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|------------------------------------|--|-------------------------------|--|
| Item No. 6.1 | Classification: OPEN | Date: 17 March 2021 | Meeting Name: Planning Committee |
| Report title: | Development Management planning application: Application 20/AP/1189 for: Full Planning Application Address: SOUTHWARK UNDERGROUND STATION, THE CUT/ 68-70 BLACKFRIARS ROAD, LONDON, SE1 8JZ Proposal: Redevelopment of the site including the demolition of Nos. 49-56 Hatfields and No 1 Joan Street to provide a 17 storey (plus plant) building above Southwark Underground Station accommodating Class B1 office space and Class A1/A2/A3/A4 retail space. The development includes associated basement construction, public realm improvements and associated highways works including the closure of Joan Street. | | |
| Ward(s) or groups affected: | Borough and Bankside | | |
| From: | Director of Planning | | |
| Application Start Date | 01.06.2020 | PPA Expiry Date | 30.09.2021 |
| Earliest Decision Date | 29.07.2020 | | |

RECOMMENDATION

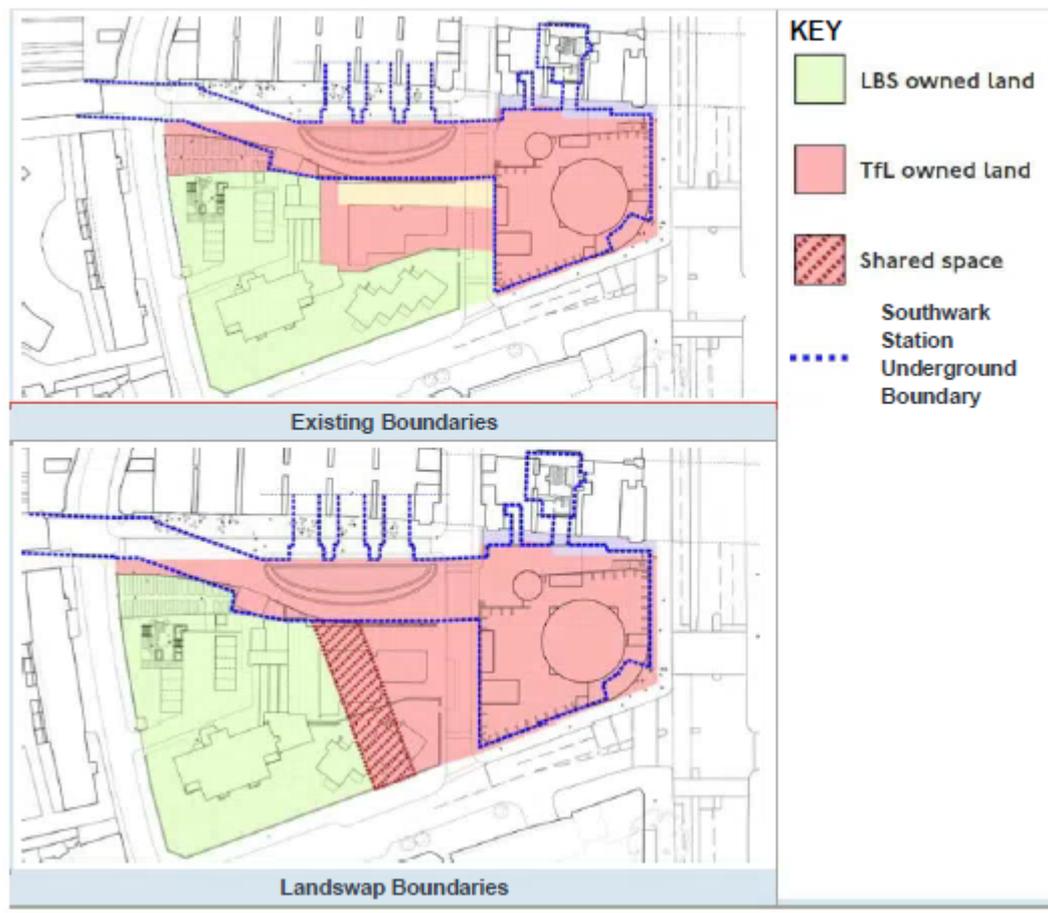
1. That planning permission is granted subject to conditions, the applicant entering into an appropriate legal agreement, and referral to the Mayor of London.
2. In the event that the requirements of paragraph 1 above are not met by 30 September 2021, the director of planning be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 235.

EXECUTIVE SUMMARY

3. Southwark Underground Station was opened around twenty years ago and was designed and constructed to enable it to be subsequently built over. Numerous options have been developed over the years to construct a new building above the station but they have been principally hampered by the following constraints:
 - The engineering constraints and the cost of keeping the tube station open and running during the construction above
 - The relatively small size of the tube station site can only accommodate a small floorplate which impacts the business case as a critical mass of floorspace would be required for any scheme to be deliverable.

4. When the underground station was originally constructed, the local area was very different and the property market less buoyant. This meant that any proposal to develop the area above the station was not financially viable at that point. In the intervening years Bankside has developed into a key office location.
5. Given the limited area above the existing station, and the difficulties in constructing a lift and service core above the voids of the station and tracks, TfL explored the options for expanding the potential development area. In 2018 TfL acquired both Algarve House (Platform Southwark) and five leasehold flats at Styles House. Concurrently, the Styles House Tenants management Organisation ('the TMO') were in discussions with the council's housing department to look at options for providing additional affordable housing within their estate. In other conversations with the council, the potential to incorporate the area of Joan Street into a development site was also raised. This would require the formal stopping up of Joan Street.
6. In 2016 the TMO contacted the housing department to seek support in appointing an independent tenant advisor and an architect to develop a feasibility study for new homes in order to help develop their understanding of how new council homes could be constructed within their estate. An independent tenant advisor was appointed and a brief was developed with the TMO to instruct an architect in July 2016. Bell Phillips, an architect practice experienced at delivering new council homes, was appointed to work with the TMO to complete a feasibility study. The study, which was completed in September 2016, illustrated the potential to construct a block of new homes, as well as re-providing the same amount of amenity space in the estate and a new tenant hall. This feasibility study relied on a land exchange with TFL.
7. On 30 April 2019, Cabinet authorised the Director of Regeneration to enter into a land exchange agreement with TFL which was formally signed on 11 August 2020. The land exchange provides the legal framework for creating two separate parcels of land on which TFL can then construct their office development, and the council can build a block of 25 new homes. In addition to the land exchange as set out below, the council will receive staged payments linked to the progress of the relevant statutory consents including planning, and the stopping up of Joan Street.
8. The land exchange agreement requires some buildings currently on site to be demolished. These are the Platform building, the lock up garages, the existing TMO hall and 49 - 56 Hatfields . 49 – 56 Hatfields is a two storey block of eight studio dwellings within the Styles House estate, sometimes referred to as the 'chalets'. Seven of these are let by the Council on secure tenancies, the other one has been sold under right to buy legislation and the lease is now held by TfL. TfL also holds the leases of four other flats that have been sold under the right to buy in the main Styles House tower building, which will transferred to the Council under the land exchange agreement, enabling four secure Council tenants to relocate. Those tenants who are not able to or would prefer not to move into the vacated tower flats will be given the highest priority for re-

housing; this is known as a “band 1 priority.”



9. The application to develop the new affordable housing and TMO hall has been submitted (reference 20/AP/0969) and was presented to the Planning Committee on 22 February. At this meeting the Planning Committee resolved to grant permission subject to referral to the Mayor of London and completion of a legal agreement.
10. This current application has been submitted by TfL, who intend to occupy the offices, if consented, themselves. The application covers the land above and adjacent to Southwark Underground Station, including Joan Street, and part of the land which is currently within the Styles House estate. It would provide a new office building with a stepped form rising to a maximum of 17 storeys, with new retail units at ground floor level on The Cut. The station entrance would remain unaffected, and the station would remain in use throughout the construction period (save, possibly, temporary closures during some key activities not compatible with safe access to the station). The development would release part of the current TfL owned land to enable the delivery of the new housing and TMO hall under the land swap, and also create a green space (a ‘no build zone’) between the office and the housing.
11. At street level the proposed building would be much more engaging with active frontages and visual interest along The Cut and Blackfriars Road. Additionally there would be an improved public realm and landscaping to the north of the site in Isabella Street. Pavement widths on The Cut and around the station

entrance would be increased, in part by changes to the carriageway alignment secured through the development, creating a much more pleasant environment for pedestrians.

