Contents

Meeting Name:	Planning Committee (Major Applications) A	
Date:	31 July 2024	
Report title:	**Development Management planning application:** Application 22/AP/4376 for: Full Planning Application **Address:** FRIARS CLOSE, BEAR LANE, LONDON, SE1 **Proposal:** Demolition of all existing residential buildings and ancillary structures on site. Construction of residential homes (Use Class C3) and flexible community & learning (Use Classes F1 & F2) floorspace; roof plant enclosure; cycle and vehicle parking; highway and access improvements; and landscape and public realm improvements. The new building would comprise a part nine, part twenty-two storey building to deliver 149 new homes.	
Ward(s) or groups affected:	Borough and Bankside	
Classification:	Open	
Reason for lateness (if applicable):	Not applicable	
From:	Director of Planning and Growth	
Application Start Date: 29.12.2023		**PPA Expiry Date:** N/A
Earliest Decision Date: 10.07.2024		

RECOMMENDATIONS

1. That planning permission is granted subject to conditions, the applicant entering into an appropriate legal agreement, and referral to the Mayor of London.

2. In the event that the requirements of paragraph 1 above are not met by 31

October 2024 the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 437.

3. That the director of planning and growth be authorised under delegated authority to make any minor modifications to the proposed conditions and s106 obligations arising out of detailed negotiations with the applicant or the Mayor of London, which may necessitate further modification and may include the variation, addition, or deletion of the conditions as drafted.

EXECUTIVE SUMMARY

4. The site is an existing four-storey flat roofed residential building comprising 28 social rented units. Only 24 of the units are currently occupied, with two of the units having become vacant during the course of the application. The site is approximately 0.18 hectares and is rectangular in shape.

5. Planning permission is sought to demolish the existing building and replace it with a part 9, part 22-storey building containing 149 residential units and 2 x community use units located on the ground floor. A total of 54 social rented units would be provided in the building, 28 of which would replace the existing social rented units and 26 would be additional units. The existing residents would be provided with temporary accommodation in the borough during the construction period, and would be given the option to return to the site.

6. A number of options for improving the existing accommodation have been explored including extending and retrofitting the existing building, but it is concluded that a wholesale redevelopment of the site, which would include an increase in the quantity and quality of affordable housing on the site all of which would be socially rented would be the most appropriate option in this instance, and this is explained in full later in the report.

7. At present there are a number of issues with the existing building as this is not wholly accessible. There are a number of stepped accesses and no lift which inhibits access. There are also issue with items such as mould and a number of undersized rooms within the existing property. The existing building also does not provide the space required for the existing residents in terms of size of units. It therefore needs to be replaced because it is currently not ‘up to standard’.

8. There are 28 social rented units in the existing building and this would increase to 54. This equates to 43% on-site affordable housing by habitable room. It is also a 93% uplift in the number of social rent units on the site.

9. There would be a significant improvement in terms of usability of playspace. At present, this is of limited size and requires improvement. The scheme would provide areas both on the ground and 9th floor and these would be a significant improvement on what is currently in place.

10. This would be of benefit to the existing residents as well as those surrounding the site.

11. This is currently located on the road and can be used by any members of the public. This would ensure that a space is purely associated with this development.

12. Table showing the proposed unit mix and tenure split:

Homes	Private Homes	Private HR	SR Homes	Aff (SR) HR	Homes Total (% of total)	HR Total
Studio	7	7	0	0	7 4.70 %	7
1-bed	42	86	10	20	52 35.00%	106
2-bed	35	118	19	62	54 36.20%	180
3-bed	11	74	22	110	33 22.10%	184
4-bed	0	0	2	12	2 1.30 %	12
5-bed	0	0	1	7	1 0.70 %	7
Total and % of total	95 64%	285 57.46%	54 36.00%	211 42.54%	149 100.00%	496 100.00%

Table showing the increase in community space on the site:

Use Class	Existing sqm	Proposed sqm	Change +/-
F	0	195	195

13.

Greening, Drainage and Sustainable Transport Infrastructure			
	Existing	Proposed	Change +/-
Urban greening factor	0.24	0.43	+0.43
Green roof coverage	0 (zero)	323 sqm	
Electric Vehicle	0 (zero)	0 (zero) on-site but	

Charging Points		a contribution is requested to install a point on Bear Lane	
Cycle parking spaces		269 long stay and 6 short stay. There would also be 2 further spaces located in the public realm.	

14.

CIL and Section 106 (or Unilateral Undertaking)	
Criterion	*Total Contribution*
CIL (estimated)	£9.5 million (pre-relief) £5.95 million (net of relief)
MCIL (estimated)	£ 1.05 million
Section 106 Contribution	As set out in the 'Planning Obligations' section of this report

BACKGROUND INFORMATION

Site location and description

15. Friars Close sits on the western side of Bear Lane, just south of Southwark Street. It is bound by Burrell Street to the north, Treveris Street to the south and a railway viaduct to the west. The site measures approximately 0.18 hectares and is rectangular in shape. It contains a 4-storey flat roofed building comprising 28 social rented flats, and the application material advises that only 24 units are currently occupied.

16. There is a vehicular access onto the site from Treveris Street which leads to a communal amenity area at the rear of the building which is located between the building and the adjacent railway viaduct to the west. There is also a small play space located within this garden area which measures approximately 33 sqm.

Image showing the grassed play area:

17. The site is subject to the following designations in the adopted Development Plan:

- Bankside, Borough and London Bridge Opportunity Area;
- Bankside and Borough District Town Centre;
- Strategic Cultural Area;
- Central Activities Zone;
- Archaeological Priority Zone;
- Low Line area.

18. The site is flanked by a variety of buildings that are of different heights and uses, including offices to the north and hotels to the east. The railway viaduct to the west and contains commercial units in the arches which are accessed from Chancel Street. Beyond this there are residential buildings including Quadrant House and Edward Edward's House.

19. The prevailing building heights along Bear Lane are 5 to 6 storeys. They then step up to 8-storeys at 18 Great Suffolk Street which is a mixed used development to the southeast of the site. There are taller buildings near to the site which are generally to the west along Blackfriars Road. Although not yet constructed, there will be a 34-storey building to the north of the site on the northern side of Southwark Street (Samson House).

20. The site has a Public Transport Accessibility Level (PTAL) rating of 6B indicating an excellent access to public transport. It is also within Flood Zone 3 as identified by the Environment Agency flood map, which indicates a high probability of flooding.

Photos of the site:

21. View of existing building:

View showing Friars Close on the right and the Hilton Hotel and associated extension on the left.

22. Views to the north of the site:

View showing Friars Close with One Blackfriars shown in the background.

23. Views to the south of the site:

Friars Close on the right and the residential properties on Treveris Street on the left.

Details of proposal

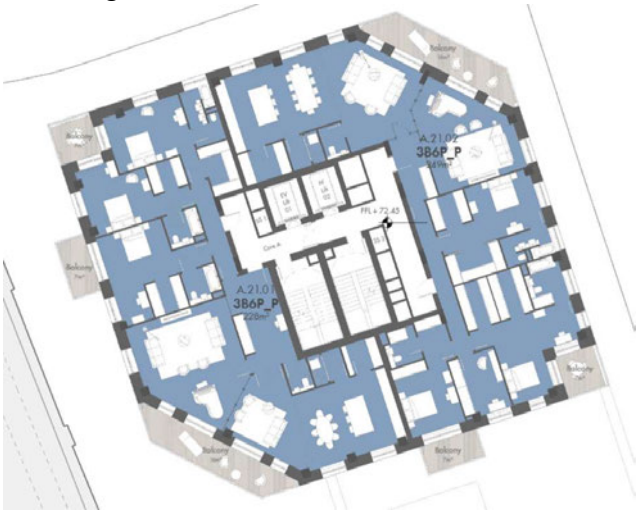
24. Full planning permission is sought for the demolition of the existing building and erection of a new part 9, part 22 storey building containing 149 new homes. The applicant, Friars Close Regeneration LLP is a joint venture partnership between Mount Anvil Ltd. and the Riverside Housing Group which own the site and is a registered provider (RP) of affordable housing.

25. The proposed new building would be a singular mass up to floor 9 which where there would be a communal garden/ amenity space with additional height up to 22 storeys. The shorter part of the building (the 9 storey element) would then be located on the southern part of the site whilst the tallest (22 storey) element being located to the northern part of the site. There would also be a central, ground floor, passageway located in the middle of the structure allowing access to the rear of the site (adjacent the arches).

26. It is noted that the building which has 28 social rented homes would be demolished; the homes would be re-provided and there would be an increase of 26 social rented homes. This would take the total number of social rented units on the site to 54. There would then be a further 95 private sale units, taking the total number of units on the site to 149. This has been expanded upon and set out in detail in sections such as Unit Mix and the Affordable Housing section.

Proposed ground floor plan on the left and 6th floor on the right:

9th floor on the left and 21st floor on the right:



North elevation - View from Hopton Street:

South elevation on left and eastern elevation on right:

27. The siting of the building would be immediately adjacent the footpath of Bear Lane but would be set away from Burrell and Treveris Street. There would be a distance of between 1.2m and 2.8m between the adjacent footpaths and the northern and

southern parts of the site. The area between the building and the footpath have soft landscaping.

28. The building would be set back from the railway line by between approximately 5.1m-9.2m which would allow for the creation of a and enhanced new amenity space for residents. It would also allow for the creation of a footpath which would follow the route of the railway arches, contributing to the Low Line route. Further details of the Low Line have been expanded upon later in the report.

29. In addition to the residential properties, there would be a new community/ flexible uses in both Core A to the north of the site (99 sqm) and Core B, to the southern part of the site (96 sqm). These would be accessed from Bear Lane.

30. The access to the two residential parts of the site would be through Lobby A, located in core A and which would be located on the corner of Bear Lane and Burrell Street. The access to Lobby B, located in core B and which would be located on Bear Lane. Lobby A, would be for the privately rented units whilst Lobby B would be for the social rent units. All of the units would be tenure blind.

31. There would additionally be internal cycle stores, located within both Core A and Core B. There would then be further storage on the first floor. The site would be able to accommodate a total of 269 cycle spaces which is in compliance with that of the London Plan. In addition, there would also be 6 short-stay located in the public realm. In terms of non-residential, there would be 1 long-stay space and 1 short-stay both located in the public realm.

32. The proposed servicing of the site would take place on the road which are permit only parking bays and are controlled Monday to Sunday 08.00-23.00. There are also single and double yellow lines in the surrounding area. There is a loading bay but this located on Burrell Street (to the north of the site).

Amendments

33. This application has been amended with changes being made in both September 2023 and then again in June 2024.

34. The September 2023 alterations made the following changes:

The tower footprint increased as to accommodate the insertion of an additional staircase.
The design altered. An example being the upper-level tower chamfers were altered to the north-west and south-west frontages.
The creation of a second community facility in the south-east corner
Changes to the cycle store
Amendments to the plant areas
Changes to the landscaping
Increase in the total number of homes to 149. This was an increase of 13 units. (The initial scheme was for 136 units.)
Change in unit mix and amount of affordable housing that would be provided.

The addition of 2 residential units on the 9th floor.

35. The June 2024 alterations made the following changes:

Increase in height from 21 to 22 storeys
Change in unit mix.
This included the loss of 1xstudio unit and 1x2b unit and an increase of 2x3b units.
The total number of dwellings would remain the same as the previous iteration at 149 units.
Change in design and location of balconies.
The balconies on Bear Lane have reduced in depth from 1.8m to 1.5m.
Alternate siting of balconies on south elevation facing Treveris Street as well as relocation of balconies facing onto Burrell Street, Bear Lane and Southwark Street
Changes to the internal layout including removing the two dwellings on the 9th floor which are accommodated in the additional storey.
Addition of a blue badge car parking space within the site.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

36. The main issues to be considered in respect of this application are:

Principle of the proposed development in terms of land use;
Environmental impact assessment
Affordable housing
Dwelling mix
Quality of residential accommodation
Impact upon the amenity of neighbouring properties
Urban design and tall buildings
Heritage
Trees and landscaping
Biodiversity and urban greening
Transport impacts
Land contamination
Air Quality
Flood risk resilience and safety
Energy and sustainability
Wind microclimate
Health impact assessment
Digital connectivity infrastructure
TV, radio and telecoms networks
Archaeology
Fire safety
Planning obligations (S.106 undertaking or agreement)
Mayoral and borough community infrastructure levy (CIL)
Community involvement and engagement
Consultation responses

Community impact, equalities assessment and human rights

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

Legal context

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

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

ASSESSMENT

Principle of the proposed development in terms of land use

40. The National Planning Policy Framework (NPPF) was updated in 2023. At the heart of the NPPF is a presumption in favour of sustainable development. The framework sets out a number of key principles, including a focus on driving and supporting sustainable economic development. Relevant paragraphs of the NPPF are considered in detail throughout this report.

41. The NPPF also states that permission should be granted for proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.

London Bridge and Bankside Opportunity Area

42. The London Plan designates the London Bridge and Bankside as one of 12 Opportunity Areas in the Central London growth corridor area. It notes that this area has considerable potential for intensification and scope to develop the strengths of the area for strategic office provision. This is reflected in Policy SD1 ('Opportunity areas') which sets an indicative capacity of 5,500 new jobs and 4,000 new homes.

Central Activities Zone and London Bridge District Town Centre

43. The site is located within the Central Activities Zone (CAZ) which covers a number of central London boroughs and is London's geographic, economic, and

administrative core. The London Plan (Policy SD4) recognises that this area is the vibrant heart of the globally-iconic core of London and is one the world's most attractive and competitive business locations. The re-development of Friars Close would not include offices or retail, but would provide an increase in residential units and new community floorspace.

44. Although this policy generally focuses on business operations, it does recognise that there is a need for residential uses within the CAZ. For instance, the supporting text (para 2.4.6) states that the CAZ does contain housing and whilst these are not strategic functions, that they play an important role in the character and function of these zones. They ensure that there is activity and vitality at different times of the day and week. It then states that new residential development should not compromise the strategic functions of the CAZ.

45. The proposed re-development of Friars Close would re-provide homes on the site. It is noted that there would be a significant increase in both number of flats as well as the number of occupiers but the site is set away from the main road. The residential uses coupled with the new community spaces would also help with activity and vitality of the area so could be deemed to be in general compliance with this policy.

Loss of and replacement of existing housing and estate regeneration

46. Policy H8 of the London Plan (2021) 'Loss of existing housing and estate redevelopment' states that loss of existing housing should be replaced by new housing at existing or higher densities, with at least the equivalent level of overall floor space.' This, along with the applicable parts of the policy have been expanded upon below:

47. Part A (of Policy H8) states that loss of existing housing should be replaced by new housing at existing or higher densities, with at least the equivalent of overall floor-space. The proposed development would result in a substantial uplift in terms of the amount of accommodation on the site, both with regards unit numbers and floor-space. This is shown in the following table:

Home size	Housing Tenure				Total
	Existing social rent homes	Replacement social rent	Additional social rent	Market	
Studio	0	0	0	7	**7**
1-bed	0	0	10	42	**52**
2-bed	20	11	8	35	**54**
3-bed	8	14	8	11	**33**
4-bed	0	2	0	0	**2**
5-bed	0	1	0	0	**1**
Total	**28**	**28**	**26**	**95**	**149**
Total hab rooms	120	122	89	285	**496**
Total floor space (GIA; sqm)*	2,080	3,800	2,600	10,338	**16,739**

** Total floorspace figures includes communal and ancillary floorspace but excludes communal amenity spaces.*

48. As shown in the above table, there are currently 28 affordable units on site. These would be replaced within the new development and when coupled with the proposed uplift, there would be an increase from 28 to 54 affordable dwellings on the site. This is an increase of 26 units or 93% when assessed on a per unit basis.

49. When considering the increase in affordable floor-space, there would be an increase in GIA from 2080 sqm to 6400 sqm. This is an increase of 4320 sqm or a 207.7% on what is currently in place.

50. There would be a substantial uplift on the site, both in terms of unit numbers/ density on the site as well as habitable floor-space. It is therefore in compliance with part A of policy H8 of the London Plan 2021.

51. In respect of Part B (of Policy H8), there are no hostels, staff accommodation or shared/ supported accommodation currently on the site. This part of the policy would therefore not be applicable.

52. Part C (of Policy H8) states that before considering the demolition and replacement of affordable homes, boroughs, housing associations and their partners should always consider alternative options first. They should balance the potential benefits of demolition and rebuilding of homes against the wider social and environmental impacts and consider the availability of Mayoral funding and any conditions attached to that funding. This is reinforced by the Mayor's Good Practice Guide to Estate Regeneration which has been expanded upon later in the report.

53. With regards Part C of Policy H8, the submitted Case for Regeneration as well as other supporting documents have considered a number of changes to the existing building. For instance, these documents have referenced whether it would be feasible to carry out changes such as a limited refurbishment of the existing structure. It has then considered a more extensive retro-fit as well as a number of extensions. The scheme has considered the following:

1. Refurbishment - Light Touch

2. Retrofit - Extensive
3. Extension - 1 storey upwards
4. Extension - 2 storey upwards
5. Extension - Perimeter / Lateral

54. *Refurbishment - Light Touch*
The submitted documents have stated that a refurbishment of the existing buildings (1) would generally be more environmentally friendly when compared to demolition. A limited refurbishment would however, be of limited benefit and the majority of the problems associated with the existing building would remain. An example being that this change would not allow the units to be fully accessible. It would also not meet the required housing needs of the existing residents. This is highlighted in the table below:

	Existing Home Mix	Housing Need Mix
Home Type	*No. of Homes*	*No. of Homes*
1 bed	0	0
2 beds	20	11
3 beds	8	14
4 beds	0	2
5 beds	0	1
TOTAL	**28**	**28**

55. This table shows that the existing unit mix is insufficient and that there is actually a requirement from residents for larger homes with a demand for 3-5 bed properties. In addition, attention is drawn to the sizes of the existing units. A number of these are undersized with an example being that an existing 3-bed maisonette has a GIA of 72 sqm while current size standard is 84 sqm. It is also noted that a number of existing rooms are undersized, for example being bedroom 3 of Flat 5 measures 5.9 sqm when the current minimum GIA for a single bedroom is 7.5 sqm. There are also other issues with regards undersized rooms such as Bedroom 2 of both Flat 4 and Flat 6 being at least 1.5 sqm under the minimum requirement. This shows that there are issues with the existing building concerning the quality of accommodation and that a ‘light touch’ redevelopment would not be of significant benefit to the living conditions of the existing residents.

56. *Retrofit - Extensive*
The supporting information has also referenced a more extensive retrofit of the existing structure (2). This would provide two additional lifts to allow step free access as well as the provision of an extended external walkway. These changes would ensure that the upper floors would become M4(3) (wheelchair accessible) compliant homes. There are however, issues with this change with regards the proposed unit mix (required by existing tenants) as well as the quality of the accommodation with the units being undersized (referenced above). A more extensive retrofit would also result in the loss of 3 units taking the number of existing units from 28 dwellings to 25 dwellings.

57. *Extensions*
The applicant then assessed whether single and two-storey extension as well as enlarging the footprint of the existing building would be feasible (3,4&5). There were however, issues with these changes. For instance, the extensions would reduce the current floor to ceiling height of a number of the dwellings from approximately 2.5m to 2.3m. This is the lowest floor to ceiling of the units on the third floor for the 1 storey extension. Although this is a reduction of only 0.2m, this would mean that the units would be under the required 2.5m as set out in the London Plan.

58. Structural issues with regards extending the building and these changes would require an independent structural frame. This could therefore materially alter the character and appearance of the site and surrounding area. A number of the existing homes would also still be undersized and would not necessarily meet the required housing needs of existing residents.

59. The above issues are highlighted below:

	SOUTHWARK PRIORITIES / JV PRIORITIES / RESIDENT PRIORITIES							IMPACT TO RESIDENTS	
	Housing needs	High quality homes (RDS SPD)	Accessible homes (Part M4(2) Sect 2A)	Accessible homes (Part M4(2) Sect 2B)	High quality amenity space	Sustainable homes	Additional affordable homes	Low line delivery	Disturbance	Requires decant
Existing accommodation	✗	✗	✗	✗	✗	✗	✗	✗	n/a	n/a
REFURBISHMENT - LIGHT TOUCH	✗	✗	✗	✗	✗	✓	✗	✓	✓	✓
RETROFIT - EXTENSIVE	✗	✗	✓	✓	✗	✓	✗	✓	✓	✓
EXTENSION - UPWARD (x1)	✗	✗	✓	✓	✗	✓	✓	✓	✓	✓
EXTENSION - UPWARD (x2)	✓	✗	✓	✓	✗	✓	✓	✓	✓	✓
EXTENSION - LATERAL	✗	✓	✓	✓	✗	✓	✗	✓	✓	✓
COMPREHENSIVE REDEVELOPMENT	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

✗ Not achieved
✓ Achieved partially
✓ Achieved to a high standard

✓ Yes
✗ No

60. Attention should also be drawn to the state of the current building. Currently, there are steps into the front door and no lifts. A number of the properties are also suffering from damp as well as other issues and these are highlighted in the following images:

Image showing on the left shows a typical stairway entrance. The image on the right shows damp.

61. The building is also in need of repair. Although not unsafe, there are cracks in the brick work and areas such as the parapet wall. It can therefore be considered that the most feasible and suitable solution would be to demolish and replace the existing building. This would not only meet housing needs but would also offer better accommodation for both existing and future residents. The full redevelopment of the site would also have the potential to provide substantially greater benefits in this instance, compared to a scheme involving retention of the existing building; the application has met the requirements of Part C of Policy H8.

62. Part D (of Policy H8) confirms that demolition of affordable housing should not be permitted unless it is replaced by an equivalent amount of affordable housing floor-space. As previously referenced, there would be an increase in the number of units from 28 to 54. There would also be a significant increase in GIA on what is currently in place. It would therefore be in compliance with this part of the policy.

63. Policy H8 additionally references tenure and this should be the same as what is currently in place. All of the existing social rented units would be replaced with new social rented units, and a further 26 social rented units would be provided in addition. The scheme would therefore be in compliance with this requirement.

64. For the avoidance of doubt, the proposed development does offer a right to return to existing residents and this has been expanded upon later in the report. The scheme is therefore deemed to be in accordance with this part of the policy.

65. Part E (of Policy H8) requires all estate redevelopment schemes to follow the Viability Tested Route (VTR) and this has been carried out. This has also been expanded upon in the affordable homes section of this report. It would therefore be in compliance with this part of the policy and the policy as a whole.

Mayor's guide to estate regeneration and Equalities Impact Assessment (EQIA):

66. Part 3 of the Mayor's guide to estate regeneration (Better Homes for Local People) encourages the full and transparent consultation with existing residents. Part 4 of this document states that there should be the following:

- An increase in the amount of affordable housing;
- Full rights to return for social tenants; and
- A fair deal for leaseholders and freeholders.

67. The submitted Statement of Community Involvement and EQIA have set out the measures taken with regards the existing residents and what is being proposed. This includes that there were 6 engagement events between October 2021 and October 2022. All 26 households were invited to each event. This would have been 28 but 2 units were vacant. (This has since increase to 4 units being vacant but for the purposes of this document and the time this was carried out, only 2 units were vacant.) The supporting information has also confirmed that along with the events, newsletters and text messages were used as to ensure that residents were aware of the consultation events and proposals.

68. Although this proposal does not meet the threshold by the GLA to hold a formal residential ballot (as it is under 150 homes), a decision was taken by the applicant to carry out a two-stage voluntary residential vote which was independently managed.

69. The events and consultations with the residents have helped to mould and shape the scheme. For instance, the proposed dwelling mix has been informed by the need of existing residents. It is also worth noting that other issues were raised (during the consultation) which have shaped the plans, an example being the apprehension to open plan; hence the potential for a separate kitchen.

70. The first votes were held between 14th and 28th March 2022 and turnout was 96% (26 votes were received out of a possible 28). This showed that 19 respondents (approximately 70%) were supportive of the redevelopment of Friars Close.

71. The second vote was carried out between 17th and 28th October 2022. This showed that 26 votes out of a possible 28 were supportive of the redevelopment. This is approximately 93% who were supportive of the development.

72. In addition to the voluntary ballot, the SCI has confirmed that a public consultation was carried out. For this, 3,100 consultation packs (newsletters) were printed and sent to local addresses. A range of contact methods were also provided including phone and email. The responses from these however appear limited and does not necessarily provide actionable results. For instance, 'Chart 15' raised the question of whether they supported the proposed delivery of new green space, including through planting and play space. There were however, only 3 respondents with 100% supporting this statement.

73. The response to certain engagement activities was low and the age range that have responded were over the ages of 46 and of a white ethnicity. This is not representative of the areas demographic of the area as set out in the Equalities Impact Assessment (EQIA). The scheme has however, used suitable evidence sources and which highlights and mentions all necessary topics. There were also multiple attempts to consult and engage with members of the public. It can therefore be considered that the development has made a good attempt to involve both the occupiers of the site as well as the general public as a whole.

Decant strategy:

74. Given the total demolition and replacement of the existing property, the submitted Decant & Rehousing Strategy statement has referenced the above with regards the ballots and results but it also confirms that the residents would have a right to return. In addition, it states that all residents have been offered a new property once the development is completed and that they would have the option of the same number of bedrooms as before or otherwise moving into a larger property.

75. Of the 24 occupied units, 2 households have accepted a permanent move from Friars Close, whilst 22 accepted a temporary move within the Borough with an option to return. Whilst the development takes place and is being constructed, the residents would be housed in alternative accommodation through the private rental market and assisted by a local agent. This local agent has been instructed to source local properties, where possible and in line with residents wishes, that are approximately 3 miles from the site. This however, is subject to availability and residents' preference and it is noted that due to a lack of available local stock that falls within the budget or housing need requirements, a limited number of properties are located further than 3 miles from the site. It has been confirmed that the properties would generally range from 0.3-3 miles but there is one household that has chosen to reside 5.3 miles from the site so as to temporarily live closer to family in another borough. In June 2024, a total of 16 properties had been found.

76. It is expected that the tenants would be away from the site for the duration of the construction period which is estimated at being approximately 3.5 years.

77. The submitted information has confirmed the following:

That all residents would have the right to return and have been offered a new property once the development is completed.
Packing, wrapping and removal services for both moves would be covered by Riverside (the applicant)
Rent would remain at their existing levels for tenants whilst living in temporary accommodation;
Existing residents returning to the site and new residents living in the new social rented units would pay rent at social rent levels;
Service charges have not yet been confirmed and this will be followed up in an addendum.

78. For the two households which have opted for a permanent move off the site it has been confirmed that their rent and service charge would be paid at an applicable level with regards the property they move to. They would also receive home loss and disturbance payments to compensate giving up their home and to cover the cost of the move.

79. Existing residents returning to the site would also have certain choices with regards their new homes. For instance:

A choice to have an open plan or enclosed kitchens for 3, 4 and 5 bedroom homes.
A choice to have brand new white goods gifted to them.
A choice to have built-in wardrobes fitted to the master bedrooms.

80. When the above is coupled with the EQIA as well as the involvement as set out in the paragraphs above, it can be considered that the applicant has reasonably engaged in a thorough level of consultation for the proposed development. It has also considered the decant of existing residents who would have a right to return to the new development, and would continue to pay rent at social rent levels. This would therefore provide residents housing while the development takes place which, along with the measures detailed above, all of which would be secured within the legal agreement.

Introduction of class F floorspace (community use)

81. Southwark Plan policy P47 references community uses but this policy generally refers to the loss and replacement of existing facilities. As there would be no loss of existing facilities, this would not be applicable for proposed scheme at Friars Close. Part 3 of Policy P47 does however reference the provision of new facilities and confirms that these should be accessible for all members of the community.

82. Community uses are an important part of social infrastructure and can contribute to a good quality of life. The proposed redevelopment of Friars Close would provide two of these spaces on the ground floor measuring 96 sqm and 99 sqm. These would be located on the southern part of the two blocks and would be readily accessible for members of the public.

83. The introduction of this use could therefore be of benefit to the future residents as

well as to those that are in close proximity to the site.

Environmental impact assessment

84. Environmental Impact Assessment is a process reserved for the types of development that by virtue of their scale or nature have the potential to generate significant environmental effects.

85. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 set out the circumstances in which development must be underpinned by an EIA. Schedule 1 of the Regulations sets out a range of development, predominantly involving industrial operations, for which an EIA is mandatory. Schedule 2 lists a range of development types for which an EIA might be required due to the potential for significant environmental impacts to arise. Schedule 3 sets out that the significance of any impact should include consideration of the characteristics of the development, the environmental sensitivity of the location and the nature of the development.

86. The range of developments covered by Schedule 2 includes 'Urban development projects' where:

the area of the development exceeds 1 hectare and the proposal is not dwelling house development; or
the site area exceeds 5 hectares.

87. The application site is approximately 0.18 hectares and as such the proposal does not exceed the Schedule 2 threshold. Consideration, however, should still be given to the scale, location or nature of development, cumulative impacts and whether these or anything else are likely to give rise to environmental impacts of more than local significance.

88. This application proposes a residential scheme that would use part of the existing footprint. It is noted that there would be an increase in size and height but the development would be of a scale appropriate to its urban setting and is unlikely to give rise to any significant environmental impacts. Those impacts which are identified through the various submitted technical reports and studies can be mitigated through appropriate conditions or obligations.

89. For the above reasons, it is considered that an EIA is not required in respect of the proposed development.

Affordable housing

90. The proposed development would provide 43% on-site affordable housing by habitable room and these would all be social rented properties. There are no intermediate dwellings proposed and would not be in strict compliance with P1 which required 10% of homes to be intermediate housing.

91. Concerning the tenure split, Southwark has a shortage of both social rented and intermediate units. Policy P1 does however, recognise that the most acute need for housing is that of social rented properties. It states that this type of property is vital to social regeneration and that it allows residents who cannot afford market housing to remain close to families, friends and employment. While proposed tenure split would not be compliant with this arm of the policy, given the benefits and need for social rent housing, this can be accepted.

Viability

92. As required by policy H6 of the London Plan and given the non-policy complaint tenure split, a Financial Viability Assessment (FVA) has been submitted. The initial FVA of September 2023 referenced that there would be shortfall of £13,532,477.

93. This FVA has been independently reviewed by Cluttons on behalf of the Council. Cluttons agreed that scheme would deliver the maximum quantum of social housing.

Dwelling mix

94. Policy H10 of the London Plan states that residential schemes should generally consist of a range of unit sizes, with applicants and decision-makers having due regard to a number of considerations, including the housing evidence base, delivering mixed and inclusive neighbourhoods, the nature and location of the Site together with the aim of optimising the potential of housing site. Southwark Plan Policy P2 sets out the housing mix for major residential developments. This includes a maximum provision of 5% studios, minimum of 60% of two or more bedroom units and a minimum of 20% family sized homes (three bedroom +).

95. The following table show the proposed breakdown of both social rent and private sale units:

TYPE	SOCIAL RENT		PRIVATE	
	Homes	Hab rooms	Homes	Hab rooms
Studios	-	-	7	7
1B2P	10	20	42	86
2B3P	7	21	-	-
2B4P	12	41	35	118
3B5P	5	25	-	-
3B6P	17	85	11	74
4B8P	2	12	-	-
5B8P	1	7	-	-
TOTAL	**54**	**211**	**95**	**285**
Total residential floorspace (sqm; GIA)*	**6,401**		**10,338**	
Total non-residential floorspace (sqm; GIA)	**194**			

** Total floorspace figures include communal and ancillary floorspace but exclude communal amenity spaces.*

96. Table showing total numbers and % breakdown:

Unit mix	Number	%	Unit mix	3 bed +	M4(3)
Studio	7	5%	5%	-	0
1b	52	35%	35%	-	7
2b	54	36%	60%	-	10
3b	33	22%		24%	0
4b	2	1%			0
5b	1	1%			0
Total	149	100%	100%	-	17 (11%)

97. The above tables confirm that the scheme would be in compliance with the 60%, 20% and 5% requirements with regards the provision of 2 bed homes (60%), 3 bed homes (24%) and studios (5%) (as set out in Policy P2). The scheme would also provide a mixture of 2b3p and 2b4p as well as 3b5 and 3b6p units. The unit mix is therefore considered to be in complaince with policy P2 of the Southwark Plan.

Wheelchair accessible housing

98. Policy D7 of the London Plan 'Accessible housing' requires residential development to provide at least 10% of dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and for the remaining dwellings to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. Policy P7 of the Southwark Plan requires the 10% to be based on habitable rooms rather than unit numbers. It also states that where those homes are affordable wheelchair user homes, 10% of the social rented homes must meet Building Regulations M4(3)(2)(b) standard (wheelchair accessible dwellings). It sets out larger minimum floor areas which wheelchair accessible dwellings must meet, and requires a mix of dwelling sizes and tenures that meet the above standards, including family homes. Two bedroom three person affordable wheelchair homes will not be acceptable.

99. There would be 17 wheelchair user dwellings M4(3) which would equate to 11% in terms of units which would exceed the London Plan requirement which is welcomed. This would equate to 10.9% in terms of habitable rooms which is the Southwark Plan measure and would exceed the 10% requirement. 89.1% of the social rented wheelchair accessible habitable rooms would meet Building Regulations standard M4(3)(2)(b) which would comply with the Southwark Plan. The following mix of M4(3) units is being proposed:

100. <u>Private units</u>

1b2p = 7 units
2b4p = 4 units
Total private = 11 (64.7%)

Social rented units

2b4p = 6 units
Total social rented = 6 (35.3%)

Overall total = 17 units

101. All of the social rent wheelchair units would exceed the larger unit sizes set out in the Residential Design Standards SPD and Policy P8 of the Southwark Plan.

102. The remaining units within the development would meet M4 (2) standard and a condition to secure the units to these standards has been included in the draft recommendation. Planning obligations to ensure appropriate marketing and retention of the units are recommended.

Quality of residential accommodation

103. Policy D6 of the London Plan 'Housing quality and standards' requires housing developments to be of high quality design, and to provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.

104. Policy P15 of the Southwark Plan requires developments to achieve an exemplary standard of residential design, and sets out a number of criteria which must be met. The Council's Residential Design Standards SPD establishes minimum room and overall flat sizes dependant on occupancy levels, and units should be dual aspect to allow for good levels of light, outlook and cross-ventilation.

105. As set out earlier in the report, there are a number of issues affecting the quality of the existing accommodation at the site including:

Only 43% of the units comply with the Nationally Described Space Standards;
Only 7% of the rooms comply with the council's Residential Design Standards SPD;
61% of the units have insufficient storage space;
There is no step-free access to any of the units and the building is not fully wheelchair accessible;
32% of the households living at the site are classified as overcrowded;
There is only 33sqm of playspace at the site against a 375sqm which would be the current requirement; it equates to 9%, and no play equipment is provided;
Some of the ground floor units are informally using space at the front of the building as gardens, but no other units have access to private amenity space;
The external building fabric is not insulated leading to poor thermal performance and damp issues.

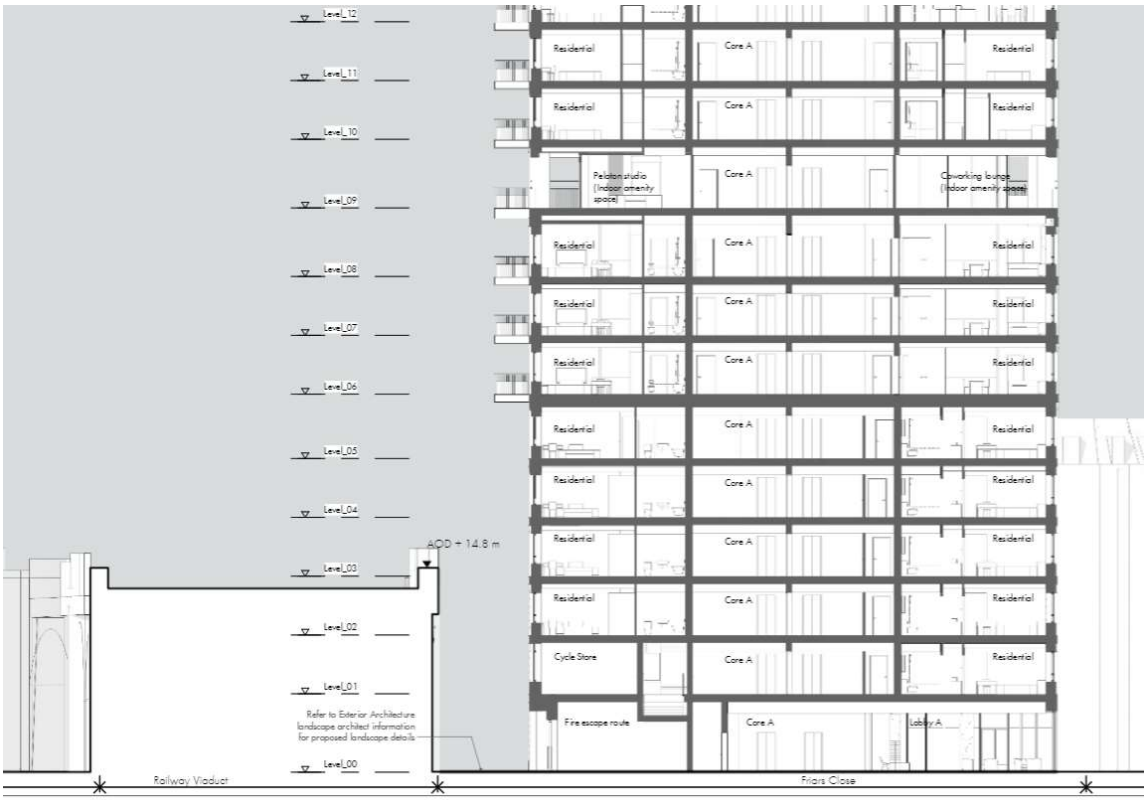
106. The proposed development therefore seeks to address these issues, and the quality of the new residential units is set out below.

