

Item No. 6.1	Classification: OPEN	Date: 11 October 2011	Meeting Name: PLANNING COMMITTEE
Report title:	Development Management planning application: Application 11-AP-1955 for: Full Planning Permission Address: SEA CONTAINERS HOUSE, UPPER GROUND, LONDON SE1 9PD Proposal: Erection of a new nine storey building in the rear parking/servicing area (maximum height AOD 42.895m) to provide retail at ground and offices above; refurbishment of existing Sea Containers House and change of use of floors 5-14 of the rear wing plus three floors of the main building from offices to a 358 bedroom hotel, including the erection of new roof extension at part 12th floor level to provide a bar ancillary to the hotel use. Extension and conversion of the ground floor area to provide new restaurant (Class A3), cafe (Class A3), service (Class A2) and retail uses (Class A1) together with new service bay, landscaping, new access arrangements and associated car and cycle parking.		
Ward(s) or groups affected:	Cathedrals		
From:	HEAD OF DEVELOPMENT MANAGEMENT		
Application Start Date 28/06/2011		Application Expiry Date 27/09/2011	

RECOMMENDATION

- 1 i) That planning permission be granted subject to conditions and the applicant first entering into an appropriate legal agreement by no later than 17th November 2011 and subject to referral to the Greater London Authority.

ii) In the event that the legal agreement is not entered into by 17th November 2011, the Head of Planning be authorised to refuse planning permission for the reasons set out in paragraph 158 of the report.

BACKGROUND INFORMATION

Site location and description

- 2 Sea Containers house is a 15 storey building, with two basement floors, in use for office purposes, though much of the building is currently vacant. The building is T shaped with a 120m long uninterrupted frontage along the Thames Path with the south wing extending perpendicular to the river, cantilevered over Upper Ground.
- 3 The building was originally designed as a hotel and construction started for this purpose. Construction was halted in the 1970's when the investors went into receivership; Sea Containers Ltd bought the site in the 1980's and obtained planning permissions for a change of use of the building to office use. An open area used for parking also forms part of the site, and together with the basement parking provision, there are 127 car parking spaces on the site. The site is not located in a conservation area but it adjoins the Old Barge House Alley Conservation Area immediately to the west, which contains the unlisted Oxo Wharf. The terms on the current leases expire in December 2011.

- 4 The site is located in an area of high public transport accessibility. The new entrance to the Blackfriars Thameslink station is 100m away and Southwark, Blackfriars and Waterloo stations are within a 10 minute walk. In addition, there are many bus services in the locality.

Details of proposal

- 5 The application seeks to retain and refurbish the existing Sea Containers House building together with a series of additions and alterations comprising of the following:

- 6 Erection of a new nine storey building

This building would be erected in the rear parking/servicing area and would face onto Upper Ground. The building would provide retail and office floorspace at ground floor level and offices above. This new building would be connected to the existing building at ground floor level. A small external terrace would be provided at 8th floor level.

- 7 Change of use of floors 5-14 of the rear [south] wing of the existing building and third to fifth floors of the main building from offices to a 358 bedroom hotel

It is proposed to convert these floors of the existing building to a hotel. Ancillary services connected to the hotel use are also proposed, including a gymnasium at basement level.

- 8 Extension and conversion to the ground floor of the existing building

The ground floor is proposed to be extended and altered to allow for the provision of a range of new uses. These include a new restaurant and a cafe, with proposals for outdoor seating on the River Walk. The extension at this level would also provide a hotel entrance, accessed from Upper Ground. The central projecting bay overhanging the river walk would also be removed.

- 9 Erection of a roof extension to the existing building at 12th floor level

This extension would be erected over the eastern part of the main building and would provide a new bar which would be ancillary to the hotel use. An external terrace area is also proposed on the roof around the perimeter of the extension.

- 10 Improvements to public realm

It is proposed to make a number of alterations to the building to improve the public realm around the building. These include the removal of the western staircase, eastern and western pepper pot and railings along the River Walk. This would provide a new "western route" for pedestrians linking Upper Ground and Hatfields with the River Walk.

- 11 Servicing and access arrangements

A new service area would be provided within the ground floor of the new building, which would serve the entire building. A series of new entrances into the site are also proposed, including the provision of new ramped and stair access from Upper Ground. Two taxi lay bys are also shown on the plans, together with two grade level disabled parking bays. A total of 29 basement car parking spaces would be retained, which includes three disabled spaces. The vehicular access at the eastern end of the site on Upper Ground would be retained as existing.

- 12 Revised plans

In order to respond to a number of issues and concerns raised on the original submission, from officers, neighbours and the Greater London Authority, a series of revisions were made to the scheme. In summary, these changes comprise of the following:

- revised positioning of taxi lay-bys on Upper Ground;
- increase in the height of all entrance doors to 3.2m;
- insertion of a window in the solid wall between hotel entrance and main office entrance;
- reduction in the extent of louvres on the east elevation;
- revised arrangement of tables and chairs on the River Walk;
- further opening up of the western route through the revised alignment of the new office building;
- increase in the pavement width to the River Walk elevation through the setback of glazing to the ground floor restaurant;
- further set back of the top storey of the new office building;
- incorporation of a brown roof on the roof of the office building; and
- conversion of all of the basement parking spaces from general needs spaces to disabled.

Relevant planning history

- 13 As referred to above in paragraph 3, planning permission was granted for the existing building in 1970. The building was originally designed as a hotel, but when funding was withdrawn, the hotel was never completed and the building was left as an unfitted cellular concrete shell structure. The site was acquired by Sea Containers Ltd in the early 1980's and they obtained permission for a change of use of the rear [south] wing into offices. They later obtained permission for the conversion of the remainder of the building for offices, and the works were completed in 1986.
- 14 11-AP-1338: An application for a Screening Opinion was made relating to the refurbishment of Sea Containers House, change of use of the south wing from offices to a hotel with new roof top bar and creation of new retail and restaurant uses at ground floor level. Erection of a new ground plus eight storey building in the south-western corner to provide office floorspace. The Council confirmed, in a letter dated 11th May 2011 that the although the site area would exceed 0.5ha. the nature, scale and location of the development is not such that it would be likely to give rise to environmental effects of more than local significance, and therefore an EIA would not be required.

Planning history of adjoining sites

- 15 Members will recall that a resolution was made to grant planning permission for the Kings Reach scheme at Planning Committee in July 2011. This scheme would provide a mixed use development providing residential, retail space, a pool and gymnasium and a new pedestrian route linking Stamford Street with Upper Ground.
- 16 In addition, many of the surrounding sites have been granted planning permission for substantial developments:
- 1 Blackfriars Road; a hotel, retail and residential development of 52 storeys plus basement levels (granted by the Secretary of State on 26/03/2009);
 - 20 Blackfriars Road; an office, retail and residential development at part 42 storeys, part 23 storeys (granted by the Secretary of State on 26/03/2009);
 - 231-241 Blackfriars Road; an office development of 20 storeys (granted 15/6/2011);
 - Wedge House, 32-40 Blackfriars Road; an office development of 11 storeys (granted 11/01/08). Note that the renewal application is also on this agenda.
 - 6 Paris Gardens, 20-21 Hatfields; a mixed use development comprising of a ballet school and student accommodation in a part 9, part 13 storey building (granted 11/02/2009).
- 17 In 1989, planning permission was granted at Stamford Wharf, Barge House Street

(now known as the Oxo Wharf development) for a mixed use development comprising residential, retail, food and drink retail, workshops, employment training area, museum/gallery space, ancillary accommodation, together with basement parking and refuse vehicle turning area. Only part of this permission was implemented [the northern residential/retail part for the conversion of Oxo Tower]. An extension to the south of this building, to accommodate a training facility was never built; the plans show that this building to be five storeys high, and would be positioned on the boundary of the site adjacent to Sea Containers House. A later permission was granted in 1993 for the variation of conditions attached to the 1989 permission. The relevance of this permission is discussed further at paragraph 52 of the report.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

- 18 The main issues to be considered in respect of this application are:
- i) principle of the proposed development in terms of land use, including loss of office floorspace;
 - ii) design issues, including site layout, impact on pedestrian movement, acceptability of a tall building and impact on local and strategic views;
 - iii) impact on the amenities of occupiers of adjoining properties;
 - iv) traffic issues, including level of car parking;
 - v) flood risk;
 - vi) sustainable development implications;
 - vii) planning obligations.

19 Planning policy

The site lies within the Borough and Bankside District Town Centre, the Central Activities Zone, the Air Quality Management Area, the Thames Policy Area, the Strategic Cultural Area, the Archaeological Priority Zone and the Bankside, Borough and London Bridge Opportunity Area. The site is adjacent to the River Thames Site of Importance for Nature Conservation and Old Barge House Conservation Area, which contains the Oxo Tower, and has a Public Transport Accessibility Level of 6.

Core Strategy 2011

- 20 Strategic Targets Policy 1 - Achieving growth
Strategic Targets Policy 2 - Improving places
Strategic Policy 1 - Sustainable development
Strategic Policy 2 - Sustainable transport
Strategic Policy 3 - Shopping, leisure and entertainment
Strategic Policy 10 - Jobs and businesses
Strategic Policy 11 - Open spaces and wildlife
Strategic Policy 12 - Design and conservation
Strategic Policy 13 - High environmental standards
Strategic Policy 14 - Implementation and Delivery

21 Southwark Plan 2007 (July) - saved policies

- Policy 1.1 Access to employment opportunities
Policy 1.4 Employment sites outside the Preferred Office Locations and Preferred Industrial Locations
Policy 1.5 Small business units
Policy 1.7 Development within town and local centres
Policy 1.8 Location of developments for retail and other town centre uses
Policy 1.12 Hotels and other visitor accommodation
Policy 2.5 Planning obligations
Policy 3.1 Environmental effects
Policy 3.2 Protection of amenity

Policy 3.3 Sustainability assessment
 Policy 3.4 Energy efficiency
 Policy 3.6 Air quality
 Policy 3.7 Waste reduction
 Policy 3.9 Water
 Policy 3.11 Efficient use of land
 Policy 3.12 Quality in design
 Policy 3.13 Urban design
 Policy 3.14 Designing out crime
 Policy 3.18 Setting of listed buildings, conservation areas and world heritage sites
 Policy 3.19 Archaeology
 Policy 3.20 Tall buildings
 Policy 3.28 Biodiversity
 Policy 5.1 Locating developments
 Policy 5.2 Transport impacts
 Policy 5.3 Walking and cycling
 Policy 5.6 Car parking
 Policy 5.7 Parking standards for disabled people and the mobility impaired

London Plan 2011

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Policy 2.9 Inner London
 Policy 2.10 Central Activities Zone – strategic priorities
 Policy 2.11 Central Activities Zone – strategic functions
 Policy 2.12 Central Activities Zone – predominantly local activities
 Policy 2.13 Opportunity Areas and Intensification Areas
 Policy 2.15 Town Centres
 Policy 3.1 Ensuring equal life chances for all
 Policy 4.1 Developing London’s economy
 Policy 4.2 Offices
 Policy 4.3 Mixed use development and offices
 Policy 4.7 Retail and town centre development
 Policy 4.8 Supporting a successful and diverse retail sector
 Policy 4.12 Improving opportunities for all
 Policy 5.1 Climate change mitigation
 Policy 5.2 Minimising carbon dioxide emissions
 Policy 5.3 Sustainable design and construction
 Policy 5.4 Retrofitting
 Policy 5.5 Decentralised energy networks
 Policy 5.6 Decentralised energy in development proposals
 Policy 5.7 Renewable energy
 Policy 5.9 Overheating and cooling
 Policy 5.10 Urban greening
 Policy 5.11 Green roofs and development site environs
 Policy 5.12 Flood risk management
 Policy 5.13 Sustainable drainage
 Policy 5.15 Water use and supplies
 Policy 5.18 Construction, excavation and demolition waste
 Policy 5.21 Contaminated land
 Policy 6.1 Strategic approach (Transport)
 Policy 6.2 Providing public transport capacity and safeguarding land for transport
 Policy 6.3 Assessing transport capacity
 Policy 6.5 Funding Crossrail and other strategically important transport infrastructure
 Policy 6.9 Cycling
 Policy 6.10 Walking
 Policy 6.11 Smoothing traffic flow and tackling congestion
 Policy 6.12 Road network capacity
 Policy 6.13 Parking

Policy 7.1 Building London's neighbourhoods and communities
 Policy 7.2 An inclusive environment
 Policy 7.3 Secured by design
 Policy 7.4 Local character
 Policy 7.5 Public realm
 Policy 7.6 Architecture
 Policy 7.7 Location and design of tall and large buildings
 Policy 7.8 Heritage assets and archaeology
 Policy 7.11 London View Management Framework
 Policy 7.12 Implementing the London View Management Framework
 Policy 7.14 Improving air quality
 Policy 7.15 Reducing noise and enhancing soundscapes
 Policy 7.18 Protecting local natural space and addressing local deficiency
 Policy 7.19 Biodiversity and access to nature
 Policy 7.21 Trees and woodlands
 Policy 8.2 Planning obligations
 Policy 8.3 Community infrastructure levy

- Planning Policy Guidance (PPG) and Planning Policy Statements (PPS)
 23 PPS 1: Delivering Sustainable Development (February 2005)
 PPS 4: Planning for Sustainable Economic Growth (December 2009)
 PPS 5: Planning for the Historic Environment (March 2010)
 PPG 13: Transport (March 2001)
 PPS 22: Renewable Energy
 PPS 23: Planning and Pollution Control
 PPG 24: Planning and Noise
 PPS 25: Development and Flood Risk
 The Community Infrastructure Levy Regulations 2010
 Circular 05/05: Planning Obligations
- Relevant Statements/SPD's/SPG's
 24 Ministerial Statement, Planning for Growth, 23 March 2010
 Section 106 Planning Obligations SPD (July 2007)
 Design and Access Statements SPD (September 2007)
 Sustainable Transport Planning SPD (September 2008)
 Sustainable Design and Construction SPD (February 2009)
 Sustainability Assessment SPD (February 2009)
 Draft London Bridge, Borough and Bankside SPD (February 2010)
 Revised London View Management Framework 2010 (SPD to the London Plan)
 Draft London View Management Framework July 2011 (SPD to the London Plan)
 Use of planning obligations in the funding of Crossrail (2010) (SPG to the London Plan)
 Draft National Planning Policy Framework (July 2011)
- 25 **Principle of development**
 PPS1 advises that developments should be promoted in locations that allow for the creation of linkages between different uses and which thereby create more vibrant places. PPS1 also promotes the efficient use of land. PPS4 seeks sustainable economic growth to reduce the need to travel and respond to climate change. PPS4 also states that economic growth including retail and hotel uses should be focussed in existing town centres.
- 26 In addition, the draft National Planning Policy Framework (NPPF) was published at the end of July 2011 for consultation until 17 October 2011. The Government has set out its commitment to a planning system that does everything it can do to support sustainable economic growth. Local planning authorities are expected to plan positively for new development. All plans should be based on the presumption

in favour of sustainable development and contain clear policies that will guide how the presumption will be applied locally.

