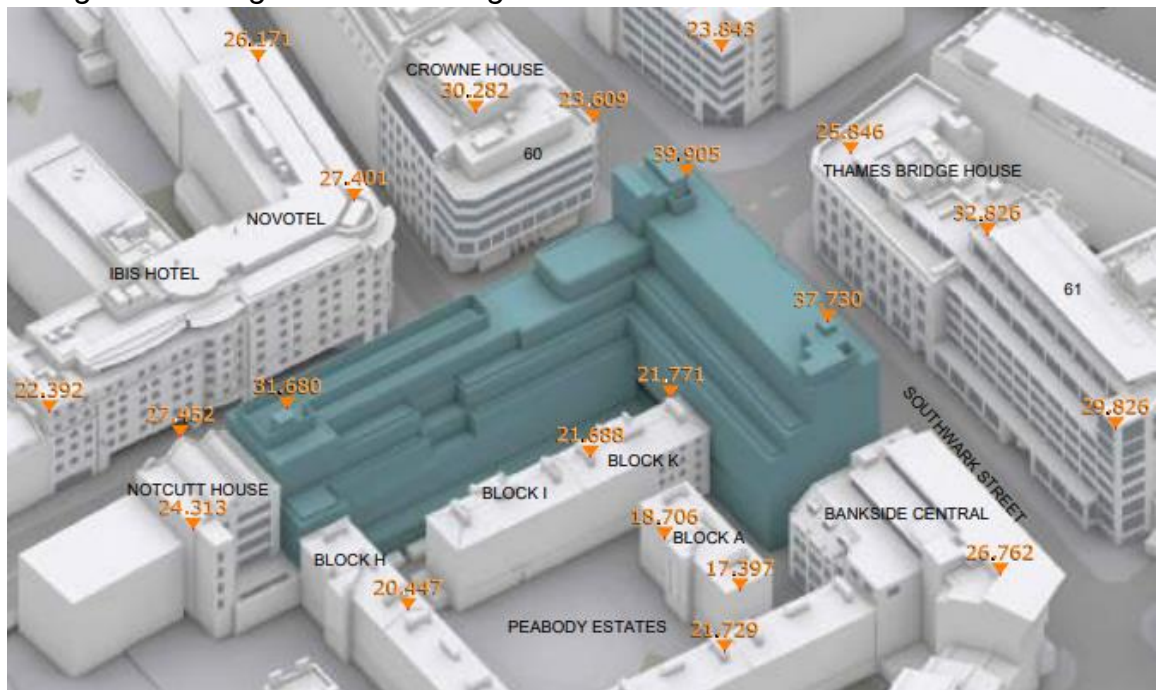
105. The Southwark Plan Policy P56 states that development should not be permitted where it would cause an unacceptable loss of amenity to existing or future occupiers. Amenity considerations to be taken into account include outlook, privacy, actual or sense of overlooking or enclosure, daylight and sunlight, nuisances such as smell, noise, vibration and lights, and the residential layout, context and design. These are assessed below and in the Environmental matters section of this report. Southwark's adopted 2015 technical Update to the Residential Design Standards SPD 2011 provides further guidance on protecting residential amenity.

#### Outlook and sense of enclosure

106. The existing building rises up ground plus five storeys onto Southwark Bridge Road and ground plus four storeys onto Southwark Street (with fifth storey set back). The proposed development would increase the maximum height on these elevations. The lift overrun on the corner junction of Southwark Bridge Road and Southwark Street would extend to 39.905 metres AOD at the tallest part. These building heights are similar to existing heights of surrounding buildings fronting Southwark Bridge Road and Southwark Street. Overall, the proposed height would not have an unacceptable impact on the amenity of these neighbouring buildings in terms of outlook and sense of enclosure.



*Image 5: Existing 3D View looking southeast.*



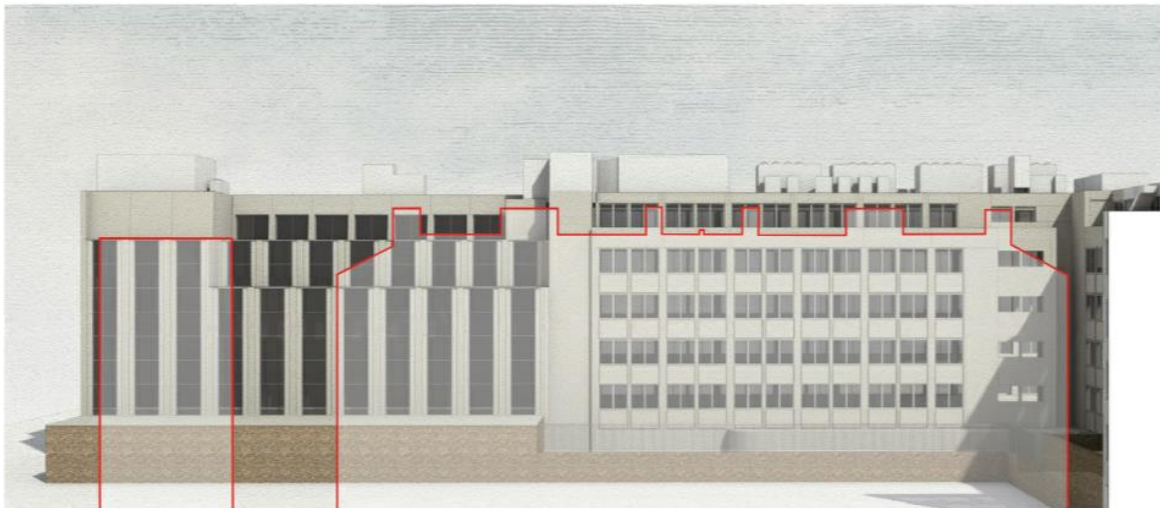
*Image 6: Proposed 3D View looking southeast.*

107. There is an existing close relationship with residential blocks in the Peabody Estate at the rear of the application site, in particular blocks A, H, I and K annotated on the image above. Residents have raised concern with the proposed development in relation to loss of privacy and increased overlooking and sense of enclosure.
108. To the rear of the Southwark Street arm, there would be no change to the building line of the existing building facing block A, maintaining a window-to-window distance of 7.5 metres. The additional height and massing on this elevation would change the outlook for these residents. This impact would be reduced by a set



back of the additional height at the upper-levels. Overall, it is considered that the proposed development would not have an unacceptable loss of the outlook or sense of enclosure for neighbouring residents for block A.

109. To the rear of the Southwark Bridge Road arm, the existing building is set back from the site boundary with no windows at ground floor and a window-to-window distance of approximately 13.75 metres between the upper floors and the neighbouring residential blocks. The new building would introduce additional height on this elevation. In addition, it would sit closer to these residential blocks at first, second and third floor by approximately 2.3 metres. The window-to-window distance here would be reduced to approximately 11.5 meters. At ground floor, this elevation is bounded by a 4-metre brick wall and railings that are to be retained. The ground floor of the main building would extend to this boundary wall and sit 1 metre higher than the existing wall. Overall, the additional height and reduced separation distance at first to third floors of this elevation would affect the sense of enclosure and outlook for existing neighbouring residents.



*Image 7: Illustrative drawing of the existing west elevation showing Blocks K and I (right), and Block H (left) in red outline.*

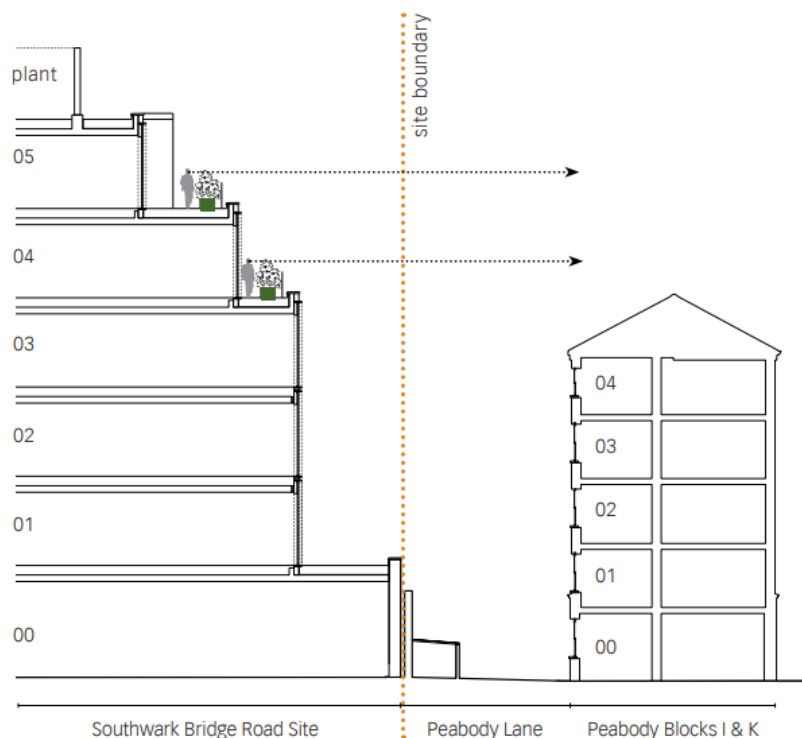


*Image 8: Illustrative drawing of the proposed west elevation showing Blocks K and I in red outline.*

110. This impact would be reduced by the soft planting and greening proposed on the rear elevations that would provide an improved outlook and design quality comparative to the existing building. The setback on the upper-levels from fourth to sixth floor would also reduce the sense of enclosure from additional height. Therefore, it is considered that the proposed development on would not have an unacceptable loss of the outlook or sense of enclosure for neighbouring residents for blocks K, I and H.