107. Suitability of the site for residential use - Policy D14 of the London Plan 'Noise'

seeks to reduce, manage and mitigate noise in order to improve health and quality of life, and provides details of how this can be achieved including through design elements such as adequate separation distances, screening, layout, and adopting good acoustic principles.

108. Within the existing building the closest habitable windows are approximately 5m from the railway viaduct, although these either face into the site or onto Burrell Street and Treveris Street. The closest existing windows which directly face the viaduct are separated from it by approximately 17m. The proposed new building would introduce habitable windows much closer to the railway viaduct, with a minimum separation distance of approximately 9m at first floor level and approximately 5m at second floor level and above. This increases the potential for noise and vibration impacts, therefore the application is accompanied by a Noise and Vibration Impact Assessment report which considers the suitability of the site for residential development.

109.



Part sectional plan showing the relationship with the units on the lower floors and the adjacent railway.

110. Noise measurements have been taken at two locations at the site, one at the front of the building and one at the back. The dominant noise sources were found to be train noise and traffic on Southwark Street, and to mitigate this the.report recommends the use of high performance glazing and mechanical ventilation, albeit that all of the windows would be openable. Vibration levels were taken at two locations at the rear of the building to account for train movements. The survey found that vibration levels within the existing building fall within acceptable limits, and that vibration levels at first floor level within the proposed building would be similar to those experienced in the existing building.

111. The report has been reviewed by the council's Environmental Protection Team (EPT) which has recommended a number of conditions to ensure that noise and vibration levels within the residenital units would fall within acceptable limits, and these have been included in the draft recommendation.

112. It is noted that there would be a number of balconies on the west elevation of the building which would face the railway viaduct with a minimum separation distance of approximately 4.5m. Noise levels on the balconies would exceed recommended limits during the daytime, largely as a result of train noise and traffic noise from Southwark Street. This must be balanced with the benefits of providing private external amenity space to the units, and officers consider that the provision of balconies would outweigh any noise concerns. All residents would have access to communal amenity space at 9th floor level where noise levels would fall within acceptable limits. Noise and vibration impacts arising from construction activities are considered later in the report.

113. The proposed class F units could be used for a range of different uses including a community room or meeting hall, art gallery, place of worship or eduation space. A condition has been included in the draft recommendation preventing amplified music from being played above a certain level.

Dwelling sizes

(the figures in brackets give the equivalent figures for the existing units on the site where applicable)

114.

Flats	**SPD minimum requirement**	**Proposed unit sizes sqm**	**SPD amenity space minimum sqm**	**Amenity space proposed sqm**
Studio	39 (or 37 with a shower room)	39-41.5	10	7-8
1-bed	50	51.3-70.45	10	6-17
2-bed	61-79	64.4-97.36 **(61-74)**	10	5-16 **(12-43)**
3-bed	74-102	86.4-249.2 **(65-83)**	10	5-30 **(12-52.5)**
4-bed	90-117	126.1	10	10
5-bed	103-121	126.1	10	17

115. All of the residential units would meet or exceed the minimum overall floorspace requirements set out in the Nationally Described Space Standards; this would represent a significant improvement over the existing building and would address issues of overcrowding. There would be a small number of instances where the minimum room and storage space standards set out in the Residential Design Standards SPD would not be met, although it is considered that a high standard of accommodation would be provided nonetheless. All of the bedrooms would meet the requirements of policy D6 of the London Plan which requires bedroom widths

to be at least 2.15m for single bedrooms, 2.75m for a first double bedroom and 2.55m for a second double bedroom, and for single bedrooms to be at least 7.5sqm.

116. The development would contain one x 5-bedroom home designed for an existing household to return to. There are no dwelling minimum room sizes are given in the SPD. Its living / dining space would measure 25.2sqm and its kitchen would measure 11.2sqm and these would exceed the minimum requirements for the equivalent rooms in a 4-bed unit by 6.2sqm and 3.2sqm respectively; as such and in the absence of any guidance, these room sizes are considered to be acceptable.

117. With regard to layouts, for 43 x 1 and 2-bed units within the development their only bathrooms would be ensuites meaning that visitors would have to pass through a bedroom to access the bathroom; guidance within the Residential Design Standards SPD advises that bathrooms should be accessed from communal spaces. This issue has therefore been raised with the applicant who has advised that all of these units would be in the private tenure, and that feedback from residents in their other developments indicates that some people prefer this option. The applicant therefore wishes to provide a mix of unit types within the development to appeal to a broader range of preferences. Overall, this is not considered that this would significantly compromise the quality of accommodation which would be provided.

118. The Residential Design Standards SPD recommends that rooms are separated within a unit where possible, particularly for social housing where there are frequently more people living in the dwelling. It is noted that of the 54 social rented units within the development, 44 (80%) would have kitchen / diners with a separate lounge, or a kitchen with a separate lounge / diner and this is welcomed.

119. There would be some very large flats within the development including 9 x 3-bed 6-person units which would measure 144.2sqm against a minimum requirement of 95sqm, another which would measure 228.2sqm, and another which would measure 249.2sqm. The Southwark Plan methodology for calculating affordable housing requirements takes account of this to ensure that larger room and unit sizes are not provided in order to reduce affordable housing requirements. Of note is that a 5-bedroom unit within the development would be a social rented unit which has been designed to accommodate an existing household at the site.

120. Internal daylight and sunlight - A daylight and sunlight assessment for the proposed dwellings has been submitted, based on the Building Research Establishment (BRE) Guidance (2022). This guidance provides advice, but also clearly states that it "is not mandatory and the guide should not be seen as an instrument 104 90 of planning policy." The guidance also acknowledges in its introduction that "Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout. In special circumstances the developer or planning authority may wish to use different target values. For example, in an area with modern high-rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings". The BRE guidance uses

two methods for assessing the daylight quality within new developments: the illuminance method and the daylight factor method, details of which are set out below.

121. The illuminance method - Climate Based Daylight Modelling (CBDM) is used to predict daylight illuminance using sun and sky conditions derived from standard meteorological data (often referred to as climate or weather data). This analytical method allows the prediction of absolute daylight illuminance based on the location and building orientation, in addition to the building's daylight systems (shading systems, for example). The guidance proposes target illuminances to exceed 50% of daylight hours across half the room. This is considered to be the most accurate approach when using climate data, however, it provides a very large amount of data for each assessed room which then needs to be interrogated. One of the methodologies that can be used to interrogate this data is Spatial Daylight Autonomy (sDA).

122. The sDA assessment is designed to understand how often each point of the room's task area sees illuminance levels at or above a specific threshold. The guidance sets out a minimum illuminance level that should be exceeded over half the space for more than 50% of the daylight hours in the year. Within high density residential settings the following targets apply:

- 100 lux for bedrooms
- 150 lux for living rooms
- 200 lux for living/kitchen/diners, kitchens, and studios.

123. The daylight factor method is the illuminance at a point on the reference plane in a space, divided by the illuminance on an unobstructed horizontal surface outdoors. The CIE standard overcast sky is used, and the ratio is usually expressed as a percentage. This method of assessments considers an overcast sky, and therefore the orientation and geographic location of buildings is not relevant. In order to account for different climatic conditions, the guidance sets equivalent daylight factor targets (D) for various locations in Europe. The median daylight factor (MDF) should meet or exceed the target daylight factor relative to a given illuminance for more than half of daylight hours, over 50% of the reference plane.

124. With regard to sunlight to new dwellings, the BRE guidance recommends that:

- At least one main wall faces within 90 degrees of due south; and
- a habitable room, preferably a main living room, receives a total of at least 1.5 hours of sunlight on 21st March.

125. A daylight and sunlight assessment based on the 2022 BRE guidance has been submitted, which uses the illuminance method for testing daylight to the proposed flats. It concludes that 85% of the habitable rooms would meet or exceed the BRE targets which would be a high level of compliance.

126. Aspect and outlook - A high proportion of the units (61%) would comply with the guidance on dual aspect, including 55% of the units in the affordable tenure. A

further 10 units could be considered as enhanced single aspect as they would have windows facing different directions, but would not fully comply with the guidance. None of the single-aspect units would have three or more bedrooms and whilst there would be some single aspect units facing towards the railway line, these would be at levels 6-8 which would sit well above the railway viaduct.

127. Privacy - The Council's Residential Design Standards SPD recommends a minimum of 21m between the rear elevation of properties, and a 12m separation distance between properties which face one another across a highway.

128. Separation distances with the neighbouring properties would all exceed the recommended 12m where properties would face each other across a highway. The proposed layout is such that there would be no mutual overlooking between the residential units within the building. Some screening between adjoining balconies on the north-east facing chamfered corner of the building would be required, and a condition for details has been included in the draft recommendation.

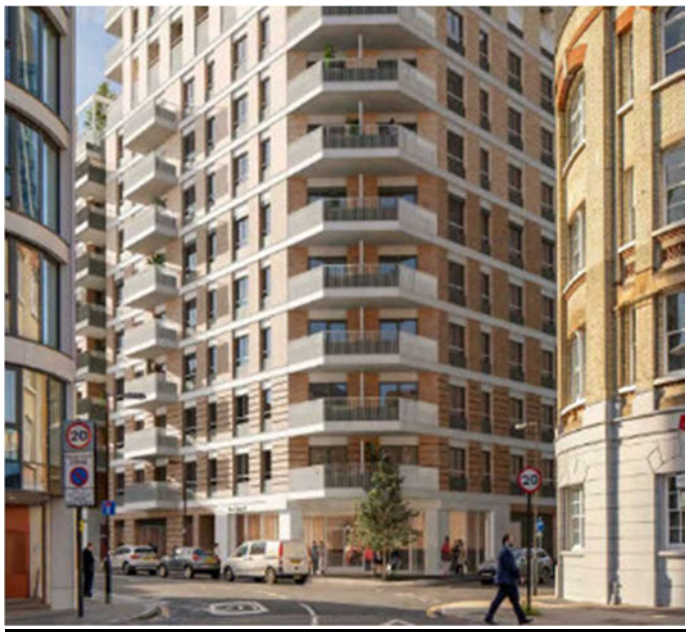
Amenity space and childrens' playspace

129.

Type of space	Policy requirement (sqm)	Proposed (sqm)	Difference (sqm)
Child play space	898.6 sqm comprising: 0-4 = 360.9 sqm 5-11 = 294.5 sqm 12+ = 243.2 sqm	457 sqm comprising: 0-4 = 361sqm 5-11 = 96sqm 12+ = 0sqm	441.6 shortfall comprising: 0-4 = 0 sqm 5-11 = 198.5 sqm 12+ = 243.2 sqm
Private amenity space	10 sqm per flat. Any shortfall to be added to the communal provision	1,296 sqm	363 sqm shortfall (made up communal provision)
Communal amenity space	50 sqm per development + any shortfall of private amenity space (the per development requirement is generally applied per block) 463 sqm required (363 sqm for private amenity shortfall + 100sqm i.e. 50 sqm per block)	492 sqm comprising: 107sqm at ground floor level; 330sqm outdoor amenity space at level 9; 55sqm covered outdoor amenity space at level 9.	Policy compliant + 29sqm

130. All of the flats within the building would have private amenity space, with all balconies complying with the minimum dimensions set out in the London Plan. This would be a significant improvement over the existing building where only some the ground floor units have access to private amenity space, albeit that this is an informal arrangement.

131. It is noted that nine of the 3-bed social rented units would have 5sqm of private amenity space, and this has arisen following amendments to the scheme to improve the appearance of the building made at the request of officers. As shown on the images below, an earlier iteration of the proposal included deeper balconies and officers raised concerns that this would have had an overbearing impact upon Bear Lane and Burrell Street as they would have projected almost the full width of the pavement. The current proposal is considered to be much improved in this respect, therefore the quality of accommodation needs to be weighed in the balance with the townscape improvements presented by the smaller balconies. Given that all of the residential units would have access to high quality communal amenity space within the development, officers consider that the smaller balconies would be acceptable in this instance.

132. 

133. The shortfalls in private amenity space would be made up for in the communal provision, which would be provided at ground and 9th floor level. The image below shows how the different external ground floor spaces would be laid out, and confirms that the communal amenity space would be for residents only and would not form part of the public realm and Low Line route. It is recommended that the planning obligation for a Low Line management plan includes a requirement for details of how the ground level communal amenity space would be physically separated from the public realm and Low Line, to ensure that it would remain for residents only. This has been managed successfully at the nearby Neo Bankside, so a similar arrangement would be sought here.

Ground level communal amenity space, public realm and Low Line route

	RESIDENTIAL AMENITY PROVISION	AREA (SQM)
	Communal outdoor amenity provision	106.5
	Play provision	194
	Other Amenity • Central route • Public realm	 158.5 205
	Total	**664**

134. The entirety of the 9th floor would be used for different types of amenity space and playspace as shown on the images below, and this is considered to be a very positive aspect of the proposal and a significant improvement on the poor quality communal space which currently exists at the site. It is described as the amenity terrace in the planning application documents, and would include outdoor and covered amenity space to meet the SPD requirements, together with playspace, a co-working lounge and an exercise studio with shower and changing facilities. The covered outdoor amenity space would be partially open to the elements by way of inset brick piers with spaces in between. The 9th floor could be accessed from both cores and would be accessible to all residents regardless of tenure, and this would be secured in the legal agreement. It is however noted that whilst the indoor facilities would technically be accessible to all tenures, that there could be an associated cost to use these. For the private sale units, the use of these facilities would be covered through their service charge. This would not however be the case with the Social Rented units and would mean that these units would need to pay for the use of these facilities.

Ninth floor level communal amenity space

	RESIDENTIAL AMENITY PROVISION	AREA (SQM)
	Communal outdoor amenity provision	329.6
	Play provision	
	• Outdoor provision	100
	• Outoor covered provision	163
	Other Amenity	
	• Covered communal amenity	54.9
	• Indoor amenity space	186
	Total	**833.5**

135. Playspace – This must be calculated in accordance with the GLA's population yield calculator, and it is noted that the calculator only takes account of residential units up to 4-bedrooms. There would be 5-bedroom unit within the development and the GLA has confirmed that this can be treated as a 4-bedroom unit for the purpose of playspace requirements. The Southwark Plan requires playspace to be provided at ground or low podium level, and it is an additional requirement over and above public realm and communal amenity space requirements.

136. The proposed playspace would be provided at ground and 9th floor level, with 194sqm on the ground floor including natural play, table tennis and a toddler climbing wall. It would be located next to the Low Line route and so could be used by the wider community throughout the day; a condition to this effect and requiring details of the play equipment to be submitted for approval has been included in the draft recommendation. Similar play facilities would be provided at 9th floor level and whilst it would not be at low podium level, the quality of the space is considered to be acceptable nonetheless. The amenity terrace would cater for a range of different activities and could act as a focal point for the development, increasing natural surveillance of the playspace. This would be a significant improvement over the existing low quality play provision at the site.

137. Owing to the site constraints such as the rectangular shape of the plot, it is not possible to meet all of the playspace requirements on site. All of the affordable units would be social rented which have a higher child yield than intermediate units, and this therefore increases the playspace requirements. The high proportion of social rented units is considered to be a significant positive aspect of

the proposal, and it is recommended that a contribution of £66,681.60 towards off-site playspace be secured within the legal agreement. The nearest playspace to the site is understood to be at Mint Street Park which is approximately 0.5 mile from the site.

138. Images showing how the proposed playspace could appear:

Overshadowing of amenity space

139. The BRE guidance advises that for an amenity area to be adequately lit it should receive at least 2 hours sunlight over half of its area on the 21st March. The public realm at ground floor falls marginally below the required 50% target with 46%. It is also noted that the area that would be affected would enjoy 1.5 hours of sun on the 21st March and that the proportion and quality of amenity space would be an improvement on what is currently on site. On the level 9 amenity terrace two areas have been tested, and 84% of the first space would receive at least 2 hours of sun on the ground on 21st March and all of the second space; this would be well in excess of the BRE guidance and is welcomed.

Secured by Design

140. Policy D11 of the London Plan and Policy P16 of the Southwark Plan requires development proposals to reduce opportunities for crime, and create and maintain safe internal and external environments.

141. The application has referenced consultation with the Designing Out Crime Officer (DOCO) prior to the submission of the application. They were also consulted

during the course of the application and there were concerns with items such as accessibility. They therefore asked that gates be included within the development. This can be associated with items such as creating safe spaces.

142. The proposed siting of the gates would impact upon the use of the Low Line. It was however recommended that be for a limited period and the Police suggested that they be open from 07:00-17:00 in winter and 07:00-19:00 in summer. This would need to be controlled through a management plan.

143. Security measures would also need to be incorporated into the development include controlled access to the residential blocks, secure windows and doors and external lighting. The conclusion of the comments confirms that they are confident that the scheme would be able to achieve certification but to ensure that this is achieved, a two-part 'Secured by Design' condition has been imposed.

Conclusion for secured by design

144. To conclude in relation to quality of accommodation, it is the view of officers that overall, the development would provide an exemplary standard of accommodation for future occupiers, including some significant improvements compared to the existing building.

Impact on neighbours

Noise and disturbance

145. The noise and vibration impacts from a site would generally be highest during the demolition of the existing buildings and substructure works and lowest during the internal fit out and landscaping. It is noted that a large proportion of the site has been cleared. However, "demolition" and general construction works such as foundations and piling would still need to be carried out and which can be noise intensive.

146. The formation of foundations and piling are likely to be the most significant noise and vibration sources although these impacts would be temporary. There would also be a degree of disturbance from increased vehicle movements during the construction phase. This is likely to increase noise levels, particularly along Bear Lane, Treveris Street and Burrell Street. A Construction Environmental Management Plan (CEMP) would therefore be required as to reduce excessive noise as far as is possible. The noise impacts from demolition and construction would be temporary in nature and it is not envisaged that any long term disturbance would be caused.

147. Once the development is completed, any excessive noise from associated plant could be controlled via condition. The development itself would also not result in a detrimental increase in traffic once the development is complete and operational. An increase in noise on Treveris Street could occur as a result of the accessible parkin space, however, this increase would be restricted to a short part of this road. It would therefore have a minor residual impact.

148. The development would result in a significant increase in the number of residents and visitors as a result of the new homes as well as people attending the new community spaces. However, it is not anticipated that there would be any significant harm caused to neighbours. The site is surrounded by a number of residential units as well as a number of hotels and a level of noise in this location would be expected.

149. With conditions imposed regarding items such as sound transmission between the proposed communal spaces and residential units and between residential and residential, the scheme would be acceptable in this regard.

Privacy and overlooking

150. The Residential Design Standards SPD suggests that to prevent unnecessary problems of overlooking, loss of privacy and disturbance, development should achieve a minimum 12m separation at the front of the building and any elevation that fronts onto a highway, and a minimum distance of 21m at the rear of the building.

151. There are a number of residential properties in close proximity to the site but the closest would be 1-11 Treveris Street This is located to the south (of the site) and the existing openings at Friars Close already look out onto this neighbouring residential property.

152. With regards the impact, there would be a minimum distance of approximately 12m between the proposed southern elevation (of the new development at Friars Close) and the northern elevation of 1-11 Treveris Street. The scheme would therefore be in compliance with the 12m restriction referenced above, It would therefore not cause undue harm in terms of outlook and privacy.

153. There are other properties in the surrounding area such as the adjacent hotels to the north and southeast of the site that would be affected by the proposed development. This would not however cause significant harm and this can be associated with the use as a hotel. The occupiers of this space would only be residing in the rooms for a limited period. The occupiers of the room would therefore experience any increase in overlooking/ loss of privacy for a limited period. This would therefore not sustain a reason for refusal.

154. It is noted that the increase in height would impact upon the outlook from the neighbouring properties. The site is however within inner London where impacts upon outlook can be expected. The impact upon the neighbouring properties in terms of loss of daylight/ sunlight is expanded upon later in the report.

155. The proposed development would therefore have an acceptable impact upon the living conditions of the adjacent properties with regards privacy and overlooking.

Daylight and sunlight

156. Paragraph 129C of the NPPF states that when considering applications for

housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).

157. The BRE Guidance sets out the rationale for testing the daylight impacts of new development through various tests. The first and most readily adopted test prescribed by the BRE Guidelines is the Vertical Sky Component assessment (VSC). This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27%, which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by approximately 20% (0.8) of the original value before the loss is noticeable.

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

159. The application has also assessed Annual Probable Sunlight Hours (APSH) and BRE guidance recommends that sunlight is tested on the basis of Annual Probable Sunlight Hours (APSH). It should be considered for all windows facing within 90 degrees of due south (windows outside of this orientation do not receive direct sunlight in the UK). The guidance advises that windows should receive at least 25% APSH, with 5% of this total being enjoyed during the winter months. If a window receives less than 25% of the APSH or less than 5% of the APSH during winter, and is reduced to less than 0.8 times its former value during either period and has a reduction in sunlight received over the whole year of greater than 4%, then sunlight to the building may be adversely affected.

<u>Properties assessed for daylight impacts</u>

160. During the course of the application, an updated daylight and sunlight assessment was received. This updated the initial report and considered the following residential and non-residential properties. For the avoidance of doubt, these have included the adjacent hotels.

Flats 1-11 Treveris Street
Quadrant House
216-220 Blackfriars Road – This was previously 10-18 and 30-39 Edward House but they have since been demolished.
101 Southwark Street and 2-4 Price's Street
103-109 Southwark Street – Holiday Inn Express
2-8 Great Suffolk Street - London Hilton Bankside
18 Great Suffolk Street
Hopton's Gardens Almshouses

Map showing these surrounding properties:

161. The tables below summaries the VSC impacts to the surrounding residential properties. These tables set out the total number of windows, how many would be in compliance with BRE targets and how many would be under the required targets. The tables also show No Sky Line (NSL) and Annual Probable Sunlight Hours (APSH).

162. For the avoidance of doubt, Quadrant House has 80 windows but 8 serve hallways. They have therefore not been included in the tables. It is also noted that there are no tables with regards the adjacent non-residential units such as the nearby hotels. The impact upon these has however been considered and referenced below.

163. VSC impacts to neighbouring residential properties.

Property	Total number of windows	Total number of windows in compliance with BRE targets	% of windows in compliance with BRE targets	Total number of windows that see a reduction of VSC 20% and more			
				20-29.9%	30-39.9%	40+%	Total
1-11 Treveris Street	57	17	30%	2	16	22	40
Quadrant House	72	57	79%	12	3	0	15
216-220 Blackfriars Road	398	390	98%	7	1	0	8
Hopton's Garden's Almhouses	116	116	100%	0	0	0	0
18 Great Suffolk Street	48	41	85%	4	3	0	7
Total	**691**	**621**	**90%**	**25**	**23**	**22**	**70**

164. The above table shows that there would be a total of 70 residential windows out of the 691 that were tested, that would not be in compliance with regards VSC.

165. The following tables summaries the NSL and the impacts to the surrounding properties as a result of the proposed development. These again show the impact upon the residential and non-residential properties.

166. NSL impacts to residential properties.

Property	Total number of rooms	Total number of rooms in compliance with BRE targets	% of rooms in compliance of BRE targets	Total number of rooms that see a reduction of NSL that do not comply with BRE targets			
				20-29.9%	30-39.9%	40+%	Total
1-11 Treveris Street	28	16	57%	5	3	4	12
Quadrant House	56	54	96%	2	0	0	2
216-220 Blackfriars Road	117	117	100%	0	0	0	0
Hopton's Garden's Almhouses	122	120	98%	0	1	1	2

18 Great Suffolk Street	32	32	100%	0	0	0	0
Total	**355**	**339**	**95%**	**7**	**4**	**5**	**16**

167. The above table shows that there would be 16 residential rooms out of the 355 that were tested, that would not be in compliance with regards NSL. This would equate to 5% not being in compliance with BRE recommendations.

168. APSH impact to residential properties:

Property name	**Total number of relevant rooms within 90 degree of due south**	**Total number of rooms in compliance of BRE targets**	**Total number of rooms not complying with BRE targets**	**% of rooms in compliance of BRE targets**
Treveris Street	4	4	0	100%
Quadrant House	24	24	0	100%
216-220 Blackfriars Road	49	49	0	100%
Hopton's Garden's Almhouses	21	19	2	90%
18 Great Suffolk Street	11	11	0	100%
Total	**107**	**105**	**2**	**98%**

169. The above table shows that there would be 2 rooms out of the 107 that were tested, that would not be in compliance with regards NSL. This would equate to 2% not being in compliance with BRE recommendations.

170. The VSC, NSL and along with a review of the APSH for each scenario have been expanded upon below. However and given the results, not all scenarios have been tested/ referenced. It is also noted that the submitted report sometimes references NSC (No Sky Contour) and NSL. This was raised with the company that carried out the report who stated that these were interchangeable.

Flats 1-11 Treveris Street

171. This is located to the south of the site and is a six-storey mixed used development. There are two commercial units on the ground floor and there is then residential above.

172. *VSC:*
With regards the impact and for VSC, 17 of the 57 windows would be in compliance with the BRE guidelines and these would experience a negligible impact. This would equate to 30% of the tested windows.

Of the other 40 (affected windows):

2 would experience an alteration in VSC between 20.1-29.9% which is considered a minor adverse impact.
16 openings would experience an alteration between 30-39.9% which is considered a moderate adverse effect.
The remaining 22 windows would experience an alteration in excess of 40% which is considered a major adverse effect.

173. This existing property does have external balconies that project over the pavement and which impact upon the light and outlook to this (existing) building. Given the siting and the relationship, the proposed development at Friars Close would impact upon this property and a number of openings. For instance, the existing Living, Kitchen and Dining rooms (LKD) would receive a sizeable percentage loss. An example being room R4, window (LKD) W8 on the first floor would result in a 55% loss. This would retain just 0.45 of its former value. Room R7, window W11 on the second floor (which again supplies light and outlook to a LKD), would lose 63% and retain just 0.37 of its former value. The impact upon these openings are clearly more than the 20% reduction and 0.8 times its former value as set out in BRE guidance and the development would have a major adverse impact.

174. It is however noted that the above measurements were taken with the existing balconies in place. When the balconies are removed, W8 (the LKD on the first floor) would result in a 40% loss and would retain 0.60 of its former value. W11 (the LKD on the second floor) would result in a 48% loss and would retain 0.52 of its former value. These would therefore go from major adverse impact to moderate.

175. *NSL:*
The NSL assessment confirms that 16 of the 28 rooms (which were assessed) would experience no noticeable alteration in daylight distribution. Of the 12 remaining rooms:

5 experience change of between 20%-30% which is considered a minor adverse impact.
3 experience moderate change of between 30%-40%
4 experience change of 40%+ which is considered a major adverse effect.

176. *APSH:*
All of the windows facing the site are north facing so would not require testing. The report has however tested 4 rooms on the south and southwest elevation and 100% that have been tested, fully comply with the BRE guidelines. The scheme would therefore have an acceptable impact with regards APSH.

Quadrant House

177. This is a 9 storey residential property located to the west of the site

178. *VSC:*
57 of the 72 windows that were tested would be in compliance with the BRE guidelines and these would experience a negligible impact. This would equate to 79% of the tested windows.

Of the other 15 (affected windows):

12 would experience an alteration in VSC between 20.1-29.9% which is considered a minor adverse impact.
3 openings would experience an alteration between 30-39.9% which is considered a moderate adverse effect.

179. A number of the windows that would be affected are dual aspect openings. For instance, R5 – W6 on the second floor would experience a 31% loss of VSC. This would still however retain a figure of 0.69 and there would also be another opening to this room.

180. It is noted that not all the affected rooms would be dual aspect but it can be considered that the proposed development at Friars Close would have an acceptable impact and this is evident in the NSL results:

181. *NSL:*
The NSL assessment confirms that 54 of the 56 rooms (which were assessed) would experience no noticeable alteration in daylight distribution. Of the 2 remaining rooms:

2 experience change of between 20%-30% which is considered a minor adverse impact.

182. *APSH:*
24 of the 24 rooms assessed fully comply with the BRE guidelines.

183. The scheme would therefore have an acceptable impact upon this property in terms of daylight/ sunlight.

216-220 Blackfriars Road

184. This is located to the south-west of the site and was previously a two-storey residential building called Edwards House. This (Edwards House) has since been demolished and will now form part of a larger more comprehensive development that extends onto Blackfriars Road and projects up to 22 storeys. Although construction works have not yet started, the demolition has removed the existing buildings and shows that construction works are likely. The redevelopment of this site has therefore been considered in the latest daylight/ sunlight report.

185. *VSC:*
390 of the 398 windows that were tested would be in compliance with the BRE guidelines and these would experience a negligible impact. This would equate to 98% of the tested windows.

Of the other 8 (affected windows):

07 would experience an alteration in VSC between 20.1-29.9% which is considered a minor adverse impact.
01 openings would experience an alteration between 30-39.9% which is considered a moderate adverse effect.

186. *NSL:*
The NSL assessment confirms that 117 of the 117 rooms (which were assessed) would experience no noticeable alteration in daylight distribution.

187. *APSH:*
49 of the 49 rooms assessed fully comply with the BRE guidelines.
The scheme would therefore have an acceptable impact with regards APSH

101 Southwark Street and 2-4 Price's Street

188. Like a number of neighbouring properties, this is a hotel. It is a 6 storey building located to the north-east of the site. Given the orientation, not all openings look directly towards the development site at Friars Close.

189. Like the other hotels, the submitted report has considered the impact but this data has not been challenged/ extrapolated. With regards this site, the submitted information has confirmed compliance with regards VSC and NSL. For instance, the proportion retained for VSC would be a minimum of 0.87 and for NSL, this would be 0.94.
It would also be in compliance with BRE recommendations in terms of APSH.

190. The proposed development would therefore have an acceptable impact upon this property.

103-109 Southwark Street – Holiday Inn Express

191. This six-storey building is situated on Southwark Street to the northeast of the site and is a hotel. There is a distance of approximately 13m between the site and this adjacent building and planning permission has been granted in 2024 for a 7-storey extension to this building (22/AP/3682). This has not yet been constructed.

192. Like other hotels, the submitted report has considered the impact upon and although the data has not been challenged/ extrapolated, it does show that the redevelopment of Friars Close would affect this property. For instance the VSC (of rooms in the hotel) would result in loses of up to 85% (first floor- R5 - W9. This would retain just 0.15 of its previous figure. The maximum loss of NSL would be 95% (an example being first floor - R6 - W10) which shows that the proposed re-development of Friars Close would cause a major adverse impact.

193. It is noted that BRE guidance states that the impact upon hotels would need to be considered, the occupiers are more transient in nature. They would not expect to reside in the hotel for a pro-longed period and that the user would also spend less time in a hotel room than that of a residential flat.

194. *APSH:*
The submitted report has confirmed that a number of the bedrooms that are within 90 degrees of due south would be affected. BRE guidelines however state that sunlight into bedrooms is viewed as being less important than other rooms. Attention is also drawn to the use as a hotel and the occupiers being transient in nature. The impact upon this building as a whole is therefore noted but given the above, would not sustain a reason for refusal.

2-8 Great Suffolk Street - London Hilton Bankside

195. This is located to the east of the site and is a part 5, part 8 storey part hotel and aparthotel accommodation. There are also items such as conference rooms as well as leisure uses located within this development. As referenced above, the site is currently being extended with an infill extension to the 4th, 5th and 6th floors (20/AP/2421).

196. Like others, the data has not been extrapolated but the report does reference the impact and states that the redevelopment of Friars Close would cause a level of harm to this building. In terms of VSC, the maximum loss would be 55% (first floor - R9 w10 retained) 0.45 would however be retained. In terms of NSL,

197. The impact upon this hotel is therefore noted but given the usage, the redevelopment of Friars Close would not cause undue harm in terms of daylight and sunlight/

18 Great Suffolk Street

198. This is an 8 storey, mixed use development and is located next to the London Hilton Bankside. It is located to the southeast of the site and there is a distance of approximately 30m between this and the proposed windows in the new development at Friars Close.

199. *VSC*:
With regards the impact and for VSC, 41 of the 48 windows would be in compliance with the BRE guidelines and these would experience a negligible impact. This would equate to 85% of the tested windows.

Of the other 07 (affected windows):

04 would experience an alteration in VSC between 20.1-29.9% which is considered a minor adverse impact.
03 openings would experience an alteration between 30-39.9% which is considered a moderate adverse effect.

200. *NSL:*
The NSL assessment confirms that 32 of the 32 rooms (which were assessed) would experience no noticeable alteration in daylight distribution.

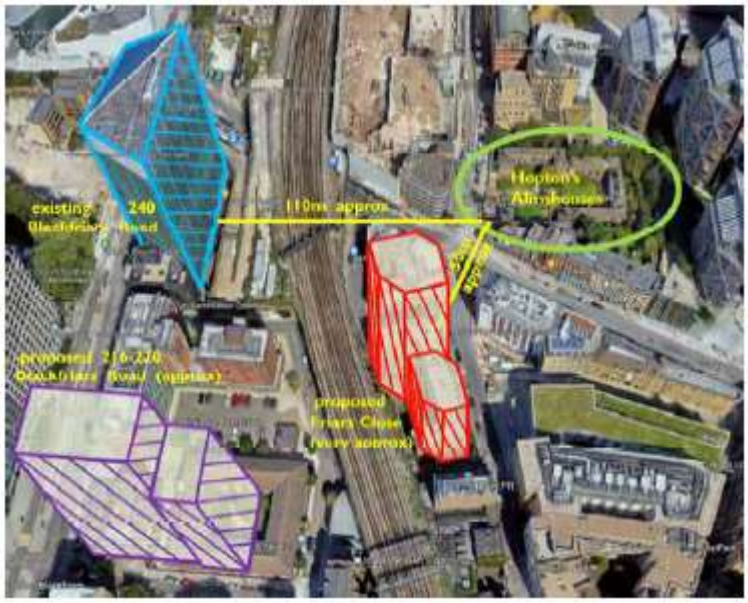
201. *APSH:*
11 of the 11 rooms assessed fully comply with the BRE guidelines.

202. The scheme would therefore have an acceptable impact upon this property in terms of daylight/ sunlight.

Hopton's Gardens Almshouses

203. These buildings were previously 28 Almshouses but are now 7, two-storey residential dwellings buildings. They are Grade II* listed and from letters of representation, a number are occupied by elderly residents.

204. The residents of these buildings have submitted a number of representations which have referenced daylight/ sunlight and have also shown a number of images and a report highlighting the impact. The following image is taken from this document and shows the site compared to the surrounding buildings:



205. These representations as well as the impact upon the Almshouses as a whole have been considered and also referenced in the most recent daylight/ sunlight report.

206. *VSC:*
With regards the impact and for VSC, all of the 116 of the windows that were tested would be in compliance with the BRE guidelines.

207. *NSL:*

The NSL assessment confirms that 120 of the 122 rooms (which were assessed) would experience no noticeable alteration in daylight distribution. Of the 2 remaining rooms:

None would experience change of between 20%-30% which is considered a minor adverse impact.
1 experience moderate change of between 30%-40%
1 experience change of 40%+ which is considered a major adverse effect.

208. The rooms that would be affected would be a ground floor living room (R15) and a first floor bedroom (R13). These would be located in Almshouse number 5, and R15 has an existing NSL of 27% which would be reduced to 17%. R13 has an existing NSL of 7% and this would be reduced to 4%.

209. With regards the results for bedroom (R13 – first floor window of Almshouse 5), the retention of 4% would mean that this room would not receive an adequate amount of daylight distribution and that electric lighting would be required. This does raise concern but also needs to be balanced against the benefits the application would bring.

210. *APSH*
19 (90%) of the 21 rooms assessed fully comply with the BRE guidelines.

With regards the affected windows, these would be located in Almshouse number 1 and the rooms that would be mostly affected would be a kitchen (R3) and living room (R4). R3 would receive a 25% total reduction and 78% in winter whilst R4 would receive a 21% reduction and a 67% reduction in winter. The submitted documents have confirmed that there are other openings to these rooms which would mitigate the impact but this has not been confirmed.

211. For the avoidance of doubt, these openings are different to those referenced in the VSC section. ASPH would affect Almshouse number 1 for NSL, this would relate to Almshouse number 5.

212. It is noted that the scheme would cause harm to two windows but this is a central London location. The scheme also needs to be weighed against the benefits the proposed development would bring.