- 27 Presumption in favour of sustainable development is a new policy designed to ensure that the planning system as a whole focuses on opportunities. The presumption, in practice, means that significant weight should be placed on the need to support economic growth through the planning system and local planning authorities should plan positively for new development and approve all individual proposals wherever possible. Furthermore, Local Plans should meet development needs, approvals should be promptly given and, where plans are silent, out of date or unclear on relevant policy, approval should be granted. But development should not be allowed if it would undermine the key principles for sustainability in the Framework. The draft NPPF makes clear that the policies should apply 'unless the adverse impacts of allowing development would significantly and demonstrably outweigh the benefits'.
- 28 The NPPF builds upon the Government's 'Plan for Growth' which was published in March 2011. The overall theme of this document is to support long term sustainable economic growth and job creation in the UK. This is set out as a clear and current Government objective (and accordingly should attract significant weight). Consistent with that objective, the application proposal should ensure the effective and most efficient use of land and buildings, and they will also promote the vitality and viability of the town centre and will promote prosperity. In relation to the vitality and viability of the town centre, the draft NPPF requires planning policies to be positive and promote competitive town centre environments. This includes recognising town centres as the heart of the community, defining a network of centres and setting policies to be clear on which uses will be permitted.

Loss of offices and provision of retail uses

- 29 The site lies within the London South East Sub-Region, the Central Activities Zone (CAZ), the London Bridge and Bankside Opportunity Area, the Borough and Bankside District Town Centre and the Strategic Cultural Area. In these locations the London Plan, Saved Southwark Plan policies and Core Strategy seek to provide for high quality developments which will increase employment and also to support the provision of new retail space. London Plan Policy 2.11 Central Activities Zone - Strategic Priorities states that development proposals should increase office floorspace within the CAZ. This is because the CAZ is recognised as the country's most important strategic office location and needs to ensure adequate capacity to meet future demand. Policy 4.7 of the London Plan advises that retail, commercial and leisure development should be focused on sites within town centres.
- 30 Strategic Policy 10 - Jobs and businesses of the Core Strategy seeks to protect office floorspace in the Central Activities Zone and the Strategic Cultural Area and specifically supports the provision of 25,000sqm - 30,000sqm of additional business floorspace to help meet demand for office floorspace. Saved policy 1.4 Employment sites outside the preferred office locations and preferred industrial locations also applies; this policy would allow for retail and other town centre uses to replace B1 uses, provided that the site is located within a town or local centre.
- 31 The site is also referred to as an opportunity site in the Borough, Bankside and London Bridge draft SPD requiring an increase in Class B floorspace, with additional floorspace required to be an appropriate mix of office (Class B), retail (Class A1), leisure, entertainment and cultural (Class D) uses with active uses at lower levels. The SPD also advises that residential uses could also be provided.
- 32 The proposed change of use to a hotel would involve the loss of office accommodation currently located on floors 5-14 of the rear [south] wing of the

existing building plus four floors of the main building.

Table showing existing and proposed land uses (Net Internal Area)

Use	Existing	Proposed	Difference
Offices	36,898sqm	27,873sqm	-9,025sqm
Hotel	0sqm	16,817sqm	+16,817sqm
Class A retail uses	0sqm	1,176sqm	+1,176sqm
Total	36,898sqm	45,866sqm	+8,968sqm

- 34 The scheme proposes the net loss of 9,025sqm of office accommodation, on account of the change of use of much of the existing building to a hotel and only the partial replacement of offices in the new building. The incorporation of retail and other town centre uses would however, off set part of this loss in accordance with saved policy 1.4. However, the loss of 7,849sqm net remains and is therefore contrary to Saved Policy 1.4 and will not address, moreover will undermine growth in office space expected under Strategic Policy 10 of the Core Strategy. The (Saved) Southwark Plan does not consider hotels to be a town centre use, and therefore it is necessary to consider whether other factors exist which should outweigh the normal presumptions of Saved Policy 1.4. Issues in relation to the building being designed for hotel use, the difficulties achieving grade A office space within the retained structure, the levels of vacancy and the limits on the size and height of the new building which restrict full re-provision all need to be considered. The loss of office accommodation is disappointing, as both the Core Strategy and the London Plan specifically seek an increase in the provision of office accommodation in this part of the borough. This is because additional office floorspace is required in order to help meet central London's need, and as the site is located in at the northern part of the borough which has close links to the City.
- 35 In order to justify the loss, the applicant has argued that as the building was not built for office purposes, it has inherent design constraints which prevent the provision of high quality office floorspace. It has become very difficult to let and is increasingly viewed as undesirable for continued occupation by existing tenants. The building is only partially let and all leases expire in December 2011. The building was designed for hotel purposes, and in order to upgrade the floorspace, internal adaption would be required to its current cellular layout. Structurally, there remains scope to upgrade the majority of the space in the east and west wings; this would provide more desirable office floorspace than currently exists, ensuring its viability in the long term.
- 36 The structural limitations of the south wing, however, do not provide the same opportunity for successful refurbishment to high quality [grade A] office space. The need to retain the existing structural fin walls means that it would only appeal to a very limited range of users. Significant structural intervention would be required to enable the cutting back of these fin walls. The floor to ceiling heights are also very low.
- 37 As outlined above, both the Core Strategy and the London Plan seeks to protect office floorspace. Saved Policy 1.4 of the Southwark Plan does allow for exceptions to this general presumption, and advises that retail and other town centres would be acceptable in lieu of offices. There is some debate as to whether hotels could legitimately be considered as a town centre use. Saved Southwark Plan policies have sought to distinguish hotels from other town centre uses. On the other hand, PPS4 (published just over a year ago) does define them as a town centre use. The existing building would be re-used, and the current cellular format would allow it to be readily adapted to hotel accommodation. So whilst the Saved Southwark Plan does not include hotels as a town centre use for the purpose of replacing lost office floorspace under Policy 1.4, the current layout of the building, together with the

designer's original intentions for it, would make it suitable for such a use. This would also be a benefit in terms of sustainability, and the existing building layout is considered to be a special circumstance which would support the change of use. The use of three floors of the frontage building would give the hotel the benefit of river views, which would help to attract a high grade hotel user, and would be in accordance with the originally designed use. Further, the existing building provides compromised office floorspace. On balance, it is considered that there are site specific material issues which could outweigh the normal provisions of Saved Policy 1.4 and Strategic Policy 10. Notwithstanding this, the provision of a hotel needs to be considered against further policy tests; these are set out below.

- 38 In recognition of the loss of office space, the applicant has offered an additional contribution towards employment and training over and above the section 106 toolkits normal requirement. This would enable additional training to be provided for workers in the hospitality and retail sectors. The additional contribution offered (£77,000) would allow for a series of different training programmes to be provided in the form of apprenticeships, internships and work placements, and this would be a benefit for those seeking to enter or progress a career in the hotel or hospitality industries.

Provision of retail uses

- 39 The provision of the ground floor Class A uses within the scheme, including a restaurant is supported and would be in line with policy aspirations to focus retail uses in town centres. These uses would help meet the needs of local residents, as well as visitors and businesses and would contribute towards the vitality and viability of the south bank. This aspect of the scheme represents a welcome improvement compared with the existing building which does not provide an active or engaging frontage and would enliven the Thames Path. The concentration of visitor activity and services for visitors would also support the Strategic Cultural Area.

- 40 Correspondence received during the consultation process (from the Greater London Authority and the Coin Street Community Builders) have commented that the scheme would benefit from the introduction of active uses along western edge of the site, so as to increase the attractiveness of the new route. Officers also raised this issue with the applicant during pre-application discussions. The western end of the Sea Containers building comprises a solid concrete wall which provides fundamental stability to the structure, and it would not be physically possible to achieve openings here. This is a structural constraint with the existing building, which would not allow for an active frontage to be provided. The main entrance and foyer to the new office building is located in the south-western corner, which would bring in activity and passive surveillance to this corner. Details of a lighting design would also be required by condition, to ensure that the route would be welcoming and also to draw activity from the south of the site. So whilst the comments are noted, the incorporation of any active use along this boundary would be very difficult to achieve.

Provision of a hotel

- 41 Saved policy 1.12 of the Southwark Plan states that hotels will be encouraged in areas with high public transport accessibility, but that they will not be permitted where they would result in a loss of residential accommodation, or an over dominance of visitor accommodation in the locality. Strategic Policy 10 - Jobs and businesses of the Core Strategy advises that hotels would be allowed in town centres, strategic cultural areas and places with good accessibility to public transport, providing that there is no harm to local character. In addition, the draft Borough, Bankside and London Bridge SPD advises that suitable locations for hotels would be the northern end of Blackfriars Road.

- 42 Policy 4.5 London's Visitor Infrastructure of the London Plan states that the Mayor seeks to achieve 40,000 net additional hotel bedrooms by 2031 in town centres and opportunity areas, where there is good access to central London and international and national transport termini.
- 43 The site is in a town centre and within the Strategic Cultural Area designation. It has a high public transport accessibility level (which is 6b on scale where 1 represents low accessibility and 6b represents the highest accessibility) and is within walking distance of Southwark, Blackfriars and Waterloo and London Bridge stations. Several bus routes serve Blackfriars Road and Stamford Street. The new Blackfriars Station will also provide a direct route to Gatwick Airport. The location therefore does meet the requirement for high public transport accessibility.
- 44 Notwithstanding that a hotel on this site may be appropriately located, the requirement for the proposal to not result in an over dominance of visitor accommodation needs to be considered. There are a number of existing hotels and consented hotels in the development pipeline which are located within close proximity to the application site in the wider Bankside area. An over-concentration of hotels can detract from the vitality of an area, reduce the opportunity for a range of other services to be provided, and can increase the transient population in an area, which does not help towards creating a stable and engaged community as well as potentially being detrimental to the character and functioning of an area.
- 45 The Bankside area has seen a strong growth in hotels and, whilst this growth helps meet a demand, it is important that this is balanced against the aim of fostering a stable community, and providing space for offices and other important facilities.
- 46 In the wider area there are a number of existing hotels including the Mad Hatter Hotel on Stamford Street (30 rooms), Southwark Rose Hotel (84 rooms) and Novotel London City South (182 rooms) on Southwark Bridge Road and a Travelodge (202 rooms) on Union Street. Two hotels also exist on Southwark Street; the Holiday Inn Express (88 rooms) and the Mercure (144 rooms). Planning permission was also granted in November 2009 for two hotels incorporating 477 rooms at 46-49 Blackfriars Road, and this is now under construction. A luxury hotel (261 rooms) has been agreed as part of the 1 Blackfriars development but this development has not commenced.
- 47 The GLA's Hotel Demand Study (2006) indicates that approximately 2,500 additional hotel rooms will be needed in the borough over the period 2007 to 2026. Given the number of new hotels built, and those that have consent, it is likely that this target can be reached.
- 48 However, the site is considered to be well suited for hotel use given its excellent accessibility to public transport and close proximity to a number of major tourist attractions. Given that the wider area is still very mixed no concerns are raised in terms of over dominance of visitor accommodation. The proposal is therefore considered to comply with the requirements of saved policy 1.12.
- 49 As referred to above, the site falls within the CAZ, a Strategic Cultural Area and a designated town centre, where Core Strategy policy considers hotels to be appropriately located. Regard has also given to the layout of the building having been built to a hotel design. The Employment and Enterprise Background Paper states that there are 58 visitor attractions in Southwark with the main destinations in the Bankside and London Bridge area; hence it would be reasonable to expect to see hotel accommodation provided in these areas. The number of hotel developments, both built and in the development pipeline, have increased significantly in the last decade and these are concentrated in the north part of the

borough. Whilst there are a number of hotels in the locality, the surrounding land uses are very mixed and include offices, residential and retail. On this basis it is considered that the proposal would not significantly harm the character of the area, and indeed the mix of other uses provided in the scheme would increase the range of services offered in the locality. It is considered that the location is suitable for hotel development, and would meet policy requirements in relation to hotels.