### Privacy and overlooking

111. The separation distance to buildings to the east (49-51 and 69 Southwark Bridge Road) and south (59 and 69 Southwark Street) of the proposed development exceed the minimum 12-metre requirement set out in the Residential Design Standards SPD, for buildings facing each other across a highway. Therefore, the proposed development would not result in an unacceptable loss of privacy or overlooking for these neighbouring developments on the opposite sides of Southwark Street and Southwark Bridge Road.
112. 76-80 Southwark Street sits immediately to the west of the proposed development. It currently has obscure windows on the side elevations that face the development with a 6-metre window-to-window separation. Planning permission has also been granted for 4 windows on this elevation to be re-opened up in the future. While there would be some overlooking impact here, the office use of these two building and their existing close relationship means that there would not be an unacceptable loss of privacy for 76-80 Southwark Street.
113. For Peabody blocks H, K, and I, the proposed development would not introduce any windows at ground level. As set out above, at first to third floors the window-to-window distance would be reduced to 11.5 meters, approximately 2.3 metres closer than the existing building elevation. This falls below the minimum 21-metre requirement set out in the Residential Design Standards SPD. Therefore, mitigation is required to reduce impacts of overlooking and loss of privacy for the existing residents. The application does not propose any accessible outdoor terraces at first to third floor and windows at this level would be translucent glass to prevent overlooking. The accessible terraces on the upper storeys would have linear planters along the edges to prevent overlooking as shown on the section drawing below.

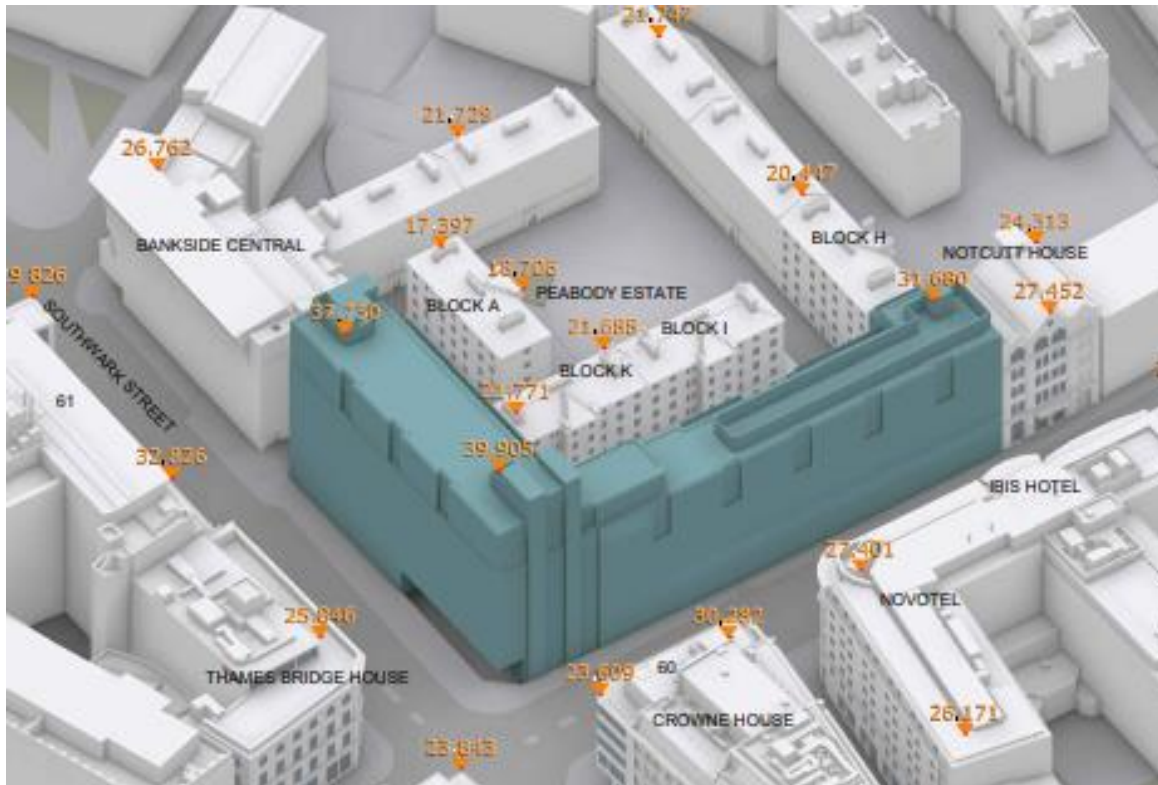


*Figure 9: Proposed rear elevation fronting blocks I & K, showing amenity terraces at fourth floor upwards*

114. A planning condition is recommended restricting the use of terraces to be limited to between the hours of 09:00-20:00, from Monday to Friday excluding bank holidays, with no exceptions for special events or occasions. This would minimise disturbance and protect privacy for the neighbouring Peabody residents.
115. With these measures in place, it is considered that the development would not have an unacceptable impact in terms of loss of privacy and overlooking for the residents in blocks I, K and H. This is subject to planning conditions being applied to secure obscure glazing for windows, buffer planting and restricted operational hours of the accessible outdoor terraces.
116. For block A, there would be no change in the window-to-window distance of 7.5 metres comparative to the existing building. It is recommended that privacy should be maintained on this elevation through a planning condition to secure obscure windows for proposed windows facing block A.
117. Given the existing close relationship with the neighbouring residential blocks, and the site location in a high-density urban area; amenity impact on neighbouring residents is unavoidable for any re-development on this site that increases floor area. It is also considered that the proposed development would sufficiently mitigate against any unacceptable impact in terms of privacy and overlooking. The use of planning conditions to restrict hours of use and require obscure glazing and planting provides greater control of privacy comparative to the existing building, should this be re-occupied for office use in its current form.

## Daylight and sunlight

118. Local residents have objected to the loss of light resulting from the proposed development. They have also raised that the assessment is based on a number of assumptions and that kitchens should be included as habitable rooms in the assessment. An addendum daylight/sunlight letter has been submitted in response, setting out the steps taken by the applicant's consultant to assess daylight and sunlight, in accordance with BRE Guidance 2022. They confirmed that for the Peabody Estate blocks, room layouts were informed by historic plans alongside a survey of two flats that they were able to gain access to in Block J in June 2022
119. Overall, the proposed development would have some impact in terms of a noticeable loss of daylight for 57 windows and 49 rooms. Of these, 5 windows and 6 rooms would experience a major impact (more than a 40% reduction) in accordance with BRE Guidance. This impact is assessed in detail in the following section of this report.
120. The London Plan Policy D6 states that the design of development should provide sufficient daylight and sunlight to new and surrounding houses that is appropriate for its context. London Plan Policy D9 requires daylight and sunlight conditions around the building and surrounding area to be considered for developments proposing tall buildings. Southwark Plan Policy P14 sets out that development should provide adequate daylight and sunlight conditions for new and existing residents. Southwark Plan Policy P56 sets out that development should not be permitted where it causes is an unacceptable loss of amenity to occupiers, including daylight and sunlight.
121. The above policies do not include prescriptive standards to define unacceptable loss of daylight and sunlight. However, the BRE 'a guide to good practice' (updated 2022) is a widely accepted and used guidance document for advising on good sunlight and daylight in the United Kingdom. It is intended to be applied flexibility and does not set mandatory targets. The guide acknowledges that in a historic city centre or an area with modern high-rise buildings, a higher degree of obstruction may be unavoidable, if new developments are to match the heights and proportion of existing buildings.
122. A daylight and sunlight report has been submitted to assess daylight and sunlight impact on existing neighbouring buildings, in accordance with the 2022 BRE guidance. The report considers impacts on residential blocks A, H, I and K of the Peabody Estate, the Ibis hotel and the Novotel hotel.



*Image 10: Proposed development highlighted blue and surrounding properties.*

123. The report applies the vertical skyline test (VSC) and the no skyline test (NSL) methodologies to assess the impact of the proposed development on daylight levels for these neighbouring properties. The annual probable sunlight hours (APSH) test is applied to assess the impact on sunlight levels.

### Daylight assessment

124. VSC is the most readily adopted methodology for assessing daylight levels. The test calculates the total amount of skylight at the centre of each main window on the neighbouring properties excluding windows for bathrooms, toilets, storeroom, circulation areas and garages. The target daylight level is recommended to be 27%, which is good level of daylight. The BRE guide recommends that reductions below this level should be kept to a minimum. If daylight levels are less than 27% and less the 0.8 times the former value prior to the new development, occupants of the existing building will notice a reduction for skylight with the new development in place.
125. Where room layouts are known, the NSL test can also be applied to assess daylight distribution in rooms of existing neighbouring buildings. This identifies areas in a room that can and cannot see the sky. Areas of a room where no skyline can be seen receive no direct daylight. The BRE guide recommends that if the area of a the room receiving direct daylight is reduced to less than 0.80 times its former value prior to the new development, occupants will notice a change in direct daylight and more of the room will appear poorly lit.
126. The assessment results are summarised in the tables below.