<u>Overshadowing of neighbouring amenity spaces</u>

213. The BRE guidance advises that for an amenity area to be adequately lit it should receive at least 2 hours sunlight over half of its area on the 21st March. If the area receiving 2 hours of sunlight is reduced by more than 0.8 times (20%) it is considered that the change may be noticeable.

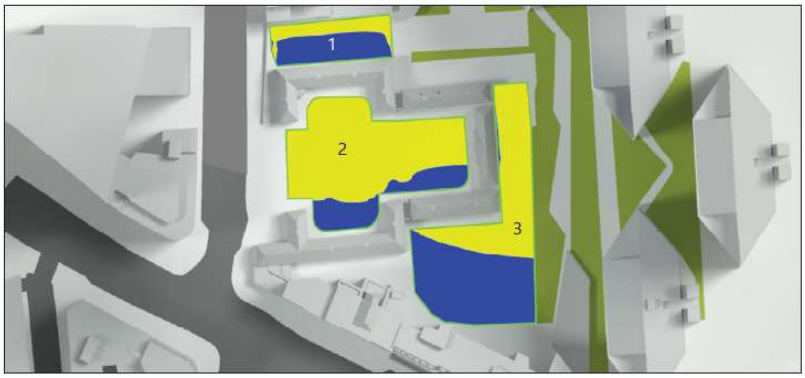
214. The submitted report has referenced the assessment of nearby amenity areas. It has drawn attention to the siting and the relationship with the surrounding buildings and stated that there is limited amenity space sufficiently close to the site that would be harmfully affected. For clarity and given the letter of representation, the report has however considered the impact upon the nearby Almshouses. It has

also included the cumulative neighbouring context on Hopton Street which would illustrate the 'real-world' impacts of the proposed scheme.

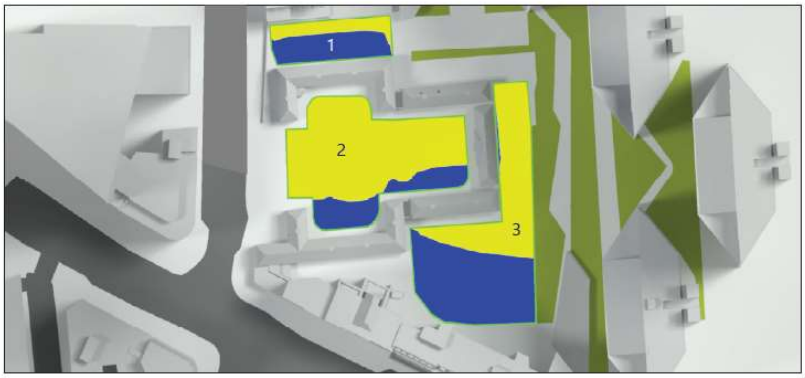
215. As referenced above, the Almshouses are located to the north of the site and site on the eastern side of Hopton Street. There is a distance of approximately 65m between these sites.

216. The submitted report has confirmed that the garden space to the north as well as the main central amenity space (of the Almshouses) would be impacted upon. The main courtyard would however continue to enjoy at least 2 hours of direct sunlight to 80% of the space, significantly above the 50% target as set out in BRE guidance. It is also noted that the change affecting the northern garden would be a 1% reduction from the cumulative scenario (see paragraph 234). This would therefore not cause adverse harm and would be in compliance with BRE recommendations.

217. The following images show the existing and proposed overshadowing of the Almshouses in March:



Existing Scenario - March 21st



Proposed Scenario - March 21st

Area	Total Area (sq.m)	Existing Scenario Area recieving more than two hours of sun		Proposed Scenario Area recieving more than two hours of sun		Proportion Retained
		(m^2)	%	(m^2)	%	
1 - Hoptons Almshouses	261.11	97.88	37	94.14	36	0.96
2 - Hoptons Almshouses	892.29	710.54	80	710.30	80	1.00
3 - Hoptons Almshouses	870.15	398.16	46	398.16	46	1.00

218. A letter of representation has made reference to the impact upon these spaces and queried the initial daylight/ sunlight report. It drew attention to items such as elder people occupying the Almshouses and utilising both internal and the outside space for their enjoyment.

219. The existing and proposed impact and level of overshadowing is shown in the images below with the existing building at Friars Close shown in green and proposed scheme in blue. The Almshouses are highlighted in red:

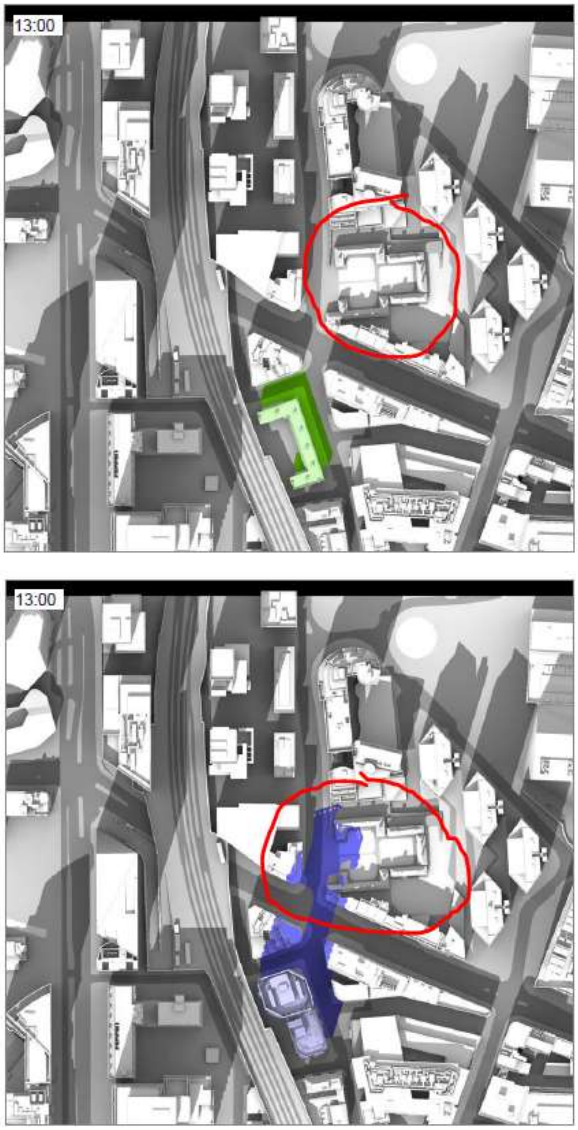


Image showing existing premises (green) and the proposed development (blue) and the amount of overshadowing on March 21st at 13.00

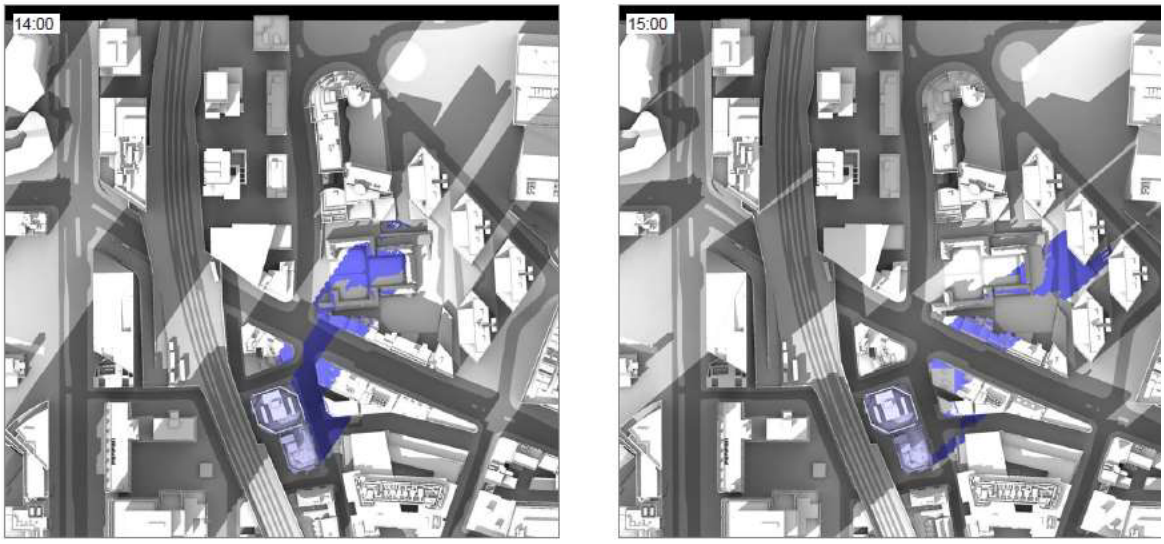
220. 

Image showing existing premises (green) and the proposed development (blue) and the amount of overshadowing on March 21st at 14.00 and 15.00

221. The above images have shown that the scheme would impact upon the amenity space of the Almshouses in March between the hours of 13.00–15.00, with the area most affected being at 14.00. A further test was however carried out for 21 June. This further test showed that the Almshouses would not experience any harm in terms of overshadowing during the summer months when the gardens and amenity space would likely receive most usage either by the existing residents or others visiting the site. This is visible in the following images which shows the shadow of the development does not reach the Almshouses (highlighted in red for ease):

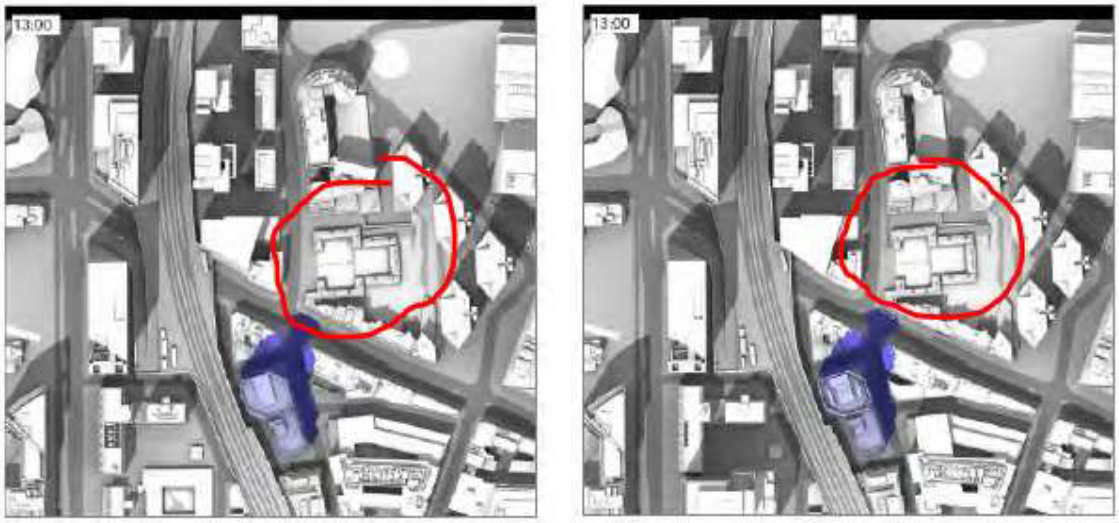


Image showing existing and proposed overshadowing on June 21st at 13.00

222. As shown in the image above, there would be minimal impact in June but the report that was submitted as part of the representations from the Almshouses, highlighted that a shadow would cover approximately half the courtyard on 21st August. The dates that have been used for the submitted report are taken from

March, June 21st (which is optimum sun) and then also December. These were chosen to show the best and worst case scenario and when the sun is at its highest and lowest levels.

223. With regards the impact in August, this is later in the summer so would have a different impact to that of June as the shadows would be longer. It is also worth noting that the submitted report from the Almshouses does not show any overshadowing from other properties (that surround/ that are close to the site) so does not provide a true reflection of what the actual impact from Friars Close would be.

224. It is noted that the scheme would impact upon the Almshouses but as shown above, this would be for a limited period in March. During the summer months, the sun would be higher so would not reach this property or garden area. The results for the winter months, such as December, show that the Almshouses and their gardens are already cast in shadow. The proposed development at Friars Close would therefore have some impact upon the amenity space during this stage but the report confirms that this would not result in material additional overshadowing.

225. The demographic of the occupiers of the Almshouses needs to be considered and given weight. For instance, an older person may not be as mobile as a younger person and would therefore be more reliant upon the use and enjoyment of both the internal living space and gardens. As shown above, the scheme would have some impact upon the openings and would affect the garden areas. The scheme is however is within central London and would bring about a number of benefits. The impact upon the garden space would also be in compliance with BRE guidelines. It is therefore deemed to have an acceptable impact.

PV impact assessment

226. There are a limited number of buildings in the surrounding area that has solar panels. The application has considered this and drew attention to this only occurring at 2-4 Princess Street.

227. These PVs are roof mounted and, considering an installation angle of approximately 20°. As per BRE guidelines, the suggested target loss would be up to 10% (BR209:2022 Chapter 4 Table 2).

228. The submitted overshadowing assessment has stated that even later in the day where the shadow cast by the building is at its longest, these do not extend over the photovoltaic panels between 14:00 and 15:00. They would therefore not experience a material or noticeable reduction in performance.

Conclusion of impact to amenity of neighbouring properties

229. The results have revealed that there would be a number of rooms and windows that would not meet the relevant daylighting standards of the BRE. For instance, 22 residential dwellings at 1-11 Treveris Street would experience a 40%+ decrease in VSC. The neighbouring hotels would also be particularly affected by the proposed development. As shown above, the submitted report has categorised

losses of 20- 29.9% VSC as minor adverse, 30-39.9% VSC as moderate adverse and any losses exceeding 40% VSC as major adverse. In total, there would be 22 windows that would have a 40+ loss of VSC and which would have a major adverse impact

230. The impact the proposed development would have can be described as balanced. The location is within Central London and the scheme would bring about benefits such there being an improvement to the existing affordable units whilst also providing a significant quantum of both affordable and new housing. It is therefore concluded that the impact of the proposed development in terms of daylight, sunlight and overshadowing would be acceptable in this instance, and would not cause unacceptable harm to neighbour amenity.

Urban design and tall buildings

Demolition

231. In terms of the demolition of the current housing, the 1930s building is both modest in scale and architecture. It comprises two levels of stacked duplex flats, with the ground floor homes accessed from individual front doors located within the rear courtyard, and the upper level of homes reached by shared deck access. A small passageway onto Bear Lane provides access to the rear courtyard and staircase. The architecture is simple, with a rectangular massing and flat roof; stock brickwork and flush white casement windows with a horizontal emphasis; and modest detailing of simple white floor bands and contrasting maroon coloured Juliette balconies and walkway at 2nd floor level. The building itself is set back from the back edge of the pavement, providing small street-facing 'rear' gardens to the lower duplex homes, while all the homes share the landscaped courtyard space at the rear.

232. Overall, the architecture is typical of social housing of the interwar period and reflective of the backwater character of Bear Lane. Beyond its low-rise scale and perimeter gardens that soften the townscape, the building makes no particular contribution to the local townscape and is not regarded as a non-designated heritage asset (NDHA). The site is not within a designated conservation area.

233. Furthermore, it is acknowledged that there are shortcomings in the building's construction and plan form that limit its successful adaptation and extension to provide accommodation that would meet modern standards, as well as provide additional homes (as referenced earlier in the report). As such, the building's demolition and replacement with a high quality housing scheme is supported on design grounds.

Replacement Building

Layout

234. As referenced above, the new build comprises a linear block that aligns with Bear Lane to the east and broadly aligns with the railway viaduct to the west. In the

instance of Bear Lane, the new building is brought forward to the back edge of the pavement, eliminating the perimeter gardens. The existing footway is unaffected and remains c.2.5m in width. The new footprint also extends at both ends compared to the current building, bringing the built form slightly forward onto Treveris Street at the south and Burrell Street at the north, although the loss of the small gardens partly allows for the widening of the footway which is welcome.

235. Pushing the building forwards generally tightens the street enclosure within this section of Bear Lane, Treveris Street and Burrell Street (see later in the report). Nonetheless, it brings the new building into closer alignment with the neighbouring buildings to the south along Bear Lane, as well as aligns with the pedestrian archways beneath the viaduct on Treveris Street and Burrell Street, ensuring a coherent streetscape.

236. Regarding the detailed layout, while the new building sits at the back edge of the adjoining pavements, the ground floor is well activated and engaging. Two residential entrances, supported by good-sized reception foyers, provide good activation to the building's northeast corner and midway along its Bear Lane frontage; while two flexible community spaces with large shopfront openings have the potential to further animate the frontage, albeit dependent upon the extent of their use. Nonetheless, the opportunity for activation and informal surveillance of the adjoining streets represents good urban design. The details of the shopfronts should be conditioned, including the treatment of the glazed cycle store, to ensure the transparent quality of the street frontages is secured.

237. That aside, the development is more challenging at the rear, where the layout looks to open up the space between the building and viaduct both as new communal gardens cum public open space that supports the Low-line project. The intention is well meaning, with the public space offering the potential for an onward extension of the Low-line walking route, with a similar connecting public route secured to the rear of the 2021 consented office development at no.33-36 Bear Lane. The public realm contribution is welcome, increasing local permeability and offering the potential for an attractive pedestrian route. The provision of the low-line would also be in compliance with Policy P52 with regards the opening up of this space, although this would be closed in the evenings/ overnight.

238. In this instance, the proposal is mainly for soft landscaping, seating and pathways rather than activate the space with commercial frontages, and to allow the space to double up as communal gardens for the new residents. Though potentially attractive, this does have implications for security and maintenance. The proposed internal floor layout has located cycle and bin storage and plantrooms at the rear ground and part first floor levels, reducing oversight of the shared garden space. This is compounded by the dead frontages of the railway arches, whose commercial uses open westwards onto neighbouring Chancel Street. While this will make for a quiet interlude along the Low-line route, informal surveillance will be limited to upper floor balconies. Much will depend on the extent of use of the space by residents and likely the use of more formal security arrangements. This will include gates, held open during daytime, but be locked over night and CCTV could also be erected as to help prevent anti-social behaviour.

239. A further shortcoming of the layout is how the new space is orientated on a north-south axis and is squeezed between the new part 9/ 23-storey building and the tall railway viaduct. The open space will likely receive little sunlight at grade, with the gardens generally in shadow during the winter months and with direct sunlight during the summer months only. Microclimatic studies show the space to be generally unaffected by wind and particularly by downdrafts from the new tall building, with conditions suitable for standing and sitting (with one area between the buildings suitable for strolling). Nonetheless, the space will be overshadowed for the majority of the year, which will have implications for extensive use by residents, but also for planting choice and landscape maintenance. As referenced earlier in the report, this space should receive at least 2 hours sunlight over half of its area on the 21st March. The low-line/ public realm at ground floor falls marginally below the required 50% target with 46%. It is however also noted that the area that would be affected would enjoy 1.5 hours of sun on the 21st Marc. The proposed planting can also be controlled through an appropriately worded condition confirming that the type of planting could grow/ flourish in the appropriate lux levels.

240. Lastly, in terms of site layout, the development includes a replacement passageway midway along the street block, which will be open to the public during the daytime. The passageway would align with Price's Street and be made legible by the building's detailed design (see below). In the new proposal, the passageway would connect with the new Low-line route at the rear of the building and offer good onward connectivity and the sense of a richer urban grain; more redolent of the area's historic street pattern. This contribution to the public realm and permeability are generally welcome, supporting good urban design.

241. Overall, the proposed layout optimises the development of the site, pushing the building forwards to the back edge of pavement, whilst ensuring decent pavement widths and continuity of general building lines. The ground floor arrangement supports good activation of the surrounding streets. The layout provides for new public routes to the rear and through the new building, supporting the Low-line project and providing good onward connectivity. The space at the rear is soft landscaped and shared with the new residents as garden space, although its appeal will be limited by the lack of informal surveillance and overshadowing by the development itself. In general, the layout offers good urban design, but is not without some constraints.

Scale (height and massing)

242. At part 9 and 23 storeys, the new development will represent a considerable increase in height compared to the current four-storey building. Furthermore, the internal layout of the linear block with a central corridor with flats on either side, and central core with perimeter flats for the tower element make for a considerable increase in massing compared to the current building with its through-flats and deck access. In brief, the development will present a significant increase in scale on this tight urban site.

243. Looking in more detail, the proposed built form is broadly a long linear block of c.52m in length that fronts onto Bear Lane and is c.30.5m to shoulder height, with a pergola-style rooftop frame at its southern end reaching c.34m above grade. The northern section of the block extends upwards to form the tower, which rises to c.76m above grade. In terms of the building's width, the double-loaded corridor results in a depth of c.18.5m for the linear block, while the tower has a planform of c.26m (east, west) by 28m (north, south). As such, both the tower and linear block are regarded as tall buildings in terms of policy P.17, exceeding the 30m threshold.

244. They also represent significantly large-scale buildings within the context of Bear Lane, which is characterised by its narrow street width and buildings of low to medium-rise height, and within the slightly wider context south of Southwark Street and east of Blackfriars Road, which generally comprise medium-rise buildings of 4-5 commercial storeys or 7-9 residential storeys.

245. By comparison, the 9-storey linear block would sit opposite the residential apartment block of no.33 Treveris Street to the south, which is 5-storeys to shoulder height and tiers to 7 storeys with an overall height of c.21m; and opposite the rear of the Hilton Hotel on Great Suffolk Street, which reaches 8-storeys or c.24m in height, although the hotel has a recent consent for two additional rooftop storeys. At these points, the street widths are generally 12m, with the existing and new development positioned at the back edge of the pavement, making for a compressed streetscape.

246. Regarding the 23-storey tower, this would sit c.12m opposite no.2-4 Burrell Street and the backs of no.111-113 Southwark Street, which are a mix of 3-6 commercial storeys, reaching a height of c.21m; and eastwards, the 7-storey Holiday Inn at no.103-109 Southwark Street, which is c.22m in height and where the street width widens to c.16m. Lastly, the railway viaduct that runs alongside the site is c.13m to parapet height. As such, the development would be of an evidently different scale to its immediate streetscape context; a concern acknowledged by the application team in relation to Bear Lane, although the architectural and sculptural qualities of the scheme are highlighted (see p.87, DAS). The case is made that the tall building is seen within much wider context of the tall building cluster around Blackfriars Station (see later), while the linear block forms a transitional element that relates the development to the adjacent streetscape.

247. In terms of massing, the use of chamfers and setbacks works well to ease the development's sense of scale and to offer a more distinctive quality to the building's profile. Regarding its presentation onto Bear Lane, a 3.2m wide recessed slot that runs the 9-storey height of the linear block does well to alleviate the large grain of the development, visually articulating the built form to suggest two buildings of more mansion-block proportion. The length of the northern section is further eased by the c.5.5m chamfer on the northeast corner that runs the full height of the building and which also orientates the tower to better address the junction of Bear Lane with Burrell Street, and with Southwark Street beyond (see later).

248. A similar chamfer runs the height of the linear block on the opposing southwest

corners of the tower and of the linear block, helping to slim the profiles of the tower on the skyline and the linear block along Treveris Street, with the latter also presenting a wider entranceway to the Low-line public space. A further high-level chamfer is introduced on the southeast corner of the linear block at the junction of Bear Lane with Treveris Street, as part of the transition narrative. This works well when viewed obliquely along Bear Lane to suggest a lower building shoulder height of six storeys, allowing the southern end of the scheme to sit moderately better in the streetscape and with the lower-rise Hilton Hotel and no.33 Treveris Street opposite, albeit the moment is brief. A final chamfer is at ground floor only, located on the northeast corner of the southern block at the passageway entrance, which works well to highlight the entrance and offer a moderate sense of visual relief at footway level.

249. In terms of the mansion-block proportion, the setback of the indoor amenity space at 9th floor level above the northern section of the development is effective. The resulting colonnade works well to draw through the sense of a common height datum and scale between the two buildings, while visually releasing the upper tower volume.

250. At 30.5m to shoulder height and despite the chamfering, for the most part the mansion-style blocks will nonetheless be experienced as large-scale blocks that are out of character for Bear Lane, as indeed will be the tower. Located at the back edge of the pavement, the volumes will significantly tighten the streetscape and add significantly to its built-up character. Moreover, the tower's position on the slightly wider junction with Price's Lane will do little to moderate the sense of heightened density in the locality.

251. The recent scheme revisions that have adjusted the balconies that projected over the footway in Bear Lane are welcome; rationalising a number onto the building's flanks and chamfered corners, and slightly reducing the width of those that remain along Bear Lane. This has helped moderate the overbearing condition of the scheme. That the site is outside of a conservation area is notable, although the impacts on the local townscape remain a relevant consideration (policy P13.1). The sense of enclosure created by the introduction of the scheme remains challenging within the immediate surrounds and overbearing in part. This, and the visual impacts on the wider townscape context, including the wider historic environment (see later), would need to be considered against the planning merits of the scheme. Whilst the scale is challenging when considering the wider context and the detailed design response of the architect, including chamfering and set backs, the scale is considered on balance to be acceptable in the context of the local townscape."

Elevational architecture and functional quality

252. The designs provide a common architectural language for both the linear block and tower of robust brickwork with contrasting light coloured banding and lintels; an aesthetic of expressed floorslabs, wide and narrow piers, with ordered openings and stacked projecting balconies; and articulation of the base, middle and top. Within this language, the corner chamfers, 9-storey vertical slot and high-level

colonnade bring legibility and a more dynamic quality to the architecture, as well as helping to soften and slim the built form.

253. The base of the building is well articulated, with large shopfront style window openings onto the street, comprising curtain wall glazing with brickwork sills, and rusticated brickwork that extends over ground, 1st and 2nd floor levels that add visual weight to the designs. The entrance foyers are framed in contrasting white, ensuring their legibility within the street. The main body of the building has a calm, orderly appearance, while the top of the linear block is highlighted by the tall, open metal framework and adjacent brickwork colonnade of the 9th floor amenity deck, which also serves to visually release the tower above at the northern end. A stronger cornice detail would help improve the conclusion of the linear block, and can be explored by a condition regarding the parapet detailing. The tower itself concludes with double-height openings and a parapet line that is broken at the corners for further visual interest, creating an engaging crown. The rooftop plant and lift overruns are setback within this framework, reducing their appearance.

254. The material choice adds further visual expression and texture, featuring multi-tone red brickwork for the linear block that is darkened for the base by rustication and is lightened for the top by the introduction of more pinkish tones. The brickwork then switches to a multi-tone yellow for the tower element, which is graduated with the introduction of paler yellow and white tones towards the top. The contrasting white banding remains a constant throughout the floors. The choice of multi-tone reds and yellows with contrasting whites is contextual, picking up on the local building stock and viaduct.

255. The outcome is a well-articulated and engaging elevational design. However, the material quality is diminished by the use of metalwork rather than masonry for the white detailing, especially at ground floor level. This shortcoming can be addressed by condition, confirming the material palette and sample panels. Conditions are also recommended for typical façade details (shopfronts, openings, parapets) and a mock-up of the typical section of the tower's façade to confirm a sufficiently high quality of finishes.

256. Regarding the functional quality, the proposals offer generally well-planned homes and a good sense of tenure blindness. The private and affordable accommodation are well-appointed, with large, albeit separate foyers; access to two large community rooms; cycle storage; shared use of the rear gardens at grade; and shared use of the 9th floor amenity deck with its outdoor landscaping and indoor workspace and recreational facilities.

257. The flats are generally well-planned and, while the double-banked arrangement within the linear block limits the extent of dual aspect, the clever use of chamfered corners and placement of services help to ensure decent levels of internal residential amenity and to limit the impact of railway noise. While not strictly dual aspect, a large number of flats would enjoy the enhanced aspect of additional corner windows, and there would be no single aspect flats that are north-facing.

258. Floor-to-ceiling heights are 2.5m for habitable rooms, falling just below 2.4m for

service areas (bathrooms, hallways), which is an acceptable standard. All apartments have private balconies, although a number are below the Council's residential space requirements for balconies. Although it should be noted that these were reduced at the request of officers in order to address concerns about massing discussed above. Lastly, the layout of central cores and short corridors ensure good general amenity of six to eight homes per floor per core, presumably with fob key access to individual floors; and with the provision of a second staircase within the tower and access to all cores within both blocks, supporting safe evacuation in an emergency.

Tall building matters

259. At 76m above grade, the development is regarded as a tall building for the purposes of P.17 of the Southwark Plan and policy D2 of the London Plan. Briefly running through the policy requirements for new tall buildings, in terms of general location, the development is within the Central Activities Zone and the Borough, Bankside and London Bridge Opportunity Area, which are considered generally suitable for tall buildings and so meets the requirements of P17 1. of the Southwark Plan. The site is not an Allocated Site that would usually specify the opportunity for taller or tall buildings. However, the opportunity nonetheless remains for the comprehensive redevelopment of the estate as an underutilised brownfield site that optimises the site's capacity through a design-led approach, which is favoured by policy D3 of the London Plan. Such optimisation can include a tall building, where appropriate.

260. In terms of the specific location, the development does not comply with policy 17.2, part 1 of the Southwark Plan: It is not located at a point of landmark significance. There is no concentration of activity or focus of views from several directions that would particularly justify a tall building. Moreover, there is no convergence of a number of important routes. An argument could be made that the tall building would mark the Low-line walking route and its junctions with Burrell Street and/ or new passageway beneath the building that links with Price's Street. However, the route is distinctly low-key and through a backwater area, and could just as well be highlighted by a taller building than the existing.

261. It is also suggested that the tall building would be one of a number of tall buildings in the Blackfriars/ Bankside area, drawing its significance as part a tall building's cluster [see HTVIA view #14 from the north bank. This is not altogether convincing, as the views are directional, with the location appearing more on the outer edge of the cluster, if not beyond, in east/west views along Southwark Street (see views #11 and #4). In these views, the building is read slightly remote, located south of the main road, or at best loosely seen with the Isis Building at no.67-69 Southwark Street and the newly constructed tall building in the Timber Yard development in Lavington Street. A case is made for the tall building helping to frame the junction of Southwark Street with Bear Lane (see view #2). However, this is not a significant location and a more moderately scaled building would achieve the same effect without appearing distinctly out of character for the backwater site. Moreover, its appearance is less than comfortable in the immediate townscape.

262. In terms of judging whether the building's height as proportionate to the significance of its location, consideration needs to be given to the fact that the tower would be some 14m taller than Isis House, which marks the locally significant junction of Lavington Street with Southwark Street; and 14m taller than Timber Yard, which highlights the new public plaza. Nonetheless, it is below the height of no.240 Blackfriars Road (85m) and the tallest of the Neo-Bankside towers, block C (82m). Moreover, at 76m it would achieve a width to height ratio of 1:2.9; similar to the Isis Building when viewed head on (1:2.8), which is welcome in terms of slenderness for a tall residential tower, and would avoid the new building appearing squat on the local skyline and as part of the loose cluster (P.17.2, parts 2 and 3).

263. In terms of the cityscape, the site is not directly within a protected strategic London view and is c.320m west of the wider consultation area for the view of St Paul's Cathedral from Alexandra Palace (LVMF 1A.2). From this viewing point, the likelihood is that the building would be obscured from view by the existing tall buildings on the Southbank/ Blackfriars area. A map of the Zone of Theoretical Visibility (ZTV) also indicates that the scheme would not be visible from the protected river prospects. This includes the upstream view from Southwark Bridge; being obscured by intervening Tate Modern and recently completed Triptych Buildings at no.185 Park Street (LVMF 12A.1 and 12A.2).

264. A key factor, however, is the effect on the townscape view from the Millennium Bridge towards the Tate Modern, which is a protected borough view (policy P22.5). The bridge and gallery are also locally listed buildings. The Addendum Heritage and Townscape Impact Assessment Report (June 2024) provides an Accurate Visual Representation (AVR) of this south-facing view (view #15). This shows the proposed tower appearing in the backdrop to the former power station, positioned to its immediate right.

265. While it is positioned sufficiently away from its iconic chimney, the tower's crown would sit above the building's right shoulder, and would be seen to encroach on the building's distinctive roof extension, interfering with the corner silhouette of the building's horizontal massing. The impact is moderated to an extent by the tower's pale colours and by the presence of Neo-Bankside block C, which partly clutters the roofline to the right of the gallery's brick extension in the borough view, but is nonetheless harmful.

266. In protecting the borough view, the visual management guidance attached to policy P22 also suggests that building heights should step down from the established tall buildings cluster in Blackfriars Road (see annex 1, Southwark Plan). However, this step down is not achieved in the cumulative view, with the proposed tower appearing similar in height to the 2021 consented scheme for Edward Edwards House. Overall, the proposals do not fully comply with tall building policy P17.2, part 4 or with P22 (Borough Views).

267. Regarding local character and townscape (P17.2, part 5), as discussed earlier, the development offers an improved design quality compared to the existing building with an engaging built form, activated street frontage and contextual material

finishes. The chamfered design works well to address the public realm at the entrance to the Low-line and towards the junction of Bear Lane with Southwark Street. These positive features, however, must be balanced against a design rationale for a tower that works primarily within the wider townscape setting of Blackfriars and for a linear block that forms a transitional element that nonetheless sits large within this backwater location.
As such, its positive response to local character and townscape is not altogether convincing and therefore would fall short of meeting the policy requirement.

268. Regarding the provision of appropriate functional space, the inclusion of the Low-line extension, passageway and additional pavement widths are welcome contributions to the public realm. Nonetheless, it is hard to argue the contribution is proportionate with the scale of development, particularly when compared to the new plaza within the nearby Timber Yard development or the Low-line extension provided by the consented office development 33-36 at Bear Lane, where the buildings are notably lower. As such, the scheme would not satisfy the requirements of P17.2, part 6.

269. It is not considered particularly appropriate to include publicly accessible space within the tall building, given its residential use and backwater location. However, it does provide a good range of communal residential facilities at ground level and at 9th floor level, including communal rooftop garden space above the linear block, and as such satisfies the policy requirements (P17.2, part 7).

270. Regarding P.17.3, as set out above, the architectural design is high quality. The revisions to the tower to incorporate a second staircore have resulted in a chunkier and less sculptural built form, but nonetheless the building remains sufficiently slender and engaging. Its position and design are confirmed as not causing any undue environmental effects, with no harmful overshadowing of neighbouring properties or downdrafts (P17.3, part 3). The residential accommodation is generally to a high standard, although rather reliant on corner windows for quasi dual-aspect; while the development itself is regarded as sufficiently sustainable with a total of 61% complying with guidance on dual aspect openings.

271. Regarding the public realm, the scheme is positive in extending the Low-line route into the site and reinstating a publicly accessible link beneath the linear block that would connect through to Price's Street; and in moderately widening the footway widths in Treveis Street and Burrell Street. The generally open feel of the ground floor frontage, with its windows onto community rooms and large foyers will enhance the pedestrian experience, although this is partly marred by the overbearing condition of the projecting balconies and compressed feel of having a large and tall development onto narrow streets. Similarly, the more 'closed' design at the rear at ground and first floor levels hampers informal surveillance of the Low-line. On balance, the relationship with the public realm is sufficiently positive (P17.3, part 5).

272. Lastly, while the site itself does not include a designated or non-designated heritage asset and is outside a conservation area, the proposed development does affect the settings of a number of heritage assets within the locality, causing less

than substantial harm (see below). As such, it requires the provision of sufficient public benefits to outweigh the harm if the proposals are to satisfy P.17.3, part 2.

273. Overall, the proposals satisfy most, but not all the criteria for a tall building. This will need to be factored in in considering the planning merits of the scheme. Regarding the London Plan, the criteria for its tall building policy (D2) are not dissimilar to those of Southwark Plan policy P17 regarding the architecture and urban design quality, and therefore a similar conclusion for policy D2 is reached. The remaining factors are functional, relating to safety, transport capacity, servicing and construction (D9.C.2) and which have been referenced and considered elsewhere in the report.

Heritage

274. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to consider the impacts of proposals upon a conservation area and its setting and to pay “special regard to the desirability of preserving or enhancing the character or appearance of that area”. Section 66 of the Act also requires the Authority to consider the impacts of a development on a listed building or its setting and to have “special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”.

275. The NPPF (2023) provides guidance on how these tests are applied, referring in paras 199-202 to the need to give great weight to the conservation of the heritage asset (and the more important the asset, the greater the weight); evaluate the extent of harm or loss of its significance; generally refuse consent where the harm is substantial; and, where necessary, weigh the harm against the public benefits of the scheme. Para 203 goes on to advise taking into account the effect of a scheme on the significance of a non-designated heritage asset. This would include locally listed buildings.

276. The planning submission includes a Heritage and Townscape Visual Impact assessment (HTVIA) and update (June 2024) that provide a map showing the Zone of Theoretical Visibility (ZTV) and verified images of the development when viewed from 15 locations in and around the Bankside area. In general, despite being c.76m high, the proposed tall building is less widely visible than the height suggests. This is partly because of the tight urban grain within the area and the presence of other large and tall buildings close to Blackfriars Station and on the riverfront that often mask the development from wider views. Nonetheless, the building does remain visible in a number of nearby and middle distance views where it sits within the settings of designated heritage assets.