- 50 The GLA have advised that at least 10% of the rooms would need to be wheelchair accessible. A condition has therefore been attached requiring these details to be provided, together with a detailed access management plan.

Conclusion on land uses

- 51 The loss of office accommodation is on balance considered acceptable. Sea Containers House was originally built to provide hotel accommodation and the level of adaption required to achieve grade A office space, plus the limits on the size of the new office building are material factors which have influenced the acceptability of the change of use. The location of the site makes it ideal for hotel use, and criteria in relation to high public transport accessibility and town centre location are met. The hotel could not be considered to harm the character of the area as it would remain very mixed, with a wide range of uses. Whilst the loss of office space is contrary to Saved Southwark Plan Policy 1.4, and Core Strategy Policy 10, there are sufficient site specific circumstances which justify non compliance in this case.

The Oxo tower redevelopment

- 52 In 1989, planning permission was granted for a mixed use development on the adjacent Oxo Wharf site, for residential, retail, food and drink retail, workshops, employment training area, museum/gallery space, together with basement parking and refuse vehicle turning area. The plans indicate that this permission was only implemented in part, and that a second phase consisting of a five storey element, to be positioned along the boundary of the site adjacent to Sea Containers House was never built. This building was to provide exhibition space at ground floor level, with shops, an auditorium and training accommodation on the upper floors.
- 53 It is therefore appropriate to consider what impact this second phase would have on the proposed Sea Containers development, and also what realistic chance there is of it being implemented. As the permission itself was implemented to deliver the first phase of the redevelopment, the permission is effectively kept alive, and could be legitimately implemented at any point in the future.
- 54 The development was approved over 20 years ago, and whilst there has been some basement works that have been carried out to implement this second phase, it seems unlikely to progress any further. Both this second phase and the proposed development at Sea Containers house could co-exist together, but given the proximity of the new build elements, could create an overbearing environment for pedestrians on the “the western route” between the two developments. This would be emphasised by the flank elevation of the Oxo Wharf second phase which is blank at ground floor level and would contain no windows or active frontage. This route would be 7.4m wide at its closest point and 15m at its widest point. However none of the uses within the buildings themselves are considered to be particularly sensitive, and any impacts on internal daylighting or outlook would not be significant.
- 55 The Sea Containers development has sought to open up this western route through the removal of the western staircase, the western pepper-pot and the current gated access. Further, it has made a further revision during the course of the application to set part of the ground floor building line back to allow for a slightly more generous route to be provided. Whilst the land that forms part of this western route would be

within the applicant's ownership, the public would have the right of access over it. It should be noted that the Sea Containers development would make a significant contribution to the opening up of this route, whereas the Oxo Phase two development would not by virtue of it being positioned hard against its site boundary. The applicant has made attempts to discuss the removal of the current boundary wall that exists at the rear of the Oxo Wharf to allow for a significant area of public realm to be provided, but owing to the existence of the second implementable phase of the Oxo Wharf scheme, it is accepted that the chances of this wall being removed are slim.

- 56 The scheme that is the subject of this application, plus the second phase of the Oxo Wharf scheme could both co-exist together. It would still allow for a western route to be provided which would be properly landscaped with good quality materials (granite) and would be subject to details of an external lighting scheme being agreed. The Coin Street Community Builders, who own the Oxo Tower site, have undertaken some works to implement the second phase of the 1989 permission but it seems unlikely to proceed in its current form. However, having taken that permission into account, there are no legitimate reasons to refuse to grant planning permission for the Sea Containers House development.

Environmental impact assessment

- 57 The applicant submitted a screening opinion on 26th April 2011 (11-AP-1338) to determine whether an Environmental Impact Assessment would be required for the development. The development is not considered to constitute EIA development, based on a review of the scheme against both the EIA Regulations 1999 and the European Commission guidance. In summary, the proposed development would not be likely to have significant effects upon the environment by virtue of factors such as its nature, size or location of more than local significance, and therefore an EIA would not be required.

Impact on amenities of adjoining occupiers and surrounding area

- 58 Saved Policy 3.2 relates to the protection of amenity and states that permission would not be granted where a loss of amenity to present occupiers would be caused.

Daylight/Sunlight

- 59 A daylight and sunlight report has been submitted with the application. The report assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
- 60 The BRE sets out three detailed daylight tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted. 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 about 20% of their original value before the loss is noticeable.
- 61 The second method is the No Sky Line (NSL) or Daylight Distribution 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 20% in the area of sky visibility, daylight may be affected.
- 62 Another method of calculation is the Average Daylight Factor (ADF) which is a more detailed assessment and considers the amount of sky visibility on the vertical face of a window, but also the window size, room size and room use. The

recommendations for ADF in dwellings are 2% for kitchens, 1.5% for living rooms and 1% for bedrooms.

- 63 In relation to sunlight, the test is to calculate the annual probable sunlight hours (APSH) taking into account the amount of sun available in both the summer and winter for each given window which faces within 90 degrees of due south. The assessment requires that a window should receive a quarter of annual probable sunlight hours in the summer and at least 5% of sunlight hours during the winter months.
- 64 The daylight and sunlight impacts on the following adjoining residential properties has been considered in the submitted daylight report.
- 1-87 River Court
 - 1-99 Rennie Court
 - Kings Reach Tower (future residential use)
 - Enterprise House, 1-2 Hatfields
 - Oxo Wharf

1-87 River Court

- 65 In many cases, the results show that there would be an improvement in daylighting to this block, owing to the removal of the eastern pepper pot. However, the results show that three windows would experience reductions in VSC ranging 28% to 100%. These windows are located at fourth and sixth floor levels. The reduction has been caused by a situation where there is an overhanging balcony which limits the amount of natural light falling at the window face. The existing VSC levels to these flats are already low, with values ranging from 0.02% to 1.12%, and therefore any change would produce a disproportionate reduction.

- 66 In relation to NSL, all of the rooms apart from four meet the BRE guidelines. The four rooms which experience alterations are again all under overhanging elements restricting the view of the sky at the working plane. These rooms already receive low levels of existing light and therefore it is unlikely that any occupant within any of these rooms would notice an alteration with the proposed scheme in place.

- 67 The sunlight analysis indicates that all windows would be unaffected by the proposed development, and therefore would be fully BRE compliant. The daylight and sunlight impacts to River Court are therefore considered acceptable.

1-99 Rennie Court

The VSC and NSL methods indicate that all of the windows would be fully BRE compliant if the development were to be built. There would therefore be no impacts to this block in relation to daylight.

- 69 In relation to sunlight, the reductions are very minor and would result in small percentage losses ranging from 1-2%. Only five windows would be affected (those on the west flank elevation) and these windows already do not meet the BRE target for having 25% of annual probable sunlight hours in the summer months. The losses are therefore considered minor and are not considered to be harmful.

Kings Reach Tower

The VSC results indicate that a number of windows on the 11th-14th floor of the Kings Reach tower would experience reductions in VSC. All of these windows would light habitable windows of residential flats if the Kings Reach scheme were to be built out. The reductions in VSC would range from 23% to 66%, which exceed the 20% loss recommended by the BRE guide. However, there are multiple windows that light each room, ranging from four to eight windows. Therefore, whilst each of the individual windows would experience losses, the overall room would still

continue to receive very good levels of natural daylight. Further the ADF results show that the target values are comfortably met and significantly exceed the BRE's guidelines, with ADF values for these rooms ranging from 3.95% to 8.29%. These values exceed the requirements for bedrooms (1%), living rooms (1.5%) and kitchens (2%).

71 There would be no impacts to any of the aforementioned windows in relation to sunlight as the results do not show any change from the existing situation (as they are orientated north).

72 Enterprise House, 1-2 Hatfields

The submitted report queries whether the upper floors of this property are in residential use, but has nonetheless sought to consider what the impacts upon daylight and sunlight would be. The results indicate that the property would be in full compliance with the BRE criteria, and therefore would not be impacted by the scheme. It should be noted that the property is not registered as paying council tax, and on this basis should be treated as comprising wholly non-residential uses.

73 Oxo Wharf

This building lies to the west of the site and includes both commercial and residential uses. In relation to the residential units which are located on floors three and above, the results indicate full compliance with the VSC and NSL tests, and therefore these windows should not experience any noticeable reductions to their daylight.

74 A number of commercial occupiers within the Oxo have objected to the scheme on grounds that the scheme would result in a loss of daylight. However, commercial units do not have the same expectations of natural light, and there are no targets set by the BRE in relation to these types of units. Further, the building would be located in such a manner that it would not have a direct interface the commercial occupiers, and the windows are orientated to face south, with very little obstruction in terms of buildings or structures.

75 In terms of sunlight, all windows would continue to experience good levels of sunlight, because the windows are orientated south.

76 The impacts of the scheme in relation to daylight and sunlight are therefore considered acceptable.

Overlooking/outlook

77 The impacts of the scheme in relation to overlooking and outlook need to be considered in relation to River Court, Rennie Court, Oxo Wharf and Kings Reach. In relation to River Court, the new building is at some distance from the flats, and they would not be affected by the new building. The roof extension has been set back from the eastern edge of the building by 12m, so similarly it is not considered that any harmful impacts would arise. The eastern pepper pot would be removed, which would be beneficial for the closest facing flats. Details of the screening to the hotel bar terrace will be required by condition.

78 Rennie Court is located to the south-east of the site. There are a number of windows on the west elevation of this block which would have views over the application site, and the new building would be visible from these windows if it were to be built out. The opportunities for overlooking would be very limited, and given the indirect viewing angle to the new build element, it is considered that any harm in terms of loss of outlook would be very difficult to demonstrate. The impacts upon Rennie Court residents are therefore considered acceptable.

- 79 A number of consultation responses have commented that the erection of the new office building would form a dense form of development and that it would be overbearing to Upper Ground and to the Oxo tower. The new building has been set back from the pavement edge of Upper Ground by a minimum of 6.6m. This would allow for a generous pavement width to be provided, together with opportunities for tree planting. It has also been set away from the western site boundary, to allow for areas of public realm (“the western route”) to be provided at the base of the building.
- 80 The new building has been designed in such a height and mass that it is not considered to give rise to any oppressive impacts that would warrant the application to be considered unacceptable.
- 81 The future use of Kings Reach tower would see residential flats being introduced in the tower, at levels 11 and above. Given the height of the new building (nine storeys), it would not interfere with the future use of the tower for residential purposes. No areas of overlooking would be created, and no harm in terms of sense of enclosure or otherwise would arise.

Overshadowing

- 82 The BRE guide considers that sunlight availability should be checked for open spaces including amenity sitting out areas and gardens. It advises that for those spaces to appear adequately sunlit throughout the year, no more than two-fifths and preferably no more than a quarter of any garden or amenity area should be prevented by buildings from receiving any sun at all on 21st March. If, as a result of a new development, an amenity area cannot meet these guidelines, a loss of 20% would be allowed before it could be considered noticeable.
- 83 The following areas have been tested in the report.
- The Oxo Tower amenity area;
 - The public parks located west of Broadwall; and
 - The public River Walk
- 84
- The Oxo Tower amenity area
- This area is located to the west of the site. It would not experience any substantial differences in shadow as a result of the development. There would be some small areas of shadow to the eastern half of the amenity area between 0800 and 0900 hours but this would pass quickly and within the hour. The second phase of the Oxo Wharf scheme if built would be sited on this area, and therefore if built, the scheme would not produce any overshadowing.
- 85
- The public parks located west of Broadwall Road
- Given the distance between the site and the public parks, there would only be a very small area of shadow cast on these parks. This shadow would fall in early morning, and would leave by mid morning.
- 86
- The public River Walk
- Throughout the year, the shadows cast as existing and as proposed are practically identical and would not change the existing areas of shadow.
- 87 In conclusion, no significant issues would arise in relation to overshadowing.

Noise

- 88 The proposal would result in a more intensive of use on the site with the potential for vehicular and pedestrian movement to and from the site on a 24 hour basis given the hotel use. In addition, new retail uses are proposed, including a restaurant at ground floor level of the building. The objections have commented that these movements would increase the noise levels in the area and raise concern about the

impact upon the amenities of the area. The site is located in a central London environment and is on the south bank of Thames. Whilst the nature and usage of the site would be more intensively used, including at late night hours, it is not considered that this would be unreasonable. The site is located in a town centre, where such activities are supported and some level of noise expected. However, in order to protect residential amenities, hours of opening for the retail and restaurant uses and hours for deliveries can be strictly controlled by condition which should help to mitigate unacceptable levels of noise (not beyond 2330 hours Mondays to Saturdays, and 2300 hours on Sundays and Bank Holidays). Given the proximity of the roof top terrace bar to River Court residents, it is recommended that a 2200 closing time would be appropriate for the terrace. A condition is also attached to ensure that guests that are not staying at the hotel are not permitted to use the hotel bar or hotel restaurant beyond 2330 hours Monday to Saturday and 2300 hours on Sundays and Bank Holidays. Noise from taxi pick up/drop off to the hotel, including noise from hotel guests returning should not be so substantial that planning permission should be refused.

