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Item No. 6.1	Classification: OPEN	Date: 16 April 2024	Meeting Name: Planning Committee (Major Applications) B
Report title:	Development Management planning applications: Planning permission application: 23/AP/3068 Listed building consent application: 23/AP/3069 Address: 4-5 PARIS GARDEN AND 18-19 HATFIELDS (INCLUDING PART 6 PARIS GARDEN, FLANK WALL OF 17 HATFIELDS AND UNDERCROFT SERVICING ROUTE) LONDON, SE1 8ND Proposal: Planning permission application: Part demolition and part retention, refurbishment, and extension of 4-5 Paris Garden, together with demolition and redevelopment of 18-19 Hatfields, to provide Use Class E(g)(i) floorspace in a single five to eleven storey building with a single basement; including basement car and cycle parking and servicing area, external landscaped courtyard linking Paris Garden and Hatfields, landscaped terraces, rooftop plant equipment and enclosures, and other associated works. Listed building consent application: Structural and remedial works, and cosmetic repairs to the flank wall of 17 Hatfields.		
Ward(s) or groups affected:	Borough and Bankside		
From:	Director of Planning and Growth		
Application Start Dates: 7 / 3 November 2023		PPA Expiry Date: 30 April 2023	
Earliest Decision Dates: 3 April 2024 / 19 December 2023			

RECOMMENDATION

1. That planning permission be granted, subject to conditions and informatives, the completion of an appropriate legal agreement under Section 106 of the Town and Country Planning Act 1990 (as amended), and Stage 2 referral to the Mayor of London (MoL).
2. That listed building consent be granted, subject to conditions.
3. That the Director of Planning and Growth be authorised to agree any non-material amendments to the recommended conditions and informatives and legal agreement heads of terms, if required.
4. That, in the event that the requirements of paragraph 1 above are not met by 16 October 2024, the Director of Planning and Growth be authorised to refuse

planning permission for the reason set out in paragraph 250, if appropriate.

EXECUTIVE SUMMARY

5. The proposal is principally for the part demolition and part retention, refurbishment, and extension of 4-5 Paris Garden together with the demolition and redevelopment of 18-19 Hatfields to provide:

	Existing	Proposed	Change
Use Class E(g)(i) (office) floorspace square metres (sqm) (Gross Internal Area (GIA))	9,442	14,799	+5,357
Affordable workspace sqm GIA	0	571 (on site) and 242.7 (off site)	+571 (on site) and +242.7 (off site)
Jobs	0	206 (construction phase) and 942 (operational phase)	+206 (construction phase) and +942 (operational phase)

6. This increased amount of employment floorspace, including on-site affordable workspace, would be delivered in a single building designed to meet modern occupier demand for high quality, flexible office accommodation.
7. Other benefits of the proposal would include:
- A new east-west link through the site.
 - New and improved areas of landscaped public realm, including a new external courtyard.
 - A building that would be:
 - Attractive and contextually sensitive.
 - Energy efficient and sustainable.
 - Less harmful than the scheme that could be delivered on the site by an extant planning permission.
 - Increases in greening and biodiversity.
 - The encouragement of sustainable and active travel.
 - Air quality improvements.
8. A small amount of harm would be caused by the proposal in relation to the amenity of some current and future adjoining occupiers in terms of daylight and sunlight. However, this would be clearly outweighed by the proposal's benefits.
9. Overall, the proposal would generally accord with the development plan and, on balance, be acceptable in terms of:
- Land use principles;
 - Urban design;
 - Landscaping and urban greening;
 - Impacts on biodiversity;
 - Designing out crime;

- Fire safety;
 - Impacts on heritage;
 - Impacts on the amenity of adjoining occupiers and the surrounding area;
 - Transport and highways considerations;
 - Environmental matters;
 - Energy and sustainability considerations; and
 - The provision of digital infrastructure.
10. As such, it is recommended that planning permission be granted, subject to conditions and informatives, the completion of an appropriate legal agreement, and Stage 2 referral to the MoL
11. The proposal would also include some work to the facing flank wall of 17 Hatfields. This would be required to make it structurally sound and/or presentable following the demolition of 18-19 Hatfields and the creation of the new external courtyard. Given that 15-17 Hatfields is Grade II statutory listed, listed building consent, in addition to planning permission, would be required. However, the proposed work would not result in any harm to the significance of 15-17 Hatfields. As such, it is recommended that listed building consent be granted, subject to conditions.

BACKGROUND INFORMATION

Site location and description

12. The site mainly comprises 4-5 Paris Garden and 18-19 Hatfields. This main part of the site measures approximately 0.23 hectares in size and fronts Paris Garden to the east and Hatfields to the west; buildings adjoin it to the north and south.
13. In addition to this main part, the site also includes a small adjoining part of 6 Paris Garden, the adjoining flank wall of 17 Hatfields, and the entire length of the servicing route that runs between 15 Hatfields and 6 Paris Garden.
14. The site is located on the western edge of the London Borough of Southwark, opposite the boundary with the London Borough of Lambeth, which runs along Hatfields.
15. 4-5 Paris Garden was built in the early 1930s as an extension to the former print works at 1-3 Paris Garden. It has five-storeys plus a lower ground floor. 18 Hatfields was built around the turn of the twentieth century and has four-storeys plus a lower ground floor. 19 Hatfields was built in the 1950s and has five-storeys plus a basement. The elevations of all three buildings are mostly faced with brick. All three buildings have been extended and extensively altered since they were first constructed.
16. In total, these buildings currently provide 9,442 sqm GIA of office (Use Class E(g)(i)) floor space. It is understood that both buildings are currently vacant.

17. Pedestrian access to all three buildings is provided directly from either Paris Garden or Hatfields. Vehicular access to the delivery and servicing yard to the rear of the three buildings is via an underpass beneath 19 Hatfields. Vehicular access to the lower ground floor/basement level is via the one-way servicing route that enters down a ramp at 15 Hatfields and then exits up another ramp at 6 Paris Garden.
18. The adjoining buildings to the north of the main part of the site are 1-3 Paris Garden and 15-17 Hatfields, which are both Grade II statutory listed, of a similar scale to the 4-5 Paris Garden and 18-19 Hatfields buildings, and also currently in use as offices. The adjoining building to the south is 6 Paris Garden and 20-21 Hatfields, which has purpose-built student accommodation on its upper floors with the Central School of Ballet on its lower floors, and is up to 13 storeys in height. The 18 Blackfriars Road site on the opposite side of Paris Garden is currently cleared but allocated and benefits from two extant planning permissions for mixed-use redevelopment; an entrance to Christ Church Gardens is also on the opposite side of Paris Garden. The Grade II statutory listed Christ Church, and its associated Garden and Grade II statutory listed drinking fountain, are just beyond the 18 Blackfriars Road site. Hatfields Green and Colombo Centre Football Pitches are located on the opposite side of Hatfields.
19. There is a broad mix of uses in the wider surrounding area, including commercial, residential, educational, and community. The typology and style of nearby buildings also varies significantly, as does the scale, ranging from two storey low-rise buildings to towers up to 50 storeys in height, mainly clustered around Blackfriars Road and the River Thames.
20. The wider surrounding area also includes a number of additional designated and non-designated heritage assets, including statutory listed buildings and conservation areas, a number of which are in Lambeth.

Details of proposal

21. The proposal is for the part demolition and part retention, refurbishment, and extension of 4-5 Paris Garden together with the demolition and redevelopment of 18-19 Hatfields to provide an increased amount of office (Use Class E(g)(i)) floorspace. In total, the proposed development would provide 14,799 sqm (GIA) of office floorspace, which would be an uplift of 5,357 sqm (GIA) above the existing.
22. The proposal would create a single building, which could be used flexibly by either one tenant or multiple tenants, as well as the occupiers of the proposed affordable workspace. It would do so through extending 4-5 Paris Garden upwards to create a 5 to 10 storey block, following some limited demolition; demolishing 18-19 Hatfields and replacing it with a 9 to 11 storey block; and creating a 9 to 10 storey linking block in between.
23. An external courtyard would be created through the middle of the site, with a large opening on to Hatfields and a smaller undercroft link through the Paris

Garden block to the street. A terrace that wraps around the edges of the building fronting Paris Garden, Hatfields, and the courtyard would be located at fifth floor level; other roof terraces would be located at eighth floor level, above the 8-storey part of the Paris Garden block, and ninth floor level, above the 9-storey part of the Hatfields block. These spaces would be landscaped, and the courtyard would include stairs, ramps, and a lift to manage level changes between Paris Garden and Hatfields.

24. The Paris Garden and Hatfields blocks would contain mainly office floorspace, with the main entrance, reception, and atrium, as well as circulation and other ancillary spaces within the linking block. Whilst the main entrance would be from the courtyard in order to provide level access, there would be a secondary entrance direct from the street to the ground floor of the Paris Garden block. There would also be direct access from Paris Garden and Hatfields to ground floor circulation and other ancillary spaces.
25. An extended basement level would be accessed through the building via stairs or lifts by pedestrians and cyclists, and using the existing servicing route by motorised vehicles. It would contain one disabled persons car parking space, two delivery and servicing bays, cycle parking and facilities, plant, and circulation and other ancillary spaces.
26. Further plant and associated enclosures, including photovoltaic (PV) panels, as well as a green roof, would be located on the rooftop, above the 10 storey parts of the building.
27. Due to the demolition of 18-19 Hatfields and the creation of the courtyard, the facing flank wall of 17 Hatfields would be exposed. Some work to this wall would be required to make it structurally sound and/or presentable. However, it is understood that a partial pre-demolition survey has shown that wall is likely to be in a reasonably good condition, so it may be that mainly cosmetic repairs would be required.
28. Some very minor works to the adjoining parts of 6 Paris Garden would also be required to facilitate the proposal. These are shown on the submitted drawings but would not have any material impacts, so are not discussed further below.
29. It is noted that, unlike the extant planning permission that relates to the site (discussed below), the proposal would not include any works to 1-3 Paris Garden and 16-17 Hatfields, aside from the aforementioned works to flank wall of 17 Hatfields. Notwithstanding this point, the applicant has provided an indicative masterplan for these buildings, which are within the same ownership as the site. This potentially includes:
 - The refurbishment of the buildings to provide improved office space and enhance their external appearance.
 - A new core with access via the courtyard that would be delivered as part of the proposal; this would provide level access to the buildings with minimal impact on their heritage significance.
 - Bridge links between the buildings to allow tenancies to stretch across both at upper levels.

- Improved basement level facilities, such as cycle parking.
 - The retention of existing entrances to the buildings for secondary access directly from the street to the ground floors.
 - The continuation of the fifth floor level roof terrace that would be delivered as part of the proposal above 1-3 Paris Garden.
 - Decking over the servicing route that runs between the buildings to provide additional external amenity space for occupiers
 - A route through the ground floor of 1-3 Paris Garden, which would provide a stronger link between the street and the courtyard that would be delivered as part of the proposal.
30. The applicant has stated that the proposal is still seen as phase one of plans to upgrade the wider 1-5 Paris Garden and 16-19 Hatfields site; works to 1-3 Paris Garden and 16-17 Hatfields are envisaged as phase two.
31. The applicant has estimated that the proposal would create 206 new jobs during construction and 942 new jobs once it is operational, which would have a positive impact, especially given that the buildings on site are currently vacant.

Planning history of the site, and adjoining or nearby sites

32. The site, together with 1-3 Paris Garden and 16-17 Hatfields, has an extant planning permission (reference 17/AP/4230, dated 28 January 2021) for:

Phased redevelopment comprising: Phase 1: Demolition of 4-5 Paris Garden and 18- 19 Hatfields to create a part 23 and part 26 storey tower building (+ double basement)(up to 115.75m AOD) to be used for offices (Class B1), above a new public space with flexible retail/professional services/restaurant uses (Classes A1/A2/A3) at ground floor level and restaurant/bar uses (Classes A3/A4) at third floor level; Phase 2: Partial demolition, refurbishment and extensions to 16-17 Hatfields and 1-3 Paris Garden for continued use as offices (Class B1) with flexible use of the ground floor level (Classes A1/A2/A3/A4/B1) and restaurant/bar uses (Classes A3/A4) at part fifth floor level; creation of a new public, landscaped roof terrace at part fifth floor level and green roof at sixth floor level; lowering of existing basement slab; new landscaping and public realm; reconfigured vehicular and pedestrian access; associated works to public highway; cycle parking; ancillary servicing and plant and other associated works.