Impacts on listed buildings and structures

277. Friar’s Close is neither a statutory listed or locally listed building. However, the application site is within the vicinity of a number of heritage assets, most notably Hoptons Almshouses, Hopton Gardens (Grade II*) and no.67 Hopton Street and its

railings (Grade II) to the north; the Kirkaldy Works, no.99 Southwark Street (Grade II*), along with nos. 89, 97 and 124-126 Southwark Street (all Grade II) to the northeast/ east; and Rochester House, 43-44 Dolben Street (Grade II) to the southwest of the site. In terms of locally listed buildings, they include: nos. 95, 113, 134, 136 and 138 Southwark Street to the northeast/east; no.36 Bear Lane, the White Hart public house and the screen wall of the Grande Vitesse depot in Great Suffolk Street to the south/ southeast; and nos.4 and 6 Chancel Street to the west. Further afield, the Tate Modern and Millennium Bridge are notably also on the local list (see earlier).

278. Beginning with the listed buildings in Hopton Street, the Grade II* listed almshouses (1749/50, Thomas Ellis and William Cooley) comprise three ranges of uniform 2-storey Georgian houses in brickwork with rusticated stone quoins and hipped slate roofs with overhanging eaves, and are set around a central landscaped garden, behind brick plinth walls and railings. Their heritage significance derives from their architectural and historical interest as a well-preserved, mid-18th century philanthropic scheme with an attractive, domestic period architecture and strong visual cohesion. The walled and landscaped courtyard garden form the immediate setting to the buildings, creating more of an inward-focus to the built form. The wider setting, however, comprises modern large-scaled buildings. They notably include the tall glass and metalwork residential blocks of Neo-Bankside with their Hi-tech architecture that provide a strong contrast to the period domestic architecture; and the backs of the lower-scaled Victorian commercial properties of Southwark Street that are visually less jarring.

279. The HTVIA view #2 is from outside the entrance gates on Hopton Street, looking southwards. The proposed tall building would be very apparent, sitting above the immediate streetscape, but would be read obliquely to the listed almshouses. It would be also be evident from within the courtyard gardens themselves, rising above the southernmost tip of the range. Its tall presence would contrast with the lower-rise backdrop of Southwark Street, although the viewer would nonetheless be conscious of the high-rise backdrop of Neo-Bankside and the emerging tall buildings at Bankside Yards (Sampson House) opposite. It would therefore have a relatively minor impact on the immediate heritage setting and would not unduly detract from an appreciation of the Grade II* listed buildings.

280. A not dissimilar conclusion is reached regarding the nearby no.67 Hopton Street, which is a two-storey early Georgian house with additional attic storey (1702). Its heritage significance is its small-scale domestic architecture and as a surviving fragment of period townscape. Its setting is the property's front and rear gardens and the side passageway, which are heavily enclosed by mid-rise early 20th century and modern commercial building. View #1 is from further north along Hopton Street, looking southwards towards the site. In this view, the listed building is setback from the building line and would only be seen within the context of the development from almost outside the house. Similarly, it would be an oblique view and one in which the viewer is conscious of the current enclosure of the house and by the emerging tall buildings of Bankside Yards (Sampson House) opposite. The application proposals would not unduly detract from an appreciation of the Grade II

house or its setting.

281. Regarding the Grade II* listed Kirkaldy Building (1873 Thomas Roger Smith), no.99 Southwark Street, its primary interest is the Victorian materials testing hydraulic machinery contained within the building, although the building is of significance, being purpose-built for the engineer David Kirkaldy and as the world's first independent commercial testing centre. The building is also of special interest for its Italian Romanesque architecture and for its group value: The building is one of several statutory listed and locally listed Victorian terraced commercial properties within this stretch of Southwark street, erected within a relatively short time period after the laying out of this important east-west thoroughfare through North Southwark. It is this mid-rise terrace with its appealing Victorian architecture that forms the setting to the Grade II* listed building, and which is viewed mainly within Southwark Street and Price's Street.

282. HTVIA View #4 is along the eastern part of Southwark Street and centres on the Grade II* listed building, which sits mid-terrace within the mainly Victorian street block. The massing of the proposed building would rise directly above the listed building is this view from the prominent corner of Southwark Street and Sumner Street. The development disrupts the legibility of the roofline. Its distinctly vertical built form and chamfered profile that turns the building towards the view-point captures the viewer's attention and is seen to loom above the listed building. As such, its presence would detract from the setting of the Grade II* listed building, causing less than substantial harm. The harm would be to the lower end of the range, given the appearance of No.240 Blackfriars Road, which is further to the east and is less eye-catching in its façade design and orientation.

283. View #5 is along Price's Street, which is to the rear of the terrace, but includes the current public entrance to the Grade II* listed building. More utilitarian in its design, the facade features a bay of hatch-rank openings and hoist originally for receiving equipment and materials for testing. In this view, the new building would form an emphatic end-stop to the streetscene, dominating the view along this traditional servicing street and detracting from the low-key, historic setting of the listed building. The harm is similarly less than substantial, towards the low end of the range, tempered by the appearance of no.240 Blackfriars Road.

284. A similar conclusion is reached for the impacts of the development on the neighbouring Grade II listed Fire station at no.97 Southwark Street (1867/68, Edward Creasy), which is of significance as the first public fire brigade in England and for its Venetian-gothic architecture, high quality material detailing and notable flat-iron planform that addresses the street corner. It has group value, alongside the Kirkaldy building. It shares the same terraced streetscape setting to the front, with its strong corniced roofline seen against the relatively open skyline, and lower-key servicing setting to the rear. Views #4 and #5 similarly show the building's settings disrupted by the emphatic appearance of the development above the roofline and closing the vista, dominating the settings. The harm is similarly less than substantial, towards the low end of the range, given the appearance of no.240 Blackfriars Road within the wider context.

285. Eastwards, the adjacent street block includes the mid-terrace no.89 Southwark Street; a Grade II listed 4-storey former warehouse with offices that dates from 1880 and is notable for its classical architecture of giant order piers set above a strong base entablature and attractive use of contrasting material textures, dichromatic brickwork and bas relief stonework. Its grand architecture is of special interest, along with its historic value as part of the history of laying out of Southwark Street as a confident Victorian thoroughfare. Its setting is as part of a terrace of similar scaled buildings. While its neighbours either side are modern, they nonetheless make for a relatively consistent roofline. View #13 offers a sense of the likely impacts. The development would have a notable presence on the skyline, although the building would be seen more obliquely to the listed building. Nonetheless, its orientation and form would catch the eye, detracting to an extent from the heritage setting. The harm in this instance would be minor, with no.240 Blackfriars Road also visible in the distance.

286. Nos. 126 and 126 Southwark Street are Grade II listed buildings on the north side of Southwark Street, close to the junction with Bear Lane. The buildings are 4-storey warehouses with dormer roofs, dating from 1870 and are of architectural and historic interest for the distinctive quality of their Venetian Gothic architecture and as part of the laying out of Southwark Street as a Victorian thoroughfare. Their setting is as part of a terrace of similar scaled buildings and those opposite, making for a coherent townscape at this point. The new development would be to the south of this context, generally viewed obliquely along the main street and would not appear directly above or to the immediate side of the listed buildings. The new tall buildings of Bankside Yards (Sampson House) would be apparent when looking towards the listed warehouses, and as such, any harmful impact arising from the new development would be minor.

287. In addition to the listed buildings within Southwark Street, Nos.95 and 113 on the south side of the street and nos.134-138 on the north side of the street are locally listed, as is the railway bridge that crosses Southwark Street. The properties are late 19th century warehouses and commercial offices of classical design, notable for their attractive period appearance and contribution to the townscape. Those to the south will be similarly disrupted as their listed neighbours by the emphatic appearance of the tower above their rooflines, causing less than substantial harm at the low end of the range, with the impact on no.113 particularly evident, given the site's close proximity. Those on the north side of the street would be less affected, given the more oblique relationship to the site and presence of tall buildings on the north side of the street. The ability to appreciate the railway bridge would be unaffected by the development proposals: The robust brickwork and steel infrastructure would remain prominent in the streetscene, continuing to close the vista along the highway, and seen within the context of no.240 Blackfriars Road and Bankside Yards development opposite (see view #11).

288. View #8 provides a wireline view of the development within the context of the Grade II listed Rochester House, no.43/44 Dolben Street. The property comprises two amalgamated 3-storey 19th century townhouses in stock brick and with a slate mansard addition, converted to offices. The townhouses are of architectural and historical interest, as surviving remnants of the domestic late Georgian townscape,

prior to the arrival of the railway. The setting is limited to the immediate street frontage, with its backwater character, isolated by the tall railway viaduct that flanks the townhouses. In the wireline view, the townhouses and lower section of the proposed tower are obscured by tree cover. Nonetheless, in wintertime and in closer view the tower would become more evident, rising directly above the townhouses and adjacent railway viaduct, and would appear more overbearing. The linear block may also be present too, given its proximity, possibly seen above the viaduct. The outcome would be less than substantial harm, but of a low order, given the isolated condition of Rochester House and the limited contribution of the setting to its significance.

289. Round the corner from Rochester House, the Albert Institute and Christchurch House at No.4 and 6 Chancel Street are locally listed, being a notable 3-storey late Victorian former public library and washhouse complex, now converted to community meeting rooms and charitable offices. The institutional buildings are of local architectural interest for their decorative, picturesque design with its polychromatic brickwork and carved stone detailing, and of historical interest to the local community. The buildings post-date the railway viaduct and are representative of the more typical piecemeal mixed-use development during the 19th century in Central London. The buildings immediate setting is limited to the street frontage, neighbouring late Victorian low-rise industrial yard at no.1-6 Chancel Street and the railway viaduct that forms the notable backdrop; with the 1970s Edward Edwards almshouses opposite. View #9 provides a verified view of the development from outside the Albert Institute, with the linear block and tower distinct above the industrial yard and viaduct to the north of the locally listed buildings. The development's impact would be more emphatic when viewing the locally listed buildings from Nicholson Street directly opposite, where the buildings are currently read against the sky with only the crown of the iconic Shard breaking the roofline. The impact would be harmful, the linear block disrupting the buildings' profile and the rooftop filigree of the Shard, and with the tower looming to one side. The harm is less than substantial and of low to moderate order.

290. The rendered view #6 is of note, which is from Great Suffolk Street, close to its junction with Dolben Street and Bear Lane and features the locally listed White Hart public House at no.22 Great Suffolk Street in the foreground. The viewing point is immediately in front of the Grande Vitesse Depot screen that is also locally listed. The mid-19th century stucco fronted pub with its classical detailing forms a local landmark, despite its diminutive size. Its prominent corner setting contributes to its significance, with the modern residential-led mixed use scheme at no.5-7 Bear Lane in its immediate backdrop thoughtfully massed to step down in height in a series of fine grained blocks from eight storeys to two storeys onto Bear Lane and four storeys onto Great Suffolk Street, flanking either side of the pub. View #6 shows the tower to the northwest of the corner pub, appearing above the tallest of the stepped block on Bear Lane and obscuring the crown of no.1 Blackfriars that currently pops up at the end of the run. The proposed scale is not uncomfortable in terms of the stepped massing of the foreground building and, while its architecture and pale brickwork will read distinctive, it would not disrupt the composition of the public house seen against the flank brickwork and stepped massing of its immediate setting. As such, the impact would be neutral.

291. Lastly, the Grande Vitesse Depot screen is located on the east side of street diagonally opposite the corner pub. It is a late 19th century tall two-storey stock brick end wall with segmental arches and a blind brick arcade and is a remnant of a railway depot that formerly sat to the east of Great Suffolk Street. Its setting is the adjacent road and railway bridges that accessed the former depot. As shown in view #6, the development would be seen away from this setting, appearing above the stepped massing of no.5-7 Bear Lane, and such would have no impact on the heritage setting of the locally listed building.

Impacts on conservation areas

292. The site is not within a conservation area and there are no conservation areas within a 250m radius. The closet conservation area in Southwark is the King's Bench conservation area, which is c.360m to the south, although the Waterloo and Roupell Street conservation areas of LB Lambeth are marginally closer at c.300m to the west of the site. Other moderately close conservation areas in Southwark include Old Barge Alley to the northwest; Bear Gardens to the northeast; Thrale Street and Union Street to the east/southeast; and Valentine Place to the southwest, which are between 400-420m away.

293. Looking at the King's Bench conservation area, the ZTV indicates that the new development would not be seen in the backdrop to the late 19th/ early 20th century industrial and residential buildings that frame its streets. This is in part due to the tight urban grain of the streets within the conservation area, but also the scale of the intervening context that includes the large residential slab blocks of Nelson Square and the tall Music Box scheme at no.237 Union Street, which would obscure the development. Valentine Place conservation area, further to the west, would be similarly unaffected, with the Palestra building also likely to obscure the development from view.

294. Regarding Lambeth's conservation areas to the west, the ZTV indicates the development would be seen from Roupell Street and neighbouring Whittlesey Street. This is due to their east-west orientation towards the site and the moderate scale of the neighbouring Peabody estate that forms the immediate backdrop. The wider backdrop to the charming Victorian terraced housing that characterises the Roupell Street conservation area contains a number of tall buildings, including Columbo House and the Hoxton Building in Blackfriars Road within the middle distance. Given their presence, the new development is considered to have a neutral impact on the heritage setting.

295. The ZTV also indicates that the settings to the Old Barge Alley and Bear Gardens would also be unaffected by the proposals, due to intervening tall buildings, including the South Bank Tower in Upper Grounds to the northwest of the site and the Triptych development at no.185 Park Street and the Blue Fin building in Southwark Street to the northeast.

296. Lastly, looking eastwards, the development would be visible from within sections of the Thrale Street and Union Street conservation areas, where the street layout

runs east-west and orientates towards the site, although the development would be at a distance of 400m. View #12 is from Southwark Street, on the westernmost edge of the Thrale Street conservation area: This shows the site mostly obscured by the intervening tree cover, although the development would become more visible in wintertime. It would be visible at the far end of the vista, but would appear not dissimilar in scale and colour to the foreground buildings that frame both sides of Southwark Street, including within the conservation area. It would also be seen against the backdrop of the taller, curtain-glazed office building at no.240 Blackfriars Road in the further distance. Its appearance would not unduly affect the heritage setting, preserving the 19th century townscape of grand industrial and commercial buildings in Southwark Street and the contrasting simpler domestic character of 18th century Thrale Street that characterise the conservation area.

297. While no verified view is provided for the Union Street conservation area, the ZTV indicates that the development would be seen from within Union Street, between its junction with Borough high Street and Flat Iron Square.

298. Looking westward along the street, the streetscene is framed by the fine grained, modest-rise Victorian residential and commercial buildings on either side that characterise the conservation area. The proposed development would likely sit axial to the view, but would generally be obscured by the intervening railway bridge that cuts across the vista and by the warehouses of America Street. The uppermost levels would also be partly obscured by the tree cover within Flat Iron Square; or where visible, seen adjacent to the tall office building at no.240 Blackfriars Road that sits within the backdrop to the vista in the far distance. Overall, its appearance and impact on the heritage setting would be negligible.

Heritage conclusion

299. Overall, as there are no statutory or locally listed buildings on site there is no physical harm to any heritage assets. However, there is some less than substantial harm to the settings to the settings several designated and locally listed buildings. Where there is harm to heritage assets policy P19 part 2 requires those harms to be robustly justified. In this instance and for the reasons set out above it is considered that that justification has been made. . Where harm occurs the harm is less than substantial and towards the lower end of the range. Where visible, the scheme would have a neutral effect on the setting of conservation areas, and as such would preserve their character and appearance, complying with policy P20 of the Southwark Plan. In accordance with the NPPF, less than substantial harm should be considered against the planning benefits of the scheme, with great weight given to the conservation of the heritage asset. Lastly, it is noted that the GLA reached similar conclusions on heritage matters in carrying out its Stage 1 report (November 2023). Historic England were also consulted on the amended plans and deferred to the views of the Council.

Design review panel

300. Finally, the proposals were considered by the council's DRP at the application stage in April 2023. The panel welcomed the principle of providing affordable

housing in this location and the thoughtful consideration that had gone into the proposals. However, it considered the scheme to be overdevelopment, with the tower appearing incongruous in a location characterised by street-based architecture with a datum of 5-8 storeys. It acknowledged that a more modest increase in massing could work in the northeast corner, but of possibly 4-5 additional storeys. The panel encouraged the use of brickwork which gave the design a residential character, but questioned the use of metalwork in large and prominent areas: this it felt ran counter to the masonry language and diminished the architectural concept. It encouraged bay studies to promote a high quality of design. The Panel thought the homes were generally well-planned, but questioned the impact of the railway on those homes at lower levels and the definition of chamfered windows as dual aspect. The panel found the landscaping to lack quality and generosity for a scheme of this scale, and expressed its concerns regarding the poor levels of daylighting and informal surveillance. However, it was reassured by the additional community amenity space at Level 9. It recognised the public gesture of extending the Low-line through the site, but wondered whether it would compromise the open space for residents.

301. The designs did not especially change as a direct result of the panel's comments, with the architectural concept of a linear block and tower, its scale and material finishes remaining much the same. Subsequently, the primary scheme changes have been in adjusting the form to achieve a second staircore, pre-empting the changes in fire regulations; and more recently, to address detailed officer concerns regarding the towers proportions and form, the addition of an extra storey to the tower as a consequence of reducing the podium building and revisions to impact of overhanging balconies and loss of architectural clarity of the 9th floor amenity deck.

302. It is notable that an earlier iteration of the scheme at the pre-application stage was presented to Design South East; an independent design review panel that generally operates in those local authority areas where a design review panel is not established. That panel was broadly supportive of the scheme at the time.

Conclusion for urban design and tall buildings

303. The proposals are for the regeneration of Friar's Close, replacing a low-rise social housing estate in the Bankside area with a new tall building for a mix of social and private market housing. The loss of the existing building and replacement with a new building of improved architectural quality is welcome: As are the urban design positives the scheme, with the improved ground floor activation of entrances and community rooms onto the adjoining streets; and improved local permeability of the extension to the Low-line walking route and passageway connection through to Price's Road.

304. There is an acknowledged opportunity for delivering a larger building on site that works with its context. The design rationale is supported for a linear block that supports the character of Bear Lane, with a taller element at its northern end that frames the widened public realm at its junction with Burrell Street and Price's Street, close to Southwark Street. The scale of the proposed replacement building is challenging, but is moderated by the well-articulated massing and engaging

elevational designs.

305. The designs are effective in suggesting two mansion block-style buildings, with a robust architecture, coherent shoulder line and clear vertical expression of the base, middle and top. The corner chamfers help to ease their sense of scale within the street. The blocks are large for their immediate low to medium-rise building context and narrow street, and will appear moderately overbearing at points, but can be seen within the wider townscape context and as part of the transition in heights from the proposed tower.

306. The new tower is similarly well-designed and engaging, although its height is not proportionate to its backwater character of Bear Lane and overplays its significance as a local landmark. The site is nonetheless within the Central Activities Zone, which is considered suitable in principle for tall buildings. In terms of the cityscape, the tall building would sit on the edge of the Bankside cluster of tall buildings, and its height and location would not unduly affect London's protected strategic views, often being obscured by other tall buildings within the cluster. It would impinge on the borough protected view of the iconic Tate Modern building from the Millennium Bridge, detracting from its broader silhouette, but would not affect the backdrop to the chimney. Its impact would be modestly harmful.

307. Locally, the clustering effect is less obvious and the proposed height remains challenging within its immediate context, although the site is not within or close to a conservation area. The development, however, would appear in the settings of a number of statutory and locally listed buildings within its vicinity, including the Grade II* Hopton's Almhouses and particularly the Kirkaldy Building, disrupting their settings. However, the harm would be less than substantial and generally of low order.

308. Overall, the proposals broadly accord with design policies P13 (Design of Places), P14 (Architectural Quality); and P17 (Tall Buildings), but require clear and robust justification in the form of planning benefits that would outweigh the less than substantial harm to the statutory and locally listed buildings (P13.2, P17.3.2, P19). The planning benefits of the scheme also need to be weighed against the modest disruptions caused to the local townscape within Bear Lane and to the protected borough view of the Tate Modern (P13.1, P22.5). These benefits would include items such as opening up the low line, an improvement to the public space, the provision of community areas, an improvement with regards the quality of accommodation to existing residents and a large increase in social rented units.

Trees and landscaping

309. Policy G7 of the London Plan 'Trees and woodlands' states that development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed. Policy P61 of the Southwark Plan 'Trees' states that development must retain and protect significant existing trees and must retain and enhance the borough's trees and canopy cover.

310. Trees - An Arboricultural Impact Assessment report has been submitted with the application.

311. There are currently 6 category C trees (low quality) on the site and one category U tree (unsuitable for retention), with the species comprising Holly, Cypress, Purple Plum, Rowan and Cherry. Two of the trees are located at the front of the building within two front gardens, and the remainder are in the communal amenity space at the rear. All of the trees would be removed in order to facilitate the proposed development.

312. Given their condition, the removal of the existing trees is considered to be acceptable, subject to a contribution of £28,000 towards new tree planting in the area which would be secured through the legal agreement. A total of 13 new trees would be planted on the site, mostly along the Low Line and also on the Burrell Street and Treveris Street frontages. A broader species mix for the new trees is recommended, and this would be secured through a condition requiring a landscaping plan to be submitted for approval. A street tree bond of £4,000 for any tree not planted on the site should be secured through the legal agreement.

313. Landscaping – Policy G1 of the London Plan 'Green infrastructure' states that development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network. Green infrastructure is defined in the plan as comprising the network of parks, rivers, water spaces and green spaces, plus the green elements of the built environment such as street trees, green roofs and sustainable drainage systems. Policy G4 of the London Plan 'open space' states that development proposals should, where possible, create areas of publicly accessible open space, particularly in areas of deficiency. It is noted that there are minimal areas in close proximity to the site.

314. The proposal would deliver 364 sqm of public realm at ground floor level which would include the Low Line path, the passageway through the building to the rear of the site and areas around the edges of the site. The public realm areas would include seating, hard and soft landscaped areas including vertical planting along the railway viaduct. A mix of hard and soft landscaping is proposed on the 9th floor amenity terrace, and full details would be secured be secured by way of a condition.

Biodiversity and urban greening

Biodiversity Net Gain (BNG)

315. The recent BNG legislation requires all planning applications which were received after 12 February 2024 to improve the BNG of a site by 10%. This application was submitted and made valid on 29/12/2022 and therefore pre-dates this requirement. The applicant has nonetheless submitted a BNG matrix which shows that there would be an increase of 58.84%. This is a positive aspect of the scheme which is welcomed.

Urban Greening

316. Policy G5 (Growing a good economy) of the London Plan 2021 encourages major developments to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. The policy also recommends a target score of 0.4 for residential developments.

317. The development proposes an urban greening factor (UGF) of 0.43 which exceeds the recommended 0.4 score for residential developments which would be achieved through the provision of green walls, flower rich planting and biodiverse roofs. This is a positive aspect of the scheme, and significantly enhances the UGF on site. This would be controlled secured by condition.

Transport impacts

318. The site has a PTAL level of 6b (excellent) and is located within a Controlled Parking Zone (CPZ) which operates between the hours of 08:00 – 23:00 Monday to Sunday. Neighbouring residents have raised concerns regarding the provision of parking permits, and refuse storage and collection arrangements.

319. The development would provide one on-site accessible parking space which would be accessed from Treveris Street, and servicing would take place from Burrell Street and Bear Lane. The proposal would result in some additional vehicle trips, although these would have a negligible impact on the highway network.

320. London Plan policy T1 seeks to achieve a strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041, and policy T2 requires developments to deliver improvements to support the ten Healthy Streets indicators, reduce the dominance of vehicles and be permeable by foot and cycle. Further policies in the London Plan set out cycle parking and car parking standards, and the management of safe deliveries and servicing. Southwark Plan policy P50 seeks to minimise highways impacts and maintain safety, while policies P49, P51, P52, P53, P54 and P55 set out further requirement on different aspects of transport. Southwark Plan policy P52 supports the implementation of the Low Line route alongside the railway viaduct, and new routes through railway arches.

Demolition and construction

321. A Transport Assessment (TA) has been submitted with the application which sets out the likely transport impacts which would arise from the proposed development. The construction period, including demolition, is estimated to be three and a half years, and the TA explains that because a contractor has not yet been appointed to carry out these works, the likely number and type of construction vehicles are not yet known. The TA therefore recommends that these details be secured by way of a condition.

322. The site is very close to Southwark Street which forms part of the Transport for London Road Network (TLRN), and subject to appropriate management, construction vehicles should not have a significant impact upon the surrounding highway network. An Outline Construction Environmental Management Plan (CEMP) has been submitted which includes potential construction vehicle routes, together with measures such as the pre-booking of deliveries to the site, consolidating vehicle trips, no on-site parking for construction workers, and the use of banksmen / traffic marshals. These outline details are considered to be acceptable, and a condition requiring the submission of a detailed CEMP including the likely number and type of construction vehicles has been included in the draft recommendation.

Healthy Streets

323. Policy T2 of the London Plan requires development proposals to demonstrate how they would deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance, how they would reduce the dominance of vehicles on London's streets whether stationary or moving, and how they would be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport. Healthy Streets has been considered within the TA, and the table below demonstrates how the proposal would meet the TfL guidance.

324.

Indicator	**Response to indicator**
Pedestrians from all walks of life	The only vehicular access would be to an on-site accessible parking space. Opening up of the Low Line throughout the day.
Easy to cross	A scheme of highway works would be secured, including widening the pavement on Burrell Street, the provision of additional public realm and raised tables.
Shade and shelter	Shade and shelter would be provided by the covered route through the site from Bear Lane, and could be incorporated into the landscaping of the Low Line.
Places to stop and rest	Seating could be provided in the public realm including along the Low Line, and this could be secured through a landscaping condition.
Not too noisy	The proposal would not generate significant additional traffic movements, and conditions would be imposed to ensure that there would be acceptable sound levels within the flats and no excess noise from the class F floorspace.

People choose to walk, cycle and use public transport	The proposal would improve the pedestrian environment around the site by widening the pavement on Burrell Street, opening up the Low Line and providing landscaped public realm. Cycle parking would be provided on the site.
People feel safe	Active frontages would ensure that natural surveillance occurs. The applicant has requested that the Low Line and routes into the site be gated at night in order to meet Secured by Design requirements.
Things to see and do	The site is in a central London location with easy access by foot to a broad range of activities, shops and services, including along the Southbank.
People feel relaxed	The proposal would contribute to the Low Line which would be a pleasant environment for walking.
Clean air	The only car parking which would be provided would be one accessible parking space. Future occupiers would be prevented from obtaining parking permits which would encourage alternative modes of travel.

Trip generation and public transport impacts

325. Policy T4 of the London Plan requires development proposals to ensure the impacts on the capacity of the transport network are fully assessed and that any adverse impacts are mitigated. Policies P45, P49 and P50 of the Southwark Plan require developments to minimise the demand for private car journeys and demonstrate the public transport network has sufficient capacity to support any increase in the number of journeys by the users of the development.

326. The nearest bus stops are located on Blackfriars Road approximately 140m from the site, or a 2 minute walk. The nearest rail and over-ground station is London Blackfriars which is approximately a 5 minute walk from the site. The TA advises that the proposed residential units could generate 241 daily 2-way net additional public transport trips on a typical weekday compared to the existing building. Transport for London (TfL) has confirmed that this would not have a significant impact upon public transport services, given the numerous public transport services available within the vicinity of the site. A net increase in 215 daily 2-way active travel (pedestrian and cycling) movements are expected to be generated by the development.

327. The TA does not include a trip generation assessment of the Class F ground floor use, on the basis that this is likely to be very limited. Given the relatively small non-residential floorspace proposed, and the lack of any associated vehicle parking, this is considered acceptable.

328. The TA estimates that the proposal would result in a net increase in 31 daily 2-way vehicle trips, although this is considered to overestimate the likely traffic generation of the site given the absence of standard car parking provision. Nevertheless, this would have a negligible impact on the local highway network.

329. With regards to delivery and servicing trips, the TA estimates that the proposed development would generate a total of 40 daily 2-way (20 inbound, 20 outbound) trips, with no more than 5 delivery and servicing vehicles an hour arriving at the site. A detailed delivery and servicing management plan will be secured by condition, which would be expected to include measures to mitigate impacts of deliveries and to reduce the number of vehicle trips wherever possible.

Access and servicing

330. Pedestrian access through the site would be from Bear Lane via a covered walkway, and the Low Line would be opened up along the railway viaduct, albeit that both routes would be gated overnight. The applicant has advised that the gates are a requirement of achieving Secured by Design certification, and the Metropolitan Police has suggested that the gates could be open between 7am and 5pm daily, or until 7pm during the summer months. The Low Line is fully open on the western side of the viaduct, and so could be used as an alternative if required. A planning obligation is recommended requiring a Low Line Management Plan to be submitted for approval, which would cover matters such as opening times for the gates, lighting and maintenance of the route.

331. The existing pavements adjoining the site range from 1.4m to 2.7m in width. It is proposed to widen the pavement along Burrell Street to 2.4m, and raised tables would be provided on Burrell Street and Treveris Street. The reasoning for this is because the footway as currently shown on Treveris Street has pinch points of 1.8m. Increasing the width would provide an effective footway. range of highway works have therefore been requested by the council's Highways Development Management Team, and these would be secured within the legal agreement. Highways Development Management has recommended that the footway on Treveris Street be widened from 1.8m to 2.4m.

332. A number of balconies to the building would oversail the pavement along Burrell Street and Bear Lane. The plans have been amended to reduce their depth, and the lowest balconies would be located 3.75m above ground level and be set back approximately 0.9m from the edge of the carriageway, which would comply with the council's oversailing requirements; an informative advising the applicant of the need to obtain a separate oversailing licence and S177 agreement from the council as Highway Authority has been included in the draft recommendation.

333. All servicing for the proposed development would take place from the street, with

deliveries with shorter dwell times such as courier drop-offs using the single and double yellow lines on Bear Lane where vehicles are permitted to load and unload for up to 40 minutes. For deliveries with longer dwell times these would take place from an existing 25m long loading bay on Burrell Street which can accommodate several vehicles for up to one hour, with no return within two hours.

334. Burrell Street is one-way (east-bound) where it passes under the railway viaduct, and the northern spur of Burrell Street is a dead-end with no vehicular access onto Southwark Street. In light of this TfL has advised that all delivery and servicing vehicles must approach the site from the west along Burrell Street, so that they can then continue onto Bear Lane in a forward gear rather than having to perform complex reverse manoeuvres. The council's Highways Development Management Team has advised that use of the Burrell Street loading bays would be restricted to off-peak times only because this section of the street is a cycle route/connection, and this would be secured through the legal agreement. It is noted that this change would apply to existing business and not just to the proposed development.

335. Refuse and recycling from the residential units would be collected from Burrell Street and Treveris Street, from two dedicated stores which would enable operatives to collect the bins. The Council's Waste Department have raised concern with regards the dragging distances. For instance, the bins within the binstore would be greater than 10m from the proposed collection point. To ensure that the scheme would have an acceptable impact in terms of waste collection, a condition has been imposed requesting further details on the waste holding area. With this in place, the siting and collection distances could be accepted.

336. The stores would comply with the council's guidance in terms of size, and there would be a separate refuse store for the class F floorspace, with collection to be undertaken by a private contractor. Dropped kerbs are required in order to facilitate the refuse collection, which means that two parking spaces on Burrell Street would need to be relocated and one on Treveris Street would need to be removed altogether. The two relocated spaces on Burrell Street would be formed by extending an existing bank of spaces and would be acceptable in terms of manoeuvrability, and this would be secured through the s106 agreement. The loss of a space on Treveris Street is considered below in relation to accessible car parking.

337. There are a number of constraints affecting the site, including its limited size, proximity to the railway viaduct, and the council's Low Line policy. This limits the amount of space on the site, and needs to be weighed in the balance with the policy requirement for on-site servicing. Overall the proposed servicing arrangements are acceptable, subject to a condition for a detailed servicing and delivery management plan to be submitted for approval. This would need to include details of the means by which delivery drivers would be alerted to the restrictions that TfL and the council's Highways Development Management team have requested. The s106 agreement would secure a servicing bond (£2,790) which would be used to monitor the effectiveness of the servicing strategy, and to deliver additional mitigation measures if necessary.

Cycle parking

338. To make an efficient use of the site and avoid a carbon intensive basement, the applicant has designed the cycle parking to the 2021 London Plan standards rather than the 2022 Southwark Plan standards which are higher. The applicant has submitted a drawing which shows that providing cycle parking which would comply with the Southwark Plan standards would have a significant impact on the ground and first floors of the building, considerably reducing the amount of class F floorspace which could be provided and resulting in a loss of residential accommodation. The provision of class F floorspace within the development is considered to be positive, therefore when considered in the round with the limited size of the site and the Low Line requirement, officers are satisfied that use of the London Plan standards would be acceptable.

339. TfL has advised that the London Plan requires 264 long-stay and 5 short-stay cycle parking spaces for the residential units. The plans show that 269 long-stay spaces would be provided in the building at ground and first floor levels, and 6 short stay located in the public realm. There would also be 1 long stay and 1 short stay non-residential space located in the public realm. This would meet the London Plan requirement in terms of numbers, although there are some concerns regarding the layout of and access to the cycle stores as set out below. For the avoidance of doubt, all of the accessible Sheffield stands and most of the standard Sheffield stands would be located on the ground floor. Access for these spaces would therefore be acceptable.

340. With regards the internal spaces, a wheeled channel would be provided at either side of the stairs to enable residents to wheel bikes to and from the first floor stores. There would be 15% Sheffield stands and 4.9% enlarged Sheffield stands which would fall short of the 20% and 5% which is generally required, and TfL has requested that the stores are either accessed from a communal lobby, or are provided with an additional entrance as a means of escape in the event of tailgating. Reconfiguring the cycle stores has been explored, but the applicant has advised that issues would arise in relation to means of escape and a potential loss of accessible cycle parking spaces. Whilst there are some concerns, it is considered that they would not be sufficient to outweigh the benefits of the proposal, including the delivery of additional affordable housing. A condition is therefore recommended for further details of the cycle parking to be provided, including investigating the feasibility of rationalising or reducing the ground floor plant space with a view to improving the cycle store layouts, and details of the means of ensuring that the accessible cycle parking would be prioritised for people most in need of them.

341. For the class F floorspace, the TA sets out that the limited floor area is such that it is unlikely that it would be used as a nursery, primary school or university / college. The cycle parking requirement for 2 short-stay and 2 long-stay spaces has therefore been calculated on the basis of potential use as a health centre or dental surgery. This approach is considered to be acceptable, and the long-stay spaces would be provided within the units and the short-stay spaces within the public realm.

342. Expanding the cycle hire scheme together with a free 3-year membership to the TfL cycle hire scheme for residents within the development would be secured through the legal agreement.

Car parking

343. There are currently no car parking spaces on the site, although there is a dropped kerb access from Treveris Street which is likely for use by emergency vehicles or for historic access. Only two households within the building have a permit to park in the surrounding CPZ, one of which is also a Blue Badge holder.

344. There would be no general needs car parking to serve the development, and this would comply with policies T6 of the London Plan and P54 of the Southwark Plan which seek to limit the amount of car parking on sites with good access to public transport and to encourage sustainable travel. With the exception of all of the existing residents, it is recommended that all other (new) households within the development be prevented from being able to obtain an on-street parking permit to ensure that there would be no additional parking stress in the CPZ; this would be secured by way of a planning obligation.

345. With a parking permit exemption in place, the proposal would not add to parking stress on the surrounding streets. It is noted however, that 4 on-street spaces would need to be suspended during construction works in order to create a layby for construction vehicles, and one space on Treveris Street would be lost altogether as a result of the proposal. A parking survey using the Lambeth methodology has therefore been undertaken, the findings of which are included in the TA.

346. The parking survey included all roads within a 500m walking distance of the site and found that the highest average parking stress was 61% between 08:00 – 09:00, when there were 183 vehicles parked in the survey area and 115 spaces available. Parking stress is much higher on Bear Lane, Burrell Street and Treveris Street which adjoin the site, partly owning to a lower number of spaces on these streets. The average parking stress was 83%, 83% and 50% respectively, with two spaces available on Bear Lane, two available on Treveris Street, and one available on Burrell Street. Whilst some neighbouring residents may have to park slightly further away from the site during construction works, upon completion of the development it is not considered that the loss of a space on Treveris Street would have a significant impact upon parking availability in the immediate vicinity of the site.

Car club

347. Policy P54 of the Southwark Plan ‘Car parking’ requires developments to provide a minimum of three years free membership, per eligible adult who is the primary occupier of the development, to a car club if a car club bay is located within 850m of the development, and / or contribute towards the provision of new car club bays proportionate to the size and scale of the development if it creates 80 units or

more. Given the size of the proposed development and because there are no car club spaces in very close proximity to the site, it is recommended that a contribution towards an on-street car club space together with 3 years free membership for each eligible adult be secured by way of a planning obligation.