- 89 There is no current proposal to close the new western route at night, and it is considered that the level of usage and consequent disturbance would not be so great as to warrant its closure during these hours. It is noted that both the Thames Path and Upper Ground are permanently open. Concern has also been expressed from the noise that would be caused from the setting up and removal of tables and chairs that are proposed to spill out from the restaurant use, however, similarly this would not be so significant to nearby residents. It is noted that there are already a small number of tables and chairs to the rear of the Oxo building. It is however recommended that the hours of use for this outdoor seating be controlled so that neighbours do not suffer from any undue noise and disturbance from their use.

Air Quality

- 90 Policy 3.6 of the Southwark Plan states that permission will not be granted for a development that would lead to a reduction in air quality. The site falls within an Air Quality Management Area (AQMA) due to high levels of nitrogen dioxide concentrations attributable to road traffic emissions. Accordingly, an Air Quality Assessment has been submitted which assesses the impact of the scheme in terms of its effect on local air conditions and neighbouring residential amenity. The council's Environmental Protection Team have advised that the new boiler plant and flue could result in a loss of amenity in respect of the air quality of the adjacent residential properties at River Court. They have therefore advised that either the plant flue height needs to be increased or that a different boiler is selected. It is therefore recommended that a condition be attached requiring revised details to be submitted, by way of an addendum to the submitted report.

Wind Assessment

- 91 A microclimate assessment has been submitted as part of the application, which focuses on the wind microclimate during the windiest season [winter]. The assessment has considered the impacts of wind on the Thames Path, Barge House Street/West elevation, Upper Ground, Marigold Alley/East elevation, the building entrances and on the terrace amenity spaces.
- 92 The report concludes that the exposure of the site to wind is typical for an urban location in London on the banks of the Thames and that the wind microclimate at the site is expected to be generally suitable for a range of pedestrian activities including sitting, standing and leisure walking throughout the year. The two terrace areas at level 8 of the new building at level 12 of Sea Containers House have been designed to provide mitigation from the wind as boundary screening has been proposed; these include 1.5m high solid screening around the 8th floor terrace and 1.8m solid screening at 12th floor level.

- 93 The report has also considered the cumulative impact once the neighbouring development at Kings Reach has been built, and advises that the expected wind microclimate at the site would be largely unchanged. The impacts of the scheme in relation to wind microclimate are therefore acceptable.

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

- 94 The immediate surrounding area is predominantly in office use although the wider surrounding area contains a mix of uses including commercial, residential and hotel uses. In this context it is unlikely that any existing use in the locality would be detrimental to the amenities of future users of the proposed development.

Traffic issues

- 95 Saved Policy 5.1 of the Southwark Plan requires major development to be located near transport nodes. Saved Policy 5.2 advises that permission will be granted for development unless there is an adverse impact on the transport network or if there inadequate provision is made for servicing. Saved Policy 5.3 seeks to ensure that provision is made for pedestrians and cyclists within the development and Saved Policies 5.6 and 5.7 concern car parking. Core Strategy Strategic Policy 2 - Sustainable transport reaffirms the commitment to encouraging walking, cycling and use of public transport rather than travel by car.

Access and servicing arrangements

- 96 As existing, the basement parking is accessed via a ramp from the surface level car park at the western end of the site, with exit from the basement via that ramp or via another ramp at the eastern end. The proposal is to take the western ramp out of use and for the eastern ramp to be used both for entry and exit, under signal control since it would be too narrow for two-way traffic. Priority would be given to entering vehicles to avoid queuing on Upper Ground. A service yard would be created within the new office at the western end of the site, with the entry displaced a little from the current location on the junction of Upper Ground with Hatfields to improve operation and safety. Most of the servicing and waste collection would take place from that service bay, with some servicing by smaller vehicles (due to height restrictions) from within the basement. The servicing aspects of the development are therefore considered acceptable, and would not result in any highway disruption.

- 97 Pedestrian routes around the site will be improved by a) the removal of the "pepperpots" at either end of the river frontage, thus improving the width of these narrow points on the Thames Path; and b) creation of a new route between Sea Containers House and the OXO tower. The applicant intends to use some space on private land within both these areas for tables and chairs: to reduce the risk that these would unacceptably narrow the spaces created it is recommended that their location is controlled by condition.

The Coin Street Community Builders have requested that a condition be attached requiring the River Walk remain open to the public throughout the works. It is considered that such a condition would not be appropriate, particularly as the applicant intends to repave the River Walk. However, the construction management strategy [to be requested by condition], should specifically set out the details of when it would need to be closed, and set out steps to ensure that any disruption would be minimised.

Car parking

- 98 Total car parking spaces will reduce from 127 to 28, and so there would be a reduction in the traffic impact.
- 99 Of those 28 remaining parking spaces, 21 spaces (the maximum possible due to

physical constraints in the basement) would meet the standards for wheelchair-accessible parking and would be marked for use by disabled persons. Through the Travel Plan these spaces would be made available and offered freely to disabled workers in the office, hotel and A-class uses and also to visitors to the office and hotel. The remaining seven parking spaces in the basement, and any unused disabled parking spaces there, would be available for "operational" parking. While the draft Bankside, Borough and London Bridge SPD expects developments to be "car-free", this significant reduction in the provision of spaces in an existing building is to be welcomed. The use of all these parking spaces would be monitored and reported through the Travel Plan. It is proposed that two spaces are created on Upper Ground, by narrowing the footway, to accommodate disabled visitors to the A-class uses.

- 100 The details provided with the application advise that the parking spaces would have electric charging points. This measure is encouraged and it is recommended that these electric charging points are required by condition.
- 101 It is recommended that future occupiers of the building be excluded from eligibility for parking permits through the legal agreement.

Coach parking

- 102 Under normal circumstances a hotel would be expected to include provision for coach set-down and pick-up. Since the site is within a coach ban area it is not appropriate to make such provision. The applicant has accepted that the hotel would not be suitable for coach parties, and would therefore have to decline any requests for coach parties. The nearest coach parking bays are at some distance from the site, and therefore would not be appropriate or convenient for hotel guests.

Cycle parking

- 103 Given the highly accessible location, it is expected that cycle parking be provided in excess of the minimum standards given the highly cycle-able environment and increasing popularity of cycle commuting. Cycle parking for 176 workers is to be provided within the basement. The type of rack currently proposed (two-tier) is not acceptable since they require a degree of lifting of the bike, and there is some concern that it will not be possible to provide sufficient spaces. The applicant was asked to consider an alternative solution, and whilst no revised solution has been put forward, the applicant has acknowledged that negotiations should continue to find an alternative solution. It is therefore recommended that the standard cycle parking condition be slightly revised, to make it clear that the current storage facility could not be accepted. Shower and locker facilities are shown, which is welcomed, as is a commitment to maintain a convenient route through the basement between the cycle store and the entrances to the retail, hotel and offices. The plans show space for 30 cycles on the south side of Upper Ground for use by visitors. Details of these cycle parking facilities should be required by condition. It is also intended that a Cycle Hire Docking Station would also be provided. The provision of this facility is welcomed and would serve hotel guests, visitors to the retail uses and business trips by office workers. TfL have requested that a sum of £195,000 is required to deliver the Cycle Hire Docking Station. The applicant has offered a reduced sum of £132,000 for the delivery for a smaller quantum of cycles. Transport for London have confirmed that this reduced amount would be acceptable.

Taxi set down and pick up

- 104 Space would also be provided for two taxis to set-down or pick-up passengers (on Upper Ground). This provision is welcomed, and should adequately serve the development. The site is well served by public transport including tube, rail stations and buses. A cycle hire scheme would also be provided. It is therefore considered that the two taxi-bays would be acceptable, and that no further bays would be

required given the high public transport accessibility. An amendment was received during the course of construction which shifted these bays slightly to the west to allow for an improved pavement width to be provided.

Travel Plan

- 105 A robust draft Travel Plan has been submitted to support the application with the aim of reducing the transport impact by encouraging the use of sustainable modes. It is recommended that the submission of a final version, and subsequent implementation, is secured by either condition or through the legal agreement. The travel plan should include provision to publicise and facilitate access in relation to the use of the cycle hire scheme and also should identify how coach parties to the hotel could be accommodated. A sum of £3,000 would also be required for the monitoring of the travel plan.

Construction Management Plan

- 106 Many of the objection letters have commented that the construction activity would give rise to an unacceptable level of noise and disruption during construction. These issues are strictly not material planning objections. However, it is recommended that a construction management plan be requested by condition and that it should set out hours that the works would take place, and include any required mitigation. The plan should also set out the process for dealing with any complaints that are received and also state that they would be promptly investigated and remedial action taken.

- 107 Further comments made during the consultation process have raised concern over possible impact to the RV1 bus service, which runs along Upper Ground. However, no bus stop closures or diversions are planned and therefore the bus service would continue to operate as existing.

- 108 The plan should also consider the comments made by the Port of London Authority and the Commercial Boat Operators Association in relation to the role that the River Thames could play in terms of transporting goods and services and materials by water.

Blackfriars Road Improvement Scheme

- 109 In partnership with Transport for London, a scheme is being developed to enhance Blackfriars Road. This is aimed at improving the overall quality of the environment along Blackfriars Road including the junction re-design at Blackfriars Road/Southwark Street, pedestrian and cycling improvements, tree planting and materials. Transport for London have indicated that they would expect the development make a contribution towards this scheme, and the applicant has therefore offered a sum of £63,000. Transport for London have advised that this amount would be acceptable.

Design issues

- 110 London Plan Policy 7.4 Local Character advises that development should have regard to the form, function and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. Policy 7.5 Public Realm states that London's public spaces should be secure, accessible, easy to understand and maintain, and incorporate the highest quality landscaping, planting, furniture and surfaces. Policy 7.6 Architecture states that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context. Policy 7.12 Implementing the London View Management Framework requires that new development should not harm and where possible should make a positive contribution to the characteristics and composition of the strategic views and their landmark elements.

- 111 Saved policy 3.12 of the Southwark Plan asserts that developments “should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit.” Saved policy 3.13 calls for design that embodies the principles of good urban design and creates an environment that relates to its context and results in places that people like to visit and enjoy.
- 112 The scheme is made up of a number of component parts including:
- Re-landscaping of the whole site, including formation of new western route;
 - Remodel the ground floor perimeter to the site with new retail frontages, and entrances to the proposed hotel and office accommodation
 - Refurbish and re-clad the existing Sea Containers House to provide high quality office floor space and a hotel;
 - A new 12th floor roof extension on eastern wing of the existing building; and
 - A new 9-storey office building in the south west corner of the site.

Re-landscape the whole site including planting to the public realm

- 113 The proposed development seeks to improve the public spaces on the ground floor and includes new retail uses and improved entrance arrangements for the offices and newly created hotel. In this way it seeks to bring much-needed animation to the Upper Ground frontages and re-address its prominent river frontage. This re-design of the public space around the building includes the significant remodelling of edges of the existing building and improvements to the public realm including the removal of the ‘pepper-pots’ at either end of the river frontage, the removal of the gate and railings on the Thames Path and the removal of western stair tower all of which currently severely restrict the public footway in those locations. The experience of the pedestrian on the Thames Path would be greatly enhanced by the widening of the footway and the creation of new active uses on the ground floor, which would include the hotel restaurant on the west and the new lobby to the offices on the east.
- 114 The removal of the stair tower at the western end of the existing building offers a significantly improved public route to the Thames Path from Upper Ground at the northern end of Hatfields. Added to this, this newly opened public thoroughfare has the potential to connect up with the recently consented scheme for Kings Reach to the south and greatly improve north-south connections in the wider area. The design of the new building enhances this north-south route by setting well back from the boundary with the Oxo Tower site and establishing views through to the river beyond. The public realm in this location is generous, well defined and would be animated by the proposed restaurant at the ground floor of the existing building and the lobby to the new office building.
- 115 The public experience of Upper Ground would be enhanced not just by the improved materials on footway but the complete remodelling of the entrances and new activation and renewed emphasis on the Upper Ground frontage which will be achieved, moving from east to west, by the new lobby to the refurbished offices, the prominent new entrance lobby to the hotel and the entrance lobby to the new office building. This remodelling of the edge of Upper Ground not only brings the existing building closer to Upper Ground but also addresses the unusual spaces created by the southern wing of the existing building which spans over the street in this location. The new hotel lobby encloses in the large column, brings activity onto the underpass and gives the hotel the prominence it needs. The public realm on Upper Ground is compromised by the structure of the existing building including its basement which introduces a significant change in level from the streets and requires stepped and ramped entrances to both the hotel and the office lobbies. Whilst this change in levels is more successful in the hotel, the new entrance to the offices would need to be carefully detailed with planting and materials to ensure that

the experience of all users is not compromised.

- 116 The quality of the improved public realm would cement its relationship with its context not just the opening up of the western route but also the smaller gestures like the creation of a square at the southern entrance to the hotel which has the potential to compliment the public space proposed at Kings Reach across the way and to improve the quality of public space on Upper Ground. The choice of materials and planting is important in this prominent location, and the choice of granite as the preferred material would compliment the newly activated perimeter of the block and deliver a much-improved public realm to this important site. It is important therefore that high quality materials are used for the whole site including the eastern edge on Marigold Alley. Further detail was also submitted in the course of the application to show the provision of ramps to Marigold Alley, to ensure that it would provide level access. The detailed landscape proposals including the choice of species, their maintenance, the materials and detailing of the hard landscape and the layout and accessibility of the perimeter should be reserved by condition.