33. Condition 2 (time limit) of this planning permission requires that the development is implemented within 5 years.
34. There is also an associated listed building consent (reference 17/AP/4231, dated 28 January 2021), with the same time limit, related to 1-3 Paris Garden and 16-17 Hatfields.
35. This planning permission, with the associated listed building consent, provides a realistic fallback position for the redevelopment of the site.
36. The applicant undertook an extensive pre-application process (reference

23/EQ/0053) in relation to the proposal. This included engagement with Council officers. Full details of this process are available in the Council's pre-application response report.

37. The adjacent 18 Blackfriars Road site has two extant planning permissions (reference 07/AP/0301, dated 25 March 2009, and reference 16/AP/5239, dated 21 June 2018) for redevelopment. These have both been lawfully implemented. The later, more relevant permission would allow for a mixed-use scheme comprising six buildings with heights ranging from 5 to 53 storeys. The Council is currently considering an application for planning permission (reference 23/AP/1854) for an alternative mixed-use scheme across a slightly expanded site with three towers ranging from 25 to 48 storeys in height. Officers understand that, should planning permission be granted, this proposed alternative scheme is more likely to be built out.
38. There are a number of other extant planning permissions and applications for planning permission currently under consideration in the wider surrounding area, but none of these is directly relevant to the overall assessment of the proposal.
39. A planning history for this site, and other nearby sites, is also provided in Appendix 3.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

40. The main issues to be considered in respect of these applications are:
 - Principle of the proposal in terms of land use;
 - Urban design;
 - Landscaping, urban greening, and biodiversity;
 - Designing out crime;
 - Fire safety;
 - Heritage;
 - Listed building consent;
 - Impact of the proposal on the amenity of adjoining occupiers and the surrounding area;
 - Transport and highways;
 - Environmental matters;
 - Energy and sustainability;
 - Digital infrastructure;
 - Planning obligations;
 - Mayoral and Southwark Community Infrastructure Levy;
 - Community involvement and engagement;
 - Consultation responses from members of the public and local groups;
 - Consultation responses from external consultees;
 - Consultation responses from internal consultees;
 - Community impact and equalities assessment;

- Human rights implications; and
 - Positive and proactive statement.
41. These matters are discussed in detail below, in the Assessment section of this report.

Legal context

42. Section 70(2) of the Town and Country Planning Act 1990 (as amended) sets out that in dealing with applications for planning permission, the Local Planning Authority (LPA) must have regard to considerations including the provisions of the development plan and any local finance considerations, so far as material to the application, and any other material considerations.
43. Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) makes it clear that “if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”.
44. Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) requires that LPAs, when considering whether to grant listed building consent for any works, 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. Section 66(1) requires that LPAs, when considering whether to grant planning permission for development that affects a listed building or its setting, have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest that it possesses.
45. Section 72(1) of the same Act requires that LPAs pay special attention in the exercise of planning functions to the desirability of preserving or enhancing the character or appearance of a conservation area.
46. Information in relation to equalities and human rights is set out below.

Planning policy

47. The development plan for the Borough comprises the London Plan (2021) and the Southwark Plan (2022). The National Planning Policy Framework (2023) (NPPF) and any planning policy guidance and emerging planning policies constitute material considerations. A list of planning policies that are relevant to this application is provided in Appendix 4. Any planning policies that are particularly relevant to the consideration of this application are further highlighted in the Assessment section of this report.
48. Together with 1-3 Paris Garden and 16-17 Hatfields, the main part of the site is allocated in the Southwark Plan for redevelopment to provide a mix of uses. Alongside this allocation, the site is subject to the following relevant Southwark Plan policy designations:

- Air Quality Management Area (AQMA)
- Bankside and Borough District Town Centre
- Bankside, Borough and London Bridge Opportunity Area
- Better Bankside Business Improvement District
- Blackfriars Road Area Vision
- Central Activities Zone (CAZ)
- Flood Zone 3a (FZ3a)
- North Southwark and Roman Roads Archaeological Priority Area (APA)
- South Bank Cultural Quarter

ASSESSMENT

Principle of the proposal in terms of land use

Site allocation and strategic policies and designations

49. The Southwark Plan allocation (NSP23) for the main part of the site, together with 1-3 Paris Garden and 16-17 Hatfields, requires that development must:
 - Provide at least the amount of employment floorspace (Use Class E(g)) currently on the site with provision for ground floor retail space.
 - Provide active frontages with ground floor retail, community or leisure uses on Paris Garden and Hatfields.
 - Provide a new east-west link.
50. The allocation also states that development should, rather than must, provide new homes.
51. The allocation accords with the various relevant London Plan and Southwark Plan strategic policies and designations that relate to the site.
52. The proposal is for the redevelopment of the site to provide an increased amount of office floorspace. Unlike the existing, this floorspace is designed to meet modern occupier demand for high quality, flexible office accommodation. In line with Southwark Plan P30, given the strategic importance of employment floorspace in this location, a condition is recommended to restrict the proposed building to Use Class E(g).
53. There would be the potential for a small amount of ancillary café floorspace at ground floor level, as part of the ground floor affordable workspace fronting Paris Garden. This this would be acceptable, given the peripheral location of the site within Bankside and Borough District Town Centre, away from any designated Protected Shopping Frontages.
54. The proposal would activate Paris Garden and Hatfields mainly through the office use, which would be visible at ground floor level through full-height windows. There would also be a direct entrance to the affordable workspace, potentially including a café, from Paris Garden.

55. A new east-west link would be provided through the site between Paris Garden and Hatfields, via the proposed external courtyard.
56. No new homes are proposed. This would be acceptable given that the delivery of housing is not one of the core requirements of the allocation for the main part of the site, with London Plan Policy SD5 stating that the development of office space should normally be prioritised over the development of homes in the CAZ. Furthermore, there are no residential uses currently on the main part of the site and the extant planning permission that relates to the site would not deliver any new homes either.
57. There is no requirement to bring forward development across the whole site allocation in a comprehensive fashion, and the applicant has demonstrated that the proposals would help to facilitate future works to 1-3 Paris Garden and 16-17 Hatfields.

Efficient use of land

58. London Plan Policies D2, D3, and T1 and Southwark Plan P18 generally require the efficient use of land.
59. Notwithstanding that the proposal would deliver significantly less commercial floorspace on the site than the extant planning permission, the proposed approach to the optimisation of the site has been design-led, as discussed below. It would, therefore, be appropriate.

Affordable workspace

60. For proposals such as that under consideration, Southwark Plan P31 requires that at least 10% of the proposed gross employment floorspace be delivered on site at a discounted market rent as affordable workspace. Where it would not be feasible to provide affordable workspace on site, a payment in lieu towards off site provision is required.
61. The proposed gross employment floorspace, which has been calculated excluding the retained 4-5 Paris Garden building and any areas of plant, would be 8,137 sqm (GIA). The proposed on-site affordable workspace provision, which would be on the ground floor of the Paris Garden block, and include a proportionate amount of shared ancillary areas elsewhere within the building, would be 571 sqm (GIA). This equates to 7% of the proposed gross employment floorspace. The applicant has proposed to make a payment in lieu for the remaining 3%. This could be secured through a planning obligation, alongside other affordable workspace related provisions.
62. Officers, including the Local Economy Officer, support this approach and are content that the maximum reasonable amount of affordable workspace would be provided on site. The proposed affordable workspace would be in a prominent location, taking up the majority of the ground floor of the larger Paris Garden block, and with its own entrance directly from the street. It would not be possible to provide additional affordable workspace on the ground floor, given

that the remainder of the space is required for other purposes, including the main entrance and reception, and to allow any future tenant(s) to have a ground floor presence in the Hatfields block. Providing a small amount of additional affordable workspace on another floor could be inefficient.

63. The proposed payment in lieu would be pooled with other financial contributions of the same nature to provide Council owned and managed affordable workspace elsewhere within the Borough.

Conclusion

64. Overall, the proposal would be acceptable in terms of land use principles, considering the aspirations of the allocation for the main part of the site and other related strategic policies and designations, the necessity of using land efficiently, and the requirement to provide affordable workspace. Therefore, it would accord with the development plan, subject to a condition and a planning obligation.

Urban design

65. Southwark Plan P13 and P14 generally require high quality urban design that respects and builds on any characterful aspects of a site and the surrounding area.

Layout

66. London Plan Policy D8 specifically encourages the creation of new areas of high-quality public realm.
67. The starting point for the proposed site layout would be the partial retention of the existing 4-5 Paris Garden building. This part retained, refurbished, and extended building would form the new Paris Garden block and continue to address and enclose the street to the east. It would also provide an undercroft link through the block into the centre of the site. Following the demolition of the existing 18-19 Hatfields building, a new Hatfields block would be built. This would address and enclose the street to the west but leave a gap in its frontage to open up the centre of the site to Hatfields. The centre of the site would include a linking block that would integrate with the Paris Garden and Hatfields blocks to form a single office building. It would also include a new publically accessible courtyard that would provide the main access to the offices.
68. The undercroft link through the Paris Garden block, gap in the site's Hatfields frontage, and courtyard would deliver the new east-west link required by the site allocation. The alignment of this link would be along the northern edge of the site. This would be beneficial because it would ensure that most of the built form would be located on the southern part of the site away from the more sensitive adjoining statutory listed buildings to the north and towards the less sensitive 6 Paris Garden and 20-21 Hatfields building to the south. It would also create opportunities for future enhancements to these adjoining listed buildings, which could use the courtyard to provide level access with minimal levels of intervention

to their fabric.

69. The proposed alignment of the east-west link would be more compatible with the alternative scheme for the redevelopment of the 18 Blackfriars Road site, which is currently subject to an application for planning permission, rather than either of the extant planning permission schemes. Whilst a determination is yet to be made, officers understand that the alternative scheme is more likely to be built out, should planning permission be granted. In any case, as described above, the proposed alignment would be the most appropriate in terms of the creation of an acceptable relationship between the proposal and the existing adjoining buildings, including the statutory listed buildings to the north.
70. Whilst the layout would allow the proposal to activate Paris Garden and Hatfields through the office use, which would be visible at ground floor level through full-height windows, the main entrance to the building would be via the courtyard. There would be a secondary entrance to the Paris Garden block's ground floor affordable workspace from the street, but the only other entrances from either Paris Garden or Hatfields would be to ground floor circulation and other ancillary spaces. Officers worked with the applicant during the pre-application process to explore alternative entrance options. However, the challenges posed by the change in levels across the site coupled with the part-retention of the existing 4-5 Paris Garden building mean that it is preferential to have the building's main entrance via the proposed courtyard, which would itself be activated by this approach. Moreover, a direct entrance from the street to the affordable workspace on the ground floor of the Paris Garden block would work well in practice. The ground floor office space within the Hatfields block is most likely too small to be let independently from any other part of the building, so a direct entrance from the street would serve no real purpose. Notwithstanding this, there would be a secondary entrance to the Hatfield block's ground floor from the courtyard, which would provide a direct entrance if required.
71. The applicant has demonstrated that the layout of the proposal, along with its massing, would provide a high-quality environment on the site, including for the courtyard and terraces, as follows:
 - The applicant has submitted a Daylight, Sunlight & Shadow Report. This demonstrates that the proposed external courtyard and terraces would be of an overall acceptable quality in terms of the levels of sunlight that they would receive. The terraces on the eighth and ninth floors would receive at least two hours of sunlight to well over 50% of their area on 21 March. This means that these spaces would be compliant with the relevant guidance set out in the Building Research Establishment's Site layout planning for daylight and sunlight: a guide to good practice (2022) (the "BRE guidelines", as discussed further below). The external courtyard would receive at least two hours of sunlight to 46% of its area on the 21 of March, which would be just below the BRE guidelines. This would be acceptable, especially given that most of the external courtyard would receive at least two hours of sunlight during the summer months, when it is most likely to be used more intensively. The fifth floor terrace would fall below the BRE guidelines. However, this would also be acceptable, given

that occupiers of the building would have access to the other terraces and/or the external courtyard, as well as other nearby open spaces.