Address	Total windows assessed	Meet BRE guide (No noticeable change)	Below BRE criteria			Total windows affected
			20-29.9% reduction (Minor)	30-39.9% reduction (Moderate)	>40% reduction (Major)	
Ibis Hotel	75	68	7	0	0	7
Novotel	93	72	21	0	0	21
Peabody Block A	39	29	7	3	0	10
Peabody Block I	30	8	22	0	0	22
Peabody Block K	41	16	10	10	5	25
Peabody Block H	34	34	0	0	0	0

*Table 1: Summary of Vertical Sky Component calculations for the reduction in daylight to windows resulting from the proposed development*

Address	Total rooms assessed	Meet BRE guide	Below BRE criteria			Total affected rooms
			20-29.9% reduction (Minor)	30-39.9% reduction (Moderate)	>40% reduction (Major)	
Ibis Hotel	60	39	8	4	9	21
Novotel	80	50	5	10	15	30
Peabody Block A	30	22	3	4	1	8
Peabody Block I	25	2	12	8	3	23
Peabody Block K	35	17	10	6	2	18

*Table 2: Summary of Daylight Distribution (No Sky Line) calculations for the reduction in daylight to rooms resulting from the proposed development.*

127. **Ibis and Novotel hotels:** The Ibis and Novotel are commercial buildings to the east of the proposed development fronting Southwark Bridge Road and Thrale Street. The assessment results show a minor impact on daylight levels for a proportion of windows serving hotel rooms in addition to minor, moderate and major impacts on daylight distribution for just over a third of hotel rooms. This impact is less sensitive due to the intended use of hotels for temporary overnight accommodation; therefore, the expectation for daylight is less important than conventional residential buildings. Notwithstanding this, the impact of loss of daylight for these commercial hotel buildings must be balanced against the benefits of the proposed development.
128. **Peabody Block A:** This residential building faces towards the rear of the Southwark Street arm of the proposed development and there is an existing close 7.5-metre separation distance between the buildings. Currently only 3 of Block A's windows (W3, W4 and W8 on the fourth floor) exceed daylight level of more than 27%.



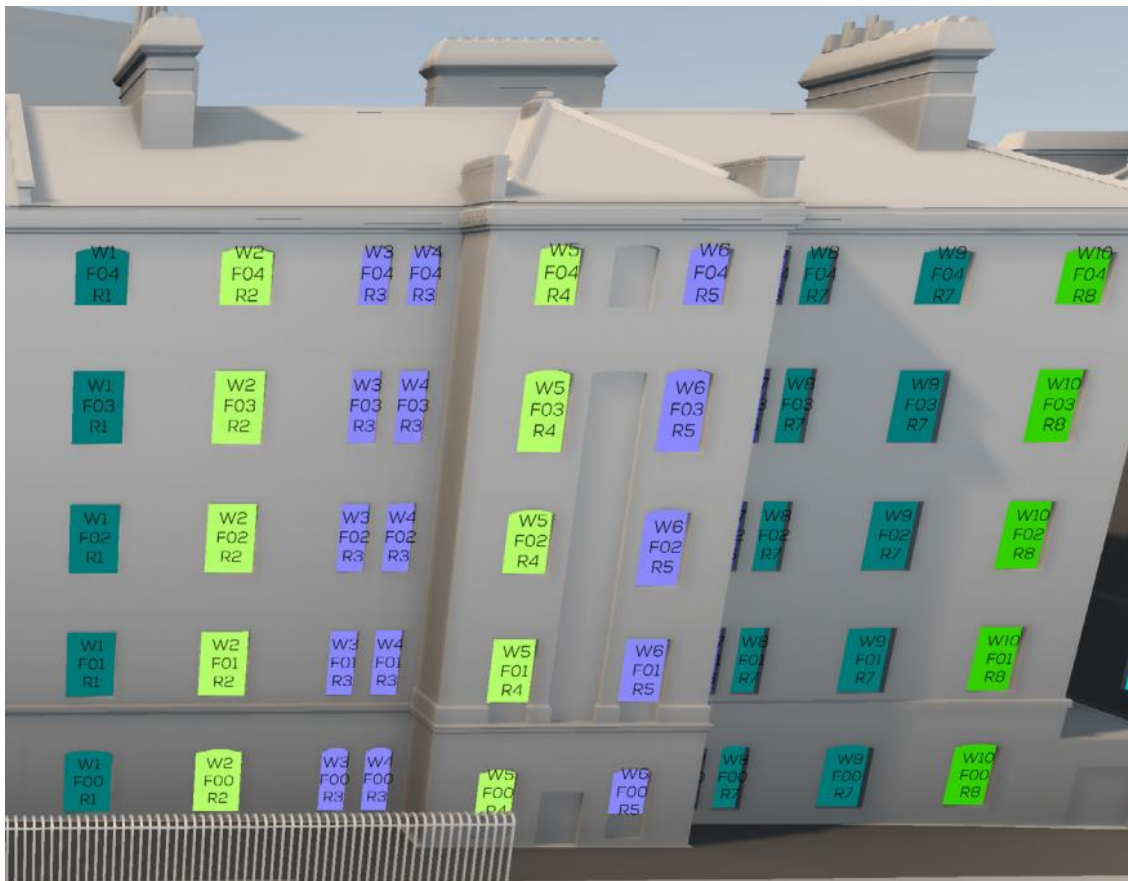


*Image 11: Block A windows facing south towards the Southwark Street arm of the proposed development.*

129. The VSC assessment shows that with the new development in place, the following windows would experience a noticeable loss of daylight:
- Ground floor W8 (minor reduction) serving a bedroom
  - First floor W7 (minor reduction) serving a bedroom
  - Second floor W6 (minor reduction) serving a kitchen
  - Second floor W7 (minor reduction) serving a bedroom
  - Third floor W6 (minor reduction) serving a kitchen
  - Third floor W7 (moderate reduction) serving a bedroom
  - Fourth Floor W4 (minor reduction) unknown floorplan
  - Fourth Floor W5 (minor reduction) unknown floorplan
  - Fourth Floor W6 (moderate reduction) serving a kitchen
  - Fourth Floor W7 (moderate reduction) serving a bedroom
130. Window W8 at ground floor is understood to be the only window that serves bedroom R7. The existing VSC and direct daylight coverage for this window and room is low. Therefore, daylight to this room is already limited. It is anticipated that the room would experience a minor noticeable loss daylight with the new development in place. Given the room is at ground floor level and enclosed by the application site to the south and block K to the east, an impact on daylight levels would be expected with any development of this site. This impact must be balanced against the benefits of the proposed development.
131. Windows W7 at first to fourth floor all serve bedrooms, which are BRE compliant for NSL. These rooms are also served by windows W8, which are BRE compliant for VSC. Therefore, the rooms should not experience a noticeable loss in daylight.
132. Windows W6 at second to fourth floor all serve kitchens. The kitchens at second

and third floor would experience a moderate loss of direct daylight NSL. The kitchen at fourth floor would experience a major loss of direct daylight NSL. These kitchens are therefore likely to experience a noticeable loss of daylight. The use of these rooms as kitchens and not the main living spaces reduces the sensitivity of this impact. Notwithstanding this, there is an impact in particular for the kitchen at fourth floor, likely due to the additional height proposed by the new development.

133. The room use for windows W4 and W5 at fourth floor is unknown; however, the room is served by both windows and is BRE compliant for NSL. Therefore the room should not experience a noticeable loss in daylight overall.
134. **Peabody Block I:** This residential building faces towards the Southwark Bridge Road arm of the development and there is existing close relationship between these buildings. Currently no windows exceed a daylight level of more than 27%. The new development would move approximately 2.3 metres closer to Block I at first to third floor. The building height would also increase, albeit the upper floors are set back away from Block I.



*Image 12: Block I windows facing west toward the Southwark Bridge Road arm of the proposed development.*

135. The VSC assessment shows that with the new development in place, the following windows would experience a noticeable loss of daylight:
  - Ground Floor
  - W1 (minor impact) serving a bedroom
  - W2 (minor impact) serving a kitchen
  - W5 (minor impact) serving a kitchen

- W8 (minor impact) serving a bedroom
- W9 (minor impact) serving a bedroom
- W10 (minor impact) serving a living room

#### First Floor

- W5 (minor impact) serving a kitchen
- W8 (minor impact) serving a bedroom
- W9 (minor impact) serving a bedroom
- W10 (minor impact) serving a living room

#### Second Floor

- W5 (minor impact) serving a kitchen
- W8 (minor impact) serving a bedroom
- W9 (minor impact) serving a bedroom
- W10 (minor impact) serving a living room

#### Third Floor

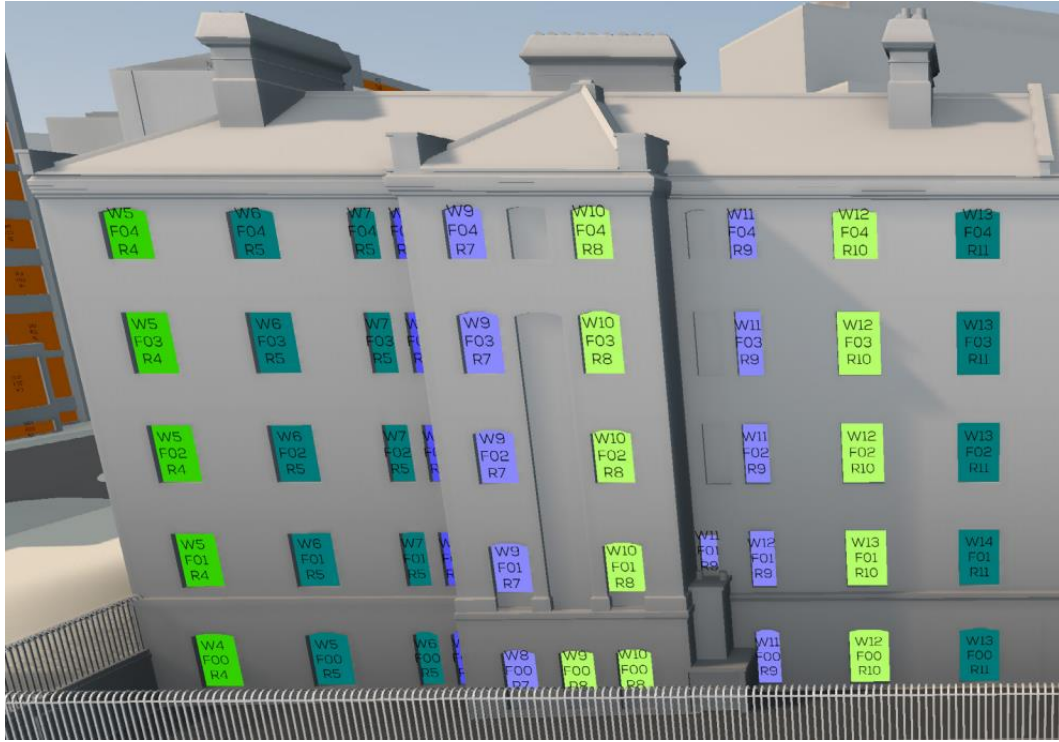
- W5 (minor impact) serving a kitchen
- W8 (minor impact) serving a bedroom
- W9 (minor impact) serving a bedroom
- W10 (minor impact) serving a living room