12. The design of the new office building is considered to be of a high quality befitting of a building of this scale in this prominent location, and the office space being provided would meet modern requirements. The development would include 10% of the uplift in office floorspace as affordable workspace which would meet the demands of micro to medium sized businesses as well as start-ups and enterprises looking to expand.
13. The development would be energy efficient and sustainable with an on-site carbon reduction of 42% above the 2013 Building Regulations in addition to a carbon offset payment that would help the development achieve Carbon Zero targets.
14. The site is located in the Central Activities Zone, the Bankside Borough and London Bridge Opportunity Area and the Bankside and Borough District Town Centre, and is allocated in the New Southwark Plan as NSP17. The proposals are consistent with the site allocation and the objectives of the development plan for this area.
15. The impact on the amenity of neighbours in terms of privacy, outlook and impact daylight/sunlight is set out in the report, and it is noted that the impacts on a small number of residential properties closest to the site are significant. These impacts need to be considered in the context of the character of the area in line with the flexibility expected by the BRE when looking at dense urban environments. These impacts also need to be balanced against the very significant benefits of delivering this scheme.
16. The development would be reliant on the Stopping Up (closure) of Joan Street and whilst this has been concluded as being acceptable in planning terms, the applicant would need to make a separate application for permission to close Joan Street from the Highways Authority (LBS); an objection from BT to this closure is noted in the report.
17. A total of 2,468 letters were sent to local residents as part of the neighbour consultation exercise and 40 letters of objection were received. The main points of the objections are set out below along with the number of times they have been raised. A detailed breakdown of the objections along with a detailed officer response is set out in paragraph 245.

| Objection topic | Number of time raised |
|--|-----------------------|
| Height/scale/massing | 17 |
| Daylight and sunlight | 11 |
| Land use | 11 |
| Covid-19 - changes to working patterns | 8 |
| Overdevelopment | 7 |
| Noise | 6 |
| Design | 3 |

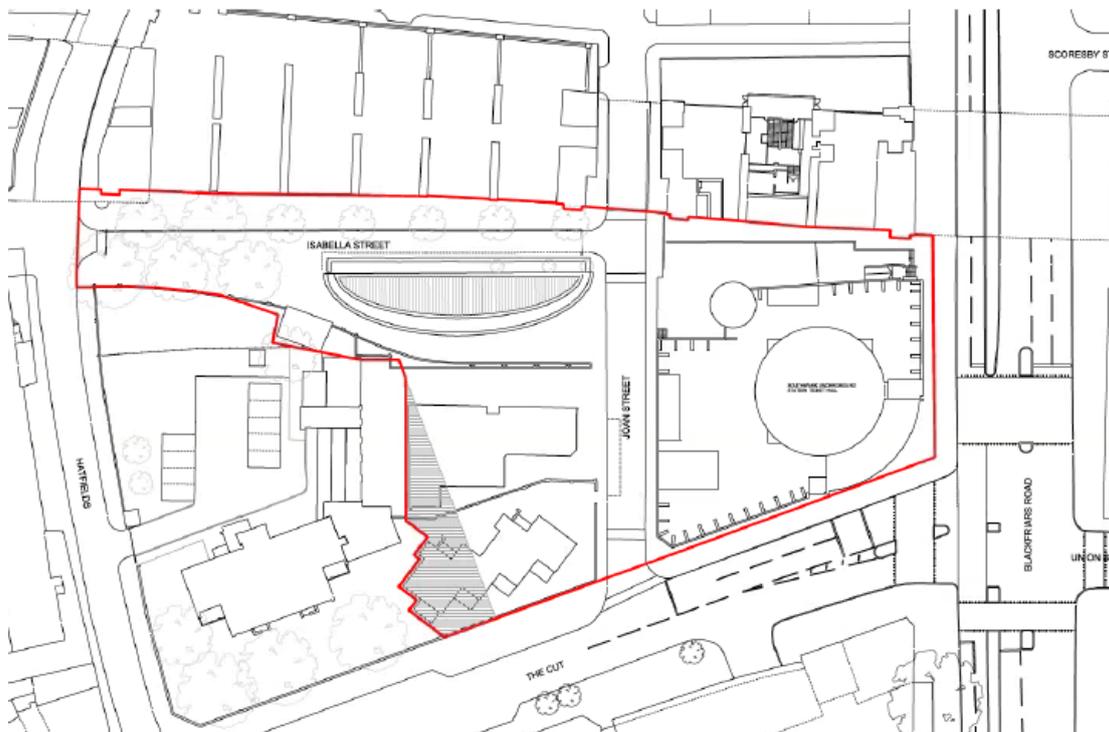
| | |
|------------------|---|
| Sustainability | 3 |
| Townscape | 3 |
| Transport | 3 |
| Views | 3 |
| Access | 2 |
| Wind | 2 |
| Climate change | 1 |
| Heritage | 1 |
| Privacy | 1 |
| Public transport | 1 |

18. The ability to deliver the new office scheme would be dependant on concluding the land transfer agreement with the Council for the land between the station and Styles House. The ability to conclude this land transfer agreement is itself contingent on the application for the Styles House development (application 20/AP/0969) being granted. The two applications must be assessed and determined independently, but the ability to implement either scheme depends on the other also coming forward.

BACKGROUND INFORMATION

Site location and description

19. The application site, identified on the site location plan below, is situated at and around Southwark Station, fronting Blackfriars Road to the east and The Cut to the south. To the north is the railway viaduct for the South Eastern Main Line, which runs on an east-west axis towards Waterloo East Station. Opposite the site to the east is the Transport for London Palestra office.



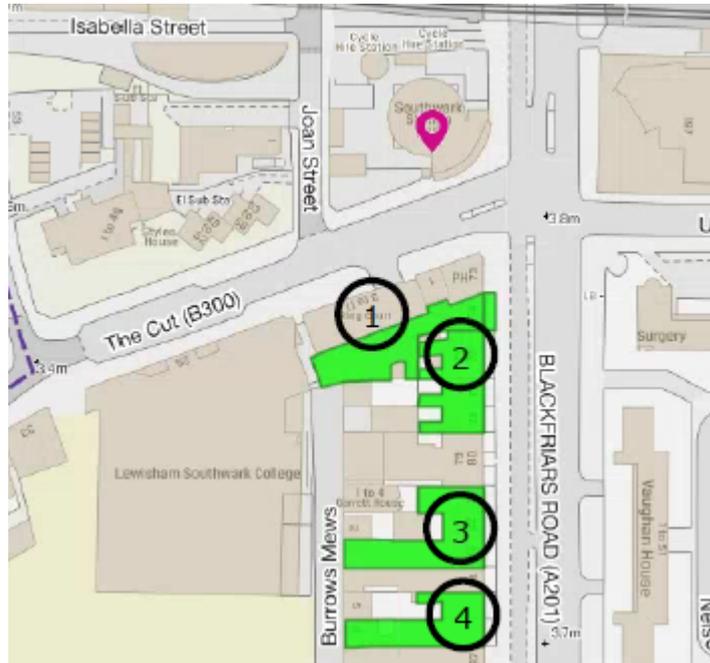
20. To the immediate west of the site is Styles House, a collection of residential units, including a block of flats and eight chalet style houses. Adjacent to Styles House is Platform Southwark, an office/industrial building currently used on a 'meanwhile' basis as a multi-discipline community space for art, music and

performance. At ground level, south of the railway viaduct, is Isabella Street, which contains a vibrant mix of small food and beverage units within the railway arches.

21. Between Isabella Street and Southwark Station is an area of public realm, including an 'eyelid' structure which provides a roof light to the tube station below. In the existing arrangement, Joan Street runs from Hatfields to The Cut, passing beneath the railway viaduct, and dissects the site. Joan Street is not a major route and is used primarily for servicing Colombo House to the north of Joan Street and the food and beverage units on Isabella Street.