Accessible car parking

348. Policy T6.1 'Residential parking' of the 2021 London Plan requires 10% accessible car parking spaces, with 3% to be provided from the outset and details of how the remaining 7% could be provided to be set out in a Parking Design and Management Plan. Policy P55 of the Southwark Plan requires accessible car parking spaces up to a maximum of one car parking space per wheelchair accessible unit.

349. Owing to the site constraints outlined above, only one accessible car parking space would be provided in the development. It would be accessed from Treveris Street and there would be two retractable bollards at the northern end of the space to ensure that there would be no encroachment onto the Low Line, whilst maintaining emergency access to the railway viaduct by Network Rail if necessary. The parking space would be of an acceptable size, and visibility splay drawings have been provided which demonstrate that there would be adequate visibility for pedestrians and drivers; it is recommended that the visibility splay be secured by way of a condition. Whilst it is noted that drivers would need to reverse onto the space and exit in a forward gear, the single blue badge space would be expected to generate a minimal number of vehicle movements. As Treveris Street is very lightly trafficked, this is considered acceptable in this instance.

350. It is recommended that the accessible parking space be allocated to the existing Blue Badge holder in the first instance, with a parking management plan to be secured by way of a condition to set out how it would be used in the future. Whilst this provision would not meet the London Plan requirement, this should be weighed in the balance with other planning matters, including the proximity of the site to step-tree public transport, the delivery of high quality housing including affordable housing, and new public realm including the Low Line. Whilst there may be scope to provide some additional Blue Badge spaces on-street, these would not be exclusively for use by people living in the development and as such have not been requested. The nearest on-street Blue Badge bay is located immediately outside the site on Bear Lane, and a contribution of £13,500 to fit it with an electric vehicle charging point should be secured within the legal agreement. A condition has been included in the draft recommendation requiring details of on-site mobility scooter parking to be submitted for approval.

Travel Plan

351. In order to encourage sustainable modes of travel to and from the site, including active travel, a condition requiring a residential travel plan to be submitted for approval has been included in the draft recommendation.

Solar Glare

352. The application has submitted a Solar Glare report which has considered the impacts upon the adjacent railway network. This is because the proposed development could cause 'solar dazzle' which could reasonably impact upon safety. This report simulates the point of the view of the driver approaching the proposed scheme. The report confirms that the proposed development would impact upon northbound trains but that this would not cause 'disability glare' and would be treated as minor adverse. To ensure that the proposed development would not cause undue harm to the adjacent railway, an appropriately worded condition has been imposed.

Transport impacts conclusion

353. Overall it is concluded that the proposed development would not result in any adverse highway conditions, subject to a number of conditions and planning obligations as outlined above. Whilst it is noted that the proposal would not provide the required number of accessible parking spaces, given the proximity of the site to step-free public transport options, on balance this is considered to be acceptable. The proposal would result in the loss of an on-street parking space, and with the exception of two existing residents who already have parking permits, no other residents within the development would be able to obtain a permit to park on the surrounding streets which would prevent any additional parking stress. A condition is recommended requiring the applicant to investigate whether the cycle parking for the development can be improved.

Land contamination

354. Planning Policy P64 of the Southwark Plan references contaminated land and seeks to address adverse effects on the natural environment such as soil, water, habitat and biodiversity. The effects of new development on the environment can be temporary, permanent and/ or cumulative and if these impacts are not identified at the design stage it can be much more difficult to rectify or add measures once a scheme is built

355. A desk top (contaminated land) investigation assessment report was submitted at application stage. This has been reviewed and appropriate conditions requiring further surveys would be required and have been imposed via suitably worded conditions. With these in place, the proposal would comply with policy P64 of the Southwark Plan.

Air quality

356. Southwark has poor air quality across many parts of the borough and pollutants have a direct and adverse impact on the health, quality of life and life expectancy of Londoners. It also impacts upon the environment and exacerbates climate change. This is something that Planning Policy P65 seeks to address.

357. The submitted report carried out by Air Quality Consultants has been considered and assessed. The report states that no mitigation is required and that the construction and operations air quality effects on the development would not be significant. It confirms that the scheme would be air quality neutral and to ensure compliance and to address items such as construction dust issues, appropriate conditions have been imposed, requiring a CEMP. With these in place, the scheme would comply with Policies such as P65 of the Southwark Plan and SI 1 of the London Plan.

Flood risk and drainage

358. The site is located in Flood Zone 3 as identified by the Environment Agency flood map, which indicates a high probability of flooding. Paragraph 165 of the NPPF advises that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. In line with the NPPF, the Council has a Flood Risk Assessment which acknowledges that development within flood zone 3 is required, and is allowed with the application of the Exception Test set out the NPPF.

359. Paragraph 167 of the NPPF states that the need for the exception test will depend on the potential vulnerability of the site and of the proposed development, in line with the Flood Risk Vulnerability Classification set out in national planning guidance. The development would contain some ground floor residential units which are classified as more vulnerable uses under the NPPF.

360. For the Exception Test to be passed it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, and that a site-specific flood risk assessment must demonstrate that no adverse impacts would occur. Where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again. However, the exception test may need to be reapplied if relevant aspects of the proposal had not been considered when the test was applied at the plan-making stage, or if more recent information about existing or potential flood risk should be taken into account.

361. The site is located on previously developed land and there are strong sustainability reasons why it should be redeveloped. The development of brownfield sites such as this will be necessary if accommodation is to be provided to meet the current shortfall in housing in the area.

362. As comments have not yet been received from bodies such as the Council's Drainage Department concerning the updated strategy, members will be updated in an addendum if required.

Construction management

363. In order to ensure that increases in traffic, noise and dust associated with the

demolition and construction phases of the development are minimised, a Construction Environmental Management and Logistics Plan should be secured as an s106 obligation. The plan will need to take account of any cumulative impacts with the adjacent developments taking place at the same time.

Energy and sustainability

364. The application has sought to address the revised and new policy requirements of the current development plan relating to energy and sustainability, and take account of the revised Building Regulations in Part L (conservation of fuel and power) and new Part O (overheating) especially.

Operational Carbon emission reduction

365. The proposed development will utilise a range of energy-demand reduction and clean and low-carbon energy-supply measures as part of the overall strategy to reduce carbon emissions against a comparison to 2021 Part L Building Regulations. The London Plan requires a minimum total 35% on-site reduction in carbon emissions against part L, while the Southwark Plan requires major residential proposals to achieve a 100% reduction (i.e. net zero) and where this is not able to be achieved, utilise a payment-in-lieu to off-set the shortfall.

366. The Southwark Plan additionally requires major non-residential development to achieve a minimum of 40% savings against Part L on site. The proposed development does not fall under this category and on this basis the performance of the non-residential element is exempt from meeting the requirement.

Cumulative Site-Wide Savings

367. The proposed development will achieve an overall regulated carbon dioxide emissions of 65% over Part L 2021 (10% be lean, 0% be clean, 55% be green). In accordance with LP Policy SI2 and SP Policy P70, the shortfall in carbon emissions to meet net zero will be met by an off-site payment in-lieu, calculated on the basis of the remaining emissions per annum totalled across a 30 year period. This has been calculated at £138,523 which will be secured via a planning obligation within a s106 agreement. The residential components achieve 67% over Part L 2021 and the non-residential components achieve 18% over Part L 2021. The applicant has demonstrated that all steps have been taken to reduce carbon emission in line with the energy hierarchy. The non-residential component is a small proportion of the scheme and it is more difficult to achieve carbon emission reduction.

Be Lean (use less energy)

368. The ‘Be Lean’ stage of the Mayor’s Energy Hierarchy requires carbon emission savings against 2021 Part L Building Regulations to be achieved by passive measures built into the design of the development, including orientation and site layout, natural ventilation and lighting, consideration (and technical modelling) of the impact of chosen building materials in terms of thermal mass and insulation and air tightness, and the extent (and technical specification) of glazing and use of

shading, among others.

369. The residential element of the scheme would achieve a 10% saving in carbon emissions over Building Regulations Part L 2021. This would meet the minimum required saving as set out in GLA Energy Assessment Guidance). The policy additionally requires a minimum of 15% savings to be achieved through energy efficiency measures for non-residential uses. The proposed development would not achieve this, instead achieving a 7% saving on the 2021 Part L Building Regulations. It is however noted that GLA in energy assessment guidance acknowledge how difficult it is to achieve carbon savings against Part L for Be Lean.

370. The non-residential (community space) units themselves are anticipated to have very small if not zero heating and cooling demands. Further to this, the applicant's modelling has found that additional improvements to the space's/building's fabric efficiencies do not significantly reduce the energy use that is anticipated to be incurred as a result of the use of the spaces. Additionally, the constraints of the site (i.e. external noise sources that are required to be mitigated against) means that active, rather than passive, cooling is required to be utilised, which would normally contribute to a better reduction in carbon emissions at the 'Be Lean' stage which the non-residential uses are not able to benefit from in this instance.

371. Alongside the residential element of the scheme, the non-residential spaces (community space) will be utilise high efficiency lighting and mechanical ventilation systems. These measures, along with the fabric efficiency measures, are considered to be the maximum reasonable and practicable to implement with a view to maximising the carbon emissions savings at the 'Be Lean' stage. While the 7% saving is technically not in compliance with the required 15% saving, this is on balance considered acceptable especially given the benefits associated with the scheme.

Be Clean (supply energy efficiently)

372. The 'Be Clean' stage of the energy hierarchy relates to connection to an off-site district heating network where this is feasible, and future-proofing a development for a connection to such a network where it is currently not. There are no such available networks within a reasonable distance of the site, and it is not anticipated that there would be one available to connect to within a reasonable assumption of the time of the proposed development completing and being able to be occupied (i.e. there are no future networks currently in the firm planning stage).

373. In order to meet policy requirements, the proposal would be futureproofed for connection to a district heat network should the opportunity to connect to one arise in the future. The space to facilitate this connection is provided for within a designated district heating plant room at ground floor level in the southern-most block (Core B). The futureproofed connection to a DHN and to utilise this space for that purpose will be secured as a planning obligation within a s106 agreement. As a result of there not being an existing or planned DHN for the proposed development to connect into, there are no carbon emission savings at this 'Be

Clean' stage.

Be Green

374. Following the 'Be Lean' (energy efficiency and energy-demand reduction measures) and 'Be Clean' (clean, efficient, low-carbon energy supply) stages of the energy hierarchy, the 'Be Green' stage relates to utilising renewable energy technologies as a way to supply energy to a development. A range of technologies were explored by the applicant in considering how this could be implemented, with x2 Air Source Heat Pump (ASHP) units and an array of photovoltaic solar panels (PV panels) chosen as the two that would provide the greatest carbon emissions savings when considered in the context of cost to implement and maintain.

375. The ASHP units would be located on the roof of the proposed tower (Core A) to generate electricity and Low Temperature Hot Water which would be used for heating, hot water and cooling. The use of these technologies in generating energy for the development will see an improvement on carbon emissions against 2021 Part L Building Regulations of 55% overall and then 57% for residential and 10% for non-residential.

Be Seen (Monitor and review)

376. The GLA's "Be Seen" planning stage reporting spreadsheet has been provided with the application. The development would include building management systems to control and monitor the electrical and mechanical plant, to allow reporting on services and metering of the residential properties and community units. A planning obligation would secure the ongoing monitoring and reporting requirements post construction, to comply with policy SI2 part A.4 and P70 Energy in the Southwark Plan.

Whole Lifecycle Carbon

377. As part of the submission a Whole Life Carbon Assessment (WLCA) has been undertaken which demonstrates that the proposed upfront embodied carbon is 622.931 kgCO2E/M2 GIA modules A1-A5, and this is lower than the GLA benchmark for residential of <850 kgCO2E/M2. The upfront embodied carbon (plus the operational in use modules excluding B6 and B7) is 1080 kgCO2E/M2 which is under the benchmark of <1200 kgCO2E/M2.

Circular economy

378. The Proposed Development will seek to minimise waste during construction and operation as required under LP Policy SI7 and set out in the accompanying Circular Economy Statement (CES) and Circular Economy Template. This will seek to divert a minimum of 95% of demolition and construction waste from landfill and a minimum 65% recycling for municipal waste with 20% of the materials to be recycled or reused content. This is below the target of 100%.

379. The circular economy strategic approach and targets for the Site to meet the

circular economy principles is described in detail in the Circular Economy Statement, and is summarised as follows:

Deconstruct and Reuse/ Demolish and Recycle – Consideration and assessment of all elements and materials that can be re-used. No topsoil will be sent to landfill and the proposal aims to re-use 15-20% of the excavated soil on-site. To mitigate the impact of demolition, the scheme would use a minimum of 25-35% of total weight of high grade aggregate specified from recycled aggregate.

Overheating and Sustainability Standards

380. Various options were explored. Natural ventilation options were assessed first and then mechanical cooling and use of trim cooling for example. The acoustic report indicates that the site noise levels are above what is considered acceptable by the Building Regulations Part O guidance to allow the night-time opening of bedroom windows to be used as the means of ventilation for passive cooling.

381. TM59 testing indicated that boosted mechanical ventilation would not sufficiently mitigate the overheating risk (see Section 10.0). An active cooling system would therefore be provided to allow tenants to address overheating while keeping windows closed. This is therefore deemed to be in compliance with London Plan Policy SI 4.

Reducing the amount of heat entering the building

382. Solar control glazing with a g-value of 0.40 is to be provided to flatted units and 0.32 to occupied communal rooms. This will reduce solar gains a in comparison to using standard glazing (typical g-value being between 0-1). Decreasing the flatted units' g-value to below 0.4 offered a minor improvement to overheating performance to the detriment of daylighting and energy performance of the flats. Shared communal rooms generally have larger glazed areas and do significantly benefit from a further reduction in g-value to 0.32.-This will further reduce the amount of heat entering the building, in line with the Cooling Hierarchy in P69 of the Southwark Plan.

Minimise internal heat generation

383. The communal heating system has been designed as to run at a relatively low temperature (55/50^{o}C flow/return). Insulation would also be applied to the communal pipework with an industry leading thickness of at least 50mm high performance phenolic foam insulation. Furthermore, low heat loss HIUs are proposed, minimising the heat gain.

Manage the heat within the building

384. The proposed construction of the building would be thermally lightweight as the internal insulation would separate the internal environment from any thermal mass of the building structure. Bedrooms exhibited the greatest overheating risk at the beginning of the night, rather than the mornings, so a lightweight construction is of

benefit in avoiding additional heat being stored in the fabric.

Provide mechanical ventilation

385. The mechanical ventilation system (MVHR) unit will incorporate a ‘summer bypass’ for the heat exchanger to help mitigate summertime overheating. Mechanical ventilation and active cooling is required because passive ventilation was not enough to mitigate against overheating.

Provide active cooling

386. The acoustic report submitted to support the application indicated that the site noise levels are above what is considered acceptable by the Building Regulations Part O Overheating guidance to allow the night-time opening of bedroom windows to be used as the means of ventilation for passive cooling. This has been factored into the assessment of overheating and its mitigation.

387. Testing (to the standards and methodology set out in the Chartered Institute of Building Services Engineer’s (CIBSE) TM59: 2017 guidance document) indicated that boosted mechanical ventilation would not sufficiently mitigate the overheating. An active cooling system is therefore required to be provided as part of the overall cooling strategy to allow tenants to address overheating while keeping windows closed.

Overheating testing

388. Overheating modelling was conducted for the residential element of the proposed development using the DSY1 (Design Summer Year) for the 2020s and in accordance with the standards and methodology outline within the CIBSE TM49 technical guidance document.

389. The CIBSE compliance criteria were met for all dwelling types for the DSY1 for both of the following cases:

i) Windows remain closed and mechanical cooling in use
ii) Windows open where only noise constraints would otherwise require them to be closed (security and protection from falling constraints still apply) and no mechanical cooling.

390. Testing was also undertaken for the residential uses for the DSY2 and DSY3 scenarios. It is acknowledged within the GLA's Energy Assessment Guidance (June 2022) that meeting the CIBSE compliance criteria is challenging for the DSY 2 & 3 weather scenarios, and requires that where these have not been passed, all passive measures have been explored in line with the cooling hierarchy and the risk of overheating has been reduced as far as practical. This is considered satisfactory because all rooms pass the TM59 cooling criteria for predominantly mechanical ventilated homes when assessed against the DSY1, 2, and 3, 2020 high 50% weather file. Due to the issues with noise during the night meaning that the windows must remain closed at night, trim cooling is required for all units and

due to the risk of overheating, mechanical cooling is therefore required to mitigate this risk.

391. The non-residential and ancillary residential spaces (i.e. excluding the proposed flats) were also subject to overheating testing under CIBSE TM:59 standards and methodology. This included the 'back of house' areas of the development, the residential lobbies, and the two community spaces among others. Mitigating actions were taken to reduce the potential for internal overheating in accordance with the London Plan cooling hierarchy outline above and, as a result, the CIBSE compliance criteria were met for all spaces. In other spaces active cooling is unavoidable due to high internal gains associated with the space use. In these cases, the actual cooling demand has been reduced to below that of the notional building using mitigation measures in line with the London Plan cooling hierarchy.

Water management

392. As demonstrated within the Sustainability Statement, the Proposed Development will achieve a mains water consumption of 105 litres per person per day in accordance with Policy SI5 and Southwark Plan policy P67 Reducing water use.

Wind microclimate

393. London Plan Policy D9 requires all tall building proposals not to cause changes to the wind environment that would compromise comfort and the enjoyment of open spaces around the building and in the neighbourhood. Southwark Plan Policies P14 and P56 require wind effects to be taken into consideration when determining planning applications, as does Policy P17 as the proposal is for a tall building.

394. The applicant's Wind Microclimate Report submitted in support of the application considers the following scenarios:

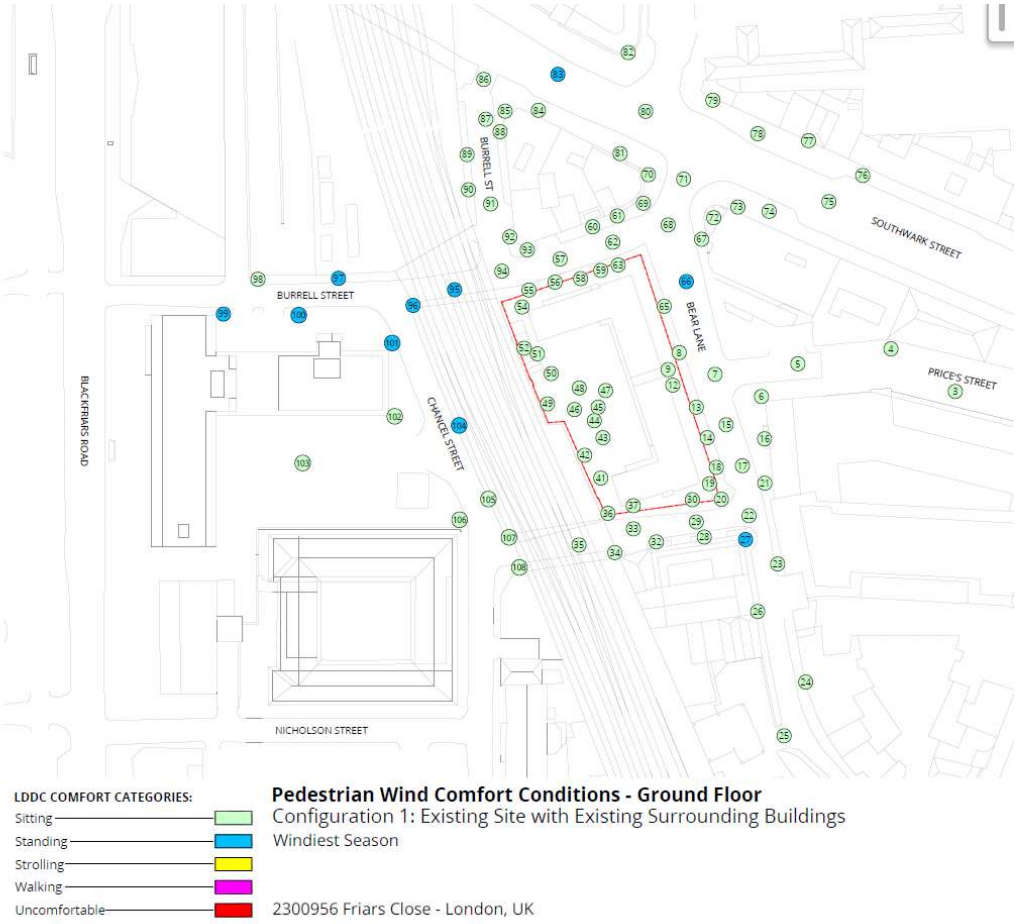
- Scenario 1 – existing site with existing buildings.
- Scenario 2 – proposed development with existing buildings.
- Scenario 3 – proposed development with cumulative surrounding buildings.

For the avoidance of doubt and given the changes, wind and microclimate was reviewed. This took into consideration the proposed changes concerning items such as the increase in height along with the alternate siting of the balconies and the removal of the residential units on the 9th floor.

Existing site with existing buildings (Scenario 1)

395. The wind microclimate within and around the Site has been assessed and classified using the Lawson Comfort Criteria. The results of the assessment for each configuration against Lawson Comfort Criteria are described below and also presented graphically.

396. Image showing the existing situation for the ground floor:

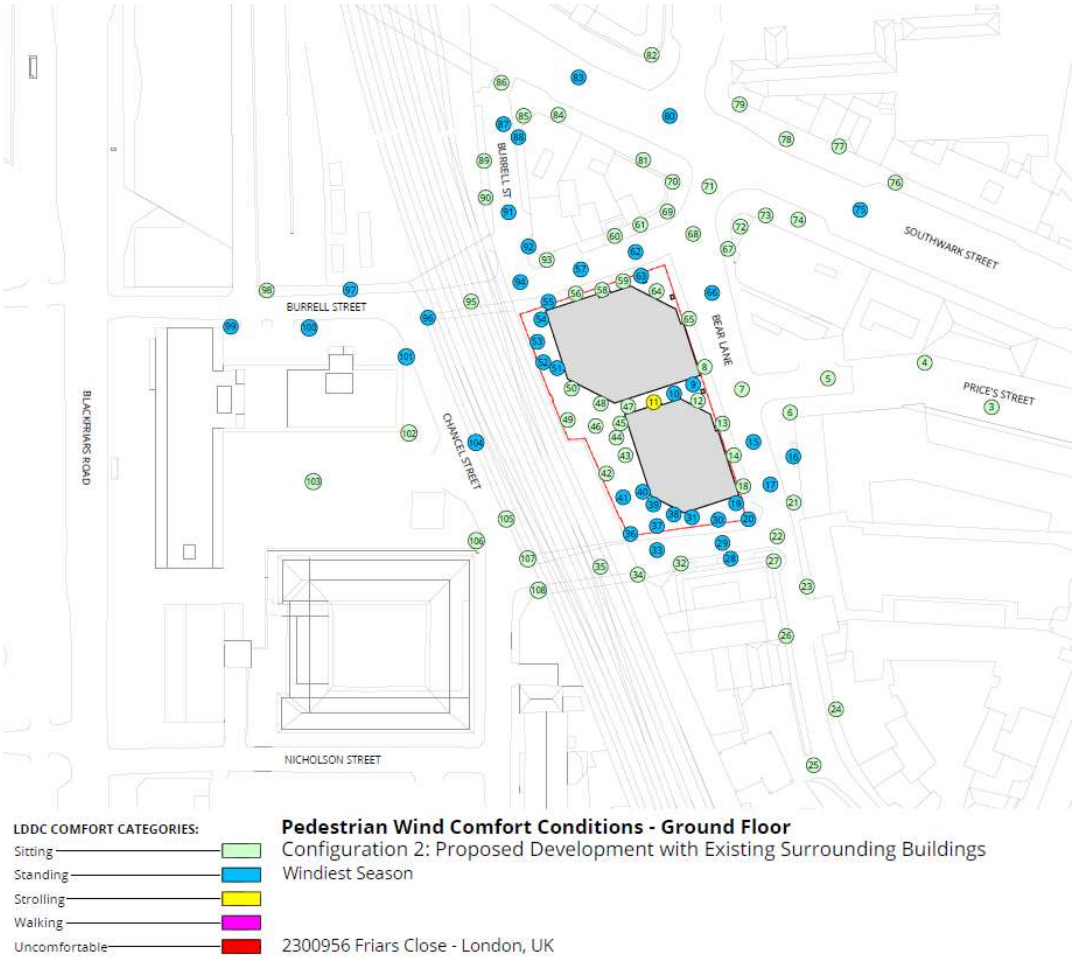


This shows that the majority of the areas within and surrounding the site are suitable for both sitting and standing.

Proposed development with existing surrounding buildings (Scenario 2)

397. The proposed development would change the wind conditions when compared to the existing structure. Bar one entrance, the majority of the wind conditions at ground level would be suitable for both sitting and standing during the windiest

season. This includes both within and outside of the site:



398. As shown in the above image, location 11 (as shown in yellow) would have 'strolling' use wind conditions during the windiest season. This area would however be a secondary escape route and therefore classed as a secondary entrance. As such, it would not cause undue harm.

399. The majority of the areas would have sitting conditions during the summer season (green dots). There would be a number of locations with standing conditions (blue dots) both within and outside of the site. This is a change from the existing situation but would not cause undue harm.

400. The submitted report has also confirmed that the majority of the balcony amenity spaces would be suitable for siting and standing during the summer season. The terraces on levels 13 and 17, would only have sitting condition during the summer months.

401. With regards the podium on the 9th floor, this would accommodate standing conditions but if this were to be used for seating, then screening/ planting would be required in certain areas (such as areas 117, 118 and 119). To ensure that these are in place and that this area could be readily utilised, this has been controlled through a landscaping condition.

402. There would be no exceedances of the safety criteria for ground, podium and roof levels in terms of strong winds.

Proposed development with cumulative surrounding buildings (scenario 3)

403. As referenced earlier in the report, there are a number of 'tall buildings' that are close to the site. These would provide a level of screening and the report has confirmed that this result in calmer wind conditions at and around the site. This report has also confirmed that the site and surrounding area would be suitable for sitting with localised standing during the windiest seasons.

404. The submitted report has drawn attention to the north-western corner of the Development (measurement locations 53 and 54). This would have standing conditions, similar to scenario 2 and like this, the wind conditions for on- and off-site pedestrian thoroughfares would remain suitable for the intended uses.

405. The entrance to the north of plot B (location 11 – the yellow dot shown in the above section) would have standing use conditions, one category calmer than in scenario 2. Off-Site entrance locations would also have conditions similar to the Configuration 2, suitable for intended uses.

406. During the summer season, balconies and private terraces would remain consistent with scenario 2 and would be suitable for private amenity use. The conditions on the 9th level podium (measurement locations 117, 118 and 119) would be suitable for sitting use, one category calmer as compared to the scenario 2.

407. The submitted reports have considered the potential wind microclimate effects of the proposed changes as well as the amendments that have been made to the scheme. They have been qualitatively assessed and overall, the massing and the layout amendments would not be expected to adversely affect the wind conditions at and around the proposed development. Furthermore, the balcony amenity spaces would be expected to have mixture of sitting and standing wind conditions during the summer season, suitable conditions for private amenity use.

408. The scheme is therefore deemed to be in compliance with policies P14, P17 and P56 of the Southwark Local Plan and policy D9 of the London Plan.

Health impact assessment

409. The scheme has submitted a Health Impact Assessment (HIA) which has referenced items such as the local health profile. It confirms that the health of people in Southwark is carried compared with the England average. It also has referenced the local GP surgeries and whether they are under or over capacity. Apart from Blackfriars Medical Practice, the remainder of the GPs in the surrounding area appear over capacity. It has also done this with dentists as well as considered the impact upon schools.

410. The report has referenced the increase in the number of people on the site and stated that there are currently 25 primary schools and 6 secondary schools within 2km (of the site). It notes that the development would increase the number of people thus placing increased pressure upon educational facilities. It does however go onto state that the existing facilities would be able to cope with this increase so would have a neutral impact.

411. It is noted that the proposed development would be an improvement of the existing playspace and would offer areas of 'green' for the wider public. The HIA also references items such as the need for a travel plan as to show other sustainable ways of travelling as well as CEMP as to effectively control items such as noise and air quality. The scheme has therefore considered the impact the scheme would have on terms of health impact.

Digital connectivity infrastructure

412. London Plan policy SI6 on digital connectivity infrastructure requires the provision of sufficient ducting for full fibre connectivity to all end users in new developments. Southwark Plan policy P44 requires delivery of fibre to the premises broadband or equivalent technology for future occupants and users. The scheme should include provision for full fibre connectivity to ensure all community and residential end users can benefit. A compliance condition is attached to ensure each building has fibre connection in line with the submitted information.

TV, radio and telecoms networks

413. The maximum height measures 80.25m and the overall height of the building could impact upon items such as TV and radio reception. Arqiva have therefore been consulted. They are responsible for providing the BBC, ITV and the majority of the UK's radio transmission network. They are also responsible for the integrity of re-broadcast links. They have considered the latest iteration of the proposed development and have raised no concerns with regards the impact upon these elements.

414. A planning condition has been proposed to remove permitted development rights for telecoms infrastructure. This is in the interest of protecting the appearance of the new buildings and amenity of the area as well as preventing any harm with regards items such as TV reception. The equipment could increase the height of the building which could reasonably impact upon TV reception. With this condition in place, the scheme would have an acceptable impact.

CCTV

415. The Council's CCTV department have assessed the application and the scheme may compromise CCTV in the vicinity. However, this could be mitigated by the requirement to have a point of presence on roof space on the development for CCTV radio transmission kit. They would also require a portion of roofspace which the applicant has agreed to be provided. With this addressed through the s106 agreement, this would have an acceptable impact.

Archaeology

416. The site is located within Tier 1 of the 'North Southwark and Roman Roads' Archaeological Priority Area (APA). The site does not lie within the vicinity of a World Heritage Site, Scheduled Monument, Historic Battlefield or Historic Wreck.

417. Tier 1 APAs are typically a defined areas which is known, or strongly suspected, to contain a heritage asset of national significance. The Council's archaeologist has considered and assessed the submitted reports and confirms that there is potential to aid the definition of the definition of prehistoric and historic waterways in the area, industrial archaeology and the geo-archaeological conditions of the site, all of which are worthy of study and examination.

418. The council's archaeologist has stated that following demolition of the site, to ground slab level, an archaeological evaluation would need to be undertaken. This would need to include a geo-archaeological assessment. Depending upon the results of this work further archaeological work may be required and to mitigate any harm, this can be secured via suitable conditions and a contribution of £11,171 which would be secured through the legal agreement.

419. With these conditions in place, the scheme would have an acceptable impact and would be in compliance with Policy P23 of the Southwark Plan.

Fire safety

420. The Town and Country Planning (Development Management Procedure and Section 62A Applications) (England) (Amendment) Order 2021 establishes that any relevant building is subject to Gateway 1 requirements. Relevant buildings are that which satisfy the 'height condition' and contain two or more dwellings or educational accommodation. The height condition is that (a) the building is 18 metres or more in height; or (b) the building contains 7 or more storeys. The Gateway 1 requirements outline that schemes which feature a relevant building must submit a fire safety statement form and the HSE must be consulted. As a section 73 application, a Gateway 1 form is not required by the legislation for this proposal which proposes relevant buildings, however it seemed reasonable to consult the HSE given the scale of the changes made and because of the second fire cores to the buildings. The HSE was consulted on the application.

421. Policy D12 (B) of the London Plan (2021) requires that all major developments must submit a fire statement. The fire statement should demonstrate how the proposals respond to and contain information on the requirements of both parts A and B of the London Plan policy D12 on fire safety. This must be completed by a third-party, independent, suitably qualified person. Paragraph 3.12.9 of policy D12 explains that Fire Statements should be produced by someone who is "third-party independent and suitably-qualified". The council considers this to be a qualified engineer with relevant experience in fire safety, such as a chartered engineer registered with the Engineering Council by the Institution of Fire Engineers, or a suitably qualified and competent professional with the demonstrable experience to

address the complexity of the design being proposed. This should be evidenced in the fire statement. The council accepts fire statements in good faith on that basis. The statement was compiled and reviewed by suitably qualified assessors on behalf of the applicant and is considered to be detailed and HSE have stated that it is also helpfully informative.

422. As referenced earlier in the report, the proposed development has been redesigned. The initial scheme only included one stair core and this has since been amended to include a second stair.

With regards the two blocks:

Block A would provide a firefighting shaft including a firefighting lift and wet rising main.
Block B would provide a firefighting shaft including a firefighting lift and wet rising main.

423. Given the height of the proposed building, the Health and Safety Executive (HSE) considered both the initial proposal as well as the amended scheme. Concerns were raised about the first iteration as this included a single stair. This was amended for the updated scheme and with regards these changes HSE referenced items such as internal layouts and means of escape and needing to demonstrate compliance at later regulatory stages. They were however content with the fire safety design relating to the project description, to the extent that it affects land use planning.

424. London Fire Brigade (LFB) also assessed the proposed development and raised objections to the following:

The two stair design
Open plan apartments
The residential roof terrace on the 9th floor
Evacuation lifts
Access facilities for fire and rescue
Access to wet riser tank and other water based equipment
Cycle stores

425. The applicant has considered and responded to these concerns and sent an updated fire safety strategy. This was passed onto both HSE and LFB and we are currently waiting updated comments from LFB.

426. Two stair design:
The updated report addressed the concern with the 2 stair design and stated that they have been designed in accordance with the guidance of Approved Document B Volume 1 (AD-B (Fire Safety). They also drew attention to the design of the building being in compliance with Building Regulations.

427. Open plan apartments:
The updated fire strategy confirmed that they acknowledge the comments provided by the Fire Service and would highlight that due cognisance has been given without undertaking the computation fluid dynamics (CFD) analysis (e.g. it is recommended that the cooking hob is not located in close proximity to an escape route from a sleeping area and should be no less than 1.8m plus the clear width of the escape route). Given that the kitchen layouts are subject to further development in the proposal, this has been controlled via an appropriately worded conditions.

428. 9th Floor:
With regards the 9th Floor, LFB referenced concern with the fire strategy for the two flats and the remainder of the space. The flats would have been 'stay put' but the roof terraces would have been evacuation. The amended scheme has removed the flats from this floor which has removed this conflict.

429. Evacuation lifts:
LFB were concerned about the number of lifts and what would occur if one was out of service. With regards this, both lifts would have dual functionality to provide the scheme with maximum flexibility. As such and if a lift would be out of service for any reason, there will be an alternative lift available either for disabled evacuation or firefighting.

430. Access facilities for fire and rescue:
LFB raised concern about the number of firefighter lifts and whilst the applicant acknowledges that the provision of 2 would be desired, other guidance (outside of planning) states that a firefighting shaft should contain a minimum of one firefighting lift. Therefore each firefighting shaft in both blocks is provided with a firefighting lift. On this basis, the proposal satisfies the function requirements of the Building Regulations

431. Access to wet riser tank and other water based equipment:
The concern revolved around the location of items such as a control panel and details relating to items such as the sprinkler control valve. The updated fire strategy confirms that this would be provided in a readily accessible position and would contain all the appropriate information. This has been addressed through a condition as to confirm the location.

432. Cycle stores:
LFB were concerned about possible fires relating to items such as charging electric powered personal vehicles (EPPV). The updated fire strategy has however confirmed that automatic fire suppression would be provided in the cycle stores. Each cycle store would also contain windows that the fire brigade could break as to allow access.

Conclusion for Fire Safety

433. The scheme has been altered and amended since the initial comments from LFB. The fire strategy has been updated and has addressed the points that were raised

and an appropriate condition has been imposed.

434. It is noted that LFB have not yet commented on the amended scheme/ amended strategy but given that the Fire Strategy has been updated and addressed previous concerns and as HSE have not raised an initial objection (to the current, amended scheme) this could be considered acceptable. Follow up comments are however still to be received and these will be referenced in an addendum if required.