#### Fourth Floor

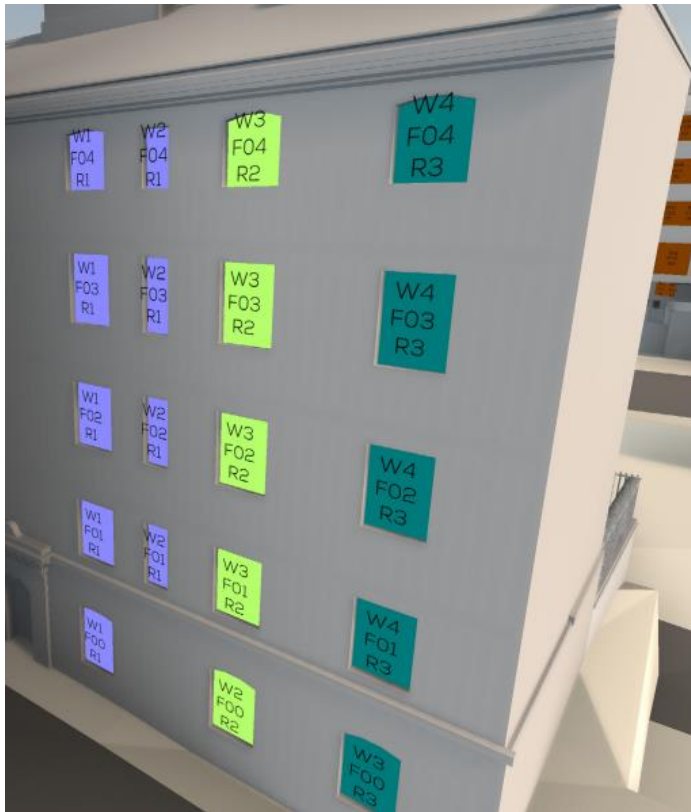
- W5 (minor impact) serving a kitchen
- W8 (minor impact) serving a bedroom
- W9 (minor impact) serving a bedroom
- W10 (minor impact) serving a living room

136. W1 and W2 at ground floor serve a bedroom and kitchen, which are both BRE compliant for NSL. Therefore, the rooms should not experience a noticeable loss of daylight overall.
137. Across all floors, windows W5 serve kitchens that would experience a minor (ground to second) or moderate (third and fourth) reduction in direct daylight for NSL. Across all floors, windows W8 and W9 serve bedrooms that experience a minor reduction in direct daylight (ground and second floor), a moderate reduction in daylight (first and third floor) and a major reduction in direct daylight (fourth floor) for NSL. Across all floors, windows W10 serve living rooms that also experience a moderate reduction in direct daylight (ground to second floor) and a major reduction in direct daylight (fourth floor) for NSL. Overall, these kitchens, bedrooms and living rooms would therefore experience a noticeable loss of daylight with the new development in place. The affected rooms (R4, R10, and R7) are not located adjacent to one another, therefore suggested that they do not serve living, kitchen and bedrooms of the same flats. Notwithstanding this, the impact is noticeable for the individual rooms in particular the rooms at fourth floor likely due to the additional height proposed by the new development. This must be balanced against the benefits of the proposed development.
138. Across all floors, bedrooms R1 would experience a minor or moderate loss of direct sunlight NSL however; windows W1 that serve these bedrooms are BRE compliant for VSC. Similarly, kitchens R2 at first floor and second floor are served by windows W2, which are BRE compliant for VSC.

139. **Peabody Block K:** This residential building adjoins the southern side of block I. It is enclosed by the proposed development to the south and east, and block A to the west. Currently no windows exceed a daylight level of more than 27%. As mentioned, the new development would move approximately 2.3 metres closer to Block K at first to third floor. The building height would also increase, albeit the upper floors are set back away from Block K.



*Image 13: Block K windows facing east towards the Southwark Bridge Road arm of the proposed development.*



*Image 14: Block K windows facing west towards Block A*

140. The VSC assessment shows that with the new development in place, the following windows would experience a noticeable loss of daylight:

#### Ground Floor

- W4 (major impact) serving a living room
- W5 (moderate impact) serving a bedroom
- W6 (moderate impact) serving a bedroom
- W9 (minor impact) serving a kitchen
- W10 (minor impact) serving a kitchen
- W12 (minor impact) serving a kitchen
- W13 (minor impact) serving a bedroom

#### First Floor

- W5 (major impact) serving a living room
- W6 (moderate impact) serving a bedroom
- W7 (moderate impact) serving a bedroom
- W10 (minor impact) serving a kitchen
- W13 (minor impact) serving a kitchen

#### Second Floor

- W5 (major impact) serving a living room
- W6 (moderate impact) serving a bedroom
- W7 (moderate impact) serving a bedroom
- W10 (minor impact) serving a kitchen

#### Third Floor

- W5 (major impact) serving a living room
- W6 (moderate impact) serving a bedroom

- W7 (moderate impact) serving a bedroom
- W10 (minor impact) serving a kitchen

#### Fourth Floor

- W4 (minor impact) serving a bedroom
- W5 (major impact) serving a living room
- W6 (moderate impact) serving a bedroom
- W7 (moderate impact) serving a bedroom
- W10 (minor impact) serving a kitchen

141. W4 at ground floor is the only window serving living room R4. This room would experience a moderate reduction in direct daylight levels for NSL. Window W5 and W6 at ground floor both serve bedroom R5. This room would experience a minor reduction in direct daylight levels for NSL. Windows W9 and W10 at ground floor both serve kitchen R8. This would experience a minor reduction in daylight levels for NSL. Given these rooms are at ground floor level and enclosed by the application site to the south and east, an impact on daylight levels is not unexpected in an urban context. This impact must be balanced against the benefits of the proposed development.
142. Window W5 at first to fourth floors serve living rooms R4. The rooms experience a moderate or major loss of direct daylight for NSL. Similarly, windows W6 and W7 across first to fourth floors serve bedrooms R5. The rooms experience a minor or moderate loss of direct daylight for NSL. Windows W10 and W13 at first floor each serve a kitchen. One of these kitchens is BRE compliant for NSL and the other would experience a minor loss in direct daylight for NSL (Room R10). Windows W10 at second to fourth floors serve kitchens R8 that would experience a minor or moderate loss of direct daylight for NSL. As set out above, the positioning of this block means that an impact is not unexpected and this must be balanced against the benefits of the proposed development.
143. Moreover, as set out in the earlier section of this report, the new development provides opportunity to improve outlook for residents comparative to the existing building. This is achieved through high quality architectural design and soft landscaping. This is visible in images 15 and 16 below.





*Image 15: Illustrative existing outward views from ground floor of block K.*



*Image 16: Illustrative proposed outward views from ground floor of block K.*

144. Window W4 at fourth floor serves a bedroom that is BRE compliant for NSL. Therefore, the rooms should not experience a noticeable loss of daylight overall. Similarly, windows W12 and W13 serve a kitchen and bedroom at ground floor. These rooms are both BRE compliant for NSL, therefore, occupiers should not

experience a noticeable loss of daylight overall

145. Room R10 at third and fourth floor and Room R11 at fourth floor are kitchens that would experience a minor loss of direct sunlight NSL however; the windows W12 and W13 that serve these kitchens are BRE compliant for VSC. Therefore, the rooms should not notice a noticeable loss of daylight overall.

### Sunlight conclusions

146. For assessing loss of sunlight, the APSH test can be applied to assess the long-term average of total number of hours during a year in which direct sunlight reached a room unobstructed. This test applies to living rooms of existing residential homes with a main window facing within 90° of due south. Sun lighting of these room would be affected by a new development where they receive less than 25% of annual probable sunlight hours and less than 0.80 times its former annual value; or less than 5% of annual probable sunlight hours between 21 September and 21 March and less than 0.80 times its former value during that period; - and also has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours.
147. Of the 21 living rooms assessed across block A, I and K of the Peabody Estate, only 4 rooms would not experience a loss in direct sunlight. The most affected living rooms are located in block K that is enclosed by the application site to the south and east and closest to the tallest part of the proposed development. 4 of the living rooms at ground to third floor would experience a 100% reduction in APSH. The existing ASHP for these rooms is already low which means these rooms currently receive limited if no direct sunlight annually or during winter months. Therefore, any additional height is likely to have affected sunlight for these rooms. The affected rooms are annotated as W5 on figure 13 above for block K.
148. As set out above, there would be a noticeable daylight and sunlight impact on some neighbouring residential rooms in particular for a small number of rooms on block K, which sits closet to the application site and already experiences low levels of light. Overall, it is considered that this impact is acceptable when balanced against the benefit of the proposed development. This includes the provision of high quality employment floorspace in the CAZ, affordable workspace, and job and training opportunities and well benefits such as soft landscaping and biodiversity, high quality architectural design, and improved privacy controls, hours of use controls to be secured through planning conditions.