22. The surrounding area is truly mixed use with homes, offices, education uses, bars, restaurants and retail. In terms of townscape, building heights range from two to five storeys on The Cut rising to the 12 storey Styles House on Hatfields and the taller Palestra on the corner of Blackfriars Road and Union Street.
23. The site is not located within a conservation area and there are no listed buildings on or adjoining the site. Within Southwark, the nearest conservation areas to the application site are Valentine Place and King's Bench. Both of these conservation areas sit to the south of the site, close to Blackfriars Road. Within the London Borough of Lambeth the Roupell Street, Waterloo and Mitre Road Conservation Areas lie to the west and north west of the application site.



Details of proposal

24. Planning consent is sought for the demolition of Algarve House and 49-56 Hatfields in order to redevelop the land above Southwark Underground Station to deliver a 17 storey building comprising new offices (Class B1) and flexible retail (Class A1/A2/A3/A4).

| Proposed Use | Proposed Floorspace (sqm GIA) |
|----------------------------|-------------------------------|
| Class B1 Office | 26,513 |
| Class B1 open reception | 382 |
| Flexible Class A1/A2/A3/A4 | 237 |
| Total | 27,132 |

25. The delivery of the development will require the Stopping Up (closure) of Joan Street in order to create a single, unified site for the proposed development with an efficient building footprint and optimised core position outside of the station 'box'.
26. In design terms the massing of the building steps down along The Cut in order to provide a transition between the lower scale development of this street and the more city scale of Blackfriars Road. Central to this articulation is the terracing of the western elevation of the building which reduces the height from the tallest element on Blackfriars Road down to the Styles house site through a series of stepped terraces. This allows the building to create the focal point required above Southwark underground station to act as a landmark for this important transport interchange whilst not unduly dominating the setting of Styles House. The series of stepped and varied terraces would be generously planted.
27. At ground floor level there will be two retail units facing onto The Cut in addition to the main reception and lift lobby. Affordable workspace would be provided at ground, first and second floor level. At the upper levels, the building will be used for Class B1 office space. The scheme also includes two basement levels, containing plant equipment and basement cycle parking for occupiers of

the building. The roof level accommodates additional plant equipment, including air source heat pumps.

28. Landscaping and public realm works are proposed for Isabella Street and the 'Eyelid' including verdant and varied planting as well as new street furniture. On The Cut, the public realm proposals include the widening of the pedestrian footpath, the creation of a new segregated cycle lane and new street furniture and soft landscaping.
29. The development would be car free and would provide a total of 402 cycle parking spaces in addition to relocated cycle hire docking station spaces.

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

30. The full planning history for the site is set out in detail at Appendix 4. The current application has been submitted following a detailed pre-application enquiry (reference 20/EQ/0143). Over the course of this pre-application enquiry, the developer has engaged with the council through an iterative process that has resulted in various amendments to the scheme from the initial proposal. This includes amendments to scale and massing as well as amendments to the detailed design/architecture. The layout of the site and relationship to Styles House has also evolved as a result of the pre-application engagement across the two proposals in order to overcome potential amenity issues and to address the requirements of the Styles House TMO.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

31. The main issues to be considered in respect of this application are:
 - Principle of the proposed development in terms of land use
 - Affordable workspace
 - Environmental impact assessment
 - Design, including layout, building heights, landscaping and ecology;
 - Heritage considerations
 - Archaeology
 - Impact of proposed development on amenity of adjoining occupiers and surrounding area, including privacy, daylight and sunlight
 - Transport and highways, including servicing, car parking and cycle parking
 - Environmental matters, including construction management, flooding and air quality
 - Energy and sustainability, including carbon emission reduction
 - Ecology and biodiversity
 - Planning obligations (S.106 undertaking or agreement)
 - Mayoral and borough community infrastructure levy (CIL)
 - Consultation responses and community engagement
 - Community impact, equalities assessment and human rights
 - All other relevant material planning considerations

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

Legal context

33. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2016, the Core Strategy 2011, and the Saved Southwark Plan 2007. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications for development within Conservation Areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. Section 66 of the Act also requires the Authority to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.
34. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

Planning policy

35. The statutory development plans for the Borough comprise the London Plan 2016, Southwark Core Strategy 2011, and saved policies from The Southwark Plan (2007 - July). The National Planning Policy Framework (2019) and emerging policies constitute material considerations but are not part of the statutory development plan. Any policies which are particularly relevant to the consideration of this application are highlighted in the report. The site is located within the:
- Air Quality Management Area
 - Bankside, Borough and London Bridge Strategic Cultural Area
 - Bankside, Borough and London Bridge Opportunity Area
 - Archaeological Priority Zone
 - Central Activities Zone
 - Bankside and Borough District Town Centre
 - Proposal Site NSP17 – Southwark Station and 1 Joan Street
 - Area covered by the Blackfriars Road SPD
36. The site has a Public Transport Accessibility Level (PTAL) of 6b where 1 is the lowest level and 6b the highest, indicating excellent access to public transport.
37. The site is located within Flood Zone 3 as identified by the Environment Agency flood map, which indicates a high probability of flooding however it benefits from protection by the Thames Barrier.
38. The site does not sit within any of the London View Management Framework (LVMF) protected views. The site does not fall within a conservation area and there are no listed buildings on or adjoining the site.

National Planning Policy Framework (NPPF)

39. The revised National Planning Policy Framework ('NPPF') was published in February 2019 which sets out the national planning policy. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental. Paragraph 212 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.
40. Chapter 2 Achieving sustainable development
Chapter 6 Building a strong, competitive economy
Chapter 7 Ensuring the vitality of town centres
Chapter 8 Promoting healthy and safe communities
Chapter 9 Promoting sustainable transport
Chapter 11 Making effective use of land
Chapter 12 Achieving well-designed places
Chapter 14 Meeting the challenge of climate change, flooding and coastal change
Chapter 15 Conserving and enhancing the natural environment
Chapter 16 Conserving and enhancing the historic environment

London Plan 2016

41. Policy 2.5 Sub-regions
Policy 2.10 Central Activities Zone – Strategic priorities
Policy 2.11 Central Activities Zone – Strategic functions
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 4.12 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 5.5 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 5.16 Waste net self-sufficiency
Policy 5.17 Waste capacity
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 effects of development on transport capacity
Policy 6.5 Funding Crossrail
Policy 6.6 Aviation
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 7.10 World heritage sites
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 7.21 Trees and woodlands
Policy 8.2 Planning obligations
Policy 8.3 Community infrastructure levy

The Core Strategy 2011

42. The Core Strategy was adopted in 2011 providing the spatial planning strategy for the borough. The strategic policies in the Core Strategy are relevant alongside the saved Southwark Plan (2007) policies. The relevant policies of the Core Strategy 2011 are:

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 12 - Design and conservation
Strategic Policy 13 - High environmental standards

The Southwark Plan 2007 (Saved policies)

43. In 2013, the Secretary of State issued a saving direction in respect of certain policies in the Southwark Plan 2007. These saved policies continue to form part of the statutory development plan. Paragraph 213 of the NPPF states that existing policies should not be considered out of date simply because they were adopted or made prior to publication of the Framework. Due weight should be given to them, according to their degree of consistency with the Framework. The relevant policies of the Southwark Plan 2007 are:

Policy 1.1 Access to Employment Opportunities

Policy 1.4 Employment Sites

Policy 1.7 Development within Town and Local Centres

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 3.8 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 3.22 Important Local Views

Policy 3.28 Biodiversity

Policy 3.29 Development within the Thames Policy Area

Policy 3.31 Flood Defences

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

Policy 5.8 Other Parking

Supplementary Planning Documents

44. Blackfriars Road SPD 2014
Design and Access Statements SPD 2007
Section 106 Planning Obligations and CIL SPD 2015 and 2017 addendum
Sustainability Assessment 2007
Sustainable Design and Construction SPD 2009
Sustainable Transport Planning SPD 2009

Greater London Authority Supplementary Guidance

45. Central Activities Zone SPG 2016
Character and Context SPG 2014
Energy Assessment Guidance 2018
London View Management Framework 2012
Sustainable Design and Construction Saved SPG 2006
Town Centres SPG 2014