Planning obligations (S.106 agreement)

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

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

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

Planning Obligation	Mitigation Proposed	Applicant position
Affordable housing	43% affordable housing by habitable room within the social rented tenure.	Agreed
Affordable housing monitoring fee	£7,146.90 (£132.35 per affordable unit).	Agreed
Affordable housing monitoring clauses	To enable the delivery of the affordable housing to be monitored.	Agreed
Affordable housing review mechanism	Early stage review, up to 50% of the habitable rooms	Agreed
Wheelchair units	To secure marketing of the wheelchair units, in listed locations,	Agreed

	and to prevent occupation of wheelchair units by non-wheelchair users until the marketing has been demonstrated to approved. Level of fit out for the social rent wheelchair units to be secured.	
Archaeology contribution	£11,171	Agreed
Employment during construction	This development would be expected to deliver 36 sustained jobs to unemployed Southwark residents, 36 short courses, and take on 9 construction industry apprentices during the construction phase, or meet the Employment and Training Contribution. [As per: Section 106 Planning Obligations and Community Infrastructure Levy (CIL); Supplementary Planning Document (SPD); and the HCA employment densities guide]. The maximum Employment and Training Contribution is £173,700 (£154,800 against sustained jobs, £5,400 against short courses, and £13,500 against construction industry apprenticeships). An employment, skills and business support plan should be included in the S106 obligations. LET would expect this plan to include: 1. Methodology for delivering the following: a. Identified 'construction workplace coordinator' role(s) responsible for on-site job brokerage through the supply chain and coordination with local skills	Agreed

	and employment agencies; b. Pre-employment information advice and guidance; c. Skills development, pre and post employment; d. Flexible financial support for training, personal protective equipment, travel costs etc; e. On-going support in the workplace; f. Facilitation of wider benefits, including schools engagement, work experience etc. 2. Targets for construction skills and employment outputs, including apprenticeships, that meet the expected obligations; 3. A mechanism for delivery of apprenticeships to be offered in the construction of the development; 4. Local supply chain activity - we would expect methodologies with KPIs agreed to: a. provide support to local SMEs to be fit to compete for supply chain opportunities; b. develop links between lead contractors, sub-contractors and local SMEs; c. work with lead contractors and sub-contractors to open up their supply chains, and exploration as to where contract packages can be broken up and promote suitable opportunities locally.	
Community use agreement for community space	Details of fit out, hours of use and charging strategy to be submitted for approval	Agreed
Local	During construction	Agreed

procurement		
Delivery of the community space prior to occupation of the private units	To ensure that the community space is delivered	Agreed
Playspace contribution	£66,681.60	Agreed
Resident decant strategy	As set out in the report	Agreed
Tree planting contribution	£28,000	Agreed, subject to confirmation of where any tree planting is located.
Street tree bond	£4,000 per tree not planted	Agreed
Highway works	- Prior to works commencing on site (including any demolition) a joint condition survey to be carried out with Southwark Highways Development Team to catalogue the condition of streets and drainage gullies; - Repave the footway around the development on Bear Lane, Treveris Street and Burrell Street using materials in accordance with Southwark's Streetscape Design Manual (Yorkstone natural stone paving slabs and 300mm wide granite kerbs). - Construct side entry raised tables on Burrell Street and Treveris Street - Construct dropped kerbs as refuse bin accesses on Treveris Street and Burrell Street -Reinstate redundant vehicle crossover on Treveris Street as	Agreed

	footway; - Resurface/reconstruct Treveris Street carriageway along the entire length of the development. - Promote traffic regulating order to relocate two parking spaces onto the northern spur on Burrell Street and restrict loading bay to off-peak use only; - Repair any damage to the highway including street furniture due to construction activities for the development including construction work and the movement of construction vehicles	
Contribution towards delivery of Great Suffolk Street LTN and associated active travel improvements	£70,000	Agreed.
CCTV contribution	Roof space and access for new CCTV required.	Agreed
Delivery service plan bond	£2,790	Agreed
TfL cycle hire membership	This is required for 3 years	Agreed
Car club membership	3 years membership for each eligible resident within the development, including the community use	Agreed
Car club space	To be agreed with car club operator	Agreed
Electric vehicle charging	£13,500	Agreed

point contribution		
Parking permit exemption	Future residents and community use occupiers would be prevented from obtaining parking permits for the surrounding streets	Agreed
Carbon off-set fund	£138,523	Agreed
CEMP monitoring	CEMP monitoring fee (£30,000)	Agreed
Future-proofing for district heating network	To enable the development to connect to future district heating networks if deemed feasible	Agreed
Post-installation review of energy measures installed	Review to verify the carbon savings delivered with an adjustment to the carbon off-set green fund contribution if required	Agreed
Administration and monitoring fee (excluding affordable housing monitoring fee and tree planting bond)	£7,213.31 (2% of the total contributions – don't include affordable housing monitoring)	Agreed
Low Line Management Plan	To secure the opening hours, landscaping, lighting, management an public access.	Agreed
Grand total	£367,878.91 (excluding tree planting bond)	Agreed

437. In the event that an agreement has not been completed by 31 October 2024 the 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 signed S106 agreement, there is no mechanism in place to mitigation against the adverse impacts of the development through contributions. It would therefore be contrary to London Plan (2021) Policies DF1, T9, T9 and E3, Southwark Plan (2022) Policies P23, P28, P31, P45, P50, P51 P54, P70, IP3 and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015), Paragraph 57 of the NPPF (2023).

Mayoral and borough community infrastructure levy (CIL)

438. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material 'local financial consideration' in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport invests in London as a whole, primarily Crossrail. Southwark's CIL will provide for infrastructure that supports growth in Southwark.

439. The site is located within Southwark CIL Zone 1 and MCIL2 Central London zone. Based on the existing floor areas provided in the agent's CIL Form1 (GIA Info) dated 21-Jun-24, the gross amount of CIL is approximately £9,544,433.95 (pre-relief) consisting £1,045,533.27 of Mayoral CIL and £8,498,900.68 of Borough CIL. Subjecting to the correct CIL forms being submitted on time, £3,593,752.18 of CIL Social Housing Relief can be claimed for a number of types of affordable housing. The resulting CIL amount is forecasted to be around £5,950,681.77 (net of relief). It should be noted that this is an estimate, and the floor areas on approved drawings will be measured after planning permission has been obtained. The two CIL phases are two separate CIL chargeable developments and each required its own set of CIL forms to be submitted prior commencement of that phase.

Community involvement and engagement

440. This application was accompanied by items such as a Statement of Community Involvement (which provides full details of the public consultation) as well as an Equalities Impact Assessment. In summary, the document confirms that nine resident events were held between October 2021 and June 2024. These were carried out prior to submission as well as during the determination of the application.

441. There were also four rounds of consultation events with the public and these included multiple types and styles of communication. This included creating a website and sending out 3,100 newsletters to local addresses which consisted of a newsletter providing information about events and how to take part in the survey. A range of contact mechanisms were provided throughout including phone and email.

442. These events helped to mould the scheme and raised items such as not all the units being open plan. It did allow residents to determine the internal layout and to provide updates with regards decanting. It is noted that there have been concerns

about items such as the size of rooms as well as the decant. These were however addressed and residents were shown items such as the existing rooms contrasted against those of the proposed development. The decant strategy has also changed throughout the process and now 16 properties have been found.

443. The applicant has therefore made acceptable efforts to engage with those affected by the proposals. As part of its statutory requirements, the council, sent letters to surrounding residents, displayed site notices in the vicinity, and issued a press notice publicising the planning application. Adequate efforts have, therefore, been made to ensure the community has been given the opportunity to participate in the planning process.

Consultation responses from members of the public and local groups

444. Public consultation was undertaken on 26.01.2023, 09.02.2024 and then again on 26.06.2024 (for the amended scheme). 503 neighbours were consulted, 25 comments were received.

- 9 of these were letters of support from the residents of Friars Close
- 16 were letters of objection.

445. Summarised below are the planning matters raised by members of the public with an officer response. Further detail on these matters are set out within the relevant sections in the report.

446. Letters of support:

- It is a very old building with cracks in the wall
- New homes would be more cost efficient
- More space
- Less stairs – better access
- Better heating,
- Would provide better safety than existing building
- Would provide better facilities
- Current flat is overcrowded and require more space.
- Current building has a rodent problem

447. One of these letters of support did raise a concern with regards the size of the new homes.

In response to this concern, the proposed development would be general compliance with the required GIA as set out in the Technical Housing Standards and London Plan. This along with the assessment against the provision of M4(3)(2)(a) units have been expanded upon in the main body of the report and are deemed to have an acceptable impact.

448. The objections raised the following issues:

- Design not in keeping
- Too high
- Out of keeping
- Traffic/ access
- Impact to nearby listed buildings - Would diminish the historic and neighbourhood value
- Impact to the Almshouses and their garden areas
- Concerns that the townscape views show significant harm
- Concern about re-housing and where this would be located?
- Parking permits - those that currently have a permit would retain this
- Proposal is very similar to former proposal
- Burrell street is well used by pedestrians and using this space as a service area and rubbish holding area would deter this.
- Darker street due to loss of light and would impact upon safety
- References the Blackfriars tall building cluster policy but this does not consider the impact on local townscape views to the streetscape of Southwark Street

Consultation responses from external and statutory consultees

449. Summarised below are the planning matters raised by external and statutory consultees. Matters are addressed within the relevant sections in the Assessment section of this report.

450. Greater London Authority (GLA) – Stage 1:

Land use principles:
•GLA Officers support the principle of estate regeneration in this instance. The proposals are considered to comply with London Plan Policy H8 and respond positively to the Mayor's Good Practice Guide to Estate Regeneration

Urban design:
• The proposed building height is generally supported from a strategic perspective. A final conclusion on the tall building impacts will follow the Council's consideration of the local visual, functional, environmental and cumulative impacts.

Heritage:
• The proposal will affect the setting of a number of designated heritage assets, and less than substantial harm at a low level is identified. The harm is to be weighed against the public benefits of the scheme, with an update to be provided at decision-making stage.

Transport:
• The scheme would introduce the low line. The night time closures should be explained as to why they are necessary and should be secured within the s106 agreement.

• A Healthy Streets contribution is requested toward improving active travel in the area. The proposed cycle parking provision is also below London Plan standards and must be increased

Sustainable development:
• Further information on Energy and Circular Economy is required to ensure full compliance with London Plan requirements.

Environmental issues:
• Further information is required for instance, there should be a condition showing the surface cover showing the UGF score and that this should occur prior to Stage 2.
• Further information is also required with regards drainage.

Officer response: Points regarding land use, urban design and heritage are noted. Further information has been submitted by the applicant, which is considered to adequately address the points made regarding items such as drainage. Any information considered outstanding will be provided prior to stage 2 and/or secured by way of condition/obligation.

451. Environment Agency: No objection but concerns with regards flood risj and contaminated land.

452. Metropolitan Police (Design out crime): No objection but did raise the requirement for a number of gates as to prevent items such as anti-social behaviour. Also requested that these be shut from dusk to a suitable time in the morning. For instance 07:00-17:00 in the winter months and 07:00-19:00 in the summer months. Would require a management plan which can be secured in the legal agreement.

453. Health and Safety Executive: Following a review of the information provided in the planning application, HSE is content with the fire safety design relating to the project description, to the extent that it affects land use planning.

Updated comments received on 19/07/24.

Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations.

454. London Fire Brigade: Raised issues. These have been referenced in the main body of the report.

Transport for London: There are some concerns with regards the low line not being accessible for certain parts of the day. This would require justification. There are also issues with items such as cycle parking. Suggested conditions.
Officer response: Updated information has been received concerning items such as cycle parking. Conditions have also been imposed as to address items such as a Construction Logistics Plan (CLP). The blocking of the low line can be related to the request from the Police and the access has been addressed through the s106.

Updated comments received on 12/07/2024

To support achieving this target, the active travel environment, not only within but beyond the red line boundary, needs to be appealing, safe, and perceived to be safe, during all times of the day. Without mitigation secured, the application would fall short in achieving Policies T1, T2 and T4. Therefore, we consider that this is therefore required to make the development acceptable in planning terms.

TFL support the £150,000 provision towards the nearby Low Traffic Neighbourhood (LTN)

As it stands, the cycle parking quality is significantly deviates from London Plan policy; it does not meet LCDS standards, has not been demonstrated to be inclusive for all, or encourage cycling to/from the development. This is particularly disappointing given the location of this application, near National Cycle Network route 4, Cycleway 6, Cycleway 7 and Cycleway 14. We consider that this development would have a high propensity for cycling and non-compliant cycle parking actively discourages this, contrary to Policies T1 and T5.

Support the request for free membership towards cycle hire.

Currently, the application does not align with London Plan Policies T1, T2, T4 or T5.

455. Historic England: They do not wish to offer specific comments. Views should be sought of specialist conversation advisers.

456. UKPN: Do not block substation.
Officer response: Noted.

457. Thames Water: The proposed development is located within 15 metres of a strategic sewer. Conditions have therefore been recommended.

458. Network Rail: Referenced a number of items that the application would need to be aware of and that they would need to comply with. These have either been addressed through conditions or as informatives.

459. Arqiva: No concerns.

Consultation responses from internal consultees

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

461. Waste: Referenced the siting of the dropped kerb in relation to the bin store. The bin stores should not be within 10m of the collection point.

Officer response: This has been referenced in the report and could be addressed

through an appropriately worded condition.

462. Ecology: No objection – The site contains Jersey cudweed which will necessitate various licenses.

The BNG assessment has stated an increase of 101% in habitat units. This is unverified as the full Metric has not been provided. The UGF score of 0.39 is just short of the minimum requirements. Suggested conditions.

Officer response – The scheme was updated in June 2024 and items such as UGF were altered. The scheme would now have a UGF score of 0.43 and which has been controlled through a number of conditions. However, the application pre-dates the BNG requirements.

463. Archaeology: No objection but suggested conditions.

464. Design Review Panel: Referenced a number of possible issues with the site. For instance, the scheme being an overdevelopment of the plot. Also queried the proposed design and impact caused via the adjacent viaduct on items such as living conditions. Also referenced inadequate play space, blue parking badge provision and poor quality daylighting in the compromised ground floor amenity space.

Officer response: Since going to the review panel, the design was amended and altered. Details such as a daylight/ sunlight report has also been updated and this has shown that the scheme would, overall, have an acceptable impact. These items have been expanded upon in the main body of the report.

465. CCTV: The proposed scheme may compromise CCTV in the vicinity. This could however be mitigated through the installation of equipment on the roof.
Officer response: This has been addressed through the s106.

466. Local Economy Team (LET): This development would be expected to deliver 36 sustained jobs to unemployed Southwark residents, 36 short courses, and take on 9 construction industry apprentices during the construction phase, or meet the Employment and Training Contribution.

The maximum Employment and Training Contribution is £173,700 (£154,800 against sustained jobs, £5,400 against short courses, and £13,500 against construction industry apprenticeships).

467. Drainage: Waiting on updated comments - TBC

468. Community Infrastructure Team: The site is located within Southwark CIL Zone 1 and MCIL2 Central London zone. Based on the existing floor areas provided in the agent's CIL Form1 (GIA Info) dated 21-Jun-24, the gross amount of CIL is approximately £9,544,433.95 (pre-relief) consisting £1,045,533.27 of Mayoral CIL and £8,498,900.68 of Borough CIL. Subjecting to the correct CIL forms being submitted on time, £3,593,752.18 of CIL Social Housing Relief can be claimed for

a number of types of affordable housing. The resulting CIL amount is forecasted to be around £5,950,681.77 (net of relief). It should be noted that this is an estimate, and the floor areas on approved drawings will be measured after planning permission has been obtained. The two CIL phases are two separate CIL chargeable developments and each required its own set of CIL forms to be submitted prior commencement of that phase.

Community impact and equalities assessment

469. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights

470. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.

471. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three "needs" which are central to the aims of the Act:

1. The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act

2. The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:

    - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
    - Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
    - Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low

3. The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.

472. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

473. There are a range of potential impacts on the local community during construction and operation. Potential impacts in terms of infrastructure, environmental factors, amenity, accessibility, housing, employment creation and health have been

discussed in detail in the relevant sections of this committee report and any necessary mitigation to limit adverse impacts has been secured through s106 obligations and planning conditions (for example construction impacts will be minimised through the use of a CEMP).

474. This application would not only replace but would improve the quality of the existing social rented housing. It would also deliver a further and significant amount of affordable housing on the site. There would be 2x community centres and amenity benefits through the opening up of the low line and enhanced public realm. The positive impacts arising from the development would benefit those groups with protected characteristics as well as the wider community as a whole.

475. The proposed development has been designed to ensure inclusive access for all. All public realm areas would have appropriate gradients and slopes instead of steps wherever possible. The landscaped areas would also incorporate appropriately designed benches and play equipment for the range of users. In addition, there would be level access into the buildings and internally the design incorporates an appropriate provision of wheelchair accessible units, lifts, wide corridors, doors and circulation areas.

476. Officers are satisfied that equality implications have been carefully considered throughout the planning process and that Members have sufficient information available to them to have due regard to the equality impacts of the proposal as required by Section 149 of the Equality Act 2010 in determining whether planning permission should be granted.

Human rights implications

477. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.

478. This application has the legitimate aim of providing new residential accommodation along with 2x community spaces. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

Positive and proactive statement

479. The council has published its development plan and Core Strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

480. The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in

accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.

481. Positive and proactive engagement: summary table

Was the pre-application service used for this application?	YES
If the pre-application service was used for this application, was the advice given followed?	NO – Changes were made to the height and design of the building.
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 – Amendments to the scheme have been made.
To help secure a timely decision, did the case officer submit their recommendation in advance of the agreed Planning Performance Agreement date?	NO – Changes were made during the course of the application.

Conclusion

482. The principle of demolishing and replacing the existing building with an increase in size/ scale and height can be accepted. This would not only improve the standard of accommodation for the existing social rent properties but there would be a significant increase in the number of these units on the site. The provision of 2x community facilities would also be of benefit and would help to contribute to the delivery of a mixed and inclusive community.

483. The proposed development would provide 1x blue badge parking space within the site. There would also be 269 long stay and 6 short stay. There would also be 2 further spaces located in the public realm.

484. It is noted that there would be a significant increase in height when compared to the current building. This 22 storey replacement structure would be readily visible but there are taller properties in the wider surrounding area. The scheme would also be visible from areas such as the Millennium Bridge and this would cause a level of harm to the Tate Modern. The balance of the scheme would however be considered acceptable in design terms especially when contrasted against the benefits it would bring such as the significant improvements to the living conditions of the existing residents as well as the increase in affordable housing. There would also be the provision of 2x community spaces which would be of benefit to the surrounding area.

485. It is therefore recommended that planning permission be granted subject to conditions, referral to the Mayor of London and the completion of a s106 Legal Agreement under the terms as set out above.

BACKGROUND DOCUMENTS

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

APPENDICES

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

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth
Report Author	Matt Redman, Senior Planning Officer
Version	Final
Dated	22 July 2024
Key Decision	No

CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	**Comments Sought**	**Comments included**
Strategic Director, Finance	No	No
Strategic Director, Environment, Neighbourhoods and Growth	No	No
Strategic Director, Housing	No	No
Date final report sent to Constitutional Team		22 July 2024

APPENDIX 1

Recommendation

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

This document is not a decision notice for this application.

Applicant	J Horner Friar's Close Regeneration LLP	**Reg. Number**	22/AP/4376
Application Type	Major application		
Recommendation	GRANT subject to Legal Agreement (GLA)	**Case Number**	1516-C

Draft of Decision Notice

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

Demolition of all existing residential buildings and ancillary structures on site. Construction of residential homes (Use Class C3) and flexible community & learning (Use Classes F1 & F2) floorspace; roof plant enclosure; cycle and vehicle parking; highway and access improvements; and landscape and public realm improvements. The new building would comprise a part nine, part twenty-two storey building to deliver 149 new homes.

Friars Close, Bear Lane, London, Southwark SE1

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

Existing Plans

Proposed Plans

SOUTH ELEVATION 16205-01-AAM-XX-ZZ-DR-A-07203 REV P3 received

20/06/2024

NORTH ELEVATION 16205-01-AAM-XX-ZZ-DR-A-07201 REV P3 received 20/06/2024

WEST ELEVATION 16205-01-AAM-XX-ZZ-DR-A-07202 REV P3 received 20/06/2024

EAST ELEVATION 16205-01-AAM-XX-ZZ-DR-A-07200 REV P3 received 20/06/2024

NORTH EAST ELEVATION TOP - BAY STUDY 16205-01-AAM-A-07401 REV P3 received 03/07/2024

EAST ELEVATION - BAY STUDY 16205-01-AAM-XX-ZZ-DR-A-07403 REV P3 received 03/07/2024

NORTH EAST ELEVATION BASE - BAY STUDY 16205-01-AAM-XX-ZZ-DR-A-07400 REV P3 received 03/07/2024

WEST ELEVATION TOP - BAY STUDY 16205-01-AAM-A-07405 REV P3 received 03/07/2024

EAST ELEVATION PASSAGE - BAY STUDY 16205-01-AAM-XX-ZZ-DR-A-07402 REV P3 received 03/07/2024

FIRST FLOOR PLAN 16205-01-AAM-XX-01-DR-AR-07101 REV P3 received 03/07/2024

Other Documents

TYPICAL FLAT LAYOUT 1 16205-01-AAM-XX-ZZ-DR-A-07501 P4 received 03/07/2024

TYPICAL FLAT LAYOUT 2 16205-01-AAM-XX-ZZ-DR-A-07502 P4 received 03/07/2024

TYPICAL FLAT LAYOUT 3 16205-01-AAM-XX-ZZ-DR-A-07503 P4 received 03/07/2024

TYPICAL FLAT LAYOUT 4 16205-01-AAM-XX-ZZ-DR-A-07504 P3 received 08/01/2024

TYPICAL FLAT LAYOUT 5 16205-01-AAM-XX-ZZ-DR-A-07505 P4 received 03/07/2024

TYPICAL FLAT LAYOUT 6 16205-01-AAM-XX-ZZ-DR-A-07506 P4 received 03/07/2024

TYPICAL FLAT LAYOUT 7 16205-01-AAM-XX-ZZ-DR-A-07507 P2 received 08/01/2024

TYPICAL FLAT LAYOUT 8 16205-01-AAM-XX-ZZ-DR-A-07508 P4 received

03/07/2024

URBAN GREENING FACTOR 2194-EXA-00-ZZ-DR-L-00800 P01 received 05/02/2024

URBAN GREENING FACTOR CHART URBAN GREENING FACTOR (contained in DAS addendum (June 24)) received 02/07/2024

PLANTING PLAN & SCHEDULE - AMENITY TERRACE 2194-EXA-00-09-DR-L-00202 P03 received 05/02/2024

PLANTING PLAN - GROUND FLOOR 2194-EXA-00-GF-DR-L-00200 P03 received 05/02/2024

PLANTING PLAN - AMENITY TERRACE 2194-EXA-00-09-DR-L-00202 P03 received 05/02/2024

NINTH FLOOR - SHARED AMENITY 16205-01-AAM-XX-09-DR-AR-07109 REV P3 received 20/06/2024

ROOF PLAN 16205-01-AAM-XX-RF-DR-AR-07122 REV P3 received 20/06/2024

SECOND TO THIRD FLOOR 16205-01-AAM-XX-ZZ-DR-AR-07102 REV P3 received 20/06/2024

SECTION BB 16205-01-AAM-XX-ZZ-DR-AR-07301 REV P3 received 20/06/2024

SECTION CC 16205-01-AAM-XX-ZZ-DR-AR-07302 REV P2 received 20/06/2024

SECTION AA 16205-01-AAM-XX-ZZ-DR-AR-07300 REV P3 received 20/06/2024

LANDSCAPE GENERAL ARRANGEMENT - AMENITY TERRACE 2194-EXA-ZZ-GF-DR-L-0002-2194-EXA-ZZ-RF-DR-L-000101 REV P03 received 20/06/2024

LANDSCAPE GENERAL ARRANGEMENT PLAN - GROUND FLOOR 2194-EXA-ZZ-GF-DR-L-0001-2194-EXA-ZZ-GF-DR-L-000100 REV P03 received 20/06/2024

TWENTY-FIRST FLOOR 16205-01-AAM-XX-21-DR-AR-07121 REV P2 received 21/06/2024

M4(2) PRIVATE HOMES 6 TYPICAL FLAT LAYOUTS 16205-01-AAM-XX-21-DR-AR-07510 REV P1 received 03/07/2024

M4(2) SOCIAL RENTED HOMES 4 TYPICAL FLAT LAYOUTS 16205-01-AAM-XX-01-DR-AR-07511 REV P1 received 03/07/2024

FIRST FLOOR CYCLE PARKING LBS STANDARDS 22-140-T-021 REV A received 03/07/2024

M4(2) PRIVATE HOMES 2 TYPICAL FLAT LAYOUTS 16205-01-AAM-XX-ZZ-DR-AR-07505 REV P4 received 03/07/2024

NORTH EAST APARTMENTS DUAL ASPECT DIAGRAM SKETCH 16205-01-AAM-XX-ZZ-SK-AR-SK_133 REV P1 received 03/07/2024

GROUND FLOOR CYCLE PARKING LBS STANDARDS 22-140-T-020 REV A received 03/07/2024

M4(2) PRIVATE HOMES 5 TYPICAL FLAT LAYOUTS 16205-01-AAM-XX-21-DR-AR-07509 REV P1 received 03/07/2024

GROUND FLOOR CYCLE PARKING DIMENSIONS 22-140-T-007 REV G received 03/07/2024

SIXTH FLOOR 16205-01-AAM-XX-06-DR-AR-07106 REV P3 received 03/07/2024

SEVENTH TO EIGHTH FLOOR 16205-01-AAM-XX-ZZ-DR-AR-07107 REV P3 received 03/07/2024

SECOND TO THIRD FLOOR 16205-01-AAM-XX-ZZ-DR-AR-07102 REV P3 received 03/07/2024

FOURTH TO FIFTH FLOOR 16205-01-AAM-XX-ZZ-DR-AR-07104 REV P3 received 03/07/2024

TWENTY-FIRST FLOOR 16205-01-AAM-XX-21-DR-AR-07121 REV P2 received 03/07/2024

TENTH TO ELEVENTH FLOOR 16205-01-AAM-XX-ZZ-DR-AR-07110 REV P2 received 03/07/2024

TWELFTH TO TWENTIETH FLOOR 16205-01-AAM-XX-ZZ-DR-AR-07112 REV P1 received 03/07/2024

AMENDED AREA SCHEDULE AND UNIT MIX SUMMARY 240617_16205_01_2QA received 20/06/2024

AMENDED ACCOMMODATION SCHEDULE RESIDENTIAL - NIA PLOT BY PLOT 240617_16205_01_2QA received 20/06/2024

AMENDED MILLENIUM BRIDGE VIEW MHL-7007-015-240617_A3T20I1 received 20/06/2024

DESIGN AND ACCESS STATEMENT ADDENDUM - AMENDED received 21/06/2024

HERITAGE, TOWNSCAPE AND VISUAL IMPACT ASSESSMENT ADDENDUM - AMENDED received 21/06/2024

SOLAR GLARE REPORT - AMENDED received 21/06/2024

DAYLIGHT SUNLIGHT ADDENDUM REPORT - AMENDED received 21/06/2024

DECANT & REHOUSING STRATEGY - AMENDED received 21/06/2024

STATEMENT OF COMMUNITY INVOLVEMENT ADDENDUM - AMENDED received 21/06/2024

WIND MICROCLIMATE STATEMENT OF CONFORMITY - AMENDED received 21/06/2024

TRANSPORT ASSESSMENT ADDENDUM - AMENDED received 21/06/2024

4036 R17 SG01 240617 (SOLAR GLARE REPORT) received 21/06/2024

333133465.A5 FRIARS CLOSE - PL2 REVISED SCHEME - COVERING LETTER received 21/06/2024

33313346501.A5 - FRIARS CLOSE - DECANT STRATEGY V.3 received 21/06/2024

33313346501.A5 - FRIARS CLOSE - FORM 1 CIL ADDITIONAL INFORMATION V.3 received 21/06/2024

FRIARS CLOSE - APPLICATION FORM V.3 received 21/06/2024

240619 FRIARS CLOSE SCI ADDENDUM - JUNE 2024 received 21/06/2024

R 240620 16205 01 FRIARS CLOSE DAS ADDENDUM PART2 received 21/06/2024

16205 01 FRIARS CLOSE ISSUE REGISTER STAGE 2 received 21/06/2024

20240619 RWDI 2409005 REP MICROCLIMATESOC FRIARSCLOSE received 21/06/2024

D009-FRIARS CLOSE, SOUTHWARK 22 140 TAA V0.1 24 06 20 received 21/06/2024

PD13849 FRIAR'S CLOSE, SOUTHWARK ADDENDUM V2 LR received 21/06/2024

DAYLIGHT/ SUNLIGHT - AMENDED 4036 received 25/06/2024

FLOOD RISK ASSESSMENT & DRAINAGE STRATEGY received 28/06/2024

FIRE ENGINEERING: STAGE 2 REPORT - FIRE STRATEGY received 28/06/2024

ARCHITECTURAL DRAWINGS ISSUE REGISTER received 03/07/2024

PARKING DESIGN MANAGEMENT PLAN received 03/07/2024

CYCLE PARKING CALCULATIONS received 03/07/2024

TRANSPORT ASSESSMENT ADDENDUM TECHNICAL NOTE received 03/07/2024

OPERATIONAL WASTE MANAGEMENT PLAN received 03/07/2024

RESIDENTIAL TRAVEL PLAN received 03/07/2024

TRANSPORT ASSESSMENT ADDENDUM received 03/07/2024

DESIGN AND ACCESS STATEMENT ADDENDUM received 03/07/2024

ACCOMMODATION SCHEDULE RESIDENTIAL - NIA PLOT BY PLOT received 03/07/2024

BIODIVERSITY NET GAIN ASSESSMENT received 03/07/2024

DELIVERY AND SERVICING PLAN received 03/07/2024

CASE FOR REGENERATION 1 received 15/07/2024

CASE FOR REGENERATION 2 received 15/07/2024

CIRCULAR ECONOMY WRITTEN EVIDENCE received 15/07/2024

ENERGY ASSESSMENT REPORT P05 received 15/07/2024

WLCA received 15/07/2024

CIRCULAR ECONOMY STATEMENT received 15/07/2024

SOUTHWARK LPA PLANNING APPLICATION COMMENTS - APPLICANT RESPONSES received 15/07/2024

GLA CIRCULAR ECONOMY STATEMENT received 15/07/2024

GLA WLCA TEMPLATE received 15/07/2024

PART L 2021 GLA CARBON EMISSION REPORTING SPREADSHEET received 15/07/2024

OVERHEATING PLANNING REPORT received 15/07/2024

Time limit for implementing this permission and the approved plans

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

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

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

3. a) Prior to the commencement of any development, a phase 1 desktop study of the historic and current uses of the site and adjacent premises shall be carried out together with an associated preliminary risk assessment including a site walkover survey, identification of contaminants of the land and controlled waters and develop a conceptual model of the site with conclusion and recommendations whether a Phase 2 intrusive investigation is required. This report shall be submitted to the Local Planning Authority for approval before the commencement of any intrusive investigations.

b) If the phase 1 site investigation reveals possible presence of contamination on or beneath the site or controlled waters, then, prior to the commencement

of development works, an intrusive site investigation and associated risk assessment shall be completed to fully characterise the nature and extent of any contamination of soils and ground water on the site.

c) In the event that contamination is found that presents a risk to future users or controlled waters or other receptors, a detailed remediation and/or mitigation strategy shall be prepared and submitted to the Local Planning Authority for approval in writing. The strategy shall detail all proposed actions to be taken to bring the site to a condition suitable for the intended use together with any monitoring or maintenance requirements. The scheme shall also ensure that as a minimum, the site should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. The approved remediation scheme (if one is required) shall be carried out and implemented as part of the development.

d) Following the completion of the works and measures identified in the approved remediation strategy, a verification report providing evidence that all works required by the remediation strategy have been completed, together with any future monitoring or maintenance requirements shall be submitted to and approved in writing by the Local Planning Authority.

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

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with the National Planning Policy Framework (2023); Policy P56 (Protection of amenity) and Policy P64 (Contaminated land and hazardous substances) of the Southwark Plan (2022).

4. No development shall take place, including any works of demolition, until a written construction environmental management plan (CEMP) has been

submitted to and approved in writing by the Local Planning Authority. The CEMP shall oblige the applicant, developer and contractors to commit to current best practice with regard to construction site management and to use all best endeavours to minimise off-site impacts, and will include the following information:

- A detailed specification of demolition and construction works including consideration of all environmental impacts (including identified contamination) and the identified remedial measures;

- Site perimeter continuous automated noise, dust and vibration monitoring;

- Engineering measures to eliminate or mitigate identified environmental impacts e.g. hoarding location, height and density, acoustic screening, sound insulation, dust control measures, emission reduction measures, location of specific activities on site, etc.;

- Arrangements for a direct and responsive site management contact for nearby occupiers during demolition and/or construction (signage on hoardings, newsletters, residents liaison meetings, etc.)

- A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Constructor Scheme;

- Site traffic - Details of the number of construction vehicles, routing of in-bound and outbound site traffic, one-way site traffic arrangements on site, location of lay off areas, etc.;

- At least Silver FORS membership for transport operators;

- Site waste Management - Accurate waste stream identification, separation, storage, registered waste carriers for transportation and disposal at appropriate destinations including locations of recycling activities on the site;

- Measures to maximise the use of sustainable modes of transport for

deliveries and collections;

- Measures to protect pedestrians and cyclists in line with the Mayor of London's Vision Zero;

- A commitment that all Non-Road Mobile Machinery equipment (37 kW and 560 kW) shall be registered on the NRMM register and meets the standard as stipulated by the Mayor of London;

-Compliance with the Non-Road Mobile Machinery L ow Emission Zone for London;

- Measures for the pre-booking of deliveries to and collections from the site;

- Measures to minimise and consolidate vehicle trips to and from the site;

- The scope, location and design of the site offices and welfare facilities in each phase of the development;

- To follow current best construction practice, including the following:-

Southwark Council's Technical Guide for Demolition & Construction at http://www.southwark.gov.uk/construction

Section 61 of Control of Pollution Act 1974, The London Mayors Supplementary Planning Guidance 'The Control of Dust

and Emissions During Construction and Demolition', The Institute of Air Quality Management's 'Guidance on the Assessment of

Dust from Demolition and Construction' and 'Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites',

BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Noise',

BS 5228-2:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Vibration'

BS 7385-2:1993 Evaluation and measurement for vibration in buildings. Guide to damage levels from ground-borne vibration,

BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings - vibration sources other than blasting.

All demolition and construction work shall be undertaken in strict accordance with the approved CEMP and other relevant codes of practice, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with the National Planning Policy Framework (2023); Policy P50 (Highway impacts), Policy P56 (Protection of amenity), Policy P62 (Reducing waste), Policy P64 (Contaminated land and hazardous substances), Policy P65 (Improving air quality) and Policy P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan (2022).

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

Reason: In order that the applicants supply the necessary archaeological information to ensure suitable mitigation measures and/or foundation design proposals be presented in accordance with the National Planning Policy Framework (2023); Policy P23 (Archaeology) of the Southwark Plan (2022).

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

Reason: In order that the details of the programme of works for the archaeological mitigation are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with the National Planning Policy Framework (2023); Policy P23 (Archaeology) of the Southwark Plan (2022).

7. (a) All dwellings shall be constructed in order to achieve the following requirements:

i. a minimum 35% improvement in the Dwelling Emission Rate over the Target Emission Rate as defined in Part L1A of the 2021 Building Regulations (utilising SAP 10.2 Carbon Factors);

ii. and a reduction in potable water demand to a maximum of 105 litres per person per day.

(b) Prior to the commencement of above ground superstructure construction works of the relevant Phase or Building of the development a Design Stage Standard Assessment Procedure (SAP) Assessment and Water Efficiency calculations, prepared by suitably qualified assessors, shall have been submitted to and approved in writing by the Local Planning Authority to demonstrate that the detailed design of each dwelling is in compliance with part (a).

(c) The development shall be carried out including the measures to achieve compliance with part (a) as approved under part (b).

(d) Within 3 months of occupation of any of the residential units hereby approved (unless an extension is agreed in writing with the Local Planning Authority), an As Built SAP Assessment and post-construction stage Water Efficiency Calculations, prepared by suitably qualified assessors, shall be submitted to the Local Planning Authority for approval in writing to demonstrate full compliance with part (a) for each unit.

Reason - To comply with London Plan (2021) Policies SI 2 Minimising greenhouse gas emissions) and SI 5 (Water Infrastructure) and Policies P67 (Reducing water use) and P70 (Energy) of the Southwark Plan (2022).

8. Prior to the commencement of above ground superstructure construction works for each relevant Phase or Building, a Circular Economy Statement for that Phase or Building demonstrating compliance with Part B of Policy SI7 "Reducing waste and supporting the circular economy" of the London Plan (2021) and including measures for monitoring and reporting against the targets within the Circular Economy Statement shall be submitted and approved in writing by the Local Planning Authority.

The assessment shall develop a strategy for the implementation of circular economy principles in both the approved building and the wider site's operational phase, in addition to developing an end-of-life strategy for the development according to circular economy principles, including disassembly and deconstruction. The development shall be carried out in accordance with the approved details.

Reason: To promote resource conservation, waste reduction, material re-use, recycling and reduction in material being sent to land fill in compliance with Policy SI7 of the London Plan (2021).

9. Prior to commencement of above ground superstructure construction works, detailed plans shall be submitted to and approved in writing by the Local Planning Authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development. The development shall be carried out in accordance with the approved plans and maintained as such in perpetuity.

Reason: To provide high quality digital connectivity infrastructure to contribute to London's global competitiveness, in accordance with the National Planning Policy Framework (2023); Policy SI 6 (Digital Connectivity Infrastructure) of the London Plan (2021) and Policy P44 (Broadband and digital infrastructure) of the Southwark Plan (2022).