Remodel the ground floor perimeter to the site

- 117 The scheme aims to fundamentally alter the relationship of this prominent building to the street. The existing building presents a number of challenges to its context including a narrow and uninviting presence on the river a deeply set-back stepped frontage onto Upper Ground and a large over-sailing structure over the roadway. The proposed development refocuses the building to the north and to the south.
- 118 Onto the river frontage to the north the scheme locates the active uses of the restaurant at the western end and offers a completely remodelled entrance to the refurbished offices at the eastern end of the building. This not only locates active uses on this important face but also introduces new entrances along the river's edge that allow users and occupiers passage through from the Thames Path to Upper Ground. The main approaches to the development would be from Upper Ground to the south where the new the entrances to the offices and the hotel have been designed as strong glass forms that positively address the street and give it a strong edge that compliment its generous proportions and sinuous form.
- 119 The two flanks of the existing building have always presented a challenge. These large featureless flanks serve a structural function and are difficult to activate. To the west the newly created connection between Upper Ground and the Thames Path is enhanced by the removal of the stair tower and the western 'pepper pot' which give this connection to the south a generous quality and improved visibility. On the other hand Marigold Alley the east remains much like it is at the moment. It would benefit from the improved public realm and the removal of the eastern stair tower.
- 120 The proposed development has been careful to limit its ambition to what can be delivered within the structural constraints of the existing building. At the same time the proposed changes fundamentally change the focus of the ground floor uses from the inward looking character of the existing building to the engaging and outward focussed uses of the development. This is not simply achieved simply through the re-cladding of the ground floor but the complete remodelling of the whole of the ground floor and the use of careful architectural expression both on Upper Ground and the Thames Path to remove inappropriate later additions and enhance the experience of the public at this important part of the river.

Refurbish and re-clad the existing Sea Containers House to provide high quality office floor space and a hotel

- 121 Sea Containers House has always been an iconic building with a larger-than-life presence onto the river. This proposal aims to remodel the existing building to capitalise on its prime location, providing uses that compliment its structural

limitations and greatly improve its appearance. The changes include the re-cladding of the northern face on the ground, first and second floors with full-height glazing to offer direct connection to the river from the refurbished office space. All the existing windows are to be replaced with high quality modern windows that would also improve the appearance of the building. Added to this the scheme proposes the removal of extraneous features like the 'pepper-pots' at either end of the building as well as the central golden garlands at the centre to bring the larger spaces at the middle of the building back into use. The proposal for a hotel for the middle floors of the building would not only offer fantastic views to the north but also give the hotel a much needed presence onto the river, which would significantly increase its marketability. On Upper Ground the scheme proposes the removal of the unfortunate features like the octagonal windows and the contorted entrance and instead creates generous and engaging entrances including the double-height lobby that stretches from Upper Ground to the river frontage. Further to the comment made by the GLA, the applicant is considering whether an internal hotel lift could be installed as a better option than the double switchback ramp.

- 122 The success of the remodelled building will rely on the detailing of the proposed features and the quality of the proposed materials. In particular the window framing and cladding system to be selected by the contractor as well as the finishes to features like ventilation grilles, handrails and parapets will contribute greatly to the quality of the design. The choice of a natural metal finish as opposed to a painted finish for example would affect the appearance of the proposed development and is a matter that should be reserved by condition.

The new 12th floor roof extension on eastern wing of the existing building

- 123 The roof extension and associated roof terrace adds a single storey to the east wing of the building at the 12th level. This addition balances the existing office accommodation on the same floor and introduces a degree of symmetry to the existing building form. It is light and glassy in character and set-back to the same line as the matching floor on the west wing and is therefore an appropriate and incidental addition to this prominent face. It is neither overbearing in character nor discordant in any way. This addition would reduce the scale of the prominent 'mansard-type' roof to the plant room of the existing building. The architectural quality and design of this building would rely on the sharpness of the detailing and the quality of the facing materials.

The new 9-storey office building in the south west corner of the site

- 124 This new 9-storey building is proposed to be constructed in the current car park of the existing building. This proposal, due to its relationship with the existing building and its proximity to the neighbouring Oxo Tower development and its location on the boundary of the Bargehouse Alley Conservation Area, has a number of sensitivities and challenges that it has to address. It is linked to the existing building by a lightweight glassy stair, which would replace the western stair tower that is proposed to be removed.
- 125 The proposed building has a sensitive relationship with the existing building, which it must compliment. The proposed building does enhances the existing building considerably. It is designed as a building in its own right but manages to accommodate the servicing and fire-escape requirements of the existing building to facilitate the removal of the western stair tower and the ramped service entrance to the basement. It occupies a prominent location at the corner of Hatfields and Upper Ground which it exploits with confidence by placing its entrance and addressing the corner in a three-dimensional manner. The proposed building is designed to give a panelled appearance in robust masonry echoing the existing building. In contrast, its panels have a vertical emphasis as opposed to the horizontal emphasis of the existing building.

- 126 The proposed building is located close to the boundary with the Oxo Tower development. The Oxo Tower development is a local landmark made up of a ten storey main body with its distinctive central tower which is a notable feature of the river prospects as set out in the Mayor's London View Management Framework. In this sensitive context the relationship of the proposed building to its historic neighbour and particularly its height, scale and massing as well as the choice of materials are important. At 9 storeys in height, the proposed building is shorter than the existing Sea Containers House but exceeds the 'shoulder' height of the Oxo development. The information submitted with the application demonstrates that the proposed building will be visible in the river prospect views particularly from the Hungerford Bridge and the northern embankment, however, the parts that would be visible are its upper two storeys which are lightweight and glassy in character and recessive by design. A particularly prominent feature of these views is the new linking staircase which, out of necessity, extends to the full height of Sea Containers House. Its success, together with that of the recessive upper storey will rely on their lightweight design and the transparency of their materials which are matters that can be reserved by condition.
- 127 A notable feature of the design of this building is the depth of the west elevation achieved by the two layers of the facade. To accommodate the environmental effect of western facade the building has been designed in two layers of almost 1m in depth, returning in masonry, to provide solar shading to this elevation. In contrast however, the south and west facade is proposed to be in a more flush panelled design. The flush-panelled appearance of the southern and eastern faces would appear very different to the western face and will be most noticeable on the south – west corner where the two different facade treatments meet. The contrast is concerning and simply emphasises the thinness of the south and east facades when compared to the substantial depth achieved on the west face and will detract from the unified appearance of the building. In the view of officers a depth of 400 to 450mm could better relate the east and south facade to the western elevation (rather than the 300mm depth indicated on the drawings) and would give these facades a depth and quality that approaches that of the western elevation particularly when viewed in the oblique from the street. In the absence of this depth on these two flanks, the architectural design runs the risk of appearing thin and lacking quality and should be reserved by condition to ensure that the constructed building retains the quality hinted at in the visualisations.

Saved policy 3.20 Tall Buildings

- 128 In terms of height the proposed new office building exceeds 25m in height. As such it is a tall building as defined by Policy 3.20 of the Southwark Plan and would need to comply with all the requirements of this policy. Saved policy 3.20 states that tall buildings should ensure that they:
- i. Make a positive contribution to the landscape; and
 - ii. Are located at a point of landmark significance; and
 - iii. Are of the highest architectural standard; and
 - iv. Relate well to its surroundings, particularly at street level; and
 - v. Contribute positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.
- 129 The existing sea Containers House exceeds 25m in height and as such is itself a tall building. Taking each of the criteria in turn:
- 130 i. The substantial improvements to the public realm noted above make a significant contribution to the public realm of the area. Added to this, the activation of the perimeter of Sea Containers House, the new western public thoroughfare and the new public space created at the southern side of the hotel lobby ensure that the new

office building is encircled by a generous and high quality public realm which includes landscaped elements. The details of the landscape and the choice of materials can be reserved by condition and present an opportunity to deliver substantial improvements to the area particularly when viewed in conjunction with the improvements that would be delivered by the recently consented scheme at Kings Reach. Indeed, these two schemes, their emphasis on permeability and the renewed north-south connections that they would deliver would make a positive contribution to the landscape and the streetscape.

- 131 ii. Technically, the location of the proposed new building does not comply with the definition of point of landmark significance to justify a tall building in this location. The Southwark Plan defines a 'point of landmark significance' as the confluence of important routes, where there is a concentration of activity or will be the focus of views from several directions. Whilst the proposed new building is not located at such a location its relationship with its context is significant. Towering over it is Kings Reach Tower and the substantial mass of Sea Containers House. It takes up an important location at the northern end of Hatfields and would come into view on the sinuous bend of Upper Ground. As such it would act as a point of orientation for pedestrians seeking connection to the Thames Path to the north. Its contribution as a point of orientation, coupled with its diminutive stature – relative to its more substantial neighbours, suggests that it is set at an appropriate height for this location albeit that it would be defined as a tall building.
- 132 iii and iv. The architectural quality of the new building is high. Its dramatic form, its varied and highly modulated facade and its elegant proportions give it an ordered and interesting appearance. Added to this the emphasis placed on the quality of the detailing would make this a fitting addition to this sensitive context. The material samples provided by the applicant raise concerns about the apparent quality of the finish to be achieved with this material. It is therefore considered that a condition should be attached requiring further details of the material to be used. Further, its contribution to the townscape particularly at street level is substantial. The rendered images of the building illustrate the building as proposed however they do not record the impact of the proposal in the local views. A Townscape Visual Impact Assessment would normally include the selected views 'as existing' and as proposed' as to demonstrate the proposed development on its context. However, on balance sufficient information has been provided to be satisfied that the building would make a positive contribution to the area.
- 133 v. The contribution of the development to the London skyline was illustrated in the Design and Access Statement submitted with this application. This includes a consideration of the views set out in the London View Management Framework (July 2010) in addition to the local views. From the information submitted with the application the impact of the new building in the river prospects from the west (Hungerford Bridge) would be a notable and acceptable addition to the backdrop of the Oxo Wharf Tower. Its takes its place in the group of taller buildings including Sea Containers House and Kings Reach, but has a more appropriate relationship in with the Oxo Tower in terms of its scale and the lightness and recessive design of its upper-most floor. The images demonstrate that the Oxo Tower (recognised as a landmark in its own right in the LVMF) retains its distinct identity and the proposed new building serves to temper the impact of the south wing of Sea Containers House which looms over the Oxo Tower development in some of the views.
- 134 In conclusion, the proposal is a fitting and confident addition to this part of Southwark and the river prospects. It mediates successfully between its more prominent neighbours and its historic context and, with the right safeguards, could deliver a high quality and appropriate design that would enhance the area.

Impact on character and setting of Old Barge House Conservation Area

- 135 Saved Policy 3.18 states that permission will not be granted for developments that would not preserve or enhance among other things: the setting of Conservation Areas; or views into or out of a Conservation Area. This is an important consideration of PPS5: Planning for the Historic Environment – and includes a consideration of the proposed scheme’s design, its scale bulk and height as well as its structure, arrangement and facing materials. The site lies adjacent to the Old Barge House Alley Conservation Area, which contains the locally listed Oxo Tower Wharf.
- 136 In developing this scheme designers need to take into account views into and out of the conservation area. In particular, views from the Southbank illustrate the presence of this scheme in the backdrop of this historic area. Policy 10.1 of PPS5 states that when considering applications for development that affect the setting of a heritage asset, *“local planning authorities should treat favourably applications that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset.”*
- 137 The Old Bargehouse Alley Conservation Area is centred on the Oxo Tower. It extends from the Thames Path to the north to Upper Ground in the south and into Lambeth to the west taking in Bernie Spain Gardens. Views within the conservation area are centred on the important local landmark of the Oxo Tower, which is notable in the river prospects and particularly prominent from the park to the west. In this case the extended and re-clad tower would be the most visible feature of this development, visible in these local views from the Thames Path and Bernie Spain Gardens to the west. The area is characterised by natural materials, brick with natural stone finish and these materials should be reflected in the proposed new building because of its prominence in the local views. The information submitted with the application proposes to use pre-cast reconstituted stone panels. The existing Sea Containers House is clad in pre-cast panels and has an uncomfortable relationship with this historic context. Rather than the reconstituted stone panels as shown on the drawings, the proposed building would be better suited to a stone or other high quality alternative reconstituted stone panelling system. It is therefore considered that the material to be used be reserved by condition, to allow further discussions to take place to find the most appropriate material for the building.
- 138 Accordingly, by preserving the best features of this iconic building and choosing cladding materials that will compliment those prevalent in the conservation area, the proposal enhances the setting of this important historic area and complies with this policy and national guidance.