Emerging policy

Publication New London Plan

46. The Mayor of London has stated that he intends to formally adopt the new London Plan on 2nd March 2021. On publication, it will become the Spatial Development Plan for London and part of the statutory Development Plan for Greater London.
47. If adopted as planned, the policies of the Publication London Plan will, by the time this Planning Committee convenes, carry full weight. The most relevant policies of the new London Plan are listed below:

GG1: Building strong and inclusive communities

GG2: Making the best use of land

GG3: Creating a healthy city

GG5: Growing a good economy

GG6: Increasing efficiency and resilience

SD1: Opportunity Areas

SD4: The Central Activities Zone

SD5: Offices, other strategic functions and residential development in the CAZ

SD6: Town centres and high streets

SD7: Town centres development principles and Development Plan Documents

D1: London's form, character and capacity for growth

D2: Infrastructure requirements for sustainable densities

D3: Optimising site capacity through the design-led approach

D4: Delivering good design

D5: Inclusive design

D8: Public realm
D14: Noise
S1: Developing London's social infrastructure
E1: Offices
E2: Providing suitable business space
E3: Affordable workspace
E9: Retail, markets and hot food takeaways
E11: Skills and opportunities for all
HC1: Heritage conservation and growth
G1: Green infrastructure
G5: Urban greening
G6: Biodiversity and access to nature
G7: Trees and woodlands
SI1: Improving air quality
SI2: Minimising greenhouse gas emissions
SI7: Reducing waste and supporting the circular economy
SI12: Flood risk management
SI13: Sustainable drainage
T1: Strategic approach to transport
T2: Healthy streets
T3: Transport capacity, connectivity and safeguarding
T4: Assessing and mitigating transport impacts
T5: Cycling
T6: Car parking
T7: Deliveries, servicing and construction
T9: Funding transport infrastructure through planning
DF1: Delivery of the Plan and Planning Obligations.

New Southwark Plan (NSP)

48. For the last 5 years the council has been preparing the New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy.
49. The Examination in Public (EiP) commenced on 22nd February and the amendments within the Proposed Changes to the Submitted New Southwark Plan will be considered along with the consultation responses received at each stage of public consultation. It is anticipated that the plan will be adopted later in 2021 following the EiP.
50. As the NSP is not yet adopted policy, it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework. The most relevant policies of the NSP are as follows:

P12 Design of places
P13 Design quality
P15 Designing out crime
P17 Efficient use of land
P18 Listed buildings and structures

P19 Conservation areas
P22 Archaeology
P48 Public transport
P49 Highway impacts
P50 Walking
P52 Cycling
P53 Car parking (no substantial objections were received, comments related to minimising residential car parking)
P55 Protection of amenity
P58 Green infrastructure
P59 Biodiversity
P60 Trees
P61 Reducing waste
P63 Contaminated land and hazardous substances
P64 Improving air quality
P67 Reducing flood risk
P68 Sustainability standards.

51. Where draft policies are different from the adopted policy (or are completely new policies) and objections were received, the specifics of those objections and the differences from the adopted policy need to be considered for each planning application proposal. For example:

P27 - Access to employment and training – objection was received relating to the financial burden.

P29 - Office and business development – objections related to the two year marketing justification and differentiation of B Class uses.

P30 - Affordable workspace – objections relating to strengthening the policy and including viability testing.

P34 - Town and local centres – objections relate to a lower threshold and strengthening the policy.

P46 - Community uses – objections to strengthening this policy.

P65 - Reducing noise pollution and enhancing soundscapes – the agent of change principle in the NPPF must also be considered.

52. Where objections were received to a draft policy and these have not been resolved through revisions, that policy can have only limited weight. In these instances, the degree of change from adopted policy on these topics should also be considered. Examples of these policies include:

P54 - Parking standards for disabled people and mobility impaired people.

P69 - Energy – objections that the December 2017 version P62 being too onerous for the carbon reductions

53. The NSP responds positively to the NPPF, by incorporating area visions, development management policies and 82 site allocations which plan for the long term delivery of housing. The NSP responds to rapid change which is occurring in Southwark and London as a whole and responds positively to the changing context of the emerging New London Plan.

54. Site allocation NSP17 covers the application site together with the wider area of the Styles House estate. This designation seeks redevelopment of the site to provide new employment use in addition to new retail, improved station access

and public realm improvements.

ASSESSMENT

Principle of the proposed development in terms of land use

Introduction

55. The redevelopment of the site would be office led, creating a significant uplift in Class B1 office space in addition to the introduction of retail opportunities at street level and within an improved street environment would create active frontages where there is currently very little animation, activity or interest at street level.

Relevant policy designations

56. The National Planning Policy Framework (NPPF) was updated in 2019. At the heart of the NPPF is a presumption in favour of sustainable development. The framework sets out a number of key principles, including a focus on driving and supporting sustainable economic development to deliver homes. Relevant paragraphs of the NPPF are considered in detail throughout this report

Bankside, Borough and London Bridge Opportunity Area

57. The London Plan designates Bankside, Borough and London Bridge as one of four Opportunity Areas in the London South Central area.
58. The London Plan notes that this area has considerable potential for intensification and scope to develop the strengths of the area for strategic office provision. This is further reflected in Policy SD2 – Opportunity Areas of the Publication London Plan which sets a target of 5,500 new jobs.
59. Strategic Targets Policy 2 of the Core Strategy underpins the London Plan and states that Southwark's vision for Bankside, Borough and London Bridge is to continue to provide high quality office accommodation, retail and around 25,000 jobs by 2026. Additionally, Strategic Policy 10 states that between 400,000sqm and 500,000sqm of additional business floorspace will be provided within the Opportunity Area to help meet Central London's need for office space.

Central Activities Zone and Bankside and Borough District Town Centre

60. The site is located within the CAZ which covers a number of central boroughs and is London's geographic, economic, and administrative core. Strategic Targets Policy 2 – Improving Places of the Core Strategy states that development in the CAZ will support the continued success of London as a world-class city as well as protecting and meeting the more local needs of the residential neighbourhoods. It also states that within the CAZ there will be new homes, office space, shopping and cultural facilities, as well as improved streets and community facilities.
61. In addition, part of the site is within the Bankside and Borough District Town

Centre. Saved policy 1.7 of the Southwark Plan states that within the centre, developments will be permitted providing a range of uses, including retail and services, leisure, entertainment and community, civic, cultural and tourism, residential and employment uses.

Bankside, Borough and London Bridge Strategic Cultural Area

62. The application site lies within the Bankside, Borough and London Bridge Strategic Cultural Area. Strategic Cultural Areas have been designated as such in order to protect and enhance the provision of arts, culture and tourism uses. Development of the tourism sector has significant local economic benefits through employment, regeneration and visitor spending in other local businesses. However, these developments must focus on effective visitor management and accessibility for all. Policy 1.11 of the Southwark Plan states that permission will be granted for new facilities provided they do not unacceptably compromise the character of an area. The policy states that management plans will be required for these uses in order to mitigate and manage impacts on local amenity.

Draft New Southwark Plan Site Allocation NSP17

63. The New Southwark Plan is in its Proposed Modifications for Examination version and was submitted to the Secretary of State in January 2020 for Local Plan Examination. The examination in public commenced on 22 February and formal adoption is set to take place later in 2021 and as such the policies currently have limited weight. The site is listed as an allocated site under the New Southwark Plan. The site allocation (NSP17) covers the application site and sets out that development must:
- Provide at least 50% of the development as employment floorspace; and
 - Provide active frontages with ground floor town centre uses (A1, A2, A3, A4, D1, D2) on Blackfriars Road, The Cut and the railway viaduct; and
 - Provide an enhanced accessible tube station, including public realm improvements.
64. The site allocation also states that the redevelopment of the site may include new housing (Class C3) and cultural uses (Class D1).

Conclusion on policy designations

65. The principle of a large scale development containing a mix of uses including Class B1 office space; Class A1/2/A3/A4 retail uses would support the role and functioning of the Central Activities Zone and the Bankside and Borough District Town Centre as well as being consistent with the policies for the Opportunity Area and the Strategic Cultural Area. The acceptability of each use is considered below.