- The applicant has submitted a Pedestrian Level Wind Microclimate Computational Fluid Dynamics Assessment. This concludes that wind conditions on the site would be acceptable, subject to mitigation relating to some of the terraces, which should be secured via a condition.
72. The proposed courtyard would need to be managed as publically accessible space. The applicant has submitted a Draft Terrace and Courtyard Management Plan and a full management plan for the courtyard and other public realm could be secure via a planning obligation, in line with the Public London Charter London Plan Guidance (2021). It is understood that a key aspect of the courtyard's management may be for the link through the Paris Garden block to be closed overnight for security reasons and at the request of Metropolitan Police Service's (MPS) Designing Out Crime Officer (DOCO). Officers support the proposed approach. This would allow for a route through the site at the busiest times of the day and create a secure and welcoming environment, subject to an acceptable full management plan and a condition to secure details of the undercroft link's detailed design.

Massing

73. London Plan Policy D9 and Southwark Plan P17 both set out locational and other criteria for the development of tall buildings.
74. The proposed building would be a tall building. By virtue of the site's location in the CAZ and the site allocation, a tall building would be acceptable in principle. The extant planning permission would also allow for a significantly taller building on the main part of the site and, therefore, further establishes the acceptability of a tall building.
75. The applicant has submitted a Planning Statement, which sets out how the proposal would comply with tall buildings policies in full. This makes reference to a (Built) Heritage, Townscape and Visual Impact Assessment (HTVIA), which has also been submitted by the applicant. The HTVIA provides an analysis of the townscape and visual impacts of the proposal, including through a series of views and cumulatively with other relevant proposed, consented, and planned tall buildings; all such impacts are assessed as being acceptable and some would be positive.
76. Officers agree with the applicant's conclusions in relation to the appropriateness of the proposed tall building. Moreover, the proposal's various relevant visual, functional, and environmental impacts are discussed elsewhere in this report and would be acceptable overall.
77. As discussed above, the proposed layout, with the opening up of the site on to Hatfields, would help to ensure that the overall approach to massing would be successful. It would do so by pushing the new Hatfields block away from the adjacent statutory listed four-storey 15-17 Hatfields building. This would mean that the 9-11 storey height of this part of the proposed building would not result

in an inappropriate relationship. Likewise, the taller part of the new 5 to 10 storey Paris Garden block would be pulled back from the adjoining statutory listed five-storey 1-3 Paris Garden building, so that the two buildings would be roughly the same height at the point of meeting.

78. The tallest parts of the building would be located adjoining 6 Paris Garden and 20-21 Hatfields, and have been design to be of a similar height. Therefore, the massing of buildings along Paris Garden and Hatfields would generally read as being taller to the south and stepping down towards the listed buildings in the north.
79. The building's massing would be well articulated, which would prevent it from appearing bulky. The creation of a horizontal "waistband" feature running around the Paris Garden, Hatfields, and courtyard edges of the building at fifth floor level would provide a break in the massing and ensure that the lower portion reads as being of a similar scale to the adjoining listed buildings. A vertical "beacon" feature that would be set within the courtyard elevation of the linking block would also provide a break. The size of the building's floorplates would progressively decrease as its height increases, which would prevent it from feeling top heavy. Other less significant design moves, such as setbacks in the building line, would provide further articulation.

Architecture and finished appearance

80. The submitted Design and Access Statement sets out details of the proposed approach to the architecture and finished appearance of the building.
81. The architectural treatment of the proposed building would seek to express it as a single entity and take cues from neighbouring buildings and the history of the site. The retained part of the 4-5 Paris Garden building would be fully re-clad, which would help to unify it with the entirely new parts of the proposed building.
82. The main facades of both the Paris Garden and Hatfields blocks would include punched window and door openings that would be organised to reference the facades of the adjoining listed buildings in terms of scale, proportion, and rhythm, including through the use of two-storey flat arched openings at ground and first floor levels. The design of the window and door openings and protruding aluminium reveals, as well as other elements of the facades, would also reference letter press boxes used by printers and, therefore, the history of the local area.
83. Further references to the history of the site, including as part of a print works in an area that was once dominated by the printing industry, are also proposed through the incorporation of public art into the elevations of the building. This would utilise the metal spandrel panels proposed for above the first floor windows. Such public art could be secured via a condition.
84. The main finishing material for the external elevations would most likely be full bricks in a warm grey with flecks of other warmer colours and a warm coloured mortar. This would complement both adjoining listed buildings – the white

rendered finish of 1-3 Paris Garden and the yellow brick of 15-17 Hatfields. Notwithstanding this, conditions could be used to secure appropriate final details of the proposed building's finished appearance, including external materials.

85. High-level information about the proposed external lighting strategy is set out in the submitted Design and Access Statement. The proposal would be generally acceptable from an urban design perspective and, as recommended below, the final lighting design should be secured through a condition.

Accessibility and inclusivity

86. London Plan Policy D5 sets out that development should achieve the highest standards of accessibility and inclusivity.
87. The applicant has submitted an Access Statement, which sets out the approach to ensuring that the proposal would be accessible and inclusive throughout. As requested by the GLA, a condition should be used to secure compliance with the submitted Access Statement.

Delivery

88. London Plan Policy D4 seeks to ensure the delivery of good design, including through the appropriate scrutiny of development at pre-application and application stages and by maintaining design quality through to the completion of the construction phase.
89. Design scrutiny undertaken by officers, including the Design and Conservation Officer, at pre-application and application stages has been sufficient without the need for the involvement of the Council's Design Review Panel. Indeed, as set out above, the proposal represents high quality, contextually sensitive design.
90. The conditions recommended above would secure the maintenance of such design quality through to the completion of the construction phase. A planning obligation is also recommended to secure the ongoing involvement of the current architect, or a high-quality alternative, to maintain design quality throughout this phase.

Conclusion

91. In summary, the proposal would be acceptable in terms of urban design, including the approach to layout, massing, architecture and finished appearance, accessibility and inclusivity, and delivery, in accordance with the development plan, subject to a conditions and planning obligations.

Landscaping, urban greening, and biodiversity

Landscaping

92. London Plan Policies D8, G1, and G7 and Southwark Plan P13, P59, and P61

promote the creation of high quality landscaped areas, with an emphasis on greening, including through tree planting.

93. The applicant has submitted a Landscaping Strategy, which sets out the proposed approach to the hard and soft landscaping of the external courtyard, terraces, and green roof, including materials, products and planting.
94. Generally, the approach would be appropriate. The hard landscaping and street furniture would be of a high quality, using materials and products that would respond to the character and history of the area and be robust and easy to maintain. The soft landscaping would include planting, including trees, which would relate well with local flora and fauna and enhance biodiversity, be suited to the relevant specific microclimate, and be varied enough to provide year-round interest.
95. The proposed landscaping of the external courtyard, and link through the Paris Garden block, would be designed to allow these spaces to function effectively as a route between Paris Garden and Hatfields and to the building's main entrance. There would be an open area outside the main entrance and stairs, ramps, and a lift to manage level changes. However, it would also be designed to be a pleasant environment that could act as the public-facing focal point of the proposal. To achieve this it would include opportunities to programme the use of the open area outside the main entrance, several seating areas, and the reuse and integration of decorative parts of the demolished 18 Hatfields building's façade.
96. The proposed landscaping of the terraces would be designed so that these spaces would provide an amenity for the occupiers of the building, visually and as a space that can be inhabited. It would include open areas that could be programmed for events and numerous seating areas, as well as movable furniture that would allow for a range of uses, including meetings.
97. The proposed green roof would be an extensive green roof, which would help to enhance biodiversity. It would also include PV panels.
98. The submitted landscaping strategy has been reviewed by the Council's Urban Forester, who supports the proposal, subject to conditions to secure details of hard and soft landscaping, as well as associated management provisions.

Urban greening

99. London Plan Policy G5 requires that proposals such as that under consideration contribute to the greening of London and recommends that an Urban Greening Factor (UGF) score of 0.3 is targeted.
100. The submitted Landscaping Strategy demonstrates that the proposal would achieve an UGF score of approximately 0.32. It is noted that only the main part of the site has been taken in to consideration for this calculation. Officers support this approach, given that other the parts of the site would only be used for vehicular access to the basement via the existing servicing route and / or to carry out very minor works to existing neighbouring buildings.

101. The proposed urban greening could be secured through the use of conditions discussed in relation to landscaping and biodiversity.

Biodiversity

102. London Plan Policy G6 and Southwark Plan P60 both seek to ensure that development protects and enhances biodiversity, including through delivering biodiversity net gain.
103. The site is located on the opposite side of Paris Garden from Christ Church Gardens, which is designated as a Site of Importance for Nature Conservation (SINC).
104. The applicant has submitted an Ecological Impact Assessment, supported by a Bat Survey Report and Biodiversity Net Gain Assessment.
105. The submitted Ecological Impact Assessment concludes that there would be very limited scope for any harm to the Christ Church Gardens SINC. This is provided that a construction environmental management plan (CEMP) is implemented; a condition to secure a detailed CEMP is recommended below. It also concludes that the site is currently of low ecological value in terms of on-site habitats, but it is noted that the proposal would enhance the site in this respect, as discussed below in relation to the submitted Biodiversity Net Gain Assessment. Likewise, it concludes that the site is of limited or low ecological value specifically for bats, birds, and terrestrial invertebrates. Its recommendations for bats are the same as those discussed below in relation to the Bat Survey Report. For birds, it recommends mitigation to protect any nesting birds during demolition and enhancements to encourage bird nesting and foraging, including the provision of bird boxes. For terrestrial invertebrates, it recommends enhancements to encourage terrestrial invertebrates nesting and foraging, including the provision of terrestrial invertebrates boxes.
106. The submitted Bat Survey Report sets out that bats were not found to use the site for roosting, commuting, or foraging. However, it recommends mitigation during demolition to ensure that any bats that could start to roost between the survey and the commencement of works would be protected. It also recommends some enhancements to encourage bat commuting and foraging.
107. The submitted Biodiversity Net Gain Assessment concludes that the proposal would result in biodiversity net gain of 100%, and recommends a management and monitoring plan to ensure delivery.
108. The applicant has also submitted an External Lighting Assessment Report. This demonstrates that the proposed external lighting strategy would not have a harmful impact on biodiversity. A condition should be used to secure details of the final lighting design.
109. The Council's Ecology Officer has reviewed the submission and generally agrees with its conclusions. However, notwithstanding the recommendations set out within the submission, conditions are recommended to secure the provision and

management of biodiversity roofs, green walls, and swift and invertebrate nesting features. Additional enhancements would be secured through the use of conditions discussed above in relation to landscaping. No additional mitigation would be required to protect potential roosting bats and/or nesting birds, given that that separate legal protections are already in place.

Conclusion

110. Therefore, the proposal would be acceptable in terms of landscaping, urban greening, and biodiversity, in accordance with the development plan, subject to conditions.

Designing out crime

111. London Plan Policy D11 and Southwark Plan P16 both require development to incorporate features to design out crime.
112. The submitted Design and Access Statement sets out that the proposed development has been designed to adhere to relevant Secured by Design guidance and the applicant has engaged with the Metropolitan Police Service's (MPS) Designing Out Crime Officer (DOCO). Indeed, the proposed development has been designed to be secure, including through the incorporation of opportunities for natural surveillance and visual permeability. The proposed link through the Paris Garden block would be managed, together with other proposed areas of public realm, to ensure that it would be secure, as discussed above.
113. The MPS DOCO has reviewed the application submission and advised that the proposal could incorporate security measures that would enable it to achieve a Secured by Design award. The MPS DOCO recommends that the implementation of such security measures be required by condition.
114. On this basis, the proposal would be acceptable in terms of designing out crime, in accordance with the development plan, subject to a condition.