10. A Flood Resistance and Resilience Report, prepared by a suitably qualified third party organisation, and recommending solutions shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of any works on site (excluding archaeological evaluation, demolition to slab level, and site investigation works). The report should be proportionate and risked based in terms of predicted flood risks to the planned development (including predicted levels for the years provided in the latest EA Product 4 if relevant. It should also include flood risk sequential and exceptions test). Construction should be carried out in line with the recommendations of the report.

Reason: To minimise potential damage to property from flood events from the sources of flood risk to the site. In addition to providing more time to occupants to get to safety, flood resistance and resilience measures also protect property and reduce the risk of the financial burden a flood can cause,

which can be psychologically damaging to victims in the near to long term in accordance with the National Planning Policy Framework (2023); Policy SI 12 (Flood risk management), Policy SI 13 (Sustainable drainage) of the London Plan (2021); Policy P56 (Protection of amenity) and Policy P68 (Reducing flood risk) of the Southwark Plan (2022).

11. No cranes or scaffolding shall be erected unless and until construction methodology and diagrams clearly presenting the location, maximum operating height, radius and start/finish dates for the use of cranes in connection with the construction of the Development have been submitted to and approved by the Local Planning Authority (in consultation with London City Airport). The development shall be carried out in accordance with the approved details.

Any scaffold which is to be constructed within 10 metres of the adjacent railway must be erected in such a manner that at no time will any poles over-sail the railway and protective netting around such scaffold must be installed.

Reason: In the interests of aircraft safety in accordance with Policy T8 (Aviation) of the London Plan (2021). The use of tall equipment in this area has the potential to impact the rail network and safeguarding surfaces, therefore they must be assessed.

12. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage and water supply infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Where vibro-compaction/displacement piling plant is to be used in development, details of the use of such machinery and a method statement should be submitted to and approved in writing by the local planning authority in consultation with Network Rail's Asset Protection Engineer.

Reason: The proposed works will be in close proximity to underground sewerage and water utility infrastructure. Piling has the potential to impact on

local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement. Also to be in accordance with London Plan (2021) Policy SI 5 and Southwark Plan (2022) Policies P64 (Contaminated land) P67 (Reducing water use). Piling has the potential to impact on local underground water utility infrastructure. To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution in line with paragraph 180 of the National Planning Policy Framework (2023). To prevent pollution of groundwater within underlying Principal and Secondary aquifers

13. Prior to the commencement of the development (excluding site set-up, demolition and/or ground & archaeological investigation works), a coordinated drainage strategy is to be provided, including a layout and details of storage structures and flow controls (in consultation with Thames Water). This is to be supported by a detailed hydraulic model and a survey confirming the invert level and condition of the outfall. In addition to the above the maintenance requirements of the different components proposed within the strategy are to be provided in line with the guidance outlined in CIRIA C753. The drainage strategy should be submitted to and approved in writing by the local planning authority.

Reason: The submitted site-wide drainage information is not sufficiently detailed to justify the attenuation volume and fails to achieve greenfield runoff rates. SUDS must be identified prior to the commencement of development to prevent flooding, improve and protect water quality, improve habitat and amenity, and ensure future maintenance of the surface water drainage system, in accordance with the National Planning Policy Framework (2023); Southwark's Strategic Flood Risk Assessment (2017); Policies SI 12 (Flood risk management) and SI 13 (Sustainable drainage) of the London Plan (2021) and P68 (Reducing flood risk) of the Southwark Plan (2022).

14. No construction shall take place within 5m of a water main. Information detailing how the proposed development would divert the asset / align the development so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water prior to the commencement of development. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.

Reason: To minimise the potential for the site to contribute to changes in groundwater conditions and any subsequent flooding in National Planning Policy Framework (2023); Southwark's Strategic Flood Risk Assessment (2017) ; Policy SI 13 (Sustainable drainage) of the London Plan (2021) and P68 (Reducing flood risk) of the Southwark Plan (2022). The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure.

15. No development shall commence (excluding all site set-up, demolition, ground & archaeological investigations, excavation and piling) until impact studies of the existing water supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point.

Reason: To minimise the potential for the site to contribute to changes in groundwater conditions and any subsequent flooding in National Planning Policy Framework (2023); Southwark's Strategic Flood Risk Assessment (2017) ; Policy SI 13 (Sustainable drainage) of the London Plan (2021) and P68 (Reducing flood risk) of the Southwark Plan (2022).

16. Prior to the commencement of above ground superstructure construction works, full details of all proposed tree planting totalling 210cm girth shall be submitted to and approved in writing by the Local Planning Authority. This will include tree pit cross sections, planting and maintenance specifications, use of guards or other protective measures and confirmation of location, species, sizes, nursery stock type, supplier and defect period.

Details of a management plan, responsibilities and maintenance schedules shall be submitted to and approved by the Local Planning Authority.

This shall include an irrigation schedule for all trees to ensure successful establishment.

For stem girths of up to 20cm the schedule shall be a minimum of three years, and five years for stem girths greater than 20cm. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

All tree planting shall be carried out in accordance with those details and at those times. All trees and shrubs will conform to the specification for nursery

stock as set out in British Standard 3936 Parts 1 (1992) and 4 (1984). Advanced Nursery stock trees shall conform to BS 5236 and BS: 4428 Code of practice for general landscaping operations; BS 8545:2014 Trees: from nursery to independence in the landscape; BS: 5837 (2012) Trees in relation to demolition, design and construction; BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 03:2022 (EN) - Tree Planting Standard, and Trees and Design Action Group guidance.

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

Reason: So that the Council may be satisfied that the proposed tree planting scheme in accordance with the National Planning Policy Framework (2023) Chapters 7 (Ensuring the vitality of town centres), 8 (Promoting healthy and safe communities), 11 (Making effective use of land), 12 (Achieving well-designed places), Chapter 14 (Meeting the challenge of climate change), and chapters 15 & 16 (Conserving and enhancing the natural and historic environment); Policy G7 (Trees and Woodlands) of the London Plan (2021); Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P56 (Protection of Amenity), Policy P57 (Open Space), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan (2022).

17. Before any work hereby authorised begins [excluding demolition to slab level, archaeological evaluation and site investigation works], the applicant shall submit a detailed scheme showing the complete scope and arrangement of the foundation design, and all associated subterranean groundworks, including the construction methods. The submitted documents should show how archaeological remains will be protected by a suitable mitigation strategy. The detailed scheme will need to be approved in writing by the Local Planning Authority and the development shall only be carried out in accordance with the approval given.

Reason: In order that all below ground impacts of the proposed development are known and an appropriate protection and mitigation strategy is achieved to preserve archaeological remains by record and/or in situ in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National

Planning Policy Framework 2021.

Permission is subject to the following Grade Condition(s)

18. HARD AND SOFT LANDSCAPING

Prior to the commencement of above ground superstructure construction works, detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings shall be submitted to and approved in writing by the Local Planning Authority. The site shall be landscaped strictly in accordance with the approved details in the first planting season after completion of the development. Details shall include:

1) a scaled plan showing all existing vegetation and landscape features to be retained with proposed trees, hedging, perennial and other plants;

2) proposed parking, access, or pathway layouts, materials and edge details;

3) location, type and materials to be used for hard landscaping including specifications, where applicable for:

a) permeable paving

b) tree pit design

c) underground modular systems

d) sustainable urban drainage integration

e) use within tree Root Protection Areas (RPAs);

4) typical cross sections;

5) a schedule detailing sizes and numbers/densities of all proposed trees/plants;

6) specifications for operations associated with plant establishment and

maintenance that are compliant with best practise; and

7) types and dimensions of all boundary treatments;

8) details to demonstrate that the urban greening factor score of 0.43 will be achieved.

There shall be no excavation or raising or lowering of levels within the prescribed root protection area of retained trees unless agreed in writing by the Local Planning Authority.

The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use. Any trees, shrubs, grass or other planting that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the equivalent stem girth and species in the first suitable planting season.

Unless required by a separate landscape management condition, all soft landscaping shall have a written five-year maintenance programme following planting.

Works shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction; BS3998: (2010) Tree work - recommendations, BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 03:2022 (EN) - Tree Planting Standard.

Reason:

So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2021; Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P56 (Protection of Amenity), Policy P57 (Open Space), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan (2022).

19. a) The dwellings hereby permitted shall be designed to ensure that the following internal noise levels are not exceeded due to environmental noise:

Bedrooms - 35dB LAeq T†, 30 dB LAeq T*, 45dB LAFmax T

Living and Dining rooms - 35dB LAeq T †.

* - Night-time - 8 hours between 23:00-07:00

† - Daytime - 16 hours between 07:00-23:00

b) Prior to commencement of any above ground superstructure construction works a report shall be submitted in writing to and approved by the Local Planning Authority detailing acoustic predictions and mitigation measures to ensure the above standards are met.

c) Following completion of the development and prior to occupation, a validation test shall be carried out on a relevant sample of premises. The results shall be submitted to the Local Planning Authority for approval in writing.

d) The approved scheme shall be implemented and permanently maintained thereafter.

Reason: To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation in accordance the National Planning Policy Framework (2023); Policy P56 (Protection of amenity); and Policy P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan (2022).

20. a) The habitable rooms within the development sharing a party ceiling/floor element with commercial premises shall be designed and constructed to provide reasonable resistance to the transmission of sound sufficient to ensure that noise due to the commercial premises does not exceed NR20 when measured as an LAeq across any 5 minute period.

b) Prior to commencement of any above ground superstructure construction works a report shall be submitted in writing to and approved by the Local Planning Authority detailing acoustic predictions and mitigation measures to ensure the above standard is met.

c) The development shall be carried out in accordance with the approval given.

d) Following completion of the development and prior to occupation, a validation test shall be carried out on a relevant sample of premises. The results shall be submitted to the Local Planning Authority for approval in writing and the approved scheme shall be permanently maintained thereafter.

Reason: To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the commercial premises in accordance with the National Planning Policy Framework (2023); Policy P56 (Protection of amenity); and Policy P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan (2022).

21. a) Following piling but prior to commencement of above-ground superstructure construction works an assessment of vibration and re-radiated noise shall be conducted which shall include measurement of vibration on in-situ piles.

b) A report detailing the assessment undertaken under Part (a) above shall be submitted to the Local Planning Authority alongside a scheme of mitigation as necessary to ensure that residential occupants shall not be exposed to vibration in excess of 0.13 m/s VDV during the night-time period of 23.00 - 07.00hrs or re-radiated noise in excess of 35dB LASmax.

Reason: To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise in accordance with the National Planning Policy Framework (2023); Policy P56 (Protection of amenity) and Policy P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan (2022).

22. Details of the biodiversity green roofs shall be submitted to and approved in writing by the Local Planning Authority prior to any above ground superstructure construction works commencing on site. The biodiversity green roofs shall be:

a) Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm,

b) Or, extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) - meets the requirements of GRO Code 2014,

c) Laid out in accordance with roof plans; hereby approved; and

d) Planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (focused on minimum 75% wildflower planting, and no more than a maximum of 25% sedum coverage).

The biodiversity green roofs shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency.

The biodiversity roofs shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the green roofs and the Local Planning Authority agreeing the submitted plans, and once the green roofs are completed in full in accordance to the agreed plans.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity as well as contributing to the Urban Greening Factor requirements of the London Plan (2021) with the aim of attaining a minimum score or 0.4 for residential developments and 0.3 for commercial developments in accordance with the National Planning Policy Framework (2023); Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity and access to nature);

Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

23. Details of the green walls shall be submitted to and approved in writing by the Local Planning Authority prior to any above ground superstructure construction works commencing on site.

The green wall can be either modular system or climbers rooted in soil.

The wall shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency.

The green wall shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.

Reason: To ensure the development provides the maximum possible provision towards Urban Greening and creation of habitats and valuable areas for biodiversity in accordance with the National Planning Policy Framework (2023); Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity and access to nature) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

24. Prior to the commencement of above ground superstructure construction works, written confirmation from the appointed building control body that the specifications for each dwelling identified in the detailed construction plans and as set out in the Friars Close Accommodation Schedule revision P10 dated 17/06/2024 meet the standard of the Approved Document M of the Building Regulations (2015) and as corresponding to the approved floor plans shall be submitted. The development shall be carried out in accordance with the details thereby approved by the appointed building control body Access to and use of building standard:

Reason: To ensure the development complies with: Chapters 5 (Delivering a sufficient supply of homes) and 8 (Promoting healthy and safe communities) of the National Planning Policy Framework (2021); Policy D7 (Accessible housing) of the London Plan (2021), and; Policy P8 (Wheelchair Accessible

and Adaptable Housing) of the Southwark Plan (2022).

25. Notwithstanding the detail shown on the approved drawings, before any above ground superstructure construction work hereby authorised begins, details of the appearance, height and materials of the screening panels (which shall be at least 1.8m high) to be installed between the balconies on the north-east facing corner of the building shall be submitted and approved in writing by the Local Planning Authority. The screening panels shall all be installed in accordance with the approved details prior to occupation and shall be maintained as such for the life of the development.

Reason: In the interest of protecting neighbour privacy and the amenity of future occupiers in accordance with the National Planning Policy Framework (2023), and Policy P56 (Protection of amenity) of the Southwark Plan (2022).

26. Prior to the commencement of any above ground superstructure construction works, samples of all external facing materials and full-scale (1:1) mock-ups of the façades to be used in the carrying out of this permission shall remain on site for inspection for the duration of the building's construction and be presented on site to the Local Planning Authority and approved in writing. The development shall not be carried out otherwise than in accordance with any such approval given. The façades to be mocked up should be agreed with the Local Planning Authority.

Reason: In order that the Local Planning Authority may be satisfied that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing, are suitable in context and consistent with the consented scheme in accordance with the National Planning Policy Framework (2023); Policy D4 (Delivering good design) of the London Plan (2021); Policy P13 (Design of places) and Policy P14 (Design quality) of the Southwark Plan (2022).

27. Prior to the commencement of any above ground superstructure construction works (excluding demolition and archaeological investigation), scale 1:5/10 section detail-drawings through the following elements shall be submitted to the Local Planning Authority for its approval in writing,

- the facades;

- the balconies;

- parapets; and

- heads, cills and jambs of all openings

-shopfronts to the class F floorspace;

-glazed cycle stores.

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

Reason: In order that the Local Planning Authority may be satisfied as to the quality of architectural design and details in accordance with the National Planning Policy Framework (2023); Policy D4 (Delivering good design) of the London Plan (2021); Policy P13 (Design of places) and Policy P14 (Design quality) of the Southwark Plan (2022).

28. Prior to the commencement of any above ground superstructure construction works, details of the specification of glass with an appropriate reflectivity, demonstrating that levels of glare would be reduced to a tolerable level at all times, to be used in the carrying out of this permission shall be submitted to and approved by the Local Planning Authority (in consultation with Network Rail). The development shall not be carried out otherwise than in accordance with any such approval given.

Reason: To ensure that occupiers of neighbouring premises or the surrounding public realm do not suffer a loss of amenity by reason of harmful glare in accordance with the National Planning Policy Framework (2023); Policy D9 (Tall Buildings) of the London Plan 2021; and Policy P56 (Protection of amenity) of the Southwark Plan (2022).

29. Prior to the commencement of above ground works of the development, and notwithstanding the cycle store layouts shown on the submitted drawings, full details of the cycle parking facilities (including cross sections, with aisle widths and floor to ceiling heights clearly labelled) shall be submitted to and approved by the Local Planning Authority. This shall include investigating the feasibility of rationalising or reducing the ground floor plant space with a view to improving the cycle store layouts, and details of the means of ensuring that the accessible cycle parking would be prioritised for people most in need of them. It shall also provide a minimum of 277 spaces and shall show details of

on-site mobility scooter parking.

Reason - To promote sustainable travel and to ensure compliance with Chapter 9 (Promoting sustainable transport) of the National Planning Policy Framework (2023); Policy T5 (Cycling) of the London Plan (2021) and Policy P53 (Cycling) of the Southwark Plan (2022).

30. Before any above ground superstructure construction works hereby authorised begins, details of the means of enclosure for all site boundaries shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the details approved and all site boundaries shall be retained and maintained in perpetuity.

Reason: In the interests of visual and residential amenity in accordance with the National Planning Policy Framework (2023); Policy D4 (Delivery good design) of the London Plan (2021); Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P15 (Residential Design) and Policy P56 (Protection of amenity) of the Southwark Plan (2022)

31. Prior to any above ground superstructure construction works being carried out, drawings and schedules of play provision and equipment to be provided including details of the means of enclosure to the 9th floor play area shall be submitted to and approved by the Local Planning Authority in writing and such provision as is agreed shall be made available to all residents prior to the first occupation of the development.

The ground level playspace shall be open to the public during the day.

Reason In order that the Local Planning Authority may be satisfied as to the design and details in accordance with the National Planning Policy Framework (2023); Policy D4 (Delivery good design) of the London Plan (2021); Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P15 (Residential Design) and Policy P56 (Protection of amenity) of the Southwark Plan (2022).

32. Before any above ground superstructure constructions works details of 10 swift nesting bricks and 6 bat tubes shall be submitted to and approved in writing by the Local Planning Authority. The details shall include the exact location, specification and design.

Prior to the first occupation of the building to which they form part, the bat tubes and bird boxes shall be installed strictly in accordance with the details so approved. Once completed, all habitats shall be maintained as such thereafter.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with the National Planning Policy Framework (2023); London Plan (2021) Policies G1 (Green infrastructure), G5 (Urban greening) and G6 (Biodiversity and access to nature); and Policies P59 (Green infrastructure) and P60 (Biodiversity) of the Southwark Plan (2022).

33. Prior to the first occupation of the development, a Landscape Management Plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas (except privately owned domestic gardens), shall be submitted to and approved in writing by the Local Planning Authority. The Landscape Management Plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the Local Planning Authority.

Reason: To ensure the protection of wildlife and supporting habitat and secure opportunities for the enhancement of the nature conservation value of the site and to ensure the management of the public realm, in accordance with the National Planning Policy Framework (2023); Policy G1 (Green infrastructure), Policy G5 (Urban greening), Policy G6 (Biodiversity and access to nature), Policy D8 (Public realm) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

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34. Prior to any occupation of the development hereby approved a Flood Warning and Evacuation Plan shall be submitted to and approved in writing by the Local Planning Authority. The plan should state how occupants will be made aware that they can sign up to the Environment Agency Flood Warning services, and of the plan itself. The plan should provide details of how occupants should respond in the event that they receive a flood warning, or become aware of a flood. The report should be proportionate and risk based in terms of sources of flooding. Once approved, the measures shall remain for as long as the development is occupied.

Reason: To ensure that the development is designed to ensure safety of the building users during extreme flood events, to mitigate residual flood risk and ensure safety of the future occupants of the proposed development and to provide safe refuge and ensure safety of the future occupants of the proposed development in accordance with the National Planning Policy Framework (2023); Policy P56 (Protection of amenity) and Policy P68 (Reducing flood risk) of the Southwark Plan (2022).

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

35. a) The on-site accessible parking space shall be provided in accordance with the approved details prior to the occupation of the development and shall be retained as such thereafter. It shall be fitted with an active electric vehicle charging point from the outset, and a 1.5m x 1.5m visibility splay at the vehicular entrance / exit for the development shall be maintained clear of obstructions and any landscaping or vegetation within the visibility splays shall be maintained so that it does not exceed 0.6m in height.

b) Prior to the occupation of the development a Parking Management Plan detailing how the accessible parking space will in the first instance be allocated to the existing Blue Badge holder at the site, and details of how it would be managed thereafter so that it is available to Blue Badge holders only shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that there would be adequate provision for wheelchair accessible parking spaces, in accordance with Policy T6.1 (Residential parking) of the London Plan (2021) and Policy P55 (Parking standards for

36. a) Before the first occupation of the development hereby approved, the refuse storage arrangements (individuals bin stores, routes to bin stores, bin collection locations, levels and gradients to and from the store, bulky waste storage) as shown on the drawings hereby approved shall be provided and made available to the users of the development. Thereafter, such facilities shall be retained and maintained in perpetuity.

b) Prior to the occupation of the development details of a temporary bin holding area and how the bins will be transported to and from it shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the details thereby approved.

Reason: To accord with Southwark's requirements for Waste Management and refuse collection arrangements (Waste Management Strategy Extension 2022 - 2025).

37. Prior to the installation of the Mechanical Heat Recovery (MVHR), hybrid cooling or comfort cooling installation for the building, a detailed scheme for the proposed MVHR, any hybrid cooling and any comfort cooling system shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall specify:

(a) air intake locations and demonstrate that they shall be in areas which are not expected to exceed UK air quality objective limits for levels of NO2 concentration (40 _$lg/m3) and are not proposed close to any chimney/boiler flues or emergency generator exhausts.

(b) measures to prevent summer overheating and minimise energy usage, including details of thermal control (cooling) within individual residential units;

(c) details of mechanical purge ventilation function (for removing internally generated pollutants within residential units).

(d) details of the overall efficiency of the system(s) which shall at least meet the details set out in the approved energy strategy.

(e) a detailed management plan for the relevant Mechanical Ventilation Heat Recovery system (MVHR), hybrid cooling and comfort cooling covering maintenance and cleaning, management responsibilities and a response plan in the event of system failures or complaints.

(f) details of the back-up generator exhaust, dilution of exhaust air, dispersal

and air quality impacts to the adjacent residential units.

The approved details shall be fully implemented prior to the occupation or use of the building and retained permanently thereafter in working order for the duration of the use and occupation of the development, in accordance with the approved details.

Reason - To ensure an acceptable standard of residential amenity is provided in terms of air quality and overheating, in accordance with Policies D6 (Housing quality and standards) SI 1 Improving air quality, and SI 4 (Managing heat risk) of the London Plan (2021) and Policies P14 (Design quality), P15 (Residential design) and P69 (Sustainability standards) of the Southwark Plan (2022).

38. a) The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific security needs of the development in accordance with the principles and objectives of Secured by Design. Details of these measures shall be submitted to and approved in writing by the local planning authority prior to commencement of above ground superstructure construction works and shall be implemented in accordance with the approved details prior to occupation.

b) Prior to occupation a satisfactory Secured by Design inspection must take place. The resulting Secured by Design certificate shall be submitted to and approved by the local planning authority.

Reason: In pursuance of the Local Planning Authority's duty under Section 17 of the Crime and Disorder Act (1998) to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention, in accordance with the National Planning Policy Framework (2023); Policy D11 (Safety security and resilience to emergency) of the London Plan (2021); Policy P16 (Designing out crime) of the Southwark Plan (2022).

39. a) Before the first occupation of the building hereby permitted commences, the applicant shall submit in writing and obtain the written approval of the Local Planning Authority to a Travel Plan written in accordance with TfL best guidance at the time of submission, setting out the proposed measures to be taken to encourage the use of modes of transport other than the car by all

users of the building, including staff and visitors.

b) At the start of the second year of operation of the approved Travel Plan, a detailed survey showing the methods of transport used by all those users of the building to and from the site and how this compares with the proposed measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise in accordance with any such approval given.

c) At the start of the fifth year of operation of the approved Travel Plan a detailed survey showing the methods of transport used by all those users of the building to and from the site and how this compares with the proposed measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise in accordance with any such approval given.

Reason: In order that the use of non-car based travel is encouraged in accordance with the National Planning Policy Framework (2023); Policy T6 (Car parking) of the London Plan (2021); Policy P54 (Car parking) of the Southwark Plan (2022).

40. Prior to the occupation of the development, a delivery and servicing plan (DSP) for the residential units and class F floorspace shall be submitted to and approved in writing by the Local Planning Authority, and shall include the following:

(a) strategy for deliveries and collections;

(b) number of servicing trips (including maintenance);

(c) details for management and receipt of deliveries for the residential properties;

(d) measures to minimise the number of servicing trips overall;

(e) measures to encourage deliveries and servicing by electric vehicle, cycle, foot and other non-private vehicular means;

(f) cleaning and waste removal, including arrangements for storage of waste and refuse collection;

(g) measures to ensure that delivery and servicing vehicles approach the site from the west along Burrell Street;

(g) monitoring and review of operations;

Servicing hours for the development using the Burrell Street loading bay shall be limited to off-peak times only.

The DSP shall be implemented once any part of the development is occupied and shall remain in place unless otherwise agreed in writing.

Reason - To ensure that the impacts of delivery and servicing on the local highway network and general amenity of the area are satisfactorily mitigated in accordance with the National Planning Policy Framework (2023), Policies T4 (Assessing and mitigating transport impacts) and T7 (Deliveries, servicing and construction) of the London Plan (2021) and Policies P14 (Design quality), P18 (Efficient use of land), P50 (Highways impacts) of the Southwark Plan (2022).

41. Prior to the occupation of the development the post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template should be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance.

The Post-Construction Assessment should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to occupation of the development.

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in compliance with the National Planning Policy Framework (2023); Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London Plan (2021) and Policy P70 (Energy) of the Southwark Plan (2022).

42. Prior to the occupation of the development, a Post Construction Monitoring Report shall be completed in line with the Greater London Authority's (GLA) Circular Economy Statement Guidance. The Post Construction Monitoring Report shall be submitted to the GLA, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to occupation of the development

Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials in accordance with Policy P62 (Reducing waste) of the Southwark Plan (2022). Details to be sent to circulareconomystatements@london.gov.uk.

43. a) A scheme of sound insulation shall be installed to ensure that the LFmax sound from amplified and non-amplified music and speech shall not exceed the lowest L90 5min at 1m from the facade of nearby residential premises at all third octave bands between 63Hz and 8kHz.

b) Prior to the commencement of use of the class F premises the proposed scheme of sound insulation shall be submitted to the local planning authority for approval.

c) The scheme of sound insulation shall be constructed and installed in accordance with the approval given and shall be permanently maintained thereafter.

d) Following completion of the development and prior to the commencement of use of the class F premises, a report demonstrating compliance with Parts (a), (b) and (c) above including a validation test shall be carried out.

The detailed results shall be submitted to the Local Planning Authority for approval in writing.

Reason: To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities associated with non-residential premises in accordance with the National Planning Policy Framework (2023); Policy P56 (Protection of amenity) and Policy P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan (2022).

44. No part of the development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.

Reason: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. In accordance with the National Planning Policy Framework (2023); Southwark's Strategic Flood Risk Assessment (2017) ; Policy SI 13 (Sustainable drainage) of the London Plan (2021) and P68 (Reducing flood risk) of the Southwark Plan (2022).

45. Prior to the occupation of any of the residential units within the development hereby consented, the communal amenity space including the co-working lounge and exercise studio shall be completed and available for use in accordance with the details approved.

All the communal amenity space as well as the co-working lounge and exercise studio within the development, shall be available to all residential occupiers of the development in perpetuity and the spaces shall be retained for amenity purposes.

Reason: To ensure a high quality of residential amenity is delivered and provided in a timely manner for new residents in accordance with the National Planning Policy Framework (2023), Policies D6 (Housing quality and standards) and D9 (Tall buildings) of the London Plan (2021) and Policies P13 (Design of places), P14 (Design quality), P15 (Residential design), P17 (Tall

buildings) and P56 (Protection of amenity) of the Southwark Plan (2022)

Permission is subject to the following Compliance Condition(s)

46. The Rated sound level from any plant, together with any associated ducting shall not exceed the Background sound level ($L_{A90\ 15min}$) at the nearest noise sensitive premises. Furthermore, the plant Specific sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific sound levels shall be calculated in full accordance with the methodology of BS4142:2014 +A1:2019.

Reason: To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the National Planning Policy Framework (2023); Policy P56 (Protection of amenity) and Policy P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan (2022).

47. The communal outdoor amenity areas shall only be used between the hours of 7am and 10pm daily (except for maintenance, repair or means of escape).

Reason: To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance in accordance with the National Planning Policy Framework (2023); Policy P56 (Protection of amenity) and P66 (Reducing noise and enhancing soundscapes) of the Southwark Plan (2022).

48. Whilst the principles and installation of sustainable drainage schemes are to be encouraged, no drainage systems for the infiltration of surface water drainage into the ground are permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Reason: To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants. This is in line with the National Planning Policy Framework (2023). Infiltrating water has the potential to cause remobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of groundwater.

49. Bar the provision of CCTV equipment and notwithstanding the provisions of Schedule 2, Part 16 The Town & Country Planning (General Permitted Development) Order 2015 (as amended or re- enacted) no external telecommunications equipment or structures shall be placed on the roof or any other part of a building hereby permitted.

Reason: In order to ensure that no telecommunications plant or equipment which might be detrimental to the design and appearance of the building and visual amenity of the area is installed on the roof of the building in accordance with the National Planning Policy Framework (2023); Policy P55 (Protection of amenity) and Policy P13 (Design of places) of the Southwark Plan (2022).

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

Reason: In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area in accordance with the National Planning Policy Framework (2023); Policy D4 (Delivering good design) of the London Plan (2021); Policy P13 (Design of places), Policy P14 (Design quality) and Policy P56 (Protection of amenity) of the Southwark Plan (2022).

51. The development hereby approved shall be carried out in accordance with the recommendations of the Fire Statement P02/ January 2024 by Arup (including automatic fire supression within the cycle stores), unless a revised Fire Statement is submitted to and approved in writing by the Local Planning Authority prior to the relevant works being carried out.

Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with Policy D12 (Fire safety) of the London Plan (2021).

52. The development shall be carried out in accordance with the Air Quality Assessment dated September 2023 and achieve air quality neutral standard.

Reason: To protect future occupiers from poor external air quality in accordance with the National Planning Policy Framework (2023); Policy P56 (Protection of amenity) and Policy P65 (Improving air quality) of the Southwark Plan (2022).

53. Obstacle lights shall be placed on the highest parts of the buildings above the Podium Phase during the construction phases and following completion of the construction. These obstacle lights must be steady state red lights with a minimum intensity of 2000 candelas. Periods of illumination of obstacle lights, obstacle light locations and obstacle light photometric performance must all be in accordance with the requirements of regulation CS ADR-DSN Chapter Q 'Visual Aids for Denoting Obstacles'

Reason: Permanent illuminated obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport.

54. The habitable rooms within the development sharing a party wall element with neighbouring habitable units shall be designed and constructed to provide reasonable resistance to the transmission of sound sufficient to ensure that the party wall meets a minimum of 5dB improvement on the Building Regulations standard set out in Approved Document E.

Reason: To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the adjacent premises in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2023.

55. No meter boxes, flues, vents or pipes [other than rainwater pipes] or other appurtenances not shown on the approved drawings shall be fixed or installed on the elevations of the buildings, unless otherwise approved by the Council.

Reason: To ensure such works do not detract from the appearance of the building (s) in accordance with The National Planning Policy Framework (2023); Policy D4 (Delivering good design) of the London Plan (2021) and Policy P13 (Design of places) and Policy P14 (Design quality) of the Southwark Plan (2022).

56. Notwithstanding the drawings hereby approved, no door shall open outwards over the public highway, public footway or any part of the publicly-accessible realm with the exception of fire escape access.

Reason: In order that the footway is kept clear of clutter to facilitate the unobstructed movement of pedestrians, including wheelchair users and the mobility impaired, having regard to the high levels of pedestrian footfall in this location, in accordance with the National Planning Policy Framework (2023); Policy P13 (Design of places) and Policy P51 (Walking) of the Southwark Plan (2022).

57. Notwithstanding the Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking, re-enacting or modifying that Order), no satellite dishes shall be installed on the north/south/east/west elevations or the roof of any Building, unless otherwise agreed in writing with the Local Planning Authority.

Reason: In order that the Local Planning Authority may be satisfied with the details of the proposal and to accord with the National Planning Policy Framework 2023 and Policies P13 (Design of Places), P14 (Design quality) and P17 (Tall buildings) of the Southwark Plan (2022).

58. The development hereby permitted is limited to 149 residential units, 195 sqm (GIA) of class F floorspace and a maximum parapet height of 80.25m (AOD) to the 22-storey tower.

Reason: This is in accordance with the application details and the approved plans.

Permission is subject to the following Special Condition(s)

59. a) Details of any external lighting (including: design; power and position of luminaries; light intensity contours) of all affected external areas (including areas beyond the boundary of the development) in compliance with the Institute of Lighting Professionals (ILE) Guidance Note 1 for the reduction of obtrusive light (2021), shall be submitted to and approved by the Local Planning Authority (in consultation with Network Rail) in writing before any such lighting is installed.

These details shall also confirm non-interference with any signalling apparatus and/or train drivers' vision on approaching trains and confirmation of the location and colour of the proposed lights as these must also be confirmed as to not give rise to the potential for confusion with the signalling arrangements on the railway.

b) The development shall not be carried out otherwise than in accordance with any such approval given. Prior to the external lighting being used, a validation report shall be shall be submitted to the Local Planning Authority for approval in writing.

Reason: In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the amenity and privacy of adjoining occupiers, and their protection from light nuisance and safety on the adjacent railway line, , in accordance with the National Planning Policy Framework (2023); Policy G6 (Biodiversity and access to nature) of the London Plan (2021) and Policy P56 (Protection of amenity) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

60. Within 6 months of the completion of the archaeological work on site, an assessment report detailing the proposals for the off-site analyses and post-excavation works, including publication of the site and preparation for deposition of the archive, shall be submitted to and approved in writing by the Local Planning Authority, and the works detailed in the assessment report shall not be carried out otherwise than in accordance with any such approval given. The assessment report shall provide evidence of the applicant's commitment to finance and resource these works to their completion.

Reason: In order that the archaeological interest of the site is secured with regard to the details of the post-excavation works, publication and archiving to ensure the preservation of archaeological remains by record in accordance

with the National Planning Policy Framework (2023); Policy P23 (Archaeology) of the Southwark Plan (2022).

Informatives

1 A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

2 If a crane is required for construction purposes, then red static omnidirectional lights will need to be applied at the highest part of the crane and at the end of the jib if a tower crane.

3 The applicant must ensure that any construction and subsequent maintenance can be carried out to any proposed buildings or structures without adversely affecting the safety of/or encroaching upon Network Rail's adjacent land and air-space. Therefore, any buildings are required to be situated at least 2 metres (3m for overhead lines and third rail) from Network Rail's boundary.

This requirement will allow for the construction and future maintenance of a building without the need to access the operational railway environment. Any less than 2m (3m for overhead lines and third rail) and there is a strong possibility that the applicant (and any future resident) will need to utilise Network Rail land and air-space to facilitate works as well as adversely impact upon Network Rail's maintenance teams' ability to maintain our boundary fencing and boundary treatments. Access to Network Rail's land may not always be granted and if granted may be subject to railway site safety requirements and special provisions with all associated railway costs charged to the applicant.

As mentioned above, any works within Network Rail's land would need approval from the Network Rail Asset Protection Engineer. This request should be submitted at least 20 weeks before any works are due to commence on site and the applicant is liable for all associated costs (e.g. all possession, site safety, asset protection presence costs). However, Network Rail is not required to grant permission for any third-party access to its land.

4 All operations, including the use of cranes or other mechanical plant working adjacent to Network Rail's property, must at all times be carried out in a "fail safe" manner such that in the event of mishandling, collapse or failure, no plant or materials are capable of falling within 3.0m of the boundary with Network Rail.

5 Storm/surface water must not be discharged onto Network Rail's property or into Network Rail's culverts or drains except by agreement with Network Rail. Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property. Proper provision must be made to accept and continue drainage discharging from Network Rail's property; full details to be submitted for approval to the Network Rail Asset Protection Engineer. Suitable foul drainage must be provided separate from Network Rail's existing drainage. Soakaways, as a means of storm/surface water disposal must not be constructed within 20 metres of Network Rail's boundary or at any point which could adversely affect the stability of Network Rail's property. After the completion and occupation of the development, any new or exacerbated problems attributable to the new development shall be investigated and remedied at the applicants' expense.

6 Any scaffold which is to be constructed within 10 metres of the railway boundary fence must be erected in such a manner that at no time will any poles over-sail the railway and protective netting around such scaffold must be installed. The applicant/applicant's contractor must consider if they can undertake the works and associated scaffold/access for working at height within the footprint of their property boundary.

7 In view of the nature of the development, it is essential that the developer provide (at their own expense) and thereafter maintain a substantial, trespass

proof fence along the development side of the existing boundary fence, to a minimum height of 1.8 metres. The 1.8m fencing should be adjacent to the railway boundary and the developer/applicant should make provision for its future maintenance and renewal without encroachment upon Network Rail land. Network Rail's existing fencing / wall must not be removed or damaged and at no point during or post construction should the foundations of the fencing or wall or any embankment therein, be damaged, undermined or compromised in any way. Any vegetation within Network Rail's land boundary must not be disturbed. Any fencing installed by the applicant must not prevent Network Rail from maintaining its own fencing/boundary treatment.

8 Any lighting associated with the development (including vehicle lights) must not interfere with the sighting of signalling apparatus and/or train drivers' vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway. The developers should obtain Network Rail's Asset Protection Engineer's approval of their detailed proposals regarding lighting.

9 The potential for any noise/vibration impacts caused by the proximity between the proposed development and any existing railway should be made aware to the future occupiers of the site. It must also be assessed in the context of the National Planning Policy Framework which holds relevant national guidance information.