Commercial uses

Offices

66. The site falls within the CAZ, which contains London's geographical, economic and administrative core. The London Plan does not protect office floorspace in

the CAZ; it simply identifies office use as an appropriate land use in the CAZ and notes that there is capacity for 25,000 jobs in the Opportunity Area. This is further supported by the Mayoral Supplementary Planning Guidance – Central Activities Zone (2016).

67. Core Strategy Strategic Policy 10 Jobs and Businesses states that the council will increase the number of jobs in Southwark and create an environment in which businesses can thrive. The policy goes on to state that existing business floorspace would be protected and the provision of around 400,000sqm-500,000sqm of additional business floorspace would be supported over the plan period in the Bankside, Borough and London Bridge Opportunity area to help meet central London's need for office space.
68. Saved policy 1.4 of the Southwark plan states that development will be permitted subject to there being no net loss of Class B floorspace (subject to a number of exceptions)
69. The site currently provides 912sqm of employment floorspace at Algarve House. This is currently being used as Class D1 floorspace as a result of a temporary permission for a meanwhile use. As the D Class use is temporary (approved for a period of 30 months), the application is being assessed on the basis of the substantive use for Algarve House which is Class B1.
70. The proposed development would provide a total of 26,513sqm of Class B1 floorspace resulting in an uplift of 25,601sqm which meets the policy objectives of protecting employment floorspace and is welcomed as a significant benefit of the scheme. The provision of 26,513sqm of Class B1 floorspace would have the potential to provide up to 2,000 jobs which would be a significant benefit of the scheme and satisfies the aims of the Core Strategy and London Plan in creating new jobs and high quality office space within the Central Activities Zone and the Opportunity Area.

Retail

71. The development would include two flexible retail units (A1/A2/A3/A4) at ground floor level. Both retail units would have frontages onto The Cut and together these provide a total of 237sqm of flexible retail floorspace.
72. The provision of new town centre uses such as retail is supported by saved Southwark Plan Policy 1.7 since the site lies within the Bankside and Borough District Town Centre. The retail units would activate the ground floor of the development and would contribute to the vitality of the Bankside and Borough District Town Centre. The current building has blank frontages around the station entrance and the proposal would create a much more welcoming street environment. The provision of retail and active frontages is consistent with site allocation NSP17.
73. In order to protect the amenities of the area, it is suggested that a cap be placed on the amount of floorspace within the larger of the two retail units that could be used for Class A4 (drinking establishments). A condition would be attached to this effect.

Conclusions on land use

74. The proposal involves the provision of high quality office floorspace alongside a range of acceptable town centre retail uses. These uses are consistent with the NSP site allocation and appropriate for the site's location within the CAZ, Opportunity Area and District town centre.

Affordable workspace

75. Publication London Plan Policy E2 - Providing suitable business space, seeks the provision of low cost Class B1 business space to meet the demand of micro to medium sized business as well as start-ups and enterprises looking to expand. The policy is clear that proposals for new B1 spaces over 2500sqm in size (or a locally determined lower threshold) should consider the provision of a proportion of workspace that would be suitable for these target businesses.
76. Publication London Plan Policy E3 relates specifically to affordable workspace and states that "In defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purposes". The policy identifies the circumstances in which it would be appropriate to secure affordable space. Part B of the policy specifically identifies the CAZ as an important location for securing low cost space for micro, small and medium sized enterprises.
77. Emerging Policy P30 of the New Southwark Plan deals with affordable workspace. Criterion 2 of the policy requires Major 'B Use Class' development proposals to deliver at least 10% of the new floorspace as affordable workspace on site at a discounted market rent for a period of at least 30 years. The policy recognises that there are many different forms that such space could take depending on the site location, characteristics and existing/proposed uses on site. Only where on-site provision would be impracticable are developers permitted to make an in lieu payment.
78. Taking into account the requirements of emerging policy P30, the proposed development would need to provide at least 10% of the uplift in commercial floorspace as affordable workspace. Since the uplift in floorspace is 25,601sqm this would equate to 2,560sqm of affordable workspace. The applicant proposes to provide 2,652sqm of affordable workspace and as such would slightly exceed the minimum target which is positive. The affordable workspace would be provided at ground, first and second floor level. As such the quantum of affordable workspace being provided is compliant with the emerging London Plan and New Southwark Plan policies.
79. In order to ensure the space is attractive to potential occupiers, the s106 agreement will require the affordable workspace to be fitted out to a minimum specification and for the common facilities (such as the bike store, showers and lifts) to remain accessible to staff throughout the lifetime of the affordable workspace unit.
80. In addition, the Section 106 Agreement will include a dedicated 'affordable workspace' schedule. This will ensure, among other things, that:
- the workspace is provided for a 30-year period at a discount of 30% on the market rent level;

- no more than 50% of the market rate floorspace can be occupied until the affordable workspace has been fitted-out ready for occupation;
- detailed plans showing final location of affordable workspace;
- a management plan is in place to secure the appointment of a Workspace Provider and a methodology for that Provider to support the occupiers;
- appropriate marketing of the affordable workspace will be conducted;
- the rates and service charges payable by the tenant will be capped, and;
- a rent-free period is offered to incentivise uptake.

Delivery of housing

81. As set out previously, the implementation of this office scheme is dependent upon a Land Swap Agreement that will facilitate the delivery of additional affordable housing on the Styles House site. As part of the enabling works to allow the delivery of the OSD, the eight chalets of Styles House fronting onto The Cut will need to be demolished. These homes would then be replaced as part of the proposed affordable housing development at Styles House which would be majority funded by TfL as part of the Land Swap Agreement and delivered by the Council. It is fully anticipated that the Council will deliver the replacement affordable housing on the Styles House site. However, to provide certainty that the replacement affordable housing (for the Chalet units) is delivered, a Section 106 obligation of £1.6 million will be secured. This obligation would ensure that, that in the event that the replacement affordable housing units are not commenced prior to the commencement of above ground works for the OSD scheme, an in-lieu affordable housing contribution shall be paid.

Environmental impact assessment

82. The applicant applied for a Screening Opinion under application reference 19/AP/5845, which confirmed that no Environmental Impact Assessment would be required to be submitted with the application.
83. Based on the assessment undertaken as part of the Screening Opinion, no significant likely effects were identified and accordingly the conclusion reached was that the proposed development would not be likely to have any significant effects upon the environment by virtue of factors such as its nature, size or location. The Screening Opinion concluded that the matters to be considered can be adequately assessed through the submission of technical reports submitted with the planning application. The proposed development was therefore not considered to constitute EIA development.
84. The applicant has submitted various technical reports in order to allow a full assessment of environmental matters and these are addressed individually in this report.

Design

85. The application is for the demolition of the existing chalet homes and Algarve House and redevelopment on a newly configured site in order to provide an office building with ancillary retail up to 17 storeys in height. The tallest part of

the building would be on the corner of The Cut and Blackfriars Road and would reach 75.14 metres in height, stepping down westwards through a series of terraces as it meets the boundary with the adjacent Styles House site. The building would effectively incorporate the land of Joan Street, which would need to be stopped up.