Fire safety

115. London Plan Policy D12 requires that planning applications for proposals such as that under consideration be designed to achieve the highest fire safety standards and accompanied by a fire statement, which must meet a number of detailed requirements. Policy D5 of the same document requires that, where lifts are proposed, at least one lift per core must be a suitably sized fire evacuation lift for use by people that require level access.
116. The applicant has submitted a London Plan Fire Statement, which was prepared by fire engineers, Jensen Hughes. This sets out how the proposal would address London Plan requirements in respect of fire safety, including through the incorporation of two fire evacuation lifts.
117. Greater London Authority (GLA) officers have assessed the submitted London

Plan Fire Statement and advised that it adheres to the London Plan's requirements. GLA officers recommend that compliance with this document be secured through a condition.

118. As such, the proposal would be acceptable in terms of fire safety, in accordance with the development plan, subject to a planning condition.

Heritage

119. London Plan Policy HC1 and Southwark Plan P21 generally require that the significance of heritage assets be conserved.

Above-ground heritage assets

120. Southwark Plan P19 relates specifically to statutory listed buildings and structures, P20 relates specifically to conservation areas, and P26 relates specifically to locally listed buildings and structures; all seek the conservation of these above-ground heritage assets.
121. There are a number of above-ground heritage assets near to and on the site, including statutory listed buildings and structures, conservation areas, and locally listed buildings and structures.
122. The submitted HTVIA, sets out full details of the above-ground heritage assets that could potentially be affected by the proposal, including a discussion of their significance. Notwithstanding this, the most likely to be affected above-ground heritage assets are as follows:
- 1-3 Paris Garden is a Grade II statutory listed building, built in 1909. Its significance is mostly derived from its historic interest as a building with a reinforced concrete frame making early use of the Kahn system, which was introduced from the United States of America during the Edwardian era. This system allowed the construction of large floorplans capable of handling heavy loads, and improved fire resistance, both of which allowed for important advancements in the design of industrial buildings. The building also has some historic interest because it forms part of the wider group of buildings connected to the printing industry in the local area, most notably 15-17 Hatfields. It also has considerable architectural interest, mainly due to the eclectic and decorative design of its front elevation, which is unusual for an industrial building.
 - 15-17 Hatfields is a Grade II statutory listed building, built in 1904/5. Again, the building's significance is mainly because of its historic interest due to its reinforced concrete frame, which was pioneering in using the Hennebique system. This system was introduced to the United Kingdom towards the end of the Victorian period and is important for similar reasons to the Kahn system, as described above. The building also has some historic interest because it forms part of the wider group of buildings connected to the printing industry in the local area, principally 1-3 Paris

Garden. It has some architectural interest, which is mainly related to the visually striking, classical design of the building's front elevation.

- Christ Church is a Grade II statutory listed building, built in 1958/9. The building's significance is mainly related to the ten stained glass windows located in its nave, which are of artistic and historic interest. These were designed by Frederick Walter Cole, once the chief designer for William Morris & Co., and depict local people at work and London landmarks. The building is also of some architectural interest as an appropriate, simple setting for the stained glass windows, which are best appreciated from its interior, and because it is well-preserved example of a post-war neo-Georgian church.
 - Christ Church Gardens Drinking Fountain is a Grade II statutory listed structure, erected in 1990. Its significance is mainly due to its historic interest as it is one of four drinking fountains across London that was funded by philanthropist John Passmore Edwards. It also has some architectural interest due to its design and good state of repair.
 - The Roupell Street Conservation Area mainly comprises terraced houses, as well as some other buildings typical of such an area; a number of these buildings are Grade II statutory listed. The Conservation Area and statutory listed buildings within are significant, both as a group and individually, as relatively intact examples of early nineteenth century residential development, with both architectural and historic interest.
 - Dorset House is a locally listed building, built in 1931. The significance of the building is mainly on account of its historic interest as part of the wider group of buildings connected to the printing industry in the local area. It also has some architectural interest due to its attractive frontages on Stamford Street, Paris Garden, and Hatfields making a positive contribution to the street scene.
123. With the exception of the proposed work to the flank wall of 17 Hatfields, there is only the potential for the proposal to have an indirect impact on heritage assets near to the site, meaning that the only possible impact could be on their settings.
124. The submitted HTVIA finds that there is a lack of intervisibility between the site and a number of the above-ground heritage assets that could potentially be indirectly affected by the proposal. These heritage assets are, therefore, scoped out of the full assessment. It is also found that there would only be very limited intervisibility between the site and several other above-ground heritage assets, such that the proposal would only be glimpsed. In such cases, the HTVIA concludes that glimpses of the upper storeys of the proposed building, as part of the wider setting of these heritage assets, would not have a material impact on their significance, particularly given the existing surrounding mixed urban context, which already features a number of tall buildings. These heritage assets are also scoped out of further assessment on this basis.

125. Where there would be greater intervisibility between the site and above-ground heritage assets that could potentially be indirectly affected by the proposal, a full assessment has been undertaken. Overall, the submitted HTVIA concludes that there would be no harmful impacts on the significance of any of these heritage assets.
126. There are some instances where this is because the significance of the heritage asset in question is not linked to its setting. However, where the setting of a heritage asset would contribute to its significance, it is also found that there would be no harm.
127. In some cases, this is because of the distance between the site and the relevant heritage assets and/or intervening built form. In other cases, it is because views of the upper storeys of the proposed buildings would form part of an existing setting that is characterised by the surrounding mixed urban context, including other tall buildings; and, in such cases, the introduction of additional tall buildings would not detract from a heritage asset's significance. In many cases, it would be due to a combination of these factors.
128. In relation to the above-ground heritage assets that would be most likely to be indirectly affected, the HTVIA concludes that there would be no harm to the significance of these assets for the following reasons:
- 1-3 Paris Garden adjoins the main part of site. However, the significance of 1-3 Paris Garden mainly relates to the historic interest associated with its reinforced concrete frame. This is unaffected by changes to its setting. It also has some historic interest on account of its place within the wider group of buildings connected to the printing industry in the local area and architectural interest mostly related to its front elevation. The changes to 4-5 Paris Garden, which was originally an extension to 1-3 Paris Garden, would have a minor negative impact. However, this would be mitigated through the contextually sensitive design of the proposal, which would include features to reference the site's history, as discussed above. The demolition of 18-19 Hatfields and the creation of the courtyard would expose the rear elevation of 1-3 Paris Garden to public view and allow for a better appreciation of the building and its historic and architectural interest.
 - 15-17 Hatfields adjoins the main part of site. The significance of 15-17 Hatfields mainly relates to the historic interest associated with its reinforced concrete frame. This is unaffected by changes to its setting. However, it also has some historic interest on account of its place within the wider group of buildings connected to the printing industry in the local area and architectural interest mostly related to its front elevation. The demolition of 18-19 Hatfields, which relates well to the front elevation of 15-17 Hatfields as part of an attractive street scene, would have a minor negative impact. However, this would be mitigated through the contextually sensitive design of the proposal, which would include features to reference the site's history, as discussed above. The demolition of 18-19 Hatfields and the creation of the courtyard would also

expose of the flank wall of 17 Hatfields. Whilst the flank wall of 17 Hatfields has typically been hidden by an adjoining building throughout its history, this change would allow for a better appreciation of the building and its historic and architectural interest, with works proposed to make the wall structurally sound and/or presentable as required.

- Christ Church is located around 50 metres away from the main part of the site, which forms part of its backdrop in views from the east. The significance of the building is mainly derived from its stained glass windows, which are best appreciated from within its interior. This means that its significance is unlikely to be impacted by changes to its setting. However, the contextually sensitive design of the proposal would ensure that the building's setting would continue to be appropriate in any case.
 - Christ Church Gardens Drinking Fountain is located around 30 metres away from the main part of the site, which forms part of its backdrop in views from the east. The significance of the structure is mainly derived from its historic interest and association with John Passmore Edwards. This means that its significance is unlikely to be impacted by changes to its setting. However, the contextually sensitive design of the proposal would ensure that the building's setting would continue to be appropriate in any case.
 - The Roupell Street Conservation Area and statutory listed buildings within are located at least 125 metres away from the main part of the site so there is limited intervisibility between it and these heritage assets. There would be some views of the proposed building above and between buildings in the Conservation Area, though mostly only the upper storeys of the proposed building would be seen. The significance of the Conservation Area and statutory listed buildings within is related to the survival of this enclave of relatively intact early nineteenth century residential development in an area generally characterised by more recent development. The significance of the Conservation Area and statutory listed buildings within would not, therefore, be negatively affected by further incremental change outside of the Conservation Area boundary.
 - Dorset House is located around 65 metres away from the main part of the site. The significance of the building is related to its connection to the printing industry in the local area and its attractive frontages. The main part of the site forms part of its setting in some views along Paris Gardens and Hatfields. The proposed changes to 1-3 Paris Garden and demolition of 18-19 Hatfields would have a very minor negative impact. However, the design of the proposal would provide mitigation through being contextually sensitive, and including features to reference the site's history, as discussed above.
129. The proposed work to the flank wall of 17 Hatfields, which would have a direct impact on a statutory listed building and, therefore, require listed building consent, is discussed below. In summary, as set out in the submitted HTVIA, this

would not result in any harm to the significance of the affected listed building, subject to conditions attached to any listed building consent. A condition would also need to be attached to any planning permission to protect the flank wall of 17 Hatfields, as well as 1-3 Paris Garden and 15-17 Hatfields more generally, during the proposed construction phase.

130. Officers agree with the conclusions of the HTVIA, in that the proposal would not result in any harm to the significance of heritage assets.
131. The existing buildings on the main part of the site are not of any particular architectural, historic, or other interest, and are not non-designated heritage assets, despite making some positive contribution to the street scene and relating well to or having some association with the directly adjoining listed buildings. In the context of the quality of the proposed replacement building, as discussed above, the part demolition of 4-5 Paris Garden and full demolition of 18-19 Hatfields would be acceptable. Indeed, the extant planning permission has established that the full demolition of both existing buildings would be acceptable, in principle.

Below-ground heritage assets

132. Southwark Plan Policy P23 relates specifically to archaeology and seeks the conservation of archaeological heritage assets, with a preference for the in situ preservation of any remains.
133. The site is located within the North Southwark and Roman Roads APA. This is a Tier 1 APA, which contains heritage assets of national significance that should be treated as designated heritage assets in line with the relevant policies in Chapter 16 of the NPPF. It also contains other heritage assets of lesser significance that should be treated as non-designated heritage assets.
134. The submitted Archaeological Desk Based Assessment concludes that it is possible that paleoenvironmental, prehistoric, and post-medieval remains of low or medium significance may be affected by the proposal due to works below existing ground and/or basement levels.
135. The Borough Archaeologist has reviewed the submitted Archaeological Desk Based Assessment and agrees with its conclusions. Conditions are recommended to ensure that any potential harm to heritage assets could be appropriately mitigated. A planning obligation is also recommended to cover the cost of archaeological technical support.

Conclusion

136. Therefore, the proposal would have an acceptable impact on heritage assets, in accordance with the development plan, subject to conditions and a planning obligation.

Listed building consent

137. Listed building consent, as well as planning permission, would be required for the proposed work to the flank wall of 17 Hatfields, which would be exposed due to the demolition of 18-19 Hatfields and the creation of the courtyard.
138. The flank wall of 17 Hatfields is part of 15-17 Hatfields, which is Grade II statutory listed. The significance of this building is discussed above in more detail. However, the most important element of its significance is related to the historic interest of its reinforced concrete frame, with its historic interest as part of the wider group of buildings connected to the printing industry in the local area and the architectural interest of its front elevation also relevant.
139. As set out in the submitted HTVIA, the proposed work requiring listed building consent would not result in any harm to the significance of 15-17 Hatfields, as it would only be to make the flank wall structurally sound and/or presentable, and most likely comprise mainly cosmetic repairs. This would preserve the building and its special interest, given that there should be no impact on the building's reinforced concrete frame, status as part of the wider group of buildings connected to the printing industry in the local area, or front elevation.
140. Given that the exact nature of the required work cannot be fully known until 18-19 Hatfields has been demolished, it is recommended that conditions should be used to ensure that any work carried out to the flank wall of 17 Hatfields would be appropriate.
141. On this basis, the proposed work would be acceptable, subject to conditions.