### **Transport and highways**

149. The site is located on the A2300 (Southwark Street) which forms part of the Transport for London Road Network, and Southwark Bridge Road which a well-used north-south route through central London and forms part of the borough highway. The site achieves a high Public Transport Accessibility Level (PTAL) score of 6b. London Bride Station, Southwark Underground station and Borough Underground station are all within walking distance of the site. The closest bus route is on Southwark Street, served by 4 TfL bus routes, in addition to a further 7 stops within walking distance. The Cycle Superhighway 7 runs along the Southwark Bridge Road frontage, in addition to a non-segregated cycle lane on



Southwark Street. There are two Santander Cycle Hire Docking Stations within walking distance, on Southwark Street and Lavington Street.

### Trip Generation and Mode Split

150. Multi-modal trip generation has been undertaken to assess the potential impact of the proposed development in terms of number of trips generated. The results show a net increase of 107 AM and 93 PM peak trips and an overall daily net increase of 672 trips because of the new development. It is estimated that nearly half of all trips would be via train. There would be a very low vehicle trip rate, which is to be expected given the development would be car free. This assessment has been reviewed in consultation with TfL and Southwark's Transport Policy and Highways Teams. Overall, the proposed development would not have an unacceptable impact on the public transport network or TLRN, subject to improvements to the walking and cycling environment as justified below.

### Healthy Streets

151. London Plan Policy T2 requires all development to support the Mayor's Healthy Streets approach. The proposed development would increase employment floorspace on site thereby increasing pedestrian footfall and cycle trips to and from the site. An active travel zone assessment (ATZ) has been submitted identifying a number of possible improvements to walking and cycling routes surrounding the site. Improvements would be secured through S278 works as part of the S106 agreement. The list of agreed works are set out later in the report in the Planning Obligations S106 summary table.
152. Other planning obligations include measures to support pedestrian and cycle wayfinding including a new Legible London sign on Southwark Bridge Road, in addition to map refreshes of nearby existing Legible London signage maps. A financial contribution of £16,000 is sought from the applicant towards these works, in accordance with London Plan Policies T2 and T3.

### Site access

153. There is an existing dropped kerb providing vehicular access onto the site from Southwark Bridge Road. The application proposes to replace this with a new access further north along Southwark Bridge Road, with improved sightlines to support the operation of CS7 and reduce potential conflict. Pedestrian sightlines of 1.5m x 1.5m would be required either side of the opening in the boundary for a vehicle access from the back edge of the public highway not within the opening and with no features higher than 0.6m within this area. This is to maintain highway and pedestrian safety in accordance with Southwark Plan Policy P50 and to support the objectives of promoting sustainable transport choices and maintaining pedestrian safety as per Southwark Plan Policy P51.
154. Gradients and spot level plans have also been provided for vehicle, pedestrian and cyclists access routes around the site demonstrating that the building could be accessed from the public highway without changes to existing levels. This includes access for disabled people at the main entrances and internal areas of buildings and routes to and from larger disabled cycling parking spaces, which

is convenient and to a high standard.

### Car parking

155. The proposed development would be car free in accordance with London Plan Policy T6, Southwark Plan Policy P54 and Southwark Movement Plan Actions 7 and 9. The proposed development would be restricted from obtaining parking permits for the existing or any future CPZ's. This would be secured through the S106 agreement.

### Cycle parking

156. The application proposes to deliver 328 cycle parking spaces, of which 274 spaces would be in two-tier rack form and 54 spaces would be from Sheffield stands including 3 larger spaces for cargo or disabled bicycle parking. 60 folding bicycles lockers are also to be provided. This provides cycle parking for both long stay and short stay visitors. The total provision meets the minimum standards required by the London Plan Policy T5. However, it falls short of the minimum requirement for 378 long-stay spaces and 68 spaces for visitors in accordance with Southwark Plan Policy P53.
157. The applicant has justified this shortfall due to site constraints; working within the space available within the retained basement areas. The proposal allocates most of the building services plant areas within the basement areas to avoid locating these at ground or roof levels for amenity and design reasons. Officers are satisfied that the quantum of cycle parking is acceptable in this instance.
158. For visitor cycle parking, it is anticipated that any visitors permitted into the building would be given access to the basement by future tenants. Alternatively, they would utilise existing cycle parking spaces on streets surrounding the site. It is also proposed that additional visitor cycle parking stands could be delivered on Southwark Street and Southwark Bridge Road (where footway widths allow). This is to be agreed as part of the S278 works in consultation with TfL and Southwark's Highways Development Team.
159. A cycle store plan (drawing ref: 1131\_P2601) details the proposed layout of cycle parking in the basement. This shows a minimum aisle width of 2.5 beyond the lowered frame of two-tier stands, required to allow bikes to be turned and loaded. Existing floor to ceiling heights fall only 0.1 meters below the recommended minimum of 2.7 metre height requirement. The proposed doorways comply with the minimum width of 1.2 metres. The ground floor access doors are from Southwark Bridge Road and would be fob activated. At basement level 02, the store would be isolated with dedicated fob access. The access strategy includes 1 dedicated cycle lift, 1 linear cycle stair core connected ground floor to basement level 02. A separate goods lift in the loading bay would be sized to be a back-up cycle lift, should the dedicated cycle lift fail. The traffic analysis for a total of 350 cyclists with a stair factor of 50% meets the BCO requirements for average waiting time and average time to destination. Overall, the design of the cycle store is considered acceptable. It would provide a significant improvement comparative to the existing building being occupied for office use in its current

form.

160. A compliance condition is recommended to secure the quantum and design of the basement cycle parking area, to ensure compliance with London Plan Policy T5, Southwark Plan Policy P53, the London Cycle Design Standards Chapter 8, DfT LTN/120, and Southwark Movement Plan Actions 4 and 9.

### Delivery and servicing

161. A draft delivery and servicing plan has been submitted setting out the proposed delivery and serving strategy. All delivery and servicing activities would be accommodated within the site itself from a vehicle access point from Southwark Bridge Road. The largest vehicle required to enter the service yard would be a 7.5 tonne box van and a swept path analysis has been provided to demonstrate that this can be accommodated.
162. A final DSMP would be secured through planning condition, in compliance with Southwark Plan Policy P50 and Southwark Movement Plan Action 14 and 18. This is to ensure safe and efficient delivery and servicing activities, minimising the number of motor vehicle journeys and requiring freight vehicles and their drivers to adhere to the highest possible standards in terms of safety, efficiency and emission reduction. It is also recommended that the access is restricted by hours of use and that other mitigation measures are agreed as part of the final Delivery and Servicing Management Plan (DSMP) in consultation with TfL and LBS Transport Policy and Highways Teams, prior to commencement of above ground works. This is to minimise impacts on the safety of cyclists and pedestrians from vehicles crossing the public footway and cycle superhighway.

### Travel Plan

163. A draft Travel Plan has been submitted setting out measures to be implemented to assist employees and visitors in making active travel choices. This includes the appointment of a Travel Plan Coordinator and Monitoring Group responsible for implementing the Plan. Welcome packs, events, and promotional content would be utilised to provide users of the site with information on active travel choices. The Travel Plan has been reviewed in consultation with TfL and is supported. It is recommended to secure a final Travel Plan through the S106 agreement.

## **Environmental matters**

### Construction management

164. An Outline Construction Environmental Management Plan (CEMP) has been submitted. This sets out how the proposed development would mitigate the environmental impacts from demolition and construction phases of development. This includes controls for noise and vibration, surface and groundwater, ground conditions, transport, air quality and waste. The plan also sets out how the project will maintain contact with affected neighbours and local residents in addition to emergency incident communication, staff training, and health and safety requirements.

165. A planning condition is recommended to secure submission of a Final CEMP including Demolition Management Plan and Construction Logistics Plan (CLP). The final plan needs to give further consideration to the safety of cyclists on C7 and pedestrians, in consultation with TfL and Southwark's Transport Policy and Network Development teams.
166. A basement impact assessment has been submitted, setting out the potential impact of construction works on local hydrology, hydrogeology. It is anticipated that there would be limited ground movements during works and that risks to neighbouring properties, slopes and infrastructure are limited and can be mitigated. The appropriate construction means and methods would be implemented to mitigate potential damage to neighbouring buildings from works.

### Noise and vibration

167. A revised Acoustic, Noise and Vibration Assessment has been submitted. This was in response to comments from Southwark's Environmental Protection Team (EPT) who raised that the previous report had not suitably assessed operational use impact for neighbouring residents, including for use of the outdoor terraces. Further information was also requested from EPT in relation to the plant noise impact assessment, which was also not complete with expected further testing required when all plant is decommissioned.
168. Planning conditions are recommended to secure the appropriate level of sound insulation for the new building and to set a maximum rated sound level from plant noise, which must not be exceeded. This would be an improvement comparative to the sound insulation and plant on the existing building and would better protect the amenity of neighbouring residential blocks on the Peabody Estate, in accordance with Southwark Plan Policies P56 and P66.