86. The NPPF at Paragraph 56 stresses the importance of good design, considering it to be a key aspect of sustainable development. This principle is embedded in the policies of the development plan, which require architecture to make a positive contribution to the public realm, streetscape and cityscape.
87. The relevant Southwark design policies are Strategic Policy 12 of the Core Strategy and Saved Policies 3.12 and 3.13, of the Southwark Plan. These policies require the highest possible standards of design for buildings and public spaces. The principles of good urban design must be taken into account in all developments including height, scale and massing, consideration of local context including historic environment, its character, and townscape strategic and local views. Policy 3.20 sets policy specific to the design and location of tall buildings.
88. The Blackfriars Road SPD envisages a range of building heights along Blackfriars Road with the tallest buildings to the north near the bridgehead marking a gateway into Southwark and central London. The SPD also expects taller buildings at important locations like Southwark Underground Station and towards St George's Circus. This is echoed in the area vision for Blackfriars Road (AV.04) set out in the draft New Southwark Plan
89. The SPD sees heights stepping down from the bridgehead and rising towards the underground station and then stepping down again towards the south before rising again at St George's Circus as shown on the massing diagrams below:

Image – Blackfriars Road height assessment

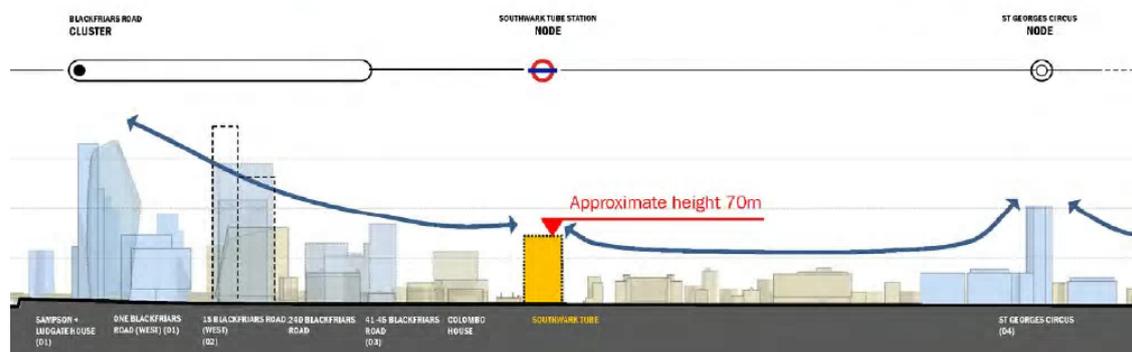
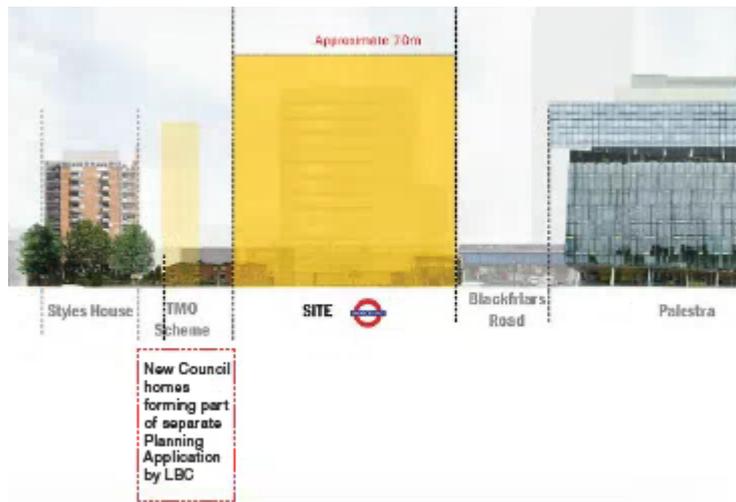


Image – Blackfriars Road height assessment



Site context

90. The application site, identified on the aerial plan below, has key frontages to Blackfriars Road to the east and The Cut to the south. The townscape is mixed, with a range of building heights and styles, the most distinctive local landmark being the Transport for London Palestra office facing the site across Blackfriars Road.
91. Southwark Station was designed by Sir Richard MacCormac of MacCormac, Jamieson & Prichard Architects and completed in 1999. At ground level is the entrance and distinctive rotunda on Blackfriars Road, with steps leading down into the ticket hall. Situated beneath and spanning the site is the ticket hall, an intermediate and lower concourse, and tube platforms. The structure was designed with the expectation of an 'over station' development being developed and as a result has always had a somewhat incomplete appearance.

Site layout

92. The proposed site layout is simple and rational, providing a single building that would be arranged along the principal boundaries of Isabella Street, Blackfriars Road and The Cut. Due to the land swap agreement, the western boundary would be located within the current Styles House communal garden (shown below) and Joan Street would be stopped up. Principal entrances would be on The Cut and Isabella Street and the retail units proposed on the ground floor would be accessed from The Cut. Vehicular access would be maintained from the remaining open section of Joan Street through the railway viaduct immediately to the north of the proposed building. The development would also create a green space between the office and the Styles House site, which is shared by the two developments but not open to the general public.



Height scale and massing

93. As mentioned previously, the Blackfriars Road SPD and the draft New Southwark Plan both accept the principle of tall buildings at important locations on Blackfriars Road and both documents specifically reference providing a focal point at Southwark Underground Station which is identified in the SPD at Policy SPD5 as being acceptable in principle for a building up to 70 metres in height.
94. The proposed development at 17 storeys would be slightly taller than the 70 metres set out in the SPD, with the total height proposed being 75.14 metres. This includes office accommodation up to 70 metres, and an enclosed plant area above, creating a maximum overall height of just over 75 metres. As such, the overall height is slightly higher than that envisaged in the Blackfriars Road SPD however this limited additional height would not lead to additional townscape or amenity issues and as such is considered acceptable.
95. This building would form a very distinctive pairing with the Palestra building, facing each other across the wide carriageway of Blackfriars Road. The pair are isolated from large buildings towards the bridgehead, whilst to the south, the character of the Blackfriars Road is defined by large listed townhouses on the west side and the blocks of the Nelson Square estate and newer offices which establish a scale of up to 10 storeys in height on the east side. The landmark status of the new building will therefore be all the more evident. This localised point of scale was envisaged in the Blackfriars Road SPD.



96. The building has a large footprint which maximises the office floor plates, but also arises from the need to site the lift and stair service core outside of the area of the underground station passenger circulation. This means that the building has a considerable mass.
97. However, the mass is complex and interesting. The footprint of the building will fold around the circular underground building in order to preserve the prominence of the curved underground station entrance (which with the rest of the underground station, is rightly celebrated as a fine piece of architecture) maintains a generous entrance to Isabella Street, between the building and the railway line to the north, and a very vibrant part of the low line project.
98. The folding of the ground floor plan form is then extruded upwards to produce a multi-faceted building of considerable interest. This breaks down the feeling of bulk to an extent and each façade will catch the light in different a way thus meaning that the appearance of the building will change throughout the day.
99. Further interest is added by the series of dramatic terraces on the western facade, each of which will be luxuriously planted to create a garden effect. This is a prominent feature in the views along The Cut from the west, and in the outlook eastwards from the Styles House buildings.
100. The net result of the multi-faceted facades and the planted terraces will be to create a dramatic form, one that is fulfils its 'landmark' brief.

Relationship to other tall buildings and the London skyline

101. Proposals for tall buildings must demonstrate a considered relationship with other tall buildings and building heights in the immediate context in views, including views along the River Thames and Blackfriars Road. The location, orientation and massing of tall buildings should be articulated to ensure that, cumulatively, tall buildings remain distinguishable as individual elements on the

skyline.

102. The Blackfriars Road SPD and draft New Southwark Plan require buildings which are significantly higher than 50 metres to demonstrate that they contribute positively to London's skyline, when viewed locally and in more distant views, particularly on the river front and that they make an exceptional contribution to the regeneration of the area.
103. Although the building will, given its landmark status, be tall for the locality, it is of a lower order of height than those in the emerging cluster of buildings being developed around the Blackfriars Road/Stamford Street junction. As such, it will be largely hidden in longer range views along the Thames.
104. From its immediate surroundings, from the south looking up Blackfriars Road and east along The Cut, it will be more prominent. From these directions it will have a robust quality which will make it a suitable but rather more assertive companion piece to the Palaestra building on the opposite side of the Blackfriars Road.