Impact of the proposal on the amenity of adjoining occupiers and the surrounding area

142. Southwark Plan P56 requires that development should not result in an unacceptable loss of amenity to current or future adjoining occupiers or the users of the surrounding area, including in terms of outlook and sense of enclosure, privacy and overlooking, light pollution, levels of daylight and sunlight, and wind microclimate.

Outlook and sense of enclosure and privacy and overlooking

143. There is some limited scope for amenity impacts on nearby sensitive receptors in terms of outlook and sense of enclosure and privacy and overlooking.
144. The adjoining office buildings to the north of the main part of the site at 1-3 Paris Garden and 15-17 Hatfields are not sensitive to such amenity impacts.
145. The adjoining purpose-built student accommodation and ballet school building to the south at 6 Paris Garden and 20-21 Hatfields does not have any windows that face towards the main part of the site, but it does have a podium-level amenity space that could be impacted. Whilst the existing 4-5 Paris Garden building partially encloses the northern side of this space, the proposed building would

enclose it further. This would be acceptable in terms of outlook and sense of enclosure, given that the space is already characterised by being enclosed, including by the building's purpose-built student accommodation towers on its east and west sides, but would continue to be open to the south. The proposal would also include windows facing directly in to this space. These windows would serve circulation and other ancillary spaces within the proposed building and a condition could be applied to ensure that they are obscure glazed and fixed shut, which would acceptably mitigate any privacy and overlooking concerns. The 6 Paris Garden and 20-21 Hatfields roof terrace would not be materially impacted, despite the erection of the proposed building to its north, given that it would remain open around the almost all of its perimeter and there would be no proposed windows directly overlooking it.

146. The existing Christ Church Gardens to the east and Hatfields Green open space and Colombo Centre football pitches to the west are either publicly accessible or open to public view, so not sensitive to privacy and overlooking impacts. In terms of impacts on outlook and sense of enclosure, these spaces have an existing relationship with buildings on the opposite side of Paris Garden or Hatfields that are between 4 and 13 storeys in height. The proposed increase in height on the main part of the site would have an impact on outlook from and the sense of enclosure of these spaces. However, this would be acceptable in the context of the surrounding high-density urban area, and would also be mitigated by the contextually sensitive design of the proposal and the screening effect of existing trees.
147. The most recent extant planning permission for the redevelopment of the adjacent 18 Blackfriars Road site allows a large residential block to be built to the east of the main part of the site, which would represent the likely worst-case scenario in terms of sensitivity. The existing 4-5 Paris Garden building provides enclosure on the opposite side of the road and includes windows that face towards the 18 Blackfriars Road site. Whilst the proposed building would have an impact on outlook and sense of enclosure and privacy and overlooking for any homes constructed on the opposite side of Paris Garden, its impact would not be significantly different overall to that of the existing building in this respect. Indeed, the proposed increase in height and introduction of terraces would only have a material impact on a relatively small number of homes. Moreover, the extant planning permission that relates to the site would allow for a much taller building opposite the 18 Blackfriars Road site and the proposal would generally have a much-reduced impact compared to this scheme.
148. The alternative scheme for the redevelopment of the 18 Blackfriars Road site, which is currently subject to an application for planning permission, would not include any buildings to the east of the main part of the site. Instead, it would include a play space that would act as an extension to Christ Church Gardens. As stated above, the impact on Christ Church Gardens in terms of outlook and sense of enclosure and privacy and overlooking would be acceptable.
149. There are no other nearby sensitive receptors that would have a direct relationship with the proposal, such that there could be any scope for impact on outlook and sense of enclosure and privacy and overlooking.

Light pollution

150. The External Lighting Assessment Report demonstrates that the proposed external lighting strategy would not have a harmful impact on amenity.
151. The Council's Environmental Protection Officer has reviewed the submitted External Lighting Assessment Report and recommends a condition to ensure that the final lighting design is acceptable in terms of any impacts on amenity.

Daylight and sunlight

152. The BRE guidelines are intended to assist with the design of new development. They are also typically used to help assess the likely daylight and sunlight impacts of new development on the amenity of current and future adjoining occupiers and users of the surrounding area, as well as the quality of a proposal itself.
153. The BRE guidelines are intended to be used flexibly and should not be applied as a strict set out rules, to which new development must adhere. This document states about itself that the "advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design".
154. The submitted Daylight, Sunlight & Shadow Report provides an assessment of the impacts that the proposal would have on the amenity of current and future adjoining occupiers and users of the surrounding area in terms of daylight and sunlight, with reference to the BRE guidelines. The measures of daylight and sunlight used to assess relevant nearby windows and/or rooms and external amenity spaces that might be affected are as follows:
 - Vertical sky component (VSC) is a measure of daylight reaching a window.
 - No sky line (NSL) is a measure of the distribution of daylight within a room.
 - Annual probable sunlight hours (APSH) is a measure of sunlight reaching a window.
 - Sun hours on ground (SHOG) is a measure of sunlight reaching the ground in an external amenity space.
155. The submitted Daylight, Sunlight & Shadow Report assesses a number of scenarios. These are:
 - Scenario 1, which compares the existing levels of daylight and sunlight with those that would exist following the delivery of the proposal.
 - Scenario 2, which compares the levels of daylight and sunlight that would exist following the delivery of the extant planning permission that relates to the site with those that would exist following the delivery of the proposal.
 - Scenario 3, which is as scenario 1, but assuming that three other planning permission schemes for nearby sites would be delivered first and, therefore, influence the baseline levels of sunlight and daylight.

- Scenario 4, which is as scenario 3, but assuming that three other planning permission schemes for nearby sites would be delivered first and, therefore, influence the baseline levels of sunlight and daylight.

156. It appears that two schemes with expired planning permissions have been included in the baseline for scenarios 3 and 4. Therefore, the discussion below mainly focusses on scenarios 1 and 2.
157. However, the third scheme included in scenarios 3 and 4 is the most recent extant planning permission scheme for the adjacent 18 Blackfriars Road site. Therefore, any consideration of the potential daylight and sunlight impacts on this scheme necessarily involves a discussion of scenarios 3 and 4. This still allows an approximate assessment.
158. A separate analysis to allow for consideration of any potential daylight and sunlight impacts on the alternative scheme for the redevelopment of the 18 Blackfriars Road site, which is currently subject to an application for planning permission, has also been provided. This includes two scenarios that would be the same as scenarios 3 and 4 but with this alternative scheme replacing the most recent extant planning permission scheme for the redevelopment of the 18 Blackfriars Road site.
159. The submitted Daylight, Sunlight & Shadow Report concludes that the proposal would mostly not have a noticeable impact on the amenity of current and future adjoining occupiers in terms of daylight and sunlight. Notwithstanding the other scenarios set out in the Daylight, Sunlight & Shadow Report, 49 Colombo Street would also fall within this category when scenario 1 is considered. There would be a small number of noticeable impacts, which are as follows.

The 18 Blackfriars Road site

This cleared site is to the east of the application site and has extant planning permissions for mixed-use redevelopment, which would include new homes.

In terms of daylight impacts, a total of 730 windows serving 346 rooms, which would be delivered as part of the most recent extant planning permission scheme for this site, have been assessed.

For scenario 3, the impacts on 284 rooms (82% of the total) and their associated windows would be compliant with the VSC and NSL assessment measures.

The impacts on 16 rooms (5% of the total) and their associated windows would result in minor transgressions of the VSC and/or NSL assessment measures.

The impacts on 24 rooms (7% of the total) would be compliant with the NSL assessment measure. However, the impacts on at least one window serving each room would result in a moderate or major transgression of the VSC assessment measure.

The impacts on 22 rooms (6% of the total) and their associated windows would result in moderate or major transgressions of the VSC and/or NSL assessment measures.

In terms of sunlight impacts, a total of 102 rooms and their windows, which would be delivered as part of the most recent extant planning permission scheme for this site, have been assessed.

For scenario 3, the impacts on 41 rooms (40% of the total) would result in transgressions of the APSH assessment measures.

Scenario 4 demonstrates that the daylight and sunlight impacts that would result from the extant planning permission scheme that relates to the application site would be the same or worse in most cases.

The separate analysis of daylight and sunlight impacts on the alternative scheme for the redevelopment of the 18 Blackfriars Road site demonstrates that there would be fewer noticeable daylight and sunlight impacts.

Whilst the daylight and sunlight impacts on the most recent extant planning permission scheme for this site would be mostly acceptable, given the general levels of compliance with the BRE guidelines, there would be some more significant impacts that would result in harm. The existence of a generally more harmful fallback position would provide some mitigation but there would still be some residual harm.

6 Paris Garden and 20-21 Hatfields,

This mixed-use building is to the south of the site and includes purpose-built student accommodation. Purpose-built student accommodation is potentially less sensitive to daylight and sunlight impacts due to the transient nature of its occupiers.

In terms of daylight impacts, a total of 198 windows serving 94 rooms have been assessed.

In scenario 1, the impacts on 29 rooms (31% of the total) and their associated windows would be compliant with the VSC and NSL assessment measures.

The impacts on 21 rooms (22% of the total) and their associated windows would result in minor transgressions of the VSC and/or NSL assessment measures.

The impacts on 19 rooms (20% of the total) would be compliant with the NSL assessment measure. However, the impacts on at least one window serving

each room would result in a moderate or major transgression of the VSC assessment measure; the impacts on other windows serving these rooms would result in a minor transgression.

The impacts on 25 rooms (27% of the total) and their associated windows would result in moderate or major transgressions of the VSC and/or NSL assessment measures.

In terms of sunlight, impacts on all rooms and their windows would be compliant with the APSH assessment measures.

Scenario 2 demonstrates that the daylight and sunlight impacts that would result from the extant planning permission scheme that relates to the application site would be the same or worse in almost all cases

Although the daylight and sunlight impacts on this building would be acceptable in some cases, because of its use as purpose-built student accommodation and the general levels of compliance with the BRE guidelines, there would be several more significant impacts that would result in harm. The existence of a generally much more harmful fallback position would provide some mitigation but there would still be a small amount of residual harm.

Climsland House, Duchy Street

This residential building is to the west of the site and contains flats. It has access decks on its façade facing the site. These access decks restrict daylight to the rooms lit by the windows below them.

In terms of daylight impacts, a total of 65 windows serving 45 rooms have been assessed.

In scenario 1, the impacts on 33 rooms (73% of the total) and their associated windows would be compliant with the VSC and NSL assessment measures.

The impacts on the other 12 rooms (27% of the total) would be compliant with the NSL assessment measure. However, the impacts on their windows would result in minor transgressions of the VSC assessment measure.

Due to the orientation of windows serving rooms, no assessment of sunlight impacts was undertaken.

Scenario 2 demonstrates that the daylight impacts that would result from the extant planning permission scheme that relates to the application site would be the same or worse.

Due to the limitations posed by the access decks and the general levels of compliance with the BRE guidelines, the daylight impacts on this building would be acceptable overall.

160. None of the surrounding external amenity spaces that have been analysed would experience impacts that would transgress the SHOG assessment measure in either scenario 1 or scenario 3. The assessed external amenity spaces include Christ Church Gardens, Hatfields Green, and the 6 Paris Garden and 20-21 Hatfields roof terrace, as well as those external amenity spaces that would be created as part of the most recent extant planning permission scheme for the adjacent 18 Blackfriars Road site. Despite some other nearby external amenity spaces, such as the 6 Paris Garden and 20-21 Hatfields podium-level amenity space, not being analysed, the Daylight, Sunlight & Shadow Report has assessed a reasonable selection of such spaces around the site and demonstrates that the proposal would have an overall acceptable impact in this respect.
161. In summary, the applicant has demonstrated that the proposal would result in very few noticeable daylight and sunlight impacts, and that many of the noticeable impacts would be acceptable in any case. There would be some noticeable impacts that would be harmful. These would be partly mitigated by the generally more harmful impacts that would result from delivery of the extant planning permission that relates to the site. Any residual harm would be outweighed by the significant benefits of the scheme. These benefits would include the provision of additional employment floorspace, incorporating affordable workspace, and the creation of associated jobs, as well as the delivery of new and improved public realm, comprising a new east-west link through the site.