Impact on trees

- 139 The proposals would result in the removal of 18 trees. The majority of these trees are very young lime trees, which are located towards the south of the site, facing Upper Ground. But four of these are semi-mature Gleditsia street trees which form part of an avenue along Upper Ground. These have a combined total of 194cm in girth.
- 140 In terms of tree replacements, three trees are proposed and the species selected are multi-stem Amelanchier. These are acceptable as are the mix of herbaceous and shrub planting shown on the plans.
- 141 In order to mitigate the loss of the other 15 trees, additional planting would have to be identified in addition to that already shown. These replacements would need to provide tree cover amounting to at least 194 cm in girth. Some indicative drawings have been provided which show the provision of new trees along Upper Ground. Full details of the additional planting can be satisfactorily requested by condition and

should ensure that there would be no loss of local tree cover. The impact upon trees is therefore considered acceptable, subject to replacement planting of suitable girth and species being requested by condition.

Archaeology

- 142 The applicant has submitted an archaeological desk-based assessment which adequately summarises the archaeological potential of the area. Recent evaluation work to the south of the site undertaken at King's Reach Tower has also provided a useful indication of the archaeological potential in this area.
- 143 The archaeological interest of the site, based upon the interpretation of the desk-based assessment are for archaeological remains from the prehistoric and post medieval periods. Material from the prehistoric period is likely to take the form of geo-archaeological evidence so sampling of this evidence should also be considered.
- 144 The desk-based assessment also details the most likely previous impacts upon the archaeological resource of the site.
- 145 It is recommended that a programme of archaeological evaluation is undertaken on site. Any site investigation or geotechnical works undertaken in advance of the evaluation should be monitored by an experienced archaeologist. Subject to the results of the archaeological evaluation further works may be necessary and it is likely that this would include geo-archaeological sampling and analysis. These works can all be required by condition.

Flood Risk

- 146 The site is located within Flood Zone 3a which is considered to be an area of high risk of flooding due to the proximity of the tidal River Thames. However the site is protected by the Thames Barrier and related defences. A flood risk assessment has been submitted with the application and the associated breach analysis demonstrates that the site would not flood in the event of a breach of the Thames tidal defences. The Environment Agency were consulted on the application and have advised that they have no objections to the proposed development on flood risk grounds, subject to the imposition of a condition requiring the scheme to be built in accordance with the submitted Flood Risk Assessment.
- 147 Consideration must be given to the sequential test, advocated in Planning Policy Statement 25 "Development and Flood Risk" which requires Local Planning Authorities to direct development towards lower flood risk zones and within development sites where the highest vulnerability uses should be located on parts of the site at lowest probability of flooding. A significant part of Southwark is within Flood Zone 3 and there are no sites at a lower risk of flooding for some distance. Whilst the application site is not designated for a mixed use development, the development of brownfield sites such as this is encouraged in order to maximise the efficient use of land with the provision of new office and hotel accommodation. The proposed scheme therefore meets the Planning Policy Statement 25 sequential test.
- 148 **Planning obligations (S.106 undertaking or agreement)**
Saved Policy 2.5 of the Southwark Plan and Policy 8.2 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. Saved Policy 2.5 of the Southwark Plan is reinforced by the Supplementary Planning Document (SPD) on Section 106 Planning Obligations, (which sets out in detail the type of development that qualifies for planning obligations), and Circular 05/05, which advises that every planning application will be judged on its own merits against relevant policy, guidance and other material considerations when assessing planning obligations. Strategic Policy

14 – Implementation and delivery of the emerging Core Strategy states that planning obligations will be sought to reduce or mitigate the impact of developments.

149 The Community Infrastructure Levy Regulations came into force on 6th April 2010. The regulations state under 122 – “Limitation on use of planning obligations” that it is unlawful for a planning obligation to be taken into account when determining a planning application for a development, or any part of a development, that is capable of being charged CIL if the obligation does not meet all of the following tests:

- 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.

150 The applicant has submitted a proposed Heads of Terms based on the Council’s Planning Obligations SPD. The following table sets out the contributions payable based on the Section 106 Planning Obligations SPD and what the applicant has proposed to offer. The contributions are set out based on the uplift in retail floorspace and the provision of a 358 bedroom hotel.

151	Topic area	S106 SPD	Applicant’s S106 offer
	Employment in the development	£84,547	£84,547
	Employment in the development: additional contribution to training	£0,00	£77,000
	Employment during construction	£267,330	In kind works through provision of work place co-ordinator to value of £267,330
	Employment during construction management fee	£20,609	£20,609
	Public open space	£64,614	£64,614
	Sports development	£27,545	£27,545
	Transport Strategic	£168,454	£168,454
	Transport Site Specific	£197,215	In kind works including to granite paving to River Walk plus maintenance programme to value of £197,215
	Transport for London	£0,00	£63,000 (for Blackfriars Road Improvement Scheme) £132,000 (for the Cycle docking station)
	Public Realm	£286,215	In kind works towards upgrading of Upper Ground including the junction at Hatfields/Upper Ground and Marigold Alley to the value of £286,215
	Archaeology	£10,199	£10,199
	Tourism	£0,00	£70,000
	Admin charge	£22,535	£14,359 (collected for cash)

		contributions only)
Total	£1,149,262	£732,327 + in kind works to the value of £750,760 (Total £1,483,087)

- 152 In addition to those listed above, the SPD also advises that for large developments which have wide ranging impacts, additional mitigation measures may also be sought. TfL also requests the safeguarding of land towards the installation, operation and maintenance of a Mayor's Cycle Hire docking station. The applicant has offered £132,000, which TfL have accepted. TfL have confirmed that a Crossrail payment is not generated, and have also advised that the contribution to Blackfriars Road would be acceptable.
- 153 An amendment to the Traffic Management Order would be required to exclude occupiers from obtaining parking permits. The amount sought is £2,750.
- 154 It should also be requested that the public realm works are completed before the development is occupied. A travel plan would also be required (for three years), together with terms to ensure travel plan monitoring, including the payment of the monitoring fee (£3,000). In addition, standard hotel clauses are required limiting hotel guests to no more than a 90 day occupation.
- 155 The applicant is proposing to make a number of improvements to the public realm as part of the application. These include repaving the river walk in high quality materials (granite), repaving of Marigold Alley also in high quality materials and improvements to Upper Ground. It is accepted that the developer could offset the normal public realm and site specific contributions against the cost of completing this work, provided that realistic cost estimates of the work are provided, which would need to be verified and checked. Any shortfalls would require a cash payment to be paid, or for the applicant to submit details of additional improvements. It is also required that the materials used are high quality. Commuted sum payments are required from the applicant in order to cover the cost of repair and maintenance since the majority of the materials used do not form part of the council's standard materials palette. Associated S.278 agreements may be required to enable this work to be undertaken by the developer.
- 156 As referred to in paragraph 38 of the report, additional contributions have been offered in recognition of the loss of office floorspace; this would provide for a range of training programmes for those seeking to progress careers in the hotel or hospitality industries. In addition, £70,000 has been offered towards tourism.
- 157 It is considered that the planning obligations sought meet the planning tests of Circular 05/05 and the CIL regulations. The contributions would be spent on employment and training, including job creation during construction and in the final development, improvements to open spaces and sports facilities given the increase in usage, improvements to increase the capacity of transport provision across the borough, improvements to the public realm and tourism and funds to secure archaeological monitoring.
- 158 In accordance with the recommendation, if the Section 106 Agreement is not signed by 17th November 2011, the Head of Development is authorised to refuse planning permission, if appropriate, for the reason below:
 'In the absence of a signed Section 106 Agreement, there is no mechanism in place to avoid or mitigate the impact of the proposed development on the public realm, public open space, sports facilities, the transport network and employment and the proposal would therefore be contrary to Saved Policy 2.5 'Planning Obligations' of the Southwark Plan and Policy 14 – 'Implementation and delivery' of the Southwark

Core Strategy, the Southwark Supplementary Planning Document 'Section 106 Planning Obligations' 2007, and Policy 8.2 Planning obligations of the London Plan 2011.

Sustainable development implications

- 159 Policy 5.2 of the London Plan Minimising Carbon Dioxide Emissions that requires development proposals should make the fullest contribution to minimising carbon dioxide and that they should provide an assessment of their energy demands and demonstrate how they have taken steps to apply the Mayor's energy hierarchy. Policy 5.7 Renewable Energy seeks to increase the proportion of energy generated from renewable sources. Saved Policy 3.4 of the Southwark Plan seeks energy efficient development. Core Strategy Strategic Policy 13 - High environmental standards applies a similar energy hierarchy to the London Plan and requires the highest possible environmental standards including requiring major developments to achieve a reduction in carbon dioxide emissions of 20% from low or zero carbon sources of energy, and achieving a BREEAM "excellent" standard. These policies are expanded upon in the Council's Sustainable Construction and Design SPD. An Energy Strategy and Sustainability Statement has been submitted as part of the application.
- 160 Energy Efficiency
A series of energy efficient measures are proposed for the development; these include energy efficient lighting, enhanced pipe-work and ductwork thermal insulation and measures to reduce the demand for water. However, the development does not achieve any carbon savings from energy efficiency along compared to a 2010 Building regulations compliant development and should use demand reduction measures such as strengthening the measures proposed for the new build elements. Further analysis is therefore being undertaken to assess the opportunities further to reduce emissions from energy efficiency alone.
- 161 District Heating
No existing heat networks have been identified within the vicinity of the development. There is the possibility that a network could be established following work commissioned through the South Bank Employers Group and the development would be designed to allow future connection.
- 162 Combined Heat and Power (CHP)
The proposed strategy will incorporate a 500kWe CHP plant on site. This would provide space heating and water heating to the development. The use of the CHP would allow for a 28% reduction in carbon savings.
- 163 Cooling
Cooling requirements on-site will be provided using a cooling network which would distribute cold water to the buildings on site. Such a heat network would be supplied using high efficiency electrical chillers.
- 164 Renewable energy technologies
A wide range of renewable energy technologies have been considered in the submitted energy report, and an analysis has been provided in relation to why each form of technology would/would not be suitable for incorporation into the development. Following this analysis, a series of photovoltaic panels are proposed to the roof of the development to provide renewable energy for the development. The total area that the panels would take up would amount to 130sqm. This would amount to a 0.55% reduction from renewable energy technologies. The reduction is a considerable way short of the 20% target in the Core Strategy. However, given that the proposal seeks to re-use and adapt existing buildings (which itself is a sustainable measure), it is considered that the opportunities for introducing greater

reductions from renewables are limited. The new London Plan (2011) recognises this approach, and focuses more on total carbon savings than on on-site renewables.

165 In summary, the estimated regulated carbon emissions of the development are 1,422 tonnes of carbon dioxide per year after the cumulative effect of energy efficiency measures, combined heat and power and renewable energy have been taken into account. This equates to a reduction of 556 tonnes per year in regulated emissions compared to a 2010 Building Regulations compliant development, equivalent to an overall saving of 28%.

166 BREEAM and Ecology

The applicant has submitted a sustainability statement and has committed to achieving a BREEAM “very good” overall rating for hotel and office refurbishment. The new office building however, would achieve an “excellent” rating. A range of sustainability measures are proposed, including sustainable construction practices. The applicant has agreed to install a bio-diverse roof on the roof of the new office building, and it is requested that details showing this provision be required by condition.

Other matters

167 Comments received during consultation have queried whether the drainage in the area would have adequate capacity to serve the development. Whilst not strictly a material planning concern, it is expected that there would be adequate infrastructure to serve the development. Further, it is not considered that the uses would increase pressure on emergency services – it should be noted that the London Fire and Emergency Planning Authority have not raised any concerns or objections on this issue.

Conclusion on planning issues

168 The proposal would result in the net loss of a substantial quantum of office floorspace, which on balance has been considered acceptable on the basis of material planning considerations which would outweigh the normal policy provisions to protect office floorspace. The location of the site makes it ideal for hotel use, and criteria in relation to high public transport accessibility and town centre location are met. The hotel could not be considered to harm the character of the area as it would remain very mixed, with a wide range of uses. The provision of Class A uses are welcomed and supported by policy.

169 The impacts of the second phase of the Oxo Wharf development have been considered and it is considered that both developments could satisfactorily co-exist together, and would not give rise to any unacceptable impacts. In addition, the creation of the western route would be a significant benefit to the public realm, and would provide permeability to the river walk.

170 In relation to the design, officers consider that the scheme has reached an acceptable standard, and are minded to recommend approval given the high quality of the design and the interest it will bring to the townscape. There are some outstanding relating to the detailed design and use of materials, but it is considered that the attachment of suitably worded conditions could address these concerns. Further, there would be no harm to the setting of the Old Barge House Conservation Area.

171 The impacts of the scheme in relation to daylight, sunlight and outlook are considered acceptable, and it is considered that no harmful impacts would arise.

172 The scheme would not be expected to cause any unacceptable impact to local

highway or transport conditions.

173 The proposal would be capable of generating significant economic benefits for the local and wider area, and would also seek to enhance pedestrian movement in the local area. The proposal would also make efficient use of land and re-use the existing building, which is a benefit in terms of sustainability.

175 In assessing and determining the application the council has applied the presumption in favour of sustainable development. The application would accord with sustainable principles and would positively promote a sustainable mixed use development and an effective use of land. It is located in an appropriate town centre site and within the Borough and Bankside town centre. It would therefore appear that the proposal would be consistent with the draft NPPF and the Planning for Growth statement. It is therefore recommended that permission be granted, subject to conditions as set out in the attached draft decision notice, completion of s S106 agreement on terms as set out above, and referral to the Greater London Authority.