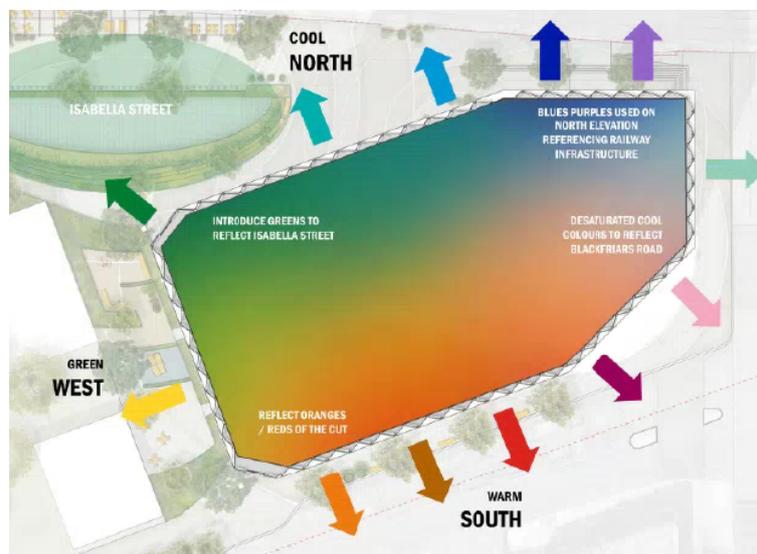


Architectural design and materials

105. In order to be considered exemplary, the architectural design of the façade has to be integrated with the overall form of the building, and has to be responsive to site conditions, especially environmental factors.
106. The façades will consist of expressed floor slabs brought to and exposed on the outside of the building. Spanning between the floors slabs are panels that are to be angled in plan in a zig-zag arrangement around the perimeter of the building. Panels will be alternatively glass and vertically textured/fluted solid panels.
107. From a distance the framework of slabs and panels will look balanced, well-proportioned and elegant in itself. Closer up, the considerable depth of the

facades imparted by the zig-zag arrangement will be revealed. Furthermore, the pattern of solid and transparent panels will alter as one moves around the building according to orientation, with more a more solid arrangement towards the south in order to reduce heat gain in summer, and a more open arrangement to the north to allow more daylight into the building from this aspect. This arrangement is a subtle device which reinforces the multi-faceted concept of the massing of the building.

108. Unusually, the building is to be a colourful one. The flutes of the solid vertical panels will be coloured to match the colours of the various underground lines, with the northern facades featuring the cooler colours of the Piccadilly, Victoria, and Docklands lines, through to the warmer greens and yellows of the Circle and District Lines as one moves round the building, to reds, yellows and purples of the Central, Overground and Metropolitan Lines on the southern façade. Again, this change in colour as one moves around the building reinforces the multi faceted architectural concept of the design. The colour adds interest without becoming garish or overly dominant.



109. The main body of the building will stand on a two storey plinth that is tall enough to encompass the interesting and dynamic existing station entrance at the key outward facing façade of the building. The top of the building is to be marked by a double height module of the façade below that will serve as an effective cap to the building.
110. The terraces on the west side of the building are a key part of the overall aesthetic. The dramatic form of the building imparted by this feature will be reinforced with planting which will vary according to height on the building. The lower (and therefore darker) tiers will have a 'forest floor' theme. This will give way to valley meadow, grassland, pioneer summit and alpine forest as one goes up the building. The choice of species and the planting and irrigation systems will be critical to ensuring that the planting thrives and does create the intended garden effect, and this would be secured by condition. Behind the edge planting each terrace will provide generous outdoor areas for tenants of the building.

111. Overall, the facades and form of the building constitute an integrated aesthetic concept, which alludes to this building's position at a key transport node and which will be fully climate responsive. Overall, therefore the form and aesthetic of the building envelope befits the building's intended role as a local landmark. It will be one of considerable interest and quality.

Landscaping and public realm

112. Isabella Street lies immediately to the north of the proposed building. At present this is the western termination of the Low Line and has cafes spilling out from adjacent railway arches on to it. Despite this, changes in level make access from Blackfriars Road awkward. In addition, the area immediately adjacent to the station is somewhat utilitarian and uninteresting. The 'eyelid'- a skylight into the underground station below - forms a dramatic feature but is somewhat isolated.



113. The scheme proposes extensive landscaping for this whole area. Whilst it will not result in new public space, it will be more accessible, more usable and will be a more interesting and attractive space to spend time in and to pass through. The eyelid is to be integrated as a feature with tiered landscaping and seating around its perimeter. Whilst there would be the loss of a number of small trees, their contribution to amenity is limited given their poor quality and new planting as part of a comprehensive landscaping strategy can appropriately mitigate their loss.



114. The land swap with the adjacent Styles House site results in a building of a bigger and therefore more viable commercial footprint. However, it will also mean the loss of Joan Street which runs between Isabella Street and The Cut. Whilst it is not at present a particularly important or pleasant street, its loss means that the site will be less permeable for pedestrians, and access to the Isabella Street will be less easy and obvious from the south and west.
115. The no build zone between the new office building and the new homes proposed on the Styles House site will be pleasant landscaped garden. The gardens will form a green open space between The Cut and Isabella Street, but would not be open to the general public; the issue of pedestrian movement is discussed further in the transport section below.



Heritage considerations

116. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990

requires local planning authorities to consider the impacts of proposals upon a conservation area and its setting and to pay “special regard to the desirability of preserving or enhancing the character or appearance of that area”. Section 66 of the Act also requires the Authority to consider the impacts of a development on a listed building or its setting and to have “special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”. The NPPF provides guidance on how these tests are applied, referring in paras 193-196 to the need to give great weight to the conservation of the heritage asset (and the more important the asset, the greater the weight); evaluate the extent of harm or loss of its significance; and, where necessary, weigh this against the public benefits of the scheme. Para 197 goes on to advise taking into account the effect of a scheme on the significance of a non-designated heritage asset.

LVMF and Southwark views

117. In London View Management Framework (LVMF) views, the protected views from Waterloo Bridge, Victoria Embankment, Westminster Bridge would be unaffected by the proposed development. The development would either not be visible or it would appear as a small and distant object which would not impact on the overall viewing corridor. It is therefore concluded that the development would have no impact on any strategic viewing corridor and therefore satisfies the development plan requirements to respect these important London views.

Conservation areas and listed buildings

118. The application site is close to the Valentine Place and King’s Bench conservation areas which are within Southwark. However, the closest conservation area to the site is the Roupell Street Conservation Area which lies to the north west within the London Borough of Lambeth. The Waterloo and Mitre Road Conservation Areas, also in Lambeth, lies close to the site to the west. There are listed buildings located to the south of the site on Blackfriars Road as well as within the wider area including the Christ Church and the obelisk and listed buildings at St George’s Circus. The development has the potential to affect their setting. In order to explore this further CGI’s from key viewpoints have been provided.
119. As might be expected, in views from major roads which abut the site the building appears as a prominent landmark structure. It will be a major feature rising as viewed from The Cut, for example.
120. In the important view from St Georges Circus at the southern terminus of Blackfriars Road, the building will appear as a reasonably distant object that does not rise markedly above foreground buildings. Due to distance, the listed buildings that are located on parts of Blackfriars Road are not prominent in this view. From this viewpoint their settings are not affected.
121. From surrounding smaller roads the tightness of the existing townscape tends to restrict views to the proposed building. However, it will rise into the sky

above existing townscape in views from Waterloo and Mitre Road conservation areas (Lambeth) and Kings Bench conservation area. It also rises above the large group of listed townhouses that line the western side of Blackfriars Road to the south of the site (Nos.74, 75-78, 81-83, 85-86). Partly because of distance in none of these views will be building appear over dominant. However, the conservation areas each have a coherent and intact character, as does the group of townhouses on Blackfriars Road. By rising above them, the building would affect the settings of these heritage assets.

122. The NPPF requires harm to heritage assets, including to their settings, to be judged as either 'substantial', or 'less than substantial'. Substantial harm has been held at appeal to mean that most of the significance of a heritage asset has, or will be, lost. This is clearly not the case here and indeed it would be unusual to judge any harm to setting as 'substantial'. Paragraph 196 of the NPPF goes on to states that:
123. "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal".
124. In this case the heritage assets are relatively small fragments of diverse townscape. All have modern developments that impinge, to a greater or lesser degree, on their setting. The 'less than substantial harm' can therefore be judged to be towards the minor end of 'less than substantial'. It can be balanced against the public benefits that would be generated by the development including the significant uplift in employment floorspace.