Wind microclimate

162. The applicant has submitted a Pedestrian Level Wind Microclimate Computational Fluid Dynamics Assessment. This concludes that the impacts of the proposal on amenity in terms of wind conditions around the site would be acceptable without the need for mitigation.

Conclusion

163. On balance, the proposal would be acceptable overall in terms of its impact on the amenity of current and future adjoining occupiers and users of the surrounding area, including in terms of outlook and sense of enclosure, privacy and overlooking, light pollution, levels of daylight and sunlight, and wind microclimate. It would be in general accordance with the development plan, subject to conditions

Transport and highways

164. London Plan Policies T1, T2, and T4 and Southwark Plan P45, P49, P50, and P51 seek to ensure that transport and highways impacts are acceptable, whilst encouraging modal shift away from motorised vehicles and towards sustainable and active travel.
165. The site has a Public Transport Accessibility Level of 6b, which is the best possible. It is located within close proximity of public transport services, including

National Rail and London Underground stations and London Bus stops. It is also located within close proximity of Stamford Street and Blackfriars Road, both of which are part of the TfL Road Network; the former also being part of the Cycleways network.

166. The applicant has submitted a Transport Assessment, which generally sets out key aspects of the proposal in relation to transport and highways.

Trip generation and mode split

167. The submitted Transport Statement demonstrates that the proposal would be likely to result in an increase in trips to and from the site due to the uplift in office floorspace. However, the mode split would reflect the proposed emphasis on sustainable and active travel with almost all trips likely to be made using public transport, or by walking or cycling. Very few trips would be likely to be made by car. Almost all motorised vehicles accessing the site would be involved in delivery and servicing activities. Notwithstanding the likelihood that the mode split would be weighted towards public transport, the excellent availability of such services in the area around the site would ensure that there would be no significant impact on their capacity.
168. This information has been reviewed by the GLA and TfL Spatial Planning and it has been confirmed that no public transport mitigation would be required as a result of the likely trip generation and mode split. Mitigation in relation to other modes of transport, including active travel, and delivery and servicing activities is discussed below.

Healthy Streets

169. The submitted Transport Assessment sets out the ways in which the proposal's approach to transport and highways issues would align with the Healthy Streets approach through prioritising sustainable and active travel.
170. Indeed, the proposal would encourage walking and cycling through the delivery of an east-west link through the site, which would include attractively landscaped public realm. The proposal would also increase the width of Hatfields through the removal of the light well that runs between the existing building line of 18-19 Hatfields and the footway. The building line of the new Hatfields block would keep the same alignment but a new area of hard landscaping would be created between it and the footway.
171. Transport Policy and Highways Development and Management Officers have recommended planning obligations to deliver improvements to the public highway, and parts of the adjoining public realm. These would generally improve the quality of Paris Garden and Hatfields for pedestrians and cyclists, with notable enhancements including a new raised table across Paris Garden, directly connecting the proposed east-west link with Christ Church Gardens, and the repair of the existing damaged raised table across Hatfields.

Car parking

172. London Plan Policies T6, T6.2, and T6.5 and Southwark Plan P54 and P55 generally promote “car-free” office development, with the exception of at least one disabled persons car parking space.
173. The submitted Transport Assessment sets out that the proposal would be “car free” but include one disabled persons car parking space. The applicant has also submitted a detailed drawing showing the layout of this space. This would be located in the extended basement and accessed via the existing servicing route.
174. The Council’s Transport Policy Officer has reviewed the submission and recommends a condition to secure the submitted details of the disabled persons car parking space. The GLA and TfL Spatial Planning have requested an additional condition to secure an electrical vehicle charging point for this space, as well as a planning obligation to restrict occupiers from obtaining on-street business car parking permits. Additionally, a condition should be used to secure a parking design and management plan for this space.

Cycle parking

175. London Plan Policy T5 and Southwark Plan P53 set out requirements in relation to cycling, including in respect of cycle parking. Further guidance is set out in the London Cycling Design Standards (2016).
176. The submitted Transport Assessment sets out the proposed approach to cycle parking, some of which is also shown on a submitted detailed drawing. Long-stay cycling parking would be provided in the basement and would meet Southwark Plan standards and, therefore, exceed London Plan standards. Complementary facilities would be located within the basement alongside the long-stay cycle parking. This basement-level cycle parking and facilities would be accessed from Hatfields via a cycle lift or, alternatively, it could be accessed via the existing servicing route. It is proposed that short-stay cycle parking in accordance with London Plan standards would be provided within the courtyard, with off-site provision to achieve Southwark Plan standards.
177. In this case, it is accepted that it would not be possible to provide all of the short-stay cycle parking needed on site, given the requirement to provide an east-west link and the aspiration to incorporate this as part of a landscaped area of public realm. This public realm would be the only place on site that could potentially accommodate the additional short stay cycle parking required to meet the Southwark Plan standards. However, additional cycle parking would most likely detract from its function as a route through the site, as well as its attractiveness as an area of public realm.
178. The Council’s Transport Policy Officer has reviewed the submission and recommends a condition to secure the submitted details of the long-stay cycle parking, as well as a planning obligation to secure funding for the off-site, short-stay cycle parking. A condition would also be required to secure details of the on-site, short-stay cycle parking as part of the landscaping. Additionally, the GLA and TfL Spatial Planning have requested a condition to secure details of

improvements to the existing servicing route to make it more suitable for use by cyclists.

Delivery and servicing

179. London Plan Policy T7 and Southwark Plan P50 require that development should facilitate safe, clean, and efficient deliveries and servicing, with off-street provision for such activity where possible. Both policies also require that the safety and efficiency of the public highway be maintained during construction. London Plan SI 7 and Southwark Plan Policy P62 require that development provides adequate refuse and recycling storage and collection facilities.
180. The applicant has submitted a draft Delivery and Servicing Plan, supported by a Draft Operational Waste Management Plan. This sets out the proposed approach to such activity. In summary, this would be to provide two delivery and servicing bays in the extended basement that would be accessed via the existing servicing route and used by smaller vehicles. Any less frequent delivery and servicing activity requiring larger vehicles, including the collection of refuse and recycling, would be via the street from Paris Garden. This would require some alterations to the public highway.
181. The applicant has also submitted an Outline Construction Management Plan (CMP) and an Outline Construction Logistics Plan (CLP). Both documents set out the proposed approach to the safe and efficient management of vehicles during construction.
182. The approach to accommodating some delivery and servicing activity off site is acceptable, noting that size restrictions related to the existing servicing route mean that it would not be possible for all such activity to take place on site. Alterations to the public highway on Paris Garden to accommodate off-site delivery and servicing activity would be acceptable and could be secured via a planning obligation, as mentioned above.
183. Conditions should be used to secure full versions of a delivery and servicing plan and an operational waste management plan. The GLA and TfL Spatial Planning have requested that the delivery and servicing plan should include a commitment to a least 50% consolidation.
184. The Council's Network Management Officer has reviewed the submission in relation to the safety and efficiency of the public highway during construction and recommends a condition to secure a full CEMP/CLP. The GLA and TfL Spatial Planning have requested that TfL be consulted in relation to the agreement of any full CEMP/CLP.

Travel plan

185. The applicant has submitted a Framework BREEAM Travel Plan. This aims to put in place management provisions to encourage sustainable and active travel.

186. A full travel plan should be secured through a planning obligation. The Transport Policy Officer has recommended that this secure exclusive use of the accessible cycle store for disabled persons. The GLA and TfL Spatial Planning have requested that the full travel plan include a commitment to put in place safety measures for those travelling to and from the site.

Conclusion

187. In summary, the proposal would be acceptable in terms of transport and highways related issues, including in respect of trip generation and mode split, the proposed approach to healthy streets, car and cycle parking, delivery and servicing arrangements, and the travel plan. It would accord with the development plan, subject to conditions and planning obligations.
188. The GLA and TfL Spatial Planning have raised a number of queries related to transport and highways, some of which remained outstanding at the point that this report was submitted for publication. The applicant has submitted some clarifications and further information to address these queries but it should be ensured that they are fully addressed prior to Stage 2 referral to the MoL. These queries are not material to the Council's overall assessment of the proposal but any update would be included in an addendum.

Environmental matters

Construction management

189. London Plan Policies D14 and SI 1 and Southwark Plan P56, P65, P66 require that environmental impacts during the construction of development, including in relation to air quality and noise and vibration, are minimised, mitigated, and managed. Southwark Plan P14 also requires that the environmental impact of basement development is acceptable.
190. The applicant has submitted an Outline CMP, which sets out the proposed approach to the mitigation of environmental impacts during the construction phase, as well as other things.
191. The applicant has also submitted a Basement Impact Assessment and a Structural Survey. Amongst other things, these set out required mitigation related to potential environmental impacts during the construction phase and the potential for impacts on neighbouring buildings and the public highway. The submitted Outline CMP also covers matters related to the construction of the proposed basement.
192. The Council's Environmental Protection Officer has reviewed the submitted Outline CMP and recommends a condition to secure a full CEMP.
193. The Highways Development and Management Officer has recommended a condition to protect the public highway during any works related to the proposed basement or foundations.

194. Any impacts on neighbouring buildings would most likely be very minor at worst, subject to appropriate mitigation; a condition is recommended above to protect the listed buildings adjoining the main part of the site during the proposed construction phase.

Noise and vibration

195. London Plan Policy D14 and Southwark Plan P56 and P66 generally require that a site is suitable for its intended use in terms of noise and vibration and that any noise and vibration impacts of a development would be appropriately minimised, mitigated, and managed.
196. The applicant has submitted an Environmental Noise Survey Report. This concludes that the proposed development would be acceptable in terms of noise and vibration subject to a limitation being placed on any plant noise emissions, which are likely to emanate from proposed roof top plant.
197. The Council's Environmental Protection Officer has reviewed the submitted Environmental Noise Survey Report and agrees with its conclusions, recommending that plant noise emissions are limited via a condition. Conditions are also recommended to restrict the hours during which the proposed terraces could be used and for deliveries and servicing, which would ensure that these activities would not generate noise at unsociable times.

Water resources

198. London Plan SI 5 and Southwark Plan P67 seek the minimisation of mains water usage and the protection of water infrastructure.
199. The applicant has submitted a BREEAM Pre Assessment, which sets out the proposed approach to minimising water usage, including water-efficient sanitary ware and devices and a greywater system.
200. A condition to secure a BREEAM rating of 'Excellent' or higher, in line with the BREEAM Pre Assessment, is recommended below. This would also ensure that generally appropriate measures to minimise water usage are secured.
201. Thames Water (TW) has requested a condition and informatives related to its own infrastructure.

Flood risk and sustainable urban drainage

202. London Plan Policies SI 12 and SI 13 and Southwark Plan P68 set out that development must not increase flood risk on or off site, in accordance with various requirements, including the reduction of surface water run-off to greenfield rates in line with the drainage hierarchy.
203. The site is located in FZ3a, but benefits from flood defences. The proposal would be classified as less vulnerable to flood risk by Annex 3 of the NPPF.

204. The applicant has submitted a Flood Risk Assessment. This sets out that the proposal would be appropriate in terms of flood risk, in accordance with the policies set out in Chapter 14 of the NPPF. It concludes that the proposal would have a suitably managed risk of flooding from any source and would not increase the probability of flood risk elsewhere.
205. The applicant has also submitted a Drainage Strategy Report. This demonstrates that the drainage hierarchy has been followed, leading to the proposed discharged of both foul and surface water to combined public sewers around the site. Sustainable drainage systems (SuDS) would be utilised to manage surface water discharge and would include green/blue roofs, rainwater harvesting, permeable paving, areas of soft landscaping, and an attenuation tank. Whilst the proposed surface water discharge run-off rate of 10.9 litres per second would not match the targeted greenfield rate, it has been shown that it would not be possible to improve it further. Moreover, it would represent a 92% betterment compared to the existing surface water discharge run-off rate.
206. Thames Water, the operator of the combined public sewers around the site, has confirmed that it has no objection to the proposal.
207. The Council's Flood Risk Management and Urban Drainage Officer has reviewed the submission and recommends that the proposal would be acceptable overall, subject to conditions. The GLA has requested additional conditions to secure a flood warning and evacuation plan and groundwater monitoring to inform flood risk mitigation for the proposed extended basement. The Environment Agency (EA) has also requested an informative related to potential flood resistant and resilient measures.