### Waste management

169. A Sustainability Statement has been submitted, which summarises the approach to waste management during the construction and operational phases of development. This commits the development to reducing waste generation and diverting from landfill, in accordance with the waste hierarchy set out by Southwark Plan Policy P62 'Reducing waste'. A Waste Management Strategy is also included as part of the Delivery and Servicing Plan (DSP), setting out how waste would be stored and collected during operational phase of development. As set out earlier in the report, a planning condition is recommended to secure a final DSP.

### Water resources

170. The development proposes to minimise water demand through design measures to reduce usage and detect non-typical water usage or leakage, in accordance with Southwark Plan Policy P67 and London Plan Policy SI 5. The BREEAM pre-assessment is targeting to meet 7 of the 9 available credits for Water and at least a 40% reduction in water consumption comparative to a standard office building. A planning condition is recommended to secure these measures.

### Flood risk and Sustainable urban drainage

171. The application site is located in Flood Zone 3 and benefits from flood defences. A Flood Risk Assessment and SuDS Strategy document has been submitted setting out the risk of flooding including from the fluvial/tidal, surface water and ground water flows, sewers, and artificial sources. It is concluded in the report that the proposed development is at low risk of flooding from all of these sources. The SuDS Strategy set out the existing and proposed drainage arrangements including SuDS features in the form of green and blue roofs, planters and permeable paving for surface water attenuation, restricting the site discharge rate to 8.30l/s for the 1:100 year storm, equivalent to a betterment of 95% on existing rates. It is proposed to discharge this water to public combined sewers.
172. LBS Flood Risk Team reviewed the reports and initially objected to the proposed drainage strategy in relation to run off rate, attenuation volume and maintenance. A revised assessment has been submitted to address their comments. The proposed run off rate of 8.3l/s is agreed applying an appropriate climate change consideration. Planning conditions are recommended to secure the drainage strategy connections and maintenance tasks.
173. The Environment Agency have been consulted on the application and are supportive, finding that the FRA provides an accurate assessment for tidal and fluvial risks associated with the proposed development. Thames Water are also supportive in relation to the surface water drainage strategy, where it follows the sequential approach in accordance with London Plan Policy SI 13.

#### Land contamination

174. A Phase 1 Land Contamination Report has been submitted to identify potential contamination risks related to the application site, in accordance with Southwark Plan Policy P64. The Council's Environmental Protection Team have reviewed the report, noting that the historical use of the site and surroundings presents contamination risks. Therefore, a Phase 2 report is required prior to demolition works, further assess the risks, and show how any contamination would be remediated. This would be secured through planning condition.

#### Air quality

175. The application site is within the Borough's Air Quality Management Area. An Air Quality Assessment has been submitted with the application setting out the likely effects of the proposed development on air quality during the construction and operational phases of development. The assessment concludes that there would not be an unacceptable impact on future users of the site in terms of air quality, in compliance with London Plan Policy SI 1 and Southwark Plan Policy P65. It also concludes that there would be no significant effects from construction traffic emissions on air quality. It was concluded that the development would be Air Quality Neutral. The report includes an assessment of construction dust risks, carried out in accordance with GLA guidance. It is acknowledged that there is an emergency diesel backup generator on site, which is proposed for routine testing and maintenance only, therefore, emissions from this would not be significant. The flue for this will run to roof level in the north core riser furthest away from neighbouring residents.

176. Southwark's Environmental Protection Team and GLA are supportive of the information submitted. It is recommended that the relevant mitigation measures for construction dust risks along with a requirement for NRMM compliance with the Low Emissions Zone Standards in the CAZ are included as part of the CEMP planning condition, in accordance with London Plan Policy SI 1(D).

## **Energy and sustainability**

### Whole life cycle and carbon capture

177. A Whole Life Cycle (WLC) Assessment has been submitted with this application to capture the proposed development's embodied carbon footprint in accordance with London Plan Policy SI 2 and Southwark Plan Policy P70.
178. The GLA reviewed the assessment, which they consider to have been carried out in accordance with their relevant guidance documents. They highlight a number of points for clarification in relation to the estimated emissions and opportunities to reduce WLC emissions, as well as justification for demolition instead of building retention. The applicant has responded to the GLA WLC memo and provided an updated assessment accordingly.
179. It is estimated that the proposal would achieve a potential saving of 15% embodied carbon at practical completion and 12% over the building life cycle of 60 years. Further potential opportunities have been provided which could contribute further towards reducing emissions as the design progresses. A planning condition is recommended to secure a post-construction assessment that would report on the development's actual WLC emissions.

### Circular economy

180. A Circular Economy Statement (CES) has been submitted with this application setting out the approach to meeting circular economy targets in accordance with London Plan Policies D3 and SI7, Southwark Plan Policy P62 and GLA guidance.
181. The GLA reviewed the assessment, which they consider to have been carried out in accordance with their relevant guidance documents. They requested further information from the applicant on design approach, pre-demolition audit, bill of materials, waste management, and post-construction performance. The applicant has responded to the GLA CE memo and provided an updated assessment accordingly.
182. The report considers the opportunity to re-use the existing building as part of the pre-demolition audit and the WLC assessment, as set out above. Refurbishment was discounted due to the existing layout and condition being unsuitable for modern office standards, including long and irregular floorplate and poor quality building envelope with plant and servicing areas beyond its usable design life. The existing basement is to be retained and some materials from the existing building to be demolished will be repurposed. The proposal is aiming for 95% of non-hazardous waste materials from demolition, construction and excavation to be re-used or recycled. A planning condition is recommended to secure a post-construction report.

## Carbon emission reduction

183. An Energy Strategy and Sustainability Statement have been submitted setting out how the development aims to reduce operational carbon emissions against Part L 2021 to be net carbon zero, in accordance with the energy hierarchy set out by London Plan Policy London Plan Policy SI 2 and Southwark Plan Policy P70.
184. Through the measures outlined in the following paragraphs, the development is expected to reduce on site carbon emissions by 6.9 tonnes of carbon dioxide per annum. This equates to a 14% on-site reduction against the 2021 Part L baseline (50% onsite reduction against the 2013 Part L baseline). The development would therefore fall short of the 40% on site reduction required by Southwark Plan Policy P70, based on 2021 Part L baseline. The Energy Strategy justifies where the development would fall short at each stage of the energy hierarchy.
185. Therefore, to achieve net carbon zero the development would be required to offset 57.9 tonnes of carbon dioxide per annum, through a carbon-offset payment of £165,015 to the Council's Green Building Fund. This is based on a charge of £95 per tonne of carbon dioxide to be offset over 30 years, in accordance with Southwark's S106 Planning Obligations and Community Infrastructure Levy (CIL) SPD (November 2020 Update).

## Be Lean (use less energy)

186. The development proposes to reduce energy demand through passive building fabric measures and active energy efficient systems, including mechanical heat recovery systems on each floor and an underfloor displacement system to maintain temperatures during a day. Overall, the development would achieve a 7% saving against Part L 2021 (4.4 tonnes carbon dioxide per annum) through Be Lean measures. This falls short of the minimum 15% reduction against Part L required by London Plan Policy SI 2.
187. The applicant has identified limitations to achieving a higher saving through Be Lean measures including restrictions to altering the building orientation and form due to site layout constraints and neighbouring amenity, and natural ventilation being unsuitable due to air quality on the major road networks that the site fronts onto, thereby limiting the ability to reduce active cooling.

## Be Clean (supply energy efficiently)

188. The application site is not located near to an existing or proposed heat network. Therefore, no savings would be achieved through Be Clean measures. The development would be futureproofed to connect to a heat network should one ever be developed in the area. This would be secured through the S106.

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

189. The development proposes highly efficient four pipe energy recovery air source heat pumps that would supply hot water within the building in addition to a water source heat pump in the basement to boost central hot water generation. In addition, 150sqm of active photovoltaic (PV) panels are proposed on the

available roof space. Overall, the development would achieve a 7% saving against Part L 2021 (4.7 tonnes carbon dioxide per annum) through Be Green measures.

190. The applicant has demonstrated that renewable energy generation has been maximised through PV panels on available roof space, which is not shaded.

### Be Seen (Monitor and review)

191. The development's energy performance would be monitored, verified and reported on through to post construction in accordance with the GLA's Be Seen Monitoring platform. This monitoring would be secured through the S106.

### Overheating and cooling

192. The submitted Sustainability Statement sets out that overheating has been modelled and assessed in accordance with guidance, to ensure that summer and winter operative temperature ranges are achieved, in accordance with Southwark Plan Policy P69.

### BREEAM

193. The submitted Sustainability Statement sets out the BREEAM pre-assessment results, which show that the proposed development is targeting score of 85.28% that would achieve an 'Outstanding' rating. This exceeds the minimum requirement for BREEAM 'Excellent' rating set out in Southwark Plan Policy P69. A planning condition is recommended to secure a post-construction assessment demonstrating that the targeted BREEAM score has been achieved.