Community impact statement

176 In line with the Council's Community Impact Statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process.

177 A statement of community involvement was submitted with the application. The document sets out the pre-application consultation that has taken place, which includes a 2,500 leaflet drop to local residents and businesses, 40 letters sent to community and political stakeholders, a website to provide information on the scheme, two public exhibitions (held at the application site), together with meetings held with Members, community groups and local employers organisations (including South Bank Employers' Group, Coin Street Community Builders, Waterloo Community Development Group). In addition, a series of press releases were sent to local media.

178 All comments made during this pre-application consultation process, negative and positive, were collated and considered by the applicant and responses to the feedback were developed, either as amendments to the design or an explanation as to why the comments were not carried forward into actions.

Consultations

179 Details of consultation and any re-consultation undertaken in respect of this application are set out in Appendix 1.

Consultation replies

180 Details of consultation responses received are set out in Appendix 2.

181 Summary of consultation responses

Responses received from occupiers of River Court, Rennie Court, Oxo Wharf and the Kings Reach Flats Management Limited objecting to the height of the new building and its canyoning effect. Further concerns were also raised in relation to impacts on daylight, noise, traffic and trees.

The Conservation Areas Advisory Group (CAAG) have raised concern over the loss of existing design features and have commented that the scheme is characterless and out of context.

The Coin Street Community Builders have raised concerns regarding the visual impact of the new office building and impact upon daylight. They have also raised

concerns about the adequacy of the taxi drop off/pick up facility and kitchen extraction.

Councillor Adele Morris welcomed the amendments that had been made to the scheme.

Human rights implications

182 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.

183 This application has the legitimate aim of providing a new office building together with various extensions and additions to the existing Sea Containers building including provision of a new hotel and restaurant. 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.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Strategic Director of Communities, Law & Governance

184 None.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/1227-22 Application file: 11-AP-1955 Southwark Local Development Framework and Development Plan Documents	Regeneration and Neighbourhoods Department 160 Tooley Street London SE1 2TZ	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5513 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Neighbour consultee map
Appendix 4	Images

AUDIT TRAIL

Lead Officer	Gary Rice, Head of Development Management	
Report Author	Kiran Chauhan, Development Management	
Version	Final	
Dated	1 September 2011	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Communities, Law & Governance	No	No
Strategic Director of Regeneration and Neighbourhoods	No	No
Strategic Director of Environment and Leisure	No	No
Date final report sent to Constitutional / Community Council / Scrutiny Team	30 September 2011	

Consultation undertaken

Site notice date: 11/07/2011

Press notice date: 07/07/2011

Case officer site visit date: Numerous over past six months, most recent on 7th June 2011

Neighbour consultation letters sent: 06/07/2011

Internal services consulted:

Archaeology Officer
Environmental Protection Team
Public Realm
Planning Policy
Transport Planning Team
Waste Management
Arboriculturalist
Ecology
Economic Development
Design Review Panel

Statutory and non-statutory organisations consulted:

Transport for London
Metropolitan Police
Environment Agency
London Fire & Emergency Planning
Thames Water
EDF Energy
Greater London Authority
London Borough of Westminster
London Borough of Lambeth
Arqiva Digital Telecommunications
BAA
English Heritage
Port of London Authority

Neighbours and local groups consulted:

Bankside Residents Forum
Southwark Cyclists
Southbank Employers Group
Coin Street Community Builders
Waterloo Community Development Group

Re-consultation: The revised plans submitted during the course of the information proposed a series of minor revisions only and therefore no reconsultation was necessary.

Consultation responses received

Internal services

Archaeology: Please refer to the report under "Archaeology".

Public Realm:

- The developer will need to enter into a s.278 agreement under the Highways Act for works on the public highway. In addition, if there is any private land to be adopted, a section 38 application would be required. The details and extent of the works should be secured by the s.106 agreement.
- A strategy needs to be established with Kings Reach in relation to the extent of improvements.
- All of Southwark's footways are to be Yorkstone, and no bollards should be provided.
- Safety concerns in respect of the provision of two disabled parking bays at the main entrance given conflicting interests (pedestrian crossing, contra-flow cycle lane and traffic on carriageway).
- Any cycle parking on the highway created in association with the developer shall need to be located in parking bays at the edge of the carriageway.
- New trees would need to meet new tree planting standards. Broadly these require pit openings to be designed to accommodate the mature roof plate and rooting medium volumes to be proportionate with the mature crown surface area.

Ecology: 10 bat bricks and 10 swift bricks should be conditioned to be installed in the new build. The developer should work with the London Swift group and the Bat conservation trust to determine the best locations.

Planning Policy: On balance the proposal is considered acceptable.

The refurbishment of part of the existing office space would be welcomed. The building was originally designed as a hotel and the policy allows conversion of office to appropriate town centre uses. The provision of the new office building goes some way to compensating for the loss of office space.

Policy 1.7 requires an appropriate mix of uses in town centres. While studies suggest that there is a greater need for office space in the town centre rather than hotel space, with 27,000sqm of office space, there would still be a significant amount of office space on the site.

Transport Group: Comment as follows.

While the development would increase the total floorspace, the change of use of much of it to hotel will lead to a reduction in the total trips expected. Total car parking spaces will reduce, and so there will be a significant reduction in the traffic impact.

Of those 28 remaining parking spaces, 21 (the maximum possible due to physical constraints in the basement) will meet the standards for wheelchair-accessible parking and will be marked for use by disabled persons. Through the Travel Plan it is intended that these spaces will be made available and offered freely to disabled workers in the office, hotel and A-class uses and to visitors to the office and hotel. The remaining seven parking spaces in the basement, and any unused disabled parking spaces there, will be available for "operational" parking.

It is proposed that two spaces are created on Upper Ground, by narrowing the very wide footway, to accommodate disabled visitors to the A-class uses. Space will also be created for two taxis to stop to set-down or pick-up passengers in the same area. It is recommended that future occupiers of the building be excluded from eligibility for parking permits in the normal manner.

The western ramp will be taken out of use and the eastern ramp used both for entry and exit, under signal control since it is too narrow for two-way traffic. Priority will be given to entering vehicles to avoid queuing on Upper Ground. A service yard will be created within the new office at the western end of the site, with the entry displaced a little from the current location on the junction of Upper Ground with Hatfields to improve operation and safety. Most of the servicing and waste collection will take place from that point, with some servicing by smaller vehicles (due to height restrictions) from within the basement.

The applicant intends to use some space on private land within both these areas for tables and chairs: to reduce the risk that these would unacceptably narrow the spaces created it is recommended that their location is controlled by condition.

Cycle parking for 176 workers is to be provided within the basement. The type of rack currently proposed is not acceptable, and there is some concern that it will not be possible to provide sufficient spaces. Shower and locker facilities are shown, which is welcomed, as is a commitment to maintain a convenient route through the basement between the cycle store and workplaces. Space for 30 cycles will be created on the south side of Upper Ground under the hotel element that spans the road, along with a Cycle Hire Docking Station for 25 cycles: both of these are welcomed.

A robust draft Travel Plan has been submitted to support the application with the aim of reducing the transport impact by encouraging the use of sustainable modes. It is recommended that the submission of a final version, and subsequent implementation, is secured by condition.

Design Review Panel: An earlier version of the scheme was presented to the Design Review Panel in January 2010. The following comments were provided.

- The Panel felt that the project had not gone far enough to make a meaningful contribution to the public realm, draw activity and make connections to the south. More needs to be done by the design team to examine the way people use and appreciate the site as part of experience of the Southbank, the connections to the other parts of the borough to the south of the site and the way that the Southbank is likely to change particularly with the new Blackfriars Station. Developments like the Oxo building and others have proved that restaurants on the river can be located on the upper floors, and not on the ground floor.
- The Panel felt that the ground floor plan was cluttered by too many uses and challenged the designers to introduce a generosity that would offer connections and permeability.

In relation to the new build element, the Panel felt that the extension failed to address the needs of the existing building. The presentation focused on problems posed by the existing building rather than the opportunities that it presented. They encouraged the designers to revisit the existing building, articulate their vision and use that vision to develop a comprehensive scheme that is better integrated to the site and its context.

Statutory and non-statutory organisations

English Heritage: Advise that the application shall be determined in accordance with national and local policy guidance, and on the basis of your own specialist advice.

Environment Agency: No objections to the proposed development on flood risk grounds, subject to the imposition of a condition requiring the scheme to be built in accordance with the submitted Flood Risk Assessment.

Greater London Authority: The main issues raised in the Stage 1 report are summarised as follows.

Principle of development:

- The Central Activities Zone is prioritised for office use, and therefore it is appropriate to consider whether the loss of offices undermines the strategic office location. The applicant therefore needs to evidence market conditions regarding the office release locally and marketing evidence regarding the demand for offices in this location.
- A structural survey is required to identify specific areas on plan to demonstrate that all opportunities to maximise office provision have been considered, in particular for the south wing, which is where the largest loss of offices.
- In principle, the provision of a hotel use is supported and will contribute to the target set by the Mayor. The retail and restaurant uses are also supported.

Urban design:

- The images provided from Gabriel's Wharf, Blackfriars Bridge, Hungerford Bridge, Victoria Embankment and Waterloo Bridge show that the proposal would not significantly impact on river prospect views.
- Visual impact analysis needs to be carried out to demonstrate the impact on the character and appearance of the relevant conservation areas and listed buildings – the information provided sets out a description of the impacts rather than images.
- As discussed at pre-application stage, the removal of the boundary wall that exists between the site and the Oxo Tower would allow for a new space to be created. Further, active uses along the west elevation would properly activate the space. Without these changes, the proposal fails to embrace the potential of the space.
- The removal of railings to widen the public walkway remains a positive introduction to the scheme, however a management strategy is required to ensure that the tables and chairs do not cause new obstructions, particularly to the western pinch point.
- The pedestrian route on the east side needs further refinement to manage out the need for a stepped access.
- An enclosed lift should be introduced to deal with the level change into the hotel from Upper Ground. Revolving doors should be removed given the conflict between general users with luggage and the need to provide separate disabled access doors.
- Further images should be provided showing the access arrangements to the offices from Upper Ground. The level change is significant and very limited images are provided.
- The triple height glass box office entrance will create a publically accessible atrium. The applicant is asked to consider the provision of a "Changing Places" WC in this location and would require a minor redesign of the existing WC facilities.
- The provision of windows to the east cafe unit would provide some further surveillance to the space between Sea Containers House and River Court.
- Given the significant improvements proposed to the river walk, the applicant should continue to further explore the Paralympic Inclusive Environment (PIE) programme which aims to improve access for disabled people along the south bank from Jubilee Gardens to Potters Field Park to enable visitors to the Olympic and Paralympic Games to experience London's riverside

walk.

- In terms of the rear of the building, there remains a slightly awkward junction between the existing Sea Containers House (western end) and the new office which results in the top of the new stair and lift core overrunning by two floors above the office block. It is however shown as a fairly lightweight and distinctive element of the building. The other elements of the architecture remain broadly successful with the exception of the ground floor treatment to the stair and lift core on the western elevation which now includes a series of steps and lacks any sort of animation with the public realm. As above, this space fails to embrace the potential of a linked space with the Oxo Tower. Details of the materials for the refurbishment and the new office block need to be provided.

Access and inclusive design:

- Lighting design should be conditioned to include all areas, particularly the eastern route.
- 10% of the rooms need to be wheelchair accessible, and these rooms need to be shown on plan. Details of how the gym will be accessible also need to be provided.
- The disabled parking bays need to have a transfer space both sides of each bay and at the rear. The parking management plan should include a mechanism that these spaces are monitored and reviewed.

Climate change mitigation:

- The development does not achieve any carbon savings from energy efficiency along compared to a 2010 Building regulations compliant development and should use demand reduction measures such as strengthening the measures proposed for the new build elements.
- The applicant should engage with Kings Reach regarding the sharing any heating network. The single energy centre proposed should be identified and secured by condition. A combined heat and power plant is proposed and a cooling network supplied with electrical chillers.
- Photovoltaic panels are proposed to the roof of the hotel, which would achieve a reduction in emissions of 0.55%.

Transport for London: The following comments are provided.

- Highway impact: The proposals are unlikely to have an unacceptable impact on the local highway and public transport network.
- Car parking: A total of 29 car parking spaces have been proposed which includes 3 accessible bays. A further two disabled spaces are proposed at grade level on Upper Ground for guest/visitor parking. Following further discussions, all these spaces have been designed to be disabled spaces.
- Walking: TfL supports proposals to improve pedestrian permeability at the site around the western end. TfL expects its Pedestrian Comfort Guidance tool to be used to determine the actual pedestrian levels of service.
- Cycling: 176 spaces are proposed in the basement for staff and guests. 15 spaces are proposed on the south side of Upper Ground within the podium undercroft. Given the demands for cycle parking in the area, this level of parking should be increased. TfL requests the safeguarding of land and a contribution of £195,000 towards the installation, operation and maintenance of a Mayor's Cycle Hire docking station.
- Public Realm: In partnership with the council, TfL is developing a public realm enhancement scheme for Blackfriars Road. This is aimed at improving the overall quality of the environment along Blackfriars Road including junction re-design at Blackfriars Road/Southwark Street, pedestrian and cycling improvements, tree planting and materials. In line with London Plan policies and in line with other recent proposals in the area, this development is expected to make a contribution to this scheme.