Land contamination

208. Southwark Plan P64 requires that development secures appropriate mitigation for any land contamination on site.
209. The applicant has submitted a Stage 1, Tier 1 Preliminary Risk Assessment. This concludes that it would be possible to adequately mitigate any risks associated with potential land contamination and recommends that further investigations take place prior to any below-ground work.
210. The Council's Environmental Protection Officer has reviewed the submitted Stage 1, Tier 1 Preliminary Risk Assessment and recommends a condition to secure further investigations and mitigation.

Air quality

211. London Plan Policy SI 1 and Southwark Plan P65 generally require that a site is suitable for its intended use in terms of air quality and that any air quality impacts of a development would be appropriately minimised and mitigated. It is required that development is at least air quality neutral during its operational phase.

212. The site is located within Southwark's AQMA, which covers most of the Borough, and is in place due to emissions from motorised vehicles.
213. The applicant has submitted an Air Quality Assessment. This concludes that the site would be suitable for its intended use in terms of air quality, without the need for mitigation. It states that there could be some air quality impacts during the proposal's construction phase due to dust, but that these could be mitigated through standard CEMP measures, which are discussed above. Based on the proposal including an energy strategy that would not rely on any significant combustion processes and being "car free", it is deemed that it would be air quality neutral during its operational phase, without the need for mitigation. Finally, it is set out that measures have been and would be taken to go beyond air quality neutral, to ensure that the proposal would be air quality positive.
214. The Council's Environmental Protection Officer has reviewed the submitted Air Quality Assessment and agrees with its conclusions. A condition has been recommended to control extract ventilation from the potential ancillary café.
215. Following the submission of an additional technical note to address the air quality impacts of the proposal's emergency generator, the GLA has requested an additional condition to secure the mitigation of air quality impacts through limitations on the use of the proposed emergency generator.
216. The GLA has raised several queries related to air quality, some of which remained outstanding at the point that this report was submitted for publication. The applicant has submitted some clarifications to address these queries but it should be ensured that they are fully addressed prior to Stage 2 referral to the MoL. These queries are not material to the Council's overall assessment of the proposal but any update would be included in an addendum.

Conclusion

217. Overall, the proposal would be acceptable in terms of relevant environmental matters, including construction management, noise and vibration, water resources, flood risk and sustainable drainage, land contamination, and air quality. This would be in general accordance with the development plan, subject to conditions and informatives.

Energy and sustainability

218. London Plan Policy SI 2 and Southwark Plan P70 set out that developments such as that proposed should be net zero carbon during their operation, in accordance with the energy hierarchy (be lean, be clean, be green, and be seen). There is also a requirement for such development to reduce whole life cycle carbon emissions.
219. The Council's Planning Policy Officer and the GLA have assessed the proposal in terms of energy and sustainability.

Whole life cycle carbon and circular economy

220. London Plan SI 7 and Southwark Plan P62 require that development is designed, constructed, operated, and decommissioned in a way that seeks to minimise waste and support a circular economy.
221. The applicant has submitted a Whole Life Carbon Statement. This details how the proposal has been designed and would be constructed, operated, and decommissioned to reduce whole life cycle carbon emissions.
222. The applicant has also submitted a Circular Economy Statement. The sets out how the proposal has been designed and would be constructed, operated, and decommissioned in accordance with circular economy principles.
223. In terms of design and the approach to the existing buildings on the main part of the site, it has been demonstrated that the applicant considered whether it would be technically feasible to retain these buildings. It is shown that as much of these existing buildings as possible would be retained, whilst still delivering the requirements of the allocation that relates to the site. It is also shown that the proposal would be preferable to other options considered for these buildings, including full retention and refurbishment and full demolition and redevelopment, in terms of whole life cycle carbon emissions.
224. The extant planning permission that relates to the site would allow for the full demolition of both existing buildings on the main part of the site and their redevelopment. It is understood that the proposal would represent an improvement in this respect.
225. The GLA has requested conditions that would require post-construction monitoring in relation to both whole life-cycle carbon and circular economy.

Operational carbon

226. The applicant has submitted an Energy Statement, which sets out that it is estimated that the proposal would achieve a 38% on-site reduction in carbon emissions compared to Part L 2021 of the Building Regulations. This exceeds the London Plan's minimum target for on-site reductions but falls marginally short of the Southwark Plan's minimum target for on-site reductions.
227. This would be acceptable, overall, and a financial contribution to offset the required remaining 62% reduction in carbon emissions and make the proposal net zero-carbon during its operation could be secured via a planning obligation, as requested by the GLA.
228. The measures that have and would be taken to reduce operational carbon emissions through each stage of the energy hierarchy are set out below. The submitted Energy Statement sets out a full justification for this approach. Implementation of these measures to secure a 38% on-site reduction in carbon emissions could be secured by condition.

Be lean

229. The submitted Energy Statement estimates that passive and active be lean efficiency measures (to use less energy and manage demand during operation) would achieve a 35% reduction in operational carbon emissions. This significantly exceeds the London Plan's minimum target for this stage.

Be clean

230. London Plan Policy SI 3 sets out that developments such as that proposed should have communal low-temperature heating system.
231. The site is within a Heat Network Priority Area and there is a proposed heat network nearby.
232. The Energy Statement sets out that the proposal would not be suitable for a communal low-temperature heating system, meaning that there would be no reduction in operational carbon emissions through be clean measures (to exploit local energy resources, such as secondary heat, and supply energy efficiently and cleanly). However, it would be future proofed, so that it could potentially be connected to a heat network at a later date if one is delivered nearby.
233. A planning obligation could be used to ensure that the proposal would be heat network connection ready, as requested by the GLA.

Be green

234. The submitted Energy Statement sets out that be green measures (maximise opportunities for renewable energy by producing, storing and using renewable energy on-site), namely air source heat pumps and PV panels, are estimated to achieve a 4% reduction in operational carbon emissions.

Be seen

235. Be seen measures (to monitor, verify, and report on energy performance) would be secured via a planning obligation, as requested by the GLA.

Overheating and cooling

236. London Plan Policy SI 4 and Southwark Plan P69 require that development be designed to reduce the risks of overheating and the need for air conditioning in line with the cooling hierarchy.
237. The submitted Energy Statement sets out how the proposal would minimise the use of energy-intensive cooling systems through passive and active measures in line with the cooling hierarchy, which would also reduce the risk of overheating.
238. The implementation of these measures would be secured through a condition that secures compliance with the Energy Statement.

BREEAM

- 239. Southwark Plan P69 requires that development such as that proposed achieves a BREEAM rating of excellent.
- 240. The applicant has submitted a BREEAM Pre Assessment. This concludes that it is anticipated that the proposal would achieve a rating of excellent.
- 241. It is recommended that a condition be used to ensure that the proposal would achieve this rating.

Conclusion

- 242. Overall, the proposal would be acceptable in terms of energy and sustainability matters, including whole life cycle carbon and circular economy, operational carbon, overheating and cooling, and BREEAM. It would be in general accordance with the development plan, subject to conditions and planning obligations.
- 243. The Council's Planning Policy Officer and the GLA have raised a number of queries related to energy and sustainability, some of which remained outstanding at the point that this report was submitted for publication. The applicant has submitted some clarifications and further information to address these queries but it should be ensured that they are fully addressed prior to Stage 2 referral to the MoL. These queries are not material to the Council's overall assessment of the proposal but any update would be included in an addendum.

Digital infrastructure

- 244. London Plan Policy SI 6 and Southwark Plan P44 both require development to enable the delivery of full fibre connectivity infrastructure
- 245. The GLA requested that a condition be used to secure details of sufficient ducting space within the proposal for the delivery of such infrastructure.
- 246. On this basis, the proposal would be acceptable in terms of its ability to enable the delivery of digital infrastructure, subject to a condition.

Planning obligations

- 247. As required by London Plan Policies T9 and DF1 and Southwark Plan Policies IP2 and IP3, planning obligations should be used to mitigate the impacts of development where it is not possible to use planning conditions, including through the provision of off-site infrastructure. Guidance on how these policies should be applied is set out in the Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD (2020 update). Paragraph 57 of the NPPF, which echoes Regulation 122(2) of the CIL Regulations 2010 (as amended), states that planning obligations must 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.

248. Generally, discussion of and justification for the recommended planning obligations is set out above. However, planning obligations are also recommended by the Council's Local Economy Officer to ensure that the proposal provides economic benefits in accordance with London Plan Policy E11 and Southwark Plan P28, which seek to ensure that proposals such as that under consideration deliver local training, employment, and business opportunities. Furthermore, a planning obligation is recommended in relation to the general monitoring and administration of any legal agreement.
249. More detail on heads of terms for the recommended planning obligations is set out below.

Planning obligation	Mitigation	Applicant position
Affordable workspace	571 sqm (GIA) of on-site affordable workspace provided at discount market rent for at least 30 years	Agreed
	Payment in lieu for 242.7 sqm (GIA) of off-site affordable workspace provided at discount market rent for at least 30 years	Agreed
	Affordable workspace management plan	Agreed
Public realm management	Public realm management plan	Agreed
Architect retention	Ongoing involvement of TateHindle, or alternative architect approved by the Local Planning Authority, to monitor design quality through to completion	Agreed
Archaeological technical support	Payment of £ 6,778.00	Agreed
Public highway works	<i>Either</i> Legal agreement under Section 278 of the Highways Act 1980 (as amended) ("S278 agreement") for: <ul style="list-style-type: none"> • Repave the footways including new kerbing fronting the Development on Paris Garden and Hatfields using materials in accordance to SSDM (Yorkstone natural stone paving slabs and 300mm wide granite kerbs) 	Agreed

	<ul style="list-style-type: none"> • Upgrade existing vehicle access on 6 Paris Garden • Reinstate redundant vehicle crossover on Hatfields as footway • Remove existing speed humps on Paris Garden and introduce a new raised table crossing further up • Introduce dropped kerb to facilitate refuse collection on Paris Garden • Resurface the sections of Paris Garden and Hatfields fronting the Development • Upgrade street lighting fronting the Development on Paris Garden and Hatfields • Promote a TMO for relocation/removal of parking bays and introduction of new waiting/loading and parking restrictions on Paris Garden • Repair any damages to the public highway caused by the construction of the Development and the movement of construction vehicles <p><i>Or (if a wider scheme of improvements to Paris Garden is undertaken by the Council)</i></p> <p>S278 agreement for:</p> <ul style="list-style-type: none"> • Repave the footways including new kerbing fronting the Development on Hatfields using materials in accordance to SSDM (Yorkstone natural stone paving slabs and 300mm wide granite kerbs) • Reinstate redundant vehicle crossover on Hatfields as footway • Resurface the sections of Hatfields fronting the Development • Upgrade street lighting fronting the Development on Hatfields 	
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	<ul style="list-style-type: none"> Repair any damages to the public highway caused by the construction of the Development and the movement of construction vehicles <p><i>And</i></p> <p>Payment in lieu of £200,000 towards improvements to Paris Garden</p>	
	Delivery of the strip of land between existing public highway and proposed building line as open and accessible to all and paved in the same material as the public footway with metal studs delineating the two.	Agreed
	Payment of £30,000.00 to fund the reconstruction of the existing raised table on Hatfields	Agreed
Car parking	No occupier eligibility for on-street business car parking permits	Agreed
Short stay cycle parking	Payment in lieu of £8,140.00	Agreed
Travel plan	Full travel plan, including mechanisms to secure exclusive use of the accessible cycle store for disabled persons and a commitment to put in place safety measures for those travelling to and from the site.	Agreed
Carbon offset	Payment in lieu of £128,243.00	Agreed
District heating network	Connection ready	Agreed
Be seen	Operational carbon emissions monitoring, verification, and reporting	Agreed
Local employment and training – construction	22 sustained jobs for unemployed Southwark residents, 22 short courses, and 5 construction industry apprentices and/or a maximum payment in lieu of £105,400.00	Agreed
	Employment, skills, and business support plan	Agreed
Local employment and training – operation	71 sustained jobs for unemployed Southwark Residents and/or a maximum payment in lieu of £305,300.00	Agreed
	Skills and employment plan	Agreed
Local procurement	Local businesses to be allowed to tender for the procurement of goods and services generated by the proposal during both construction and	Agreed

	operation.	
General monitoring and administration	Financial contribution equal to two percent of all other financial contributions.	Agreed

250. In the event that an appropriate legal agreement has not been completed by 16 October 2024, the planning committee is asked to authorise the Director of Planning and Growth to refuse planning permission, if appropriate, for the following reason:

In the absence of a completed legal agreement under Section 106 of the Town and Country Planning Act 1990 (as amended), there is no mechanism in place to mitigate against adverse impacts of the proposal through planning obligations. It would therefore be contrary to London Plan (2021) Policies D4, D8, E3, E11, HC1, SI 2, SI 3, T1, T2, T4, T5, T6, T6.2, T9, and DF1 and Southwark Plan (2022) P13, P14, P21, P23, P28, P31, P45, P49, P50, P51, P53, P54, P70, IP2, and IP3.