The current level of usage may be subject to change at any time without notification including increased frequency of trains, night-time train running and heavy freight trains. The appropriate building materials should be used to reduce any potential noise disturbance from the railway.

10 Where a proposal calls for hard standing area/parking of vehicles area near the boundary with the operational railway, Network Rail would recommend the installation of a highways approved vehicle incursion barrier or high kerbs to prevent vehicles accidentally driving or rolling onto the railway or damaging lineside fencing.

11 Any trees/shrubs to be planted adjacent to the railway boundary these shrubs should be positioned at a minimum distance greater than their predicted mature height from the boundary. Certain broad leaf deciduous species should not be planted adjacent to the railway boundary as the species will contribute to leaf fall which will have a detrimental effect on the safety and operation of the railway. Network Rail wish to be involved in the approval of any landscaping scheme adjacent to the railway. Any hedge planted adjacent to Network Rail's boundary fencing for screening purposes should be so placed that when fully grown it does not damage the fencing or provide a means of scaling it. No hedge should prevent Network Rail from maintaining its boundary fencing. If required, Network Rail's Asset Protection team are able to provide more details on which trees/shrubs are permitted within close proximity

12 Whilst not a planning matter, we would like to remind the applicant of the need to identify and comply with all existing rights on the land. Network Rail request all existing rights, covenants and easements are retained unless agreed otherwise with Network Rail.

13 Notwithstanding the above, if any property rights are required from Network Rail in order to deliver the development, Network Rail's Property team will need to be contacted.

14 Please be advised that the balconies over-sailing the pavement would require separate over-sailing licences as well as s177 agreement from the Council. Further details on this can be viewed at: Roads and highway licences - Southwark Council

APPENDIX 2

Relevant Planning Policy

National Planning Policy Framework (NPPF)

The revised National Planning Policy Framework ('NPPF') was published in December 2023 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental.

Paragraph 02 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications. The particularly relevant chapters from the Framework are:

- Section 2 - Achieving sustainable development
- Section 5 – Delivering a sufficient supply of homes
- Section 6 - Building a strong, competitive economy
- Section 8 - Promoting healthy and safe communities
- Section 9 - Promoting sustainable transport
- Section 11 - Making effective use of land
- Section 12 - Achieving well–designed and beautiful places
- Section 14 - Meeting the challenge of climate change, flooding and coastal change
- Section 15 - Conserving and enhancing the natural environment
- Section 16 - Conserving and enhancing the historic environment

The London Plan 2021

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

- The London Plan is the regional planning framework and was adopted on March 2nd 2021. The most relevant policies are those listed below.

- Good Growth 1 - Building strong and inclusive communities
- Good Growth 2 - Making the best use of land
- Good Growth 3 - Creating a healthy city
- Good Growth 4 - Delivering the homes Londoners need
- Good Growth 5 - Growing a good economy
- Good Growth 6 - Increasing efficiency and resilience

- Policy SD1 - Opportunity Areas
- Policy SD4 – The Central Activity Zone
- Policy SD6 – Town centres and high streets

- Policy SD7 Town centres: development principles and Development Plan Documents
- Policy SD8 Town centre network
- Policy SD9 Town centres: Local partnerships and implementation
- Policy SD10 - Strategic and local regeneration
- Policy D1 - London's form, character and capacity for growth
- Policy D3 - Optimising site capacity through the design-led approach
- Policy D4 - Delivering good design
- Policy D5 - Inclusive design
- Policy D6 - Housing quality and standards
- Policy D7 - Accessible housing
- Policy D8 - Public realm
- Policy D9 - Tall buildings
- Policy D11 - Safety, security and resilience to emergency
- Policy D12 - Fire safety
- Policy D13 - Agent of Change
- Policy D14 - Noise
- Policy H1 - Increasing housing supply
- Policy H4 - Delivering affordable housing
- Policy H5 - Threshold approach to applications
- Policy H6 - Affordable housing tenure
- Policy H7 - Monitoring of affordable housing
- Policy H10 – Housing size mix
- Policy S1 – Developing London's social infrastructure
- Policy S4 - Play and informal recreation
- Policy S6 - Public toilets
- Policy E1 - Offices
- Policy E2 - Providing suitable business space
- Policy E3 - Affordable workspace
- Policy E4 - Land for industry, logistics and services to support London's economic function
- Policy E7 - Industrial intensification, co-location and substitution
- Policy E9 - Retail, markets and hot food takeaways
- Policy E11 - Skills and opportunities for all
- Policy HC1 - Heritage conservation and growth
- Policy G1 - Green infrastructure
- Policy G4 – Open space
- Policy G5 - Urban greening
- Policy G6 - Biodiversity and access to nature
- Policy G7 - Trees and woodlands
- Policy SI 1 - Improving air quality
- Policy SI 2 - Minimising greenhouse gas emissions
- Policy SI 3 - Energy infrastructure
- Policy SI 4 - Managing heat risk
- Policy SI 5 - Water infrastructure
- Policy SI 6 - Digital connectivity infrastructure

- Policy SI 7 – Reducing waste and supporting the circular economy
- Policy SI 8 - Waste capacity and net waste self-sufficiency
- Policy SI 12 - Flood risk management
- Policy SI 13 - Sustainable drainage
- Policy SI 16 - Waterways – use and enjoyment
- Policy SI 17 - Protecting and enhancing London's waterways
- Policy T1 - Strategic approach to transport
- Policy T2 - Healthy Streets
- Policy T3 - Transport capacity, connectivity and safeguarding
- Policy T4 - Assessing and mitigating transport impacts
- Policy T5 - Cycling
- Policy T6 - Car parking
- Policy T6.1 – residential parking
- Policy T6.5 - Non-residential disabled persons parking
- Policy T7 - Deliveries, servicing and construction
- Policy T9 - Funding transport infrastructure through planning

Southwark Plan 2022

The Southwark Plan 2022 was adopted on 23 February 2022. The plan provides strategic policies, development management policies, area visions and site allocations which set out the strategy for managing growth and development across the borough from 2019 to 2036. The relevant policies are:

- ST1 – Southwark's Development Targets
- ST2 – Southwark's Places
- SP1 – Homes for all
- SP2 – Southwark together
- SP3 – A great start in life
- SP4 – Green and inclusive economy
- SP5 – Thriving neighbourhoods and tackling health inequalities
- SP6 – Climate emergency

- P1 – Social rented and intermediate housing
- P2 – New family homes
- P8 – Wheelchair accessible and adaptable housing
- P13 – Design of places
- P14 – Design quality
- P15 – Residential
- P16 – Designing out crime
- P17 – Tall buildings
- P18 – Efficient use of land
- P20 – Conservation areas
- P21 – Conservation of the historic environment and natural heritage
- P23 – Archaeology
- P26 – Local List

- P28 – Access to employment and training
- P34 – Railway arches
- P35 – Town and local centres
- P44 – Broadband and digital infrastructure
- P45 – Healthy developments
- P49 – Public transport
- P50 – Highways impacts
- P51 – Walking
- P53 – Cycling
- P54 – Car parking
- P55 - Parking standards for disabled people and the physically impaired
- P56 – Protection of amenity
- P59 – Green infrastructure
- P60 – Biodiversity
- P61 – Trees
- P62 – Reducing waste
- P64 – Contaminated land and hazardous substances
- P65 – Improving air quality
- P66 – Reducing noise pollution and enhancing soundscapes
- P67 – Reducing water use
- P68 – Reducing flood risk
- P69 – Sustainability standards
- P70 – Energy

- IP1 – Infrastructure
- IP2 – Transport infrastructure
- IP3 – Community infrastructure levy (CIL) and Section 106 planning obligations
- IP6 – Monitoring development
- IP7 – Statement of Community Involvement

- Also of relevance in the consideration of this application is the Sustainable Design and Construction SPD (2008) and the Heritage SPD 2021.

APPENDIX 3

Relevant planning history of the site and nearby sites

Planning history of the site, and adjoining or nearby sites:

The site was subject to a pre-application enquiry under references 22/EQ/0051. The main issues discussed related to layout, height, scale massing, land use and impact on views and heritage assets.

It is noted that a number of planning applications that have been granted permissions and that are in close proximity to the site. The 'taller' of the buildings/ permitted changes are generally located to the west of the railway line. An example being the redevelopment of 'Edward House' which would project up to 22 storeys (20/AP/3250) which has been demolished and this permission is currently being implemented.

The permitted changes to the east of the railway line are generally at a lower level. An example being 33-36 Bear Lane which would project up to 8 storeys (21/AP/0737). There is also a permitted application to the nearby (Hilton) hotel to the east of the site (20/AP/2421). This would be an infill extension up to the 6th floor and this is currently being constructed. Planning permission was also granted at the Holiday Inn Express (101-109 Southwark Street) for a 7 storey extension (22/AP/3682 – 06/02/2024).

Larger/ taller buildings have been permitted to the eastern side of the railway line such as the permitted scheme at Bankside Yards. This is located to the north of Friars Close, the other side of Southwark Street Road. Planning permission 18/AP/1603 permitted a scheme on this site of up to 34 storeys. This also permitted 288 residential units as well as items such as office space, a hotel and restaurant. The site has been cleared and the permission could be deemed to be implemented.

Reference is also be made to the recently approved planning permission at 18 Blackfriars Road. Planning permission 23/AP/1854 granted consent for:

"Part demolition to the rear of 1 and 3 - 7 Stamford Street together with: the erection of a ground plus three-storey podium comprising retail, leisure, office, education, gallery, library and assembly room uses; two levels of basement for servicing, plant, car and cycle parking plus pit access within a partial basement at level three; two residential buildings of 22 and 40 storeys above podium; an office building of 44 storeys above podium; improvements to the existing public house; landscaping at ground and podium levels; replacement boundary at the southern edge of the Site; plant and all other associated, enabling and ancillary works (also see associated Listed Building Consent 23/AP/1855)."

This would be approximately 112m from the redevelopment site at Friars Close.

The planning permissions referenced above and those near to the site are material considerations for the application at Friars Close. They have been given appropriate weight and where appropriate, referenced in the officer report.

APPENDIX 4

Consultation undertaken

Site notice date: 31/01/2023
Press notice date: 19/10/2023
Case officer site visit date: n/a
Neighbour consultation letters sent: 24/06/2024

Internal services consulted

LBS Archaeology
LBS Community Infrastructure Levy Team
LBS Design & Conservation Team [Formal]
LBS Ecology
LBS Environmental Protection
LBS Highways Development & Management
LBS Flood Risk Management & Urban Drain
LBS Transport Policy
LBS Urban Forester
LBS Waste Management
LBS Design & Conservation Team [Formal]
LBS Archaeology
LBS Community Infrastructure Levy Team
LBS Ecology
LBS Environmental Protection
LBS Highways Development & Management
LBS Flood Risk Management & Urban Drain
LBS Transport Policy
LBS Urban Forester
LBS Waste Management
LBS Archaeology
LBS Community Infrastructure Levy Team
LBS Design & Conservation Team [Formal]
LBS Ecology
LBS Environmental Protection
LBS Highways Development & Management
formal consultation and response to Pol
LBS Flood Risk Management & Urban Drain
LBS Transport Policy
LBS Urban Forester
LBS Waste Management
LBS Local Economy
formal consultation and response to Pol

Statutory and non-statutory organisations

Environment Agency
Historic England
London Fire & Emergency Planning Authori
Network Rail
Metropolitan Police Service (Designing O
Thames Water
Transport for London
Historic England
Environment Agency
London Fire & Emergency Planning Authori
Network Rail
Metropolitan Police Service (Designing O
Thames Water
Environment Agency
Historic England
London Fire & Emergency Planning Authori
Network Rail
Metropolitan Police Service (Designing O
Transport for London
Thames Water

Neighbour and local groups consulted:

Basement And Ground Floor 132 Southwark Street London
Part A Fourth Floor 5-13 Great Suffolk Street London
134 Southwark Street London Southwark
Cpre Part Basement 128 Southwark Street London
Second Floor 138-140 Southwark Street London
3 Burrell Street London Southwark
Flat Above Prince William Henry 216-219 Blackfriars Road
First Floor 128 Southwark Street London
17 Hoptons Gardens Hopton Street London
36 Bear Lane London Southwark
4-5 Burrell Street London Southwark
Part Arch 5 And Arches 6 To 6B Burrell Street London
Ground Floor 42-44 Dolben Street London
Second Floor And Third Floor 42-44 Dolben Street London
Ground And First Floor 8 Chancel Street London
The Pavilion Hopton Street London
122 Southwark Street London Southwark
Flat 81 18 Great Suffolk Street London
Fourth Floor Flat 132 Southwark Street London
Flat 9 Quadrant House 15 Burrell Street
Railway Arch 10 Chancel Street London
Railway Arches Southwark Street London
Flat 43A 18 Great Suffolk Street London
Fourth Floor And Fifth Floor Flat 134 Southwark Street London
13 Hoptons Gardens Hopton Street London
14 Hoptons Gardens Hopton Street London
11 Hoptons Gardens Hopton Street

London
Second Floor Flat 134 Southwark Street London
1 Robinson Road London Southwark
4 Friars Close Bear Lane London
11 Friars Close Bear Lane London
Flat 1 5B Bear Lane London
Flat 20 5B Bear Lane London
16 Friars Close Bear Lane London
First Floor 42-44 Dolben Street London
Part Ground Floor 99 Southwark Street London
34-40A Bear Lane London Southwark
7 Bear Lane London Southwark
Part Basement Ground Floor First Floor And Second Floor 6 Chancel Street London
Car Park Lloyds Computer Centre Hopton Street
Railway Arches 3 And 3A And 3C And 3D And 3E And 3F Burrell Street London
Basement Store East Rear 128 Southwark Street London
Flat 63A 18 Great Suffolk Street London
Railway Arch 9 Chancel Street London
18B Great Suffolk Street London Southwark
Fourth To Fifth Floors 240 Blackfriars Road London
Ninth And Tenth Floors 240 Blackfriars Road London
Flat 1 45 Dolben Street London
Flat 12 Holmwood Buildings 97A Southwark Street
Flat 10 Holmwood Buildings 97 Southwark Street
First Floor 99 Southwark Street London
242B Blackfriars Road London Southwark
Railway Arch 4 Burrell Street London
Holiday Inn Express 101-109 Southwark Street London
Flat 10 1 Treveris Street London
Flat 72 18 Great Suffolk Street London
24 Friars Close Bear Lane London
13 Friars Close Bear Lane London
18 Hoptons Gardens Hopton Street London
Flat 4 Edward Edwards House Nicholson Street
Flat 38 Edward Edwards House Nicholson Street
Flat 26 Edward Edwards House Nicholson Street
Flat 21 Edward Edwards House Nicholson Street
235 Blackfriars Road London Southwark
Flat 4 Quadrant House 15 Burrell Street
Flat 34 Quadrant House 15 Burrell Street
16 Nicholson Street London Southwark
Flat 15 Holmwood Buildings 97A Southwark Street
Railway Arch 11 Chancel Street London
Flat 38 18 Great Suffolk Street London
Flat 25 5B Bear Lane London
Flat 19 5B Bear Lane London
Flat 89 18 Great Suffolk Street London
Flat 84 18 Great Suffolk Street London
Ground Floor Right 128 Southwark Street London
Flat 2 Suthring House 220 Blackfriars Road
Flat 16 Holmwood Buildings 97A Southwark Street
113 Southwark Street London Southwark
Flat 31 Edward Edwards House Nicholson Street
Flat 18 Edward Edwards House Nicholson Street
7 Burrell Street London Southwark
Flat 5 Quadrant House 15 Burrell Street
Flat 35 Quadrant House 15 Burrell Street
Flat 30 Quadrant House 15 Burrell Street
Flat 17 Quadrant House 15 Burrell Street
26 Friars Close Bear Lane London
Atm Site 18 Great Suffolk Street London
Sixth Floor 240 Blackfriars Road London
Tfl Surface Transport 230 Blackfriars Road London
Third Floor 99 Southwark Street London
Flat 88 18 Great Suffolk Street London
Flat 85 18 Great Suffolk Street London
Flat 66 18 Great Suffolk Street London
Flat 10 5B Bear Lane London
Flat 52 18 Great Suffolk Street London
Flat 45 18 Great Suffolk Street London
Flat 43 18 Great Suffolk Street London
B01 To B03 Part Basement Excluding

Basement Store East Rear 128 Southwark Street London
Flat 5 1 Treveris Street London
Flat 3 1 Treveris Street London
Unit 2 1 Treveris Street London
Flat 87 18 Great Suffolk Street London
Flat 51 18 Great Suffolk Street London
Flat 36 18 Great Suffolk Street London
Flat 2 5B Bear Lane London
3 Friars Close Bear Lane London
Flat 33 Edward Edwards House Nicholson Street
Flat 25 Quadrant House 15 Burrell Street
Flat A Christchurch House 4 Chancel Street
Railway Arch 13 Chancel Street London
Flat 6 5B Bear Lane London
Flat 58 18 Great Suffolk Street London
Flat 3 Suthring House 220 Blackfriars Road
Third Floor Flat 132 Southwark Street London
Flat 3 Holmwood Buildings 97A Southwark Street
13 Bear Lane London Southwark
Flat 36 Edward Edwards House Nicholson Street
Flat 32 Edward Edwards House Nicholson Street
Flat 16 Edward Edwards House Nicholson Street
Flat 7 Quadrant House 15 Burrell Street
Flat 24 Quadrant House 15 Burrell Street
Flat 14 Quadrant House 15 Burrell Street
8 Friars Close Bear Lane London
5 Friars Close Bear Lane London
12 Friars Close Bear Lane London
6 Burrell Street London Southwark
First Floor 118 Southwark Street London
Flat 77 18 Great Suffolk Street London
Flat 18 5B Bear Lane London
Flat 15 5B Bear Lane London
Flat 4 5B Bear Lane London
Flat 49 18 Great Suffolk Street London
Flat 5 31 Dolben Street London
Flat 42 18 Great Suffolk Street London
Flat 39 18 Great Suffolk Street London
Part B Fourth Floor 5-13 Great Suffolk Street London
Flat 8 1 Treveris Street London
Flat 4 Holmwood Buildings 97A Southwark Street
9 Friars Close Bear Lane London
6 Friars Close Bear Lane London
19 Friars Close Bear Lane London
Third Floor 136 Southwark Street London
Flat 35 Edward Edwards House Nicholson Street
Flat 13 Edward Edwards House Nicholson Street
Railway Arch 8 To 8A Chancel Street London
Flat 6 Quadrant House 15 Burrell Street
Flat D Christchurch House 4 Chancel Street
Flat 55 18 Great Suffolk Street London
Flat 12 5B Bear Lane London
Flat 70 18 Great Suffolk Street London
Flat 86 18 Great Suffolk Street London
8 Hoptons Gardens Hopton Street London
6 Hoptons Gardens Hopton Street London
19 Hoptons Gardens Hopton Street London
Flat 11 Holmwood Buildings 97A Southwark Street
Flat 9 Edward Edwards House Nicholson Street
Flat 9 Holmwood Buildings 97 Southwark Street
Flat 1 Quadrant House 15 Burrell Street
7 Friars Close Bear Lane London
17 Friars Close Bear Lane London
1 Friars Close Bear Lane London
First To Third Floors 240 Blackfriars Road London
Flat 79 18 Great Suffolk Street London
Flat 76 18 Great Suffolk Street London
Flat 11 5B Bear Lane London
5A Bear Lane London Southwark
Flat 60 18 Great Suffolk Street London
Flat 57 18 Great Suffolk Street London
Flat 56 18 Great Suffolk Street London
Flat 33 18 Great Suffolk Street London
Flat 29 18 Great Suffolk Street London
Flat 26 18 Great Suffolk Street London

Apartment 7 235 Blackfriars Road London
Apartment 5 235 Blackfriars Road London
Flat 7 1 Treveris Street London
Railway Arches 15 And 16 Dolben Street London
Flat 31 Quadrant House 15 Burrell Street
Flat 5 Suthring House 220 Blackfriars Road
142A Southwark Street London Southwark
20 Hoptons Gardens Hopton Street London
15 Hoptons Gardens Hopton Street London
12 Hoptons Gardens Hopton Street London
Flat 10 Edward Edwards House Nicholson Street
Flat 18 Quadrant House 15 Burrell Street
Fourth Floor 128 Southwark Street London
Flat 41 18 Great Suffolk Street London
Flat 16 5B Bear Lane London
Flat 1 31 Dolben Street London
Arches 33 To 34 Dolben Street London
3 Hoptons Gardens Hopton Street London
Flat E Christchurch House 4 Chancel Street
Flat 3 Edward Edwards House Nicholson Street
Flat 27 Edward Edwards House Nicholson Street
Flat 36 Quadrant House 15 Burrell Street
Flat 33 Quadrant House 15 Burrell Street
Flat 27 Quadrant House 15 Burrell Street
Flat 11 Quadrant House 15 Burrell Street
2 Friars Close Bear Lane London
15 Friars Close Bear Lane London
First Floor Flat 134 Southwark Street London
Third To Fifth Floors 118 Southwark Street London
Eleventh Floor North 240 Blackfriars Road London
Second Floor 99 Southwark Street London
Flat 83 18 Great Suffolk Street London
Flat 71 18 Great Suffolk Street London
Flat 21 5B Bear Lane London
Flat 7 5B Bear Lane London
Flat 5 5B Bear Lane London
Flat 63 18 Great Suffolk Street London
Flat 46 18 Great Suffolk Street London
Flat 40 18 Great Suffolk Street London
Apartment 9 235 Blackfriars Road London
Apartment 6 235 Blackfriars Road London
Flat 11 1 Treveris Street London
Flat 9 1 Treveris Street London
Flat 74 18 Great Suffolk Street London
Flat 15 Edward Edwards House Nicholson Street
Second To Third Floors 128 Southwark Street London
Arches 3A And 3D Burrell Street London
21 Friars Close Bear Lane London
10 Friars Close Bear Lane London
4 Hoptons Gardens Hopton Street London
Flat 24 Edward Edwards House Nicholson Street
Ross House 144 Southwark Street London
Flat 53 18 Great Suffolk Street London
Flat 3 5B Bear Lane London
Flat 32 18 Great Suffolk Street London
Flat 30 18 Great Suffolk Street London
Ground Floor Left 128 Southwark Street London
Railway Arches 6 Burrell Street London
Prince William Henry 216-219 Blackfriars Road London
22 Great Suffolk Street London Southwark
Flat 7 Edward Edwards House Nicholson Street
Flat 25 Edward Edwards House Nicholson Street
Flat 19 Edward Edwards House Nicholson Street
Flat 23 Quadrant House 15 Burrell Street
22 Friars Close Bear Lane London
20 Friars Close Bear Lane London
20 Great Suffolk Street London

Southwark
Unit 1 240 Blackfriars Road London
Ground Floor 99 Southwark Street London
Flat 82 18 Great Suffolk Street London
Flat 80 18 Great Suffolk Street London
Flat 14 5B Bear Lane London
Flat 13 5B Bear Lane London
Flat 8 5B Bear Lane London
5E Bear Lane London Southwark
39 Bear Lane London Southwark
Flat 3 31 Dolben Street London
Flat 34 18 Great Suffolk Street London
Third Floor 138-140 Southwark Street London
Apartment 1 235 Blackfriars Road London
238 Blackfriars Road London Southwark
Flat 28 Edward Edwards House Nicholson Street
Flat 17 5B Bear Lane London
8 Chancel Street London Southwark
Hilton London Bankside 2-8 Great Suffolk Street London
Flat 22 Edward Edwards House Nicholson Street
Flat 28 18 Great Suffolk Street London
Flat 21 Quadrant House 15 Burrell Street
Flat 69 18 Great Suffolk Street London
Ubm Plc 240 Blackfriars Road London
Flat 29 Edward Edwards House Nicholson Street
1 Burrell Street London Southwark
Part Basement And Part Ground Floor Christchurch House 4 Chancel Street
First Floor 132 Southwark Street London
Ground Floor 18 Great Suffolk Street London
Flat 3 Quadrant House 15 Burrell Street
Flat 22 Quadrant House 15 Burrell Street
Flat 13 Quadrant House 15 Burrell Street
Railway Arch 5 Burrell Street London
Flat 44 18 Great Suffolk Street London
Flat 9 5B Bear Lane London
Flat 35 18 Great Suffolk Street London
Flat 64 18 Great Suffolk Street London
Flat 4 31 Dolben Street London
B10 To B11 Part Basement 128 Southwark Street London
Railway Arch 10 Treveris Street London
Flat 4 Suthring House 220 Blackfriars Road
16 Hoptons Gardens Hopton Street London
Flat 14 Holmwood Buildings 97 Southwark Street
Flat 13 Holmwood Buildings 97 Southwark Street
Flat 1 Holmwood Buildings 97 Southwark Street
14 Nicholson Street London Southwark
Flat C Christchurch House 4 Chancel Street
14 Great Suffolk Street London Southwark
9-11 Bear Lane London Southwark
Arch 17 Dolben Street London
Flat 39 Edward Edwards House Nicholson Street
111 Southwark Street London Southwark
Flat 12 Quadrant House 15 Burrell Street
Flat 7 Holmwood Buildings 97A Southwark Street
25 Friars Close Bear Lane London
18 Friars Close Bear Lane London
Eleventh Floor South 240 Blackfriars Road London
Second Floor 136 Southwark Street London
Third Floor 5-13 Great Suffolk Street London
Flat 73 18 Great Suffolk Street London
Flat 68 18 Great Suffolk Street London
Flat 31 18 Great Suffolk Street London
Basement To First Floor 138-140 Southwark Street London
Apartment 4 235 Blackfriars Road London
Apartment 3 235 Blackfriars Road London
Apartment 2 235 Blackfriars Road London
Flat 4 1 Treveris Street London
23 Friars Close Bear Lane London
3 Robinson Road London Southwark
Part Basement Front 42-44 Dolben Street London
Flat 54 18 Great Suffolk Street London

Flat 6 Edward Edwards House Nicholson Street
Flat 8 Quadrant House 15 Burrell Street
Flat 30 Edward Edwards House Nicholson Street
Part Basement Rear 42-44 Dolben Street London
Flat 50 18 Great Suffolk Street London
Flat 47 18 Great Suffolk Street London
Flat 61 18 Great Suffolk Street London
Second Floor 132 Southwark Street London
Flat 1 Suthring House 220 Blackfriars Road
18 Dolben Street London Southwark
5 Hoptons Gardens Hopton Street London
2 Hoptons Gardens Hopton Street London
18 Nicholson Street London Southwark
Flat B Christchurch House 4 Chancel Street
Flat 5 Edward Edwards House Nicholson Street
Flat 37 Edward Edwards House Nicholson Street
Flat 23 Edward Edwards House Nicholson Street
Flat 12 Edward Edwards House Nicholson Street
Flat 26 Quadrant House 15 Burrell Street
Flat 19 Quadrant House 15 Burrell Street
14 Friars Close Bear Lane London
Living Accommodation 22 Great Suffolk Street London
Flat 24 5B Bear Lane London
5C-5D Bear Lane London Southwark
Flat 65 18 Great Suffolk Street London
Flat 59 18 Great Suffolk Street London
Flat 2 31 Dolben Street London
Ground Floor And First Floor 136 Southwark Street London
Flat 37 18 Great Suffolk Street London
Railway Arch 12 Chancel Street London
Fourth To Seventh Floors 230 Blackfriars Road London
231 Blackfriars Road London Southwark
Flat 6 1 Treveris Street London
Units 1 And 2 1 Treveris Street London
241 Blackfriars Road London Southwark
Flat 15 Quadrant House 15 Burrell Street
Fourth Floor 136 Southwark Street London
Flat 5 Holmwood Buildings 97 Southwark Street
Flat 16 Quadrant House 15 Burrell Street
Flat 1 Edward Edwards House Nicholson Street
Flat 78 18 Great Suffolk Street London
Flat 27 18 Great Suffolk Street London
Flat 10 Quadrant House 15 Burrell Street
7 Hoptons Gardens Hopton Street London
1 Hoptons Gardens Hopton Street London
5-7 Bear Lane London Southwark
Flat 8 Edward Edwards House Nicholson Street
Flat 32 Quadrant House 15 Burrell Street
Flat 28 Quadrant House 15 Burrell Street
Flat 20 Quadrant House 15 Burrell Street
142 Southwark Street London Southwark
Flat 2 Holmwood Buildings 97 Southwark Street
Second Floor 118 Southwark Street London
Flat 8 Holmwood Buildings 97A Southwark Street
Flat 6 Holmwood Buildings 97 Southwark Street
Ground Floor To Third Floor 230 Blackfriars Road London
124 Southwark Street London Southwark
Ground Floor Centre 128 Southwark Street London
Flat 67 18 Great Suffolk Street London
Flat 22 5B Bear Lane London
Flat 75 18 Great Suffolk Street London
Excluding Third Floor And Fourth Floor 5-13 Great Suffolk Street London
Railway Arch 1 Invicta Plaza London
Flat 2 45 Dolben Street London
21 Hoptons Gardens Hopton Street London
115 Southwark Street London Southwark
Flat 29 Quadrant House 15 Burrell Street
Flat 2 Quadrant House 15 Burrell Street
Flat 80A 18 Great Suffolk Street London

240 Blackfriars Road London Southwark
Railway Arch 7 Chancel Street London
Flat 23 5B Bear Lane London
Flat 62 18 Great Suffolk Street London
Flat 48 18 Great Suffolk Street London
18A Great Suffolk Street London Southwark
Apartment 10 235 Blackfriars Road London
Apartment 8 235 Blackfriars Road London
Flat 5, 5B Bear Lane 5B Bear Lane London
Flat 22 5B Bear Lane London
87 Glengall Rd London NW2 7SX
Flat 3 - 31 Dolben Street London Se1 0uq
112 High Street Chatteris PE16 6NN
33 Almond Grove Hempstead Kent
Flat 21 5B Bear Lane London
Flat 4 31 Dolben Street London
Flat11 5B Bear Lane London
Flat 2 5B Bear Lane London
18 Great Suffolk Street London SE10UG
7 Evangelist Road London NW5 1UA
FLAT 4, 5B BEAR LANE LONDON
Flat 21 5B Bear Lane London
112 High Street CHATTERIS CAMBRIDGESHIRE
FLAT 5, 5B BEAR LANE LONDON
FLAT 19, 5B BEAR LANE LONDON
Flat 11 Albany 38-40 Alexandra Grove London
9, Birchington Road Crouch End N8 8HR
Flat 36 18 Great Suffolk Street London SE10UG
16 Myatt Avenue Stone ST15 0FP
Flat 11 5B Bear Lane London
Flat 2 31 Dolben Street London
29 Dolben Street London SE10 9JL
Flat 13, 5B Bear Lane London
FLAT 9 5B BEAR LANE LONDON
Flat 20 5B Bear Lane London Se10uh
48 Carlton Road London E175RE
Flat 17- 5B Bear Lane London SE1 0UH
Flat 2 5B Bear Lane London Se10uh
FLAT 18, 5B BEAR LANE LONDON
FLAT 21, 5B, BEAR LANE BEAR LANE LONDON
Flat 2 31 Dolben Street London
31 Dolben Street Flat 3 London
Flat 29 Belgrave Heights 26 Belgrave Road London
Flat 4 31 Dolben Street, London
FLAT 8 5B BEAR LANE LONDON
3-31 Dolben Street London Se1 0uq
Flat 26 18 Great Suffolk Street London
18 Great Suffolk Street London SE10UG
Flat 75 18 Great Suffolk St Southwark
177 Waller Road London SE14 5LX
Flat 25 5B Bear Lane London
Flat 21 5B Bear Lane London
16 Heysham Lawn Liverpool L275RQ
44 Roundhill Crescent Brighton BN23FR
9 Birchington Rd Crouch End London
46, 18 Great Suffolk Street London SE10UG
111 Southwark Street London SE1 0JF
18 Great Suffolk Street London SE10UG
Flat 75 18 Great Suffolk St London
Flat 36 18 Great Suffolk Street London SE1 0UG
Flat 46, 18 Great Suffolk Street London SE1 0UG
Flat 19,5B,Bear Lane 5B Bear Lane London
Flat 17 Quadrant House 15 Burrell Street London
Flat 6 5B Bear Lane London Se1 0uh
Flat 33 18 Great Suffolk Street London
Flat 21 5B Bear Lane London
Flat 29 18 Great Suffolk St Southwark
Flat 25 5B Bear Lane London
Flat 22 5B Bear Lane London
1 Harpes Road Harpes Road Oxford
26 Goodenough Road London SW19 3QW
Flat 44, 18 Great Suffolk Street London London
Flat 6 5B Bear Lane London Se1 0uh
Flat 20 5B Bear Lane London
48 Carlton Road London
126 Crystal Palace Rd London SE22 9ER
18 Great Suffolk St, Flat 50 London SE1 0UG
40 Dover Park Drive Putney London
Flat 4,5B,Bear Lane 5B Bear Lane

London
16 Windmill Row London LONDON
Flat 21,5B,Bear Lane 5B Bear Lane London
Flat 17,5B,Bear Lane 5B Bear Lane London
Flat 25 5B Bear Lane London
Flat 25 Lion Court London Se1 2ep
Flat 2 5B Bear Lane London Se1 0uh
20 Roupell Street London SE1 8SP
9 Stock Orchard St, London London LONDON
Flat 6 5B Bear Lane London
7A Stockwell Green London SW9 9JF
31 Dolben Street Flat 3 London
Flat 58, 18 Great Suffolk Street London SE1 0UG
Flat 16,5B,Bear Lane 5B Bear Lane London
18 Great Suffolk Street Southwark SE1 0UG
7 Copperfield Street London SE1 0EP
Flat 13, 5B Bear Lane London SE1 0UH
Flat 26 18 Great Suffolk Street London
8 Broadwall London SE1 9QE
103 Cheyne Walk London
Flat 6 5B Bear Lane London Se1 0uh
145 Bermondsey St London SE1 3UW
18 Great Suffolk St London SE1 0UG
Eta Projects LTD 5C-5D Bear Lane London
Flat 17- 5B Bear Lane London Se1 0uh
Flat 3 - 31 Dolben Street London SE1 0UQ
318 Upper Elmers End Road Beckenham BR3 3HF
8 Mossington Gardens Southwark London
Flat 25 5B Bear Lane London
Flat 2 31 Dolben Street London
Flat 75 18 Great Suffolk St Southwark
192 Applegarth House London SE1 0PZ
Flat 21 5B Bear Lane London
55 Cobourg Road London SE5 0HU
18 Great Suffolk Street London SE1 0UG
16 Heysham Lawn Liverpool L27 5RQ
12 Brinton Walk London
F3618 Great Suffolk Street London SE10UG
Flat 18,5B,Bear Lane 5B Bear Lane London
147 Chudleigh Road London
31 Bear Lane London SE1 0UH
Flat 59, 18 Great Suffolk Street London SE1 0UG
FLAT 21, 5B BEAR LANE LONDON
170 London SW19 6HG
Flat 17-5B Bear Lane London SE10UH
31 Dolben St London Se10uq
Flat A 447 Archway Road London

Re-consultation:

None

APPENDIX 5

Consultation responses received

Internal services

LBS Archaeology
LBS Community Infrastructure Levy Team
LBS Design & Conservation Team [Formal]
LBS Ecology
LBS Environmental Protection
LBS Highways Development & Management
LBS Transport Policy
LBS Urban Forester
LBS Design & Conservation Team [Formal]
LBS Archaeology
LBS Community Infrastructure Levy Team
LBS Ecology
LBS Environmental Protection
LBS Highways Development & Management
LBS Transport Policy
LBS Urban Forester
LBS Archaeology
LBS Community Infrastructure Levy Team
LBS Design & Conservation Team [Formal]
LBS Ecology
LBS Environmental Protection
LBS Transport Policy
LBS Urban Forester
formal consultation and response to Pol

Statutory and non-statutory organisations

Environment Agency
Historic England
Metropolitan Police Service (Designing O
Thames Water
Transport for London
Environment Agency
Network Rail
Metropolitan Police Service (Designing O
Thames Water
Historic England
Metropolitan Police Service (Designing O

Neighbour and local groups consulted:

FLAT 8 5B BEAR LANE LONDON
17 Hopton's Gardens Hopton Street London
11 Hoptons Gardens, Hopton Street, London SE19JJ
17 Hopton's Gardens Hopton Street London
16 Clare Hill Esher London
17 Hoptons Gardens Hopton Street London
13 Hopton's Gardens Hopton Street London
111 Southwark Street London SE1 0JF
B1402 Neo Bankside 60 Holland Street London
Via Email
16 Friars Close Bear Lane London
111 Southwark Street Southwark London
18 Great Suffolk Street Flat 46 London
17 Hoptons Gardens Hopton Street London
APARTMENT 48, ROSLER BUILDING 85 EWER STREET LONDON
18 Friars Close Bear Lane London
1 Burrell Street London Southwark
9 Friars Close Bear Lane London
23 Friars Close Bear Lane London
25 Friars Close Bear Lane London
Flat 3 31 Dolben Street London
111 Southwark Street London London