### **Planning obligations (S.106 agreement)**

194. London Plan Policy DF1 and Southwark Plan Policy IP3 advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. These policies are reinforced by the Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:

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

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

Planning Obligation	Mitigation	Applicant Position
Affordable Workspace	1308sqm GIA of affordable workspace	



	to be provided for a minimum of 30 year details to be agreed, and an Affordable Workspace Management Plan.	
Archaeological monitoring	£11,171 contribution based on 10,000 and more sqm of development to support the effective monitoring of archaeological matters.	
Employment and training: Construction phase	<p>27 sustained jobs to unemployed Southwark residents, 27 short courses, and take on 6 construction industry apprentices during the construction phase, or meet the Employment and Training Contribution.</p> <p>The maximum Employment and Training Contribution is £129,150 (£116,100 against sustained jobs, £4,050 against short courses, and £6,000 against construction industry apprenticeships).</p> <p>An employment, skills and business support plan should be included in the S106 obligations. LET would expect this plan to include:</p> <ol style="list-style-type: none"> <li>1. Methodology for delivering the following: <ol style="list-style-type: none"> <li>a. Identified 'construction workplace coordinator' role(s) responsible for on-site job brokerage through the supply chain and coordination with local skills and employment agencies;</li> <li>b. Pre-employment information advice and guidance;</li> <li>c. Skills development, pre and post employment;</li> <li>d. Flexible financial support for training, personal</li> </ol> </li> </ol>	

	<p>protective equipment, travel costs etc;</p> <p>e. On-going support in the workplace;</p> <p>f. Facilitation of wider benefits, including schools engagement, work experience etc.</p> <p>2. Targets for construction skills and employment outputs, including apprenticeships, that meet the expected obligations;</p> <p>3. A mechanism for delivery of apprenticeships to be offered in the construction of the development;</p> <p>4. Local supply chain activity - we would expect methodologies with KPIs agreed to:</p> <p>a. provide support to local SMEs to be fit to compete for supply chain opportunities;</p> <p>b. develop links between lead contractors, sub-contractors and local SMEs;</p> <p>c. work with lead contractors and sub-contractors to open up their supply chains, and exploration as to where contract packages can be broken up and promote suitable opportunities locally.</p>	
Employment and training: Operational phase	<p>85 sustained jobs for unemployed Southwark Residents at the end phase, or meet any shortfall through the Employment in the End Use Shortfall Contribution.</p> <p>The maximum Employment in the End Use Shortfall Contribution is £365,500.00 (based on £4300 per job).</p>	

	<p>No later than six months prior to first occupation of the development, we would expect the developer to provide a skills and employment plan to the Council. This plan should identify suitable sustainable employment opportunities and apprenticeships for unemployed borough residents in the end use of the development.</p> <p>LET would expect this plan to include:</p> <ol style="list-style-type: none"> <li>1. a detailed mechanism through which the Sustainable Employment Opportunities and apprenticeships will be filled, including, but not limited to, the name of the lead organisation, details of its qualifications and experience in providing employment support and job brokerage for unemployed people, and the name of the point of contact who will co-ordinate implementation of the skills and employment plan and liaise with the Council;</li> <li>2. key milestones to be achieved and profiles for filling the sustainable employment opportunities and apprenticeships;</li> <li>3. Identified skills and training gaps required to gain sustained Employment in the completed development, including the need for pre-employment training;</li> <li>4. Methods to encourage applications from suitable unemployed Borough residents by liaising with the local Jobcentre Plus and employment service providers.</li> </ol>	
Travel Plan	<p>Submission of a final Travel Plan and monitoring to ensure compliance</p> <p>Secure memberships for TfL's cycle hire scheme for a minimum of 3 years, to be provided upon first occupation</p>	

	<p>for 10% of employees within each business.</p> <p>A requirement for employers to provide pool bikes for staff business travel.</p>	
Legible London signs	£16,000 contribution for new Legible London sign/s and to enhance map refresh of local existing Legible London signs.	
CPZ Parking Permit Restriction	Access to CPZ Parking Permits will not be permitted for any use classes within the site, within any area of the borough in any existing or future CPZs.	
Highways works / improvements	<p>Repave the footways, including new kerbing fronting the development on Southwark Bridge Road and Southwark Street using materials in accordance with Southwark's Streetscape Design Manual - SSDM (Yorkstone natural paving slabs with 300mm wide granite kerbs).</p> <p>Creation of a new vehicle crossover and reinstate redundant vehicle crossover on Southwark Bridge Road to full-height kerb footway;</p> <p>Undertake cycleway CS7 modification works including cycle lane separator island(s), road markings and signage. Relocate street lighting column outside proposed vehicle crossover on Southwark Bridge Road and upgrade it to current LBS standards.</p> <p>Repair any damage to the highway due to construction activities for the development including construction work and the movement of construction vehicles.</p> <p>Improved cycle lane/drainage on the proximate sections of Southwark Bridge Road and Southwark Street plus dedication of the sliver of land</p> <p>Provision of replacement and</p>	

	<p>additional visitor cycle parking at street level;</p> <p>Repave the Southwark Street frontage up to the Peabody access; Relocate the cabinet in the centre of the footway, and a raised-to-footway-level crossing across the Peabody access; and</p> <p>Improvements to the walk from the development on Southwark Street to London Bridge station where the route goes under the railway tracks along the A3 Borough High Street where there is a lack of natural lighting, especially at night.</p> <p>Renewal of the existing raised entry treatment and improvements to the tactile paving along at the junction on Summer Street along Southwark Bridge Road on the route to Cannon Street station where there would need to be maintenance to assist people from all walks of life.</p> <p>Improvements to the crossing at the junction of America Street with Southwark Bridge Road where there are bollards blocking the road and reducing the dropped pedestrian kerb.</p>	
Be Seen energy monitoring	Monitoring of carbon savings from design, construction to operation.	
Carbon offset contribution	£165,015 contribution based on 57.90 tonnes of carbon to be offset.	
Future-proofed connection to District Heat Network	Enabling a connection to a district heating network in the future.	

196. In the event that an agreement has not been completed by 12<sup>th</sup> June 2024, the committee is asked to authorise the director of planning to refuse permission, if appropriate, for the following reason:

197. In the absence of a signed S106 agreement, there is no mechanism in place to mitigation against the adverse impacts of the development through contributions. It would therefore be contrary to London Plan (2021) Policies DF1, T9, T9 and E3, Southwark Plan (2022) Policies P23, P28, P31, P45, P50, P51 P54, P70, IP3 and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015), Paragraph 57 of the NPPF (2023).

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

198. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material 'local financial consideration' in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport invests in London as a whole, primarily Crossrail. Southwark's CIL will provide for infrastructure that supports growth in Southwark.
199. The site is located within Southwark CIL Zone 1, and MCIL Central London Band 2 Zone. Based on information obtained from CIL form 1 dated 16 November 2022, the gross amount of CIL is approximately £884,511.99. It should be noted that this is an estimate, floor areas will be checked when related CIL Assumption of Liability form is submitted, after planning approval has been secured.

### **Community involvement and engagement**

200. In accordance with Southwark's Development Consultation Charter the applicant carried out their own consultation prior to the submission of this planning application; to engage with community and political stakeholders, residents, and neighbours from the area. Their approach to this is set out in their Statement of Community Involvement (SCI) document and the Engagement Summary document submitted with this application, and summarised in the table below.

201.	<b>Consultation Undertaken by Applicant at Pre-application Stage: Summary Table</b>	
<b>Date</b>	<b>Form of consultation</b>	
April 2022	<ul style="list-style-type: none"> <li>• A consultation website, <a href="http://www.42southwarkbridgeroad.co.uk">www.42southwarkbridgeroad.co.uk</a>, with details on the site and the proposal was set up and 209 users were recorded viewing the website.</li> <li>• An online survey was launched, where consultees could comment on the early proposals and share their preferences for development.</li> <li>• Leaflets were sent to 138 addresses at the Peabody Estate, containing introductory information on the proposal, the consultation website and contact details of the consultation team.</li> <li>• 45 visits to the website and 5 completed surveys were generated. Discussion was held between Kanda Consulting team and residents from the Peabody Estate.</li> </ul>	

August 2022	<ul style="list-style-type: none"> <li>Letters were sent to 138 local residents of the Peabody Estate, containing consultation contact details and details of the scheme. Residents were invited to sign up for the 1<sup>st</sup> or 7<sup>th</sup> September 2022 online webinars.</li> <li>An introductory email was sent to 5 local ward councillors and community stakeholders, containing details of the proposal and inviting them to the 1<sup>st</sup> or 7<sup>th</sup> September 2022 online webinars.</li> <li>Personalised email reminders were sent to 4 local residents who had previously engaged with the consultation team, inviting them to the 1<sup>st</sup> or 7<sup>th</sup> September 2022 online webinars.</li> </ul>
September 2022	<ul style="list-style-type: none"> <li>An online webinar was held on the evening of 1<sup>st</sup> September 2022. No consultees attended.</li> <li>The webinar recording was uploaded to the project website and YouTube. 39 views recorded as of 28<sup>th</sup> October 2022.</li> </ul>
October 2022	<ul style="list-style-type: none"> <li>A community newsletter was delivered to 1,208 local residents and businesses, containing updates on the proposals and inviting them to the public exhibition on 20<sup>th</sup> October 2022.</li> <li>An email was sent to a total of 5 local political and community stakeholders, inviting them to the 20<sup>th</sup> October 2022 public exhibition.</li> <li>Personalised email reminders were sent to 4 local residents who had previously engaged with the consultation team, inviting them to the 20<sup>th</sup> October 2022 public exhibition.</li> <li>A public exhibition was held at The Bridge Café, 73-81 Southwark Bridge Road between 4pm to 8pm on the 20<sup>th</sup> October 2022. It was attended by 10 people.</li> </ul>

202. Their Engagement Summary sets out the feedback from the pre-planning public consultation, which included impacts on residential amenity and construction, design comments and the provision of affordable workspace.