- Coaches: The applicant is required to demonstrate how this proposal, taking into account the coach ban in the area, would be able to facilitate and manage any arrivals by coach.
- Crossrail: The indicative calculations provided show that no crossrail charge would be payable, however, the calculation should not include any basement space or service yard. Revised calculations therefore need to be undertaken.
- Travel plan: A travel plan has been submitted, but further work is required on it to ensure that the targets and measures are robust and clear.
- Construction Management: In order to mitigate any adverse impacts of construction and servicing traffic, the submitted construction logistics plan and a delivery service plan should be secured by condition.

London Underground: The applicant is in communication with London Underground, therefore no comments are made except that the applicant should continue to work with us.

City of Westminster: Do not wish to comment on the proposals.

Port of London Authority: No objection in principle but given the location of the development there would appear to transport construction materials to the site and waste materials to the site by water. The use of the River in this way is a sustainable method of transport and is recognised in Policy 4C.8 of the London Plan. As such the PLA would wish that a condition be attached to the permission requiring the submission of a strategy which maximises the use of the river for the transport of construction and waste materials to and from the site. Details of lighting should also be submitted [careful design would be required so to not cause a hazard to navigation or to ecology]. Any works that extend over Mean High Water require a river works license. There is also the opportunity to encourage river bus travel and set targets within the travel plan for river bus use.

Commercial Boat Operators Association (CBOA): The CBOA has an interest in promoting the use of the River Thames and London's canals and basins for shipping goods, to relieve road congestion and reduce exhaust fumes. CBOA members operate businesses with barges carrying goods on the waterways and can help with transport to and from the site in terms of bringing new materials and furnishings to the site, and using barges to act as temporary storage where space is at a premium during the construction phase.

London Fire and Emergency Planning Authority: The development should comply with the requirements of B5 of Approved Document B of the Building Regulations and a full building consultation should take place when an application is received.

Southwark Conservation Area Advisory Group, comment as follows:

- While this is not the most attractive of buildings to begin with, many of the proposals here are removing the existing elements of interest/character and replacing them with rather bland and characterless additions.
- Opening-up the ground-level with a restaurant that can spill onto the riverside walkway is a considerable improvement on the existing, as is the enhanced permeability with new/improved access-routes through to Upper Ground at east and west ends; the open foyer will do a similar job.
- The loss of a number of the building's existing flamboyant features was noted and there was much debate on the quality of the replacement three glazed-levels facing onto the river. The design of this was viewed as characterless and bland and inappropriate in scale to the rest of the building: a missed opportunity to enhance this building's considerable impact on the river frontage. Options for this to either be more solid or more 'structured' were

considered, but either way a stronger statement, and something that celebrates the river frontage, is required. Materials more appropriate to the river frontage than “Miesian” steel were called for – timber, masonry piers, even cast iron stanchions? Not more aluminium and glass please.

- The 9 storey block to the rear considered out-of-character to the existing building, and contributing to an overly dense/developed context around King's Reach Tower, with resultant negative impacts on the adjacent conservation area (including daylight/sunlight). If there is to be a new building here at all it should be of a much more modest height of two or three stories, perhaps with a roof-garden.
- No objections were raised to the addition at roof level at the east end.

Coin Street Community Builders (two letters received): Our comments on the SCH proposals are:

- Welcome proposals to open up a new public walkway between the site and Oxo Tower Wharf (OTW) but believe that the success of this will be dependent on having public (retail/cafe etc) uses *on both sides* at ground level;
- Concerned at the inadequacy of provision for taxi and other vehicular pick up/set down along this stretch of Upper Ground. In the light of the recent Kings Reach consent and the current proposals a more realistic traffic management plan for this stretch of Upper Ground, indicating more adequate provision for taxi set down and pick up should be provided - this should be requested by condition;
- Welcome the proposals to introduce public uses at ground level along the riverside frontage (as envisaged in the original Melia-Buckley hotel consent for this building). It is absolutely essential that the riverside walkway is kept open to the public throughout any works and that a condition to this effect be attached: commercial tenants, local residents and the general public have suffered severely during the Thameslink closure and this must never be allowed to happen again. It will be important to impose conditions that ensure that the welcome outside seating proposed does not constrict the growing pedestrian flows along the riverside;
- Concerns about the design of the proposed new office building and its impacts on Oxo Tower Wharf. The visual impact could be mitigated by amendment of the design and by the implementation of the phase 2 of the Oxo development (which would introduce lower buildings with more active uses in the foreground). It is likely that Oxo residents and tenants will want reassurance as to the impact of the proposed new building on daylight;
- Extract (particularly kitchen extract) should be kept well away from the Oxo and the public realm;
- It will be essential to secure permanent public rights of way along the proposed new pedestrian link. [Officer comment: public access will be secured in the legal agreement].
- Concern is expressed at the proposed steps down to the office core within this route and their potential for rubbish to collect and for antisocial behaviour to occur. Request a condition seeking level access at this point. [Officer comment: There would be no public access into the office building from this core, so level access could be required here. It should be noted that a condition has been attached requiring an access management plan to be requested by condition to ensure that is means of access for people with disabilities. The building will also be monitored by security staff to ensure that rubbish is not left out, and also to patrol for antisocial behaviour].
- Officers consider that the cladding proposals to the south and east facades are unsatisfactory and recommend a condition that they be reserved by condition; it is requested that the western elevation of the office building is subject to a similar reservation. [Officer response: A depth of 1m for the

cladding is shown on the western elevation, and this is considered acceptable. It is therefore not necessary to attach a condition of requiring revised details of this western elevation].

Neighbours and local groups

13 letters of objection received.

Kings Reach Flats Management Limited [who represent the collective owners of River and Rennie Court]. Raise the following concerns.

- The nine storey building may have a canyoning effect on that part of Upper Ground and reduce daylight to some flats in Rennie Court west.
- The proposed cafe on the junction of river walkway and Marigold Alley would be in proximity to flats in River Court west and therefore outdoor tables should not be permitted. Servicing should not be through Marigold Alley.
- The roof top bar should not cause any noise pollution and screening should be required.
- Concern expressed about the extra traffic along Upper Ground.
- During construction, the developers should be asked to use the Stamford Street/Hatfields route into the site rather than Rennie Street/Upper Ground.

Unit 1:06 Oxo Tower Wharf, Barge House Street:

In principle welcome the proposed redevelopment of Sea Containers House and its change of use, as it would be multi-functional, serving the local community and hopefully attracting more visitors. However, the impact both on local residents and surrounding commercial enterprises of erecting a new nine-storey building causes concern.

- There is plenty of provision of office accommodation with more developments in the pipeline that have already received planning permission. In our opinion such a high-density development has the potential to dramatically impact on the local infrastructure, in particular the obvious increase in traffic. Deliveries to existing commercial premises in the area already cause chaos, to other vehicular users and pedestrians alike. Similarly, the parking provision for the development appears to be totally inadequate for its inevitable needs.
- Currently there appears to be a good commercial and residential mix in the area that also provides amenity for visitors. Request that the application is rejected in its current format and to consider instead a development without the addition of a nine-storey tower.

Unit 1.12 Oxo Tower Wharf, Barge House Street:

- The proposal is unnecessary as there is sufficient office space in the surrounding area;
- The building works would also increase noise and disturbance in the local area from the permanent use of the new building;
- The design is out of character with its surroundings and will have a negative impact on the Oxo building. It is also very close to the existing buildings making the site too dense;
- Residents and commercial occupiers on the courtyard side of the Oxo will also experience a loss of daylight and would be overshadowed by the new building;
- Also object to the loss of trees and increase in traffic.

Unit 1.14 Oxo Tower Wharf, Barge House Street:

- Concern about long term disturbance, noise levels, traffic congestion, parking shortages.
- Proposal will create a visual eyesore and would be overdevelopment.
- Impact on daylight.
- Loss of trees.

Unit 1.15 Oxo Tower Wharf, Barge House Street:

- Businesses that are based here will be adversely affected by this project. It would seem that the proposed development would in fact be one which, not only would be visually completely out of character with the surrounding area, but also creating a density of buildings beyond requirement. This would in turn create an enormous 'shadow' onto the Oxo Tower residents (both business and residential) and ruining which is a very pleasing open space.
- Surely the fact that the Oxo Tower is a listed building must be taken into account.
- Also concern that traffic would increase during construction and during occupation and this could lead to parking pressure. Streets are also very narrow and could raise concerns regarding pedestrian safety.

Unit 1.17 Oxo Tower, Barge House Street:

- The erection of a the new building in the current Sea Containers House car park will have serious impact on the surrounding area, increase the noise impact and will cause a loss of light across the Oxo Tower Wharf's courtyard and the only trees currently in existence, negatively affecting the public area of the Oxo Tower Wharf's courtyard currently used by the visitors and residents.
- Concerned about the impact that the increase in traffic will have on the safety of the roads in the streets approaching the development as well as a negative effect on the available parking spaces in the area.
- The building would be far too close to the existing buildings and is unnecessary overdevelopment which should not be allowed to go ahead.

Unit 2.10 Oxo Tower, Barge House Street:

- The proposal would be overdevelopment of the area, and additional office accommodation is not required.
- Increase in noise and disturbance, including impact on parking, traffic and road safety.
- Loss of light and overshadowing to commercial tenants of the Oxo tower.
- New building is out of keeping and will be very close to the Oxo tower, resulting in a dense form of development.

Unit 2.11 Oxo Tower, Barge House Street:

- There is ample office space in the area, and more accommodation is not required.
- There will be an increase in general disturbance from noise, traffic and road safety for visitors and residents. There is also insufficient parking provision.
- The design of the new building is not in keeping with the surrounding area, and out of character with the listed Oxo Tower.
- Oxo tower occupants would also suffer a loss of light and would be overshadowed by the development.
- Concern to the loss of existing trees.

Flat 7, Rennie Court, Upper Ground:

- Concern about the amount of traffic both during construction and after completion.
- If the building could be pushed back away from the road, this would reduce the visual effect from our podium.
- The appearance of the existing building will be detrimentally changed, and the brass features will be unfortunately removed.

Flat 8, Rennie Court, Upper Ground:

- Concern about deliveries, taxi's, buses etc in this narrow road, and the increase in congestion and noise.
- The new building should be set back further from the road to allow more space for vehicular access/deliveries and to avoid that section of Upper Ground forming a narrow "tunnel".
- The existing brass features are in keeping with the appearance of the building on the river side. It would be a mistake to remove these features rather than to enhance them.

Flat 9, Rennie Court, Upper Ground:

- There will be a more substantial and intensive use of Upper Ground both in terms of footfall, vehicular traffic and taxis. This will cause significant disruption to Rennie Court residents as the buildings in Upper Ground notoriously act as a sound box amplifying sound. Traffic and buses will also be subject to delays, causing more noise and disruption.
- Taxi drop off points should be shown on the plans.
- Opening hours for the cafe on Marigold Alley/Upper Ground should be controlled with the only entrance to be from the River Walk.
- Also concern that the new building would create an overbearing impact and oppressive feeling and suggest that the building is further set back from the road.
- Ground and first floor fascias should be as transparent as possible to retain some feeling of space. The south elevation is also bland and has no features relating to the striking river frontage or the character of the building.

Flat 405, Redwood Housing Co-operative:

- The noise, dirt and dust created during construction would be unbearable to residents.
- Also concern that the existing wall to the west of the site would be knocked down as this would expose the area to anyone and could cause anti-social behaviour.
- Seek reassurance that there will be no impact to the RV1 bus service and that there would be no bus diversions.

Resident at 303 Oxo Tower Wharf:

- Concerned that any extension on the ground floor (north) of the Sea Containers building to provide new restaurant, cafe and service bay will cause a substantial increase in noise experienced by those in the Oxo Wharf. Require assurance that noise will be controlled and not allowed to the existing noise levels.
- Query whether the new route to the river could be closed after certain hours and not used at night.
- Noise from the setting up and removal of tables and chairs on the river walk would be disruptive. If noise disturbance is caused, it should be curtailed quickly.
- Disappointed by the lack of greenery in the new development and would have liked to see small balconies mounted outside each hotel bedroom window.

Two letters of comment received.

42 River Court, Upper Ground:

- Upper Ground is a narrow street with one way traffic, is part of a bus route with a dedicated contra flow cycle route. The provision of access to and from the proposed development would put a strain on the area and on local residents both during construction and once the site is in use.
- Construction traffic could be very intrusive and disruptive to residents,

particularly if the development at 1 Blackfriars Road proceeds at the same time.

- Query whether the drains/waste disposal arrangements are adequate and capable of handling the increase in outflow.
- The development could put extra pressure on existing services e.g. police, emergency services and transport.

Councillor Adele Morris has commented as follows:

1) Tables and chairs: The revised layout for the tables and chairs at the north western section of the site is now satisfactory and should not cause any congestion on that section of the River Walk. The situation should however be monitored to ensure that tables and chairs do not creep out into the public highway over time.

2) Roof terrace to the roof top bar: Satisfied that this should cause no disturbance to local residents on the eastern side of the building, provided this space is well managed.

3) Community Safety. Acknowledge that even if the wall dividing the Oxo Tower site and Sea Containers remains in place, there would still be good sight lines through. This alleviates concerns that there would be a blind spot between the river and Upper Ground.

4) S106. Pleased that there is now a S106 contribution towards tourism.

Neighbour Consultee Map