Mayoral and Southwark Community Infrastructure Levy

251. Section 70 of the Town and Country Planning Act 1990 (as amended) states that any sum received by the council of a London borough in payment of CIL is a local financial consideration.
252. The site is located within Southwark CIL (SCIL) Zone 1, and Mayoral CIL 2 (MCIL2) Band 2. Based on the Community Infrastructure Levy (CIL) – Form 1: CIL Additional Information submitted by the applicant, the CIL Officer has estimated that the Council would receive a total sum of £1,677,255.61 in CIL (£533,049.11 in SCIL and £1,144,206.50 in MCIL2) because of the proposal. The receipt of CIL would help to mitigate any impact of the proposal on infrastructure. SCIL helps to fund the provision of local infrastructure that supports growth in the Borough. MCIL2 helps to fund the ongoing financing of the Crossrail project; this project delivered the Elizabeth line, an east-west railway connecting London and the wider southeast region.

Community involvement and engagement

253. In accordance with Southwark’s Development Consultation Charter (2022), the applicant carried out their own consultation to engage with neighbours and other local stakeholders prior to the submission of the applications.
254. The approach to this is set out in detail in the submitted Statement of Community Involvement (SCI), prepared by The Terrapin Group and dated October 2023, which includes an Engagement Summary. The consultation included:
- The setting up of a dedicated website with information about the proposals and in-person exhibition events, and the opportunity to provide feedback online.

- The delivery of a leaflet, which included information about the proposals and in-person exhibition events, and contact details for providing feedback, to 1,087 neighbouring addresses.
 - Two in-person exhibition events, which were held on 13 and 15 July 2023 at 3 Paris Gardens and attended by nine people, and provided information about the proposals, and opportunities to speak with applicant's representatives and provide feedback.
 - The provision of a dedicated email address, telephone number, and freepost address for any feedback.
 - Eight meetings with local stakeholders, including Southwark and Lambeth Council, and Greater London Authority members; Bankside Open Spaces Trust; Better Bankside; Central School of Ballet; and Waterloo Community Development Group.
255. The SCI also includes details of the mainly positive feedback received and how the applicant has responded to it.

Consultation responses from members of the public and local groups

256. Following the validation of the applications, the Council:
- Published a press notice on 16 November 2023.
 - Sent notification letters to the 855 neighbouring addresses within approximately 100 metres of the site on 20, 27, and 28 November 2023.
 - Posted eight notices around the site on 23 November 2023.
257. The Council had not received any responses from members of the public and local groups at the point that this report was submitted for publication.

Consultation responses from external consultees

258. Planning matters raised by external consultees are set out below. Unless stated otherwise, these relate to the application for planning permission. All relevant planning matters are discussed above as part of the overall assessment of the applications.

Consultee	Comment
Active Travel England (ATE)	ATE declined to provide detailed comments but recommends consultation with TfL.
Arqiva	Arqiva advised that it has no objection.
City of London (CoL)	The CoL advised that it has no objection.
City of Westminster (CoW)	The CoW advised that it has no objection.
EA	The EA advised that it has no objection but requests an informative to encourage the incorporation of flood resistant and resilient measures in to the design of the proposal.
GLA	A Stage 1 referral was made to the GLA. Following a review of the proposal, the GLA summarised its own

	<p>comments as follows:</p> <p>“London Plan policies on land use principles, urban design, heritage, transport, sustainability, and environment are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:</p> <ul style="list-style-type: none"> • Land use principles: The proposed intensification of office development in the CAZ is strongly supported. 10% affordable workspace should be secured in the S106 agreement. • Urban design and heritage: No strategic issues are raised with the proposed tall building on the site. Refinements to the public realm and landscaping should be considered. There would be a low level of less than substantial harm to nearby heritage assets, however it is considered that public benefits of the scheme could outweigh the harm. • Transport: Further details are required on Healthy Streets, car and cycle parking, transport impacts, and servicing and construction. • Sustainable development and environmental issues: Further information is required on energy, whole-life cycle carbon, circular economy, green infrastructure, biodiversity, water, and air quality.” <p>The GLA also requests a number of conditions and additional planning obligations related to strategic planning matters.</p> <p>The applicant has submitted some clarifications and additional information to address queries raised by the GLA. Some of these queries remained outstanding at the point that this report was submitted for publication and the applicant should ensure that they are fully addressed prior to Stage 2 referral to the MoL</p>
Heathrow Airport (HA)	HA advised that it has no objection.
Historic England (HE)	HE declined to provide detailed comments in relation to either application but recommends consultation with the Council's own conservation and archaeology specialists.
London City Airport (LCA)	LCA advised that it has no objection.
MPS	The MPS has advised that the proposal could incorporate security measures that would enable it to achieve a Secured by Design award and requests a condition to secure the implementation of such

	measures.
National Air Traffic Services (NATS)	NATS advised that it has no objection.
National Planning Casework Unit (NPCU)	The NPCU advised that there is no intention to require the application for listed building consent to be referred to the Secretary of State.
Network Rail (NR)	NR requests an informative to make the applicant aware of requirements related to the protection of its assets. <i>Case officer comment: the site does not appear to be located within close proximity of Network Rail assets and, as such, the recommended informative is not considered necessary; the informative has been sent to the applicant separately, in any case.</i>
TW	TW advised that it has no objection provided that the sequential approach to surface water drainage is followed and requests informatives and a condition related to the provision and protection of nearby water infrastructure.
TfL Infrastructure Protection	TfL Infrastructure Protection advised that it has no comment to make on railway engineering and safety matters.
TfL Spatial Planning	TfL Spatial Planning provided further detail in relation to the GLA's transport-related comments, summarised above, including relevant requested conditions and planning obligations. The applicant has submitted some clarifications and additional information to address queries raised by TfL Spatial Planning. Some of these queries remained outstanding at the point that this report was submitted for publication and the applicant should ensure that they are fully addressed prior to Stage 2 referral to the MoL.
UK Power Networks (UKPN)	UKPN requested confirmation that access to substations would not be affected by the proposal. The applicant subsequently provided the confirmation requested. No further comments had been received from UKPN at the point that this report was submitted for publication.

259. Notifications were sent to a number of other external consultees, but no further responses had been received at the point that this report was submitted for publication.

Consultation responses from internal consultees

260. Planning matters raised by internal consultees are set out below. Unless stated otherwise, these relate to the application for planning permission. All relevant planning matters are discussed above as part of the overall assessment of the applications.

Consultee	Comment
Borough Archaeologist	In relation to the planning application, the Borough Archaeologist has advised that there is the potential for archaeological heritage assets to be affected and recommends conditions and a planning obligation to secure of the appropriate mitigation of any potential harm. The Borough Archaeologist confirmed that the proposed works requiring listed building consent would not have any implications in terms of archaeology.
CIL Officer	The CIL Officer provided advice on the proposal's likely CIL liability.
Design and Conservation Officer	The Design and Conservation Officer provided informal comments in relation to urban design and/or above-ground heritage assets on both applications, which are reflected in the overall assessment above.
Ecology Officer	Following clarifications from the applicant, the Ecology Officer advised that the proposal is generally acceptable and recommends conditions to secure ecological enhancements.
Environmental Protection Officer	The Environmental Protection Officer advised that the proposal is generally acceptable and recommends conditions to secure mitigation in relation to environmental impacts.
Flood Risk Management and Urban Drainage Officer	Following clarifications and further information from the applicant, the Flood Risk Management and Urban Drainage Officer advised that the proposal would be acceptable overall and recommends conditions to secure an appropriate drainage strategy.
Highways Development and Management Officer	Following clarifications and further information from the applicant, the Highways Development and Management Officer has advised that the proposal is generally acceptable and recommends a condition and planning obligations to secure mitigation in relation to impacts on and improvements to the public highway.
Local Economy Officer	The Local Economy Officer advised that the proposal is generally supported and recommends planning obligations to secure affordable workspace and local training, employment, and business opportunities.
Network Management Officer	Following clarifications and further information from the applicant, the Network Management Officer advised that the proposal is generally acceptable and recommends a condition to secure mitigation in relation to impacts on the public highway during construction.

Planning Policy Officer	<p>Following clarifications and further information from the applicant, the Planning Policy Officer has advised that the proposal is acceptable overall in relation to energy and sustainability, despite two queries that remained outstanding at the point that this report was submitted for publication.</p> <p>The applicant should ensure that these queries are fully addressed prior to Stage 2 referral to the MoL.</p>
Transport Policy Officer	<p>Following clarifications and further information from the applicant, the Transport Policy Officer has advised that the proposal is acceptable overall and recommends conditions and planning obligations to secure appropriate transport-related mitigation and provision.</p>
Urban Forester	<p>The Urban Forester has advised that the proposal is generally supported, and recommends conditions to secure a high-quality landscaping scheme.</p>

261. Notifications were sent to a number of other internal consultees, but no further responses had been received at the point that this report was submitted for publication.

Community impact and equalities assessment

262. In making its decision, the planning committee must consider the public sector equality duty (PSED) under Section 149 of the Equality Act 2010 (as amended). The PSED imposes a duty on public authorities, such as the Council, to have due regard to three needs in the exercise of their functions. These are:

- The need to eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under the Act.
- The need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This involves having due regard, in particular, 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.
- 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.

263. The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
264. It is considered that a decision to grant planning permission and listed building consent, as recommended, would comply with the PSED. The relevant issues are discussed above as part of the overall assessment of the application. However, in summary, the proposal would provide a number of benefits that should be equally accessible to people irrespective of any protected characteristics. These benefits would include the provision of additional employment floorspace, incorporating affordable workspace, and the creation of associated jobs, as well as the delivery of new and improved public realm, comprising a new east-west link through the site. The proposal would not be likely to result in any harm that would unequally affect people with any protected characteristic.

Human rights implications

265. In making its decision, the planning committee must also consider any implications that may arise relating to the Human Rights Act 1998 (as amended) (HRA). Under the HRA, it is unlawful for a public authority, such as the Council, to act in a manner that is incompatible with the European Convention on Human Rights 1950 (as amended).
266. It is not considered that a decision to grant planning permission and listed building consent, as recommended, would unlawfully interfere with human rights, including right to a fair trial, right to respect for private and family life, and protection of property. Again, the relevant issues are discussed above as part of the overall assessment of the application.

Positive and proactive statement

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

Positive and proactive engagement summary

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 end date?	YES

CONCLUSION

269. For the reasons set out in the Assessment section of this report, it is recommended that planning permission be granted, subject to conditions and informatives, the completion of an appropriate legal agreement, and Stage 2 referral to the MoL; and that listed building consent be granted, subject to conditions.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
The development plan Other planning policy documents listed in Appendix 4 The Development Management case files	Corporate Services, Finance And Governance, 160 Tooley Street, London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1a	Recommendation (planning permission)
Appendix 1b	Recommendation (listed building consent)
Appendix 2	Consultation undertaken
Appendix 3	Consultation responses received
Appendix 4	Planning policies
Appendix 5	Relevant planning history

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth
Report Author	Philip Freeman-Bentley, Team Leader
Version	2
Dated	4 April 2024
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		4 April 2024