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

203. For statutory consultation on this planning application, 588 consultation letters were sent to neighbours within 100-metre radius of the site, site notices were placed on Southwark Bridge Road and Southwark Street, and an advert was published in the Southwark News. In total, 5 comments were received back, comprising 4 objections and 1 neutral comment. This included a formal objection letter from the Peabody estate.
204. Summarised below are the planning matters raised by members of the public with an officer response. Further detail on these matters are set out within the relevant sections in the report.
205. Land use:
- No need for another office development in this location. Housing and

community uses are needed.

Officer response: The proposed land use is supported by planning policy for new development in the Central Activities Zone, District Town Centre, Opportunity Area and the Bankside and Borough Area Vision. The proposal would retain and increase the amount of employment floorspace on site and deliver benefits such as higher quality employment floorspace including affordable workspace, and the provision of jobs and training opportunities for Southwark residents.

206. Amenity impacts on neighbouring occupiers:

- Loss of light, privacy, overlooking impacts for Peabody Estate residents, from additional windows and outdoor terrace areas.
- Increased sense of enclosure for Peabody Estate residents.
- Daylight and sunlight report based on a number of assumptions.
- Noise and pollution affect Peabody residents during demolition and construction. Cumulative impact alongside other office development in the surrounding area.

Office response: There would be an impact on some neighbouring residents on the Peabody Estate in terms of daylight and sunlight, and sense of enclosure. On balance, this harm is outweighed by the benefits of the scheme in terms of employment floorspace including affordable workspace and job creation. The new building would provide some benefit in terms of outlook through soft landscaping and high quality architectural design, and improving privacy and hours of use controls to be secured through planning condition. The applicant has demonstrated that they have taken reasonable steps to inform the daylight and sunlight report in accordance with the BRE Guide recommendations. A Construction and Environmental Management Plan will be secured to minimise the impact of demolition and construction activities on neighbouring residents.

207. Design:

- Design is insensitive to 19<sup>th</sup> Century Peabody estate and buildings.

Officer response: Overall, the proposed design is considered an improvement on the existing building. The new development would enhance the architectural quality and appearance of the building. The elevations are modern and have an engaging character in keeping with its local context.

208. Transport and highways:

- Heavy traffic and insufficient footpath access.

Officer response: The application is required to be car-free during the operational phase of development therefore, is not expected to generate additional traffic. Active travel measures would be promoted as part of the operational Travel Plan and improvements to the existing pavements would be secured through S278 Highways works. The building line would be set back at the main building providing a more generous pavement width on Southwark Street.

209. Environment:

- Climate impact of demolition and rebuild.

Officer response: The Whole-life Cycle Assessment and Circular Economy Statement sets out the approach to reducing the climate impact of development.



The applicant has justified the reason for demolition and has committed to the re-use of existing materials and components, as far as practicable.

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

210. Summarised below are the planning matters raised by external and statutory consultees. Matters are addressed within the relevant sections in the Assessment section of this report.
211. Thames Water:
- Informatives recommended for a groundwater risk management permit and minimum water pressures and flow rates.
  - Planning condition recommended for a Piling Method Statement.
212. Environment Agency:
- No objection.
213. London Fire and Emergency Department:
- No further observations to make.
214. Metropolitan Police Design Out Crime Team:
- The use of tested and accredited products with certification in the name of the fabricator namely doorsets, windows, glazing, will all be necessary for this development. This coincides with the requirements for access control, CCTV, secure perimeter treatments, secure bin stores and cycle stores.
  - The development could achieve the security requirements of Secured by Design (SBD). Planning condition recommended securing SBD measures and certification.
215. Transport for London:
- Support for removal of Blue Badge bay given high PTAL location and step free nature of stations at Southwark and London Bridge, due to safety concerns with a Blue Badge space being located within the delivery and servicing yard.
  - Concern with re-location and increased width of vehicle access affecting the safety of cyclists and pedestrians. Request that the width be kept the same as the existing access, to ensure no additional impact on safety. Hours of use of the access should also be restricted.
  - Cycle parking design to be revised to meet the London Cycling Design Standards.
  - Confirmation sought on whether cycle parking spaces outside the site on Southwark Street are to be retained.
  - Potential improvements to key routes to and from the site in applicant's Active Travel Zone assessment. Funding and/or S278 works to be secured commensurate with the nature and scale of the development.
  - S106 contribution sought for new Legible London signs, cycle hire membership/pool bikes for a proportion of employees, and permit-free agreement.

- Full Travel Plan, Construction Environmental Management Plan, Construction Logistics Plan, and Delivery and Servicing Plan recommended to be secured through planning condition.
- Detailed Arboricultural Method statement recommended to be secured through condition to ensure TfL trees are suitably protected and considered during demolition and construction works.

216. Greater London Authority:

- Supportive of office use with affordable workspace in this location. Affordable workspace to be secured through S106.
- Daylight impact on neighbouring residents to be considered in relation to equality and any disproportionate impact on people with protected characteristics.
- Low level of less than substantial harm to Thrale Street Conservation Area to be weighed against public benefit of the scheme.
- No impact on protected views.
- Further detail required on urban design matters, transport matters, sustainable development and environment issues.

### **Consultation responses from internal consultees**

217. Summarised below are the planning matters raised by internal consultees. Matters are addressed within the relevant sections in the Assessment section of this report.

218. Highways Development Team:

- Visibility splays to be kept free of obstructions at the south-eastern corner of the development - ground floor plan to be revised.
- S278 works recommended.
- Informatives recommended for over sailing license and for detailed design and method statements (AIP) for foundations and basements structures retaining the highway (temporary and permanent), joint condition survey

219. Transport Policy Team:

- Advice on cycle parking quantum and design quality.
- Additional cycle parking stands should be sought as part of S278 works in discussions with TfL and Highways Development Teams.
- Support for removal of Blue Badge bay given high PTAL location and road safety concerns with crossing cycle lane and footway to reach the bay.
- Support for reduced width of vehicle crossover for servicing access, reducing potential conflict with cycle lane.
- Tracking drawings required to demonstrate larger vehicles could enter and leave the service yard in forward gear.
- Compliance condition recommended for detailed cycle store plans and delivery and servicing management plan (DSMP).
- S106 obligations recommended for cycle hire scheme, S278 works, parking permit restrictions, and DSMP monitoring fee.

220. Local Economy Team:

- Supportive of proposals including the affordable workspace offer of 10% of new floor space (excluding existing basement).
- S106 obligations recommended for employment and training requirements during construction and operational phases of development.

221. Environmental Protection Team:

- Planning conditions recommended for noise from amplified music from non-residential premises, plant noise, external terraces hours of use, servicing hours, external lighting, site contamination, and construction management.

222. Archaeologist:

- Potential for archaeological material at the corner of Southwark Street.
- Road truncated remains of roman channel management and land reclamation dumps and structures below 38-40 Southwark Bridge Road.
- Geo archaeological material may service in other areas of the site.
- Early consideration should be made to determine how to investigate and record any archaeological remains that will be removed by the permitted scheme. These remains are likely to survive below the current basements, their evaluation and subsequent mitigation should be programmed into the construction scheme.
- Planning conditions recommended for Archaeological Evaluation, Archaeological Mitigation and Archaeological Reporting,
- S106 obligation recommended for Southwark Council's effective monitoring of archaeological matters.

223. Ecologist:

- Supportive of ecological assessment, Urban Greening Factor (UGF) score, Biodiversity Net Gain (BNG) percentage and landscaping proposal.
- BNG reports are not clear and missing information.
- Planning conditions recommended AG13, AG03, AG14 – vertical greening, roof terraces and landscaping/ecology features, PC40 – 12 swift bricks, PC41 – as per BNG report, Ecological Monitoring, Invertebrate habitats (condition wording provided).

224. Flood Risk Management Team:

- Comments to be addresses on the drainage strategy, attenuation volume and maintenance.

225. Urban Forester:

- Three good quality TfL street trees retained. These require suitable pruning specification.
- Condition wording recommended.

## **Community impact and equalities assessment**

226. The council must not act in a way which is incompatible with rights contained

within the European Convention of Human Rights

227. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
228. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three "needs" which are central to the aims of the Act:
1. The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
  2. The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
    - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
    - Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
    - Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low
  3. The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.
229. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
230. This development would deliver job opportunities to local residents both during construction phase and once operational. The provision of local apprenticeship opportunities during construction should benefit young groups including black and ethnic minority communities. The provision of affordable workspace would benefit local and start-up businesses including black and ethnic minority businesses.
231. Inclusive measures have been incorporated into the design of the development to ensure that the building can be entered and used safely, easily and with dignity by all, with no barriers and allowing independent access without undue effort, separation or special treatment.
232. The daylight and sunlight impact on some of the neighbouring residential homes could affect groups with protected characteristics. This has been taken into consideration during the assessment and has informed design measures to reduce the amenity impact as far as possible and to improve outlook for some

residents comparative to the existing condition.

### **Human rights implications**

233. 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.
234. This application has the legitimate aim of *delivering employment floor area*. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

### **Positive and proactive statement**

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

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

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

### **CONCLUSION**

237. For the reasons set out in the Assessment section of this report, it is recommended that planning permission be granted, subject to conditions, the timely completion of a S106 Agreement and referral to the Mayor of London.

### **BACKGROUND INFORMATION**

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents TP/1396-38	Environmental, 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 0254 Council website: www.southwark.gov.uk

## APPENDICES

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

## AUDIT TRAIL

Lead Officer	Gemma Perry		
Report Author	Gemma Perry		
Version	2		
Dated	28/11/2023		
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 of Environment and Leisure		No	No
Strategic Director of Housing and Modernisation		No	No
Director of Regeneration		No	No
Date final report sent to Constitutional Team			29 November 2023