Ecology and biodiversity

125. A Preliminary Ecological Appraisal has been submitted with the application and reviewed by the Council's Ecologist. The site is currently occupied by buildings, hardstanding and some grassed areas and as such has negligible ecological value. It is noted that the grassed areas and small planting beds on the western part of the site may have potential value to common invertebrate species and birds, however with the inclusion of green roofs and other landscaping measures it is considered that the overall impact on biodiversity would be appropriately mitigated. Based on the current landscape plan general arrangement it is anticipated that the area based habitat biodiversity net gain for the scheme would be 88% which is welcomed. The ecological benefit measures will be secured by condition.

Fire safety

126. Policy 7.13 (B) of the London Plan 2016 requires development proposals to contribute to the minimisation of potential physical risks, including those arising as a result of fire. Policy D12 of the Publication London Plan expects all development proposals to achieve the highest standards of fire safety and to this end requires applications to be supported by an independent Fire Strategy, produced by a third party suitably qualified assessor.
127. A Fire Strategy, prepared by OFR Fire and Risk Consultants, has been submitted and sets out the fire strategy principles for the proposed

development. The fire strategy includes details of the pre-application engagement that was undertaken with the London Fire Brigade and the developer.

128. The report sets out the fire safety provisions for the building, which will be developed to satisfy the requirements of the Building Regulations. These measures include automatic fire detection and alarm systems, a phased evacuation regime, structural protection to withstand burnout, sprinkler systems, external wall construction not containing combustible materials, space separate assessments, dual firefighting shafts with mechanical smoke extraction, diverse building entry points from multiple facades and a wet riser.

Archaeology

129. The Council's Archaeologist has reviewed the application and notes that the area of archaeological interest is located to the rear of Southwark Station. This area is shown on the 18th century Rocque's map as occupied by buildings associated with a Tenter ground and works to the east side of Blackfriars' Road for the construction of the office building on this location revealed remains of geo-archaeological interest. The site is also located within the proposed north Southwark and Roman roads Archaeological Priority Area. As such it is recommended that planning conditions covering to archaeological evaluation, mitigation and reporting be imposed on any consent issued alongside an appropriate S106 contribution to fund archaeological monitoring.

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

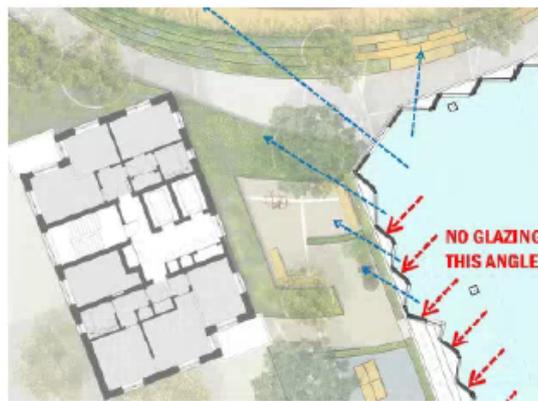
130. Strategic Policy 13 of the Core Strategy sets high environmental standards and requires developments to avoid amenity and environmental problems that affect how we enjoy the environment. Saved Policy 3.2 of the Southwark Plan states that planning permission for development will not be granted where it would cause a loss of amenity, including disturbance from noise, to present and future occupiers in the surrounding area or on the application site. Furthermore, there is a requirement in Saved Policy 3.1 to ensure that development proposals will not cause material adverse effects on the environment and quality of life.
131. A development of the size and scale proposed has the potential to impact on the amenities and quality of life of occupiers of properties both adjoining and in the vicinity of the site.

Outlook and privacy

132. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a separation distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear.
133. This distance would be met for all existing dwellings however it is noted that there would be a close relationship with the new Council housing proposed on the Styles House site to the west where the opposing facades between the new office and new housing would be separated by a minimum of 13.8 metres. The

distance from the existing Styles House would be approximately 26.5 metres. It should also be noted that the western façade of the proposed office building recesses as it increases in height thereby increasing the separation distance incrementally on upper levels and by the tenth floor the distance between it and the proposed housing block has increased to approximately 19.5 metres.

The proposed scheme is therefore considered to minimise amenity impacts on both existing occupiers and the new homes being proposed on the Styles House site. It is noted that this exceeds the minimum 12 metre requirement set out in the SPD for frontages, however, following consultation with the Styles House TMO during the scheme development for both schemes, residents expressed some concern about the amount of glazing that would be facing the new homes. In response, the developer amended their scheme during the pre-application phase and reduced the ratio of glazing at the lower levels as well as angling the windows so that there were no directly opposing windows.



Daylight

134. A daylight and sunlight report has been submitted as part of the Environmental Statement. The report assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
135. The BRE Guidance provides a technical reference for the assessment of amenity relating to daylight, sunlight and overshadowing. The guidance within it is not mandatory and the advice within the guide should not be seen as an instrument of planning policy. The guidance notes that within dense urban environments and areas of modern high rise buildings, a higher degree of obstruction may be unavoidable. The application site is located within an Opportunity Area within the CAZ and has been identified as suitable for a tall building. There are several examples of tall buildings within the local area including the completed developments at Palestra as well as consented schemes at Sampson House and Ludgate House, and the site known as 18 Blackfriars Road, all to the north of the site.
136. The BRE sets out the detailed daylight tests. The first is the Vertical Sky Component test (VSC). This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be

reduced by about 20% of their original value before the loss is noticeable. Impacts on VSC can generally be categorised as

| Reduction in VSC | Level of impact |
|------------------|-----------------------------|
| 0-20% | Negligible (not noticeable) |
| 20.1-30% | Minor |
| 30.1-40% | Moderate |
| 40% + | Major |

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

138. The daylight study considers the impact on the following neighbouring buildings:

- 77 Blackfriars Road
- 1-48 Styles House
- Benson House
- Rowland Hill House
- Ring Court
- 1 The Cut
- 36 The Cut
- Proposed Styles House TMO scheme

139. The properties at 77 Blackfriars Road, Benson House and 36 The Cut would remain unaffected by the development proposals and as such are not considered further. Each of the remaining properties will be assessed in turn:

Rowland Hill House

140. Rowland Hill House is located to the south east of the application site on the other side of Blackfriars Road and has its main frontage onto Union Street. A total of 69 windows and 64 rooms have been assessed for VSC and NSL respectively as set out below:

| Vertical Sky Component (VSC) | | | | | |
|------------------------------|------|---------------|-----------|-----------|-------|
| Window | | | Loss | | |
| Total | Pass | BRE Compliant | 20%-30% | 30% - 40% | 40% + |
| 69 | 12 | 17.4% | 9 | 2 | 46 |
| No Sky Line (NSL) | | | | | |
| Room | | | Loss | | |
| Total | Pass | BRE Compliant | 20% - 30% | 30% - 40% | 40%+ |
| 64 | 47 | 73.4% | 4 | 5 | 8 |

141. A total of 69 windows have been assessed for VSC and a total of 12 windows would remain fully compliant with the BRE guidelines. There would be 9 windows that would experience minor impacts of between 20% and 30% loss of

VSC. As set out above the loss of between 20% and 30% VSC is considered to be a minor impact overall and would be balanced by the fact that all of these windows serve rooms that would remain fully compliant in terms of NSL

142. Moderate impacts of between 30% and 40% loss of VSC would be experienced at 2 windows however the actual loss of VSC here would only be between 1.9% and 2.6% overall and as such is considered acceptable. As above, both of these windows would serve rooms that would remain fully compliant with the BRE in terms of NSL.
143. There would be major VSC impacts, equating to more than a 40% proportion reduction at 46 windows. At 42 of these windows the actual real terms reduction in VSC would be between 0.5% and 2.4% which is so low that it would be imperceptible to occupiers. The remaining four windows would see real terms VSC reductions of between 3.4% and 9.8% however these windows serve a single room that would also benefit from two additional windows that would remain unaffected in terms of a loss of VSC. Furthermore, this room would remain fully compliant with the BRE in terms of NSL.
144. It is noted in the table above that 47 of the 64 rooms assessed for NSL would remain compliant with the BRE. Of the 17 rooms that would see reductions in NSL beyond the BRE guidelines, 10 are kitchens with less than 11 sqm of floorspace and as such are not considered habitable rooms for the purposes of the assessment and the remaining seven rooms are bedrooms which are less sensitive to daylight impacts than principal living accommodation such as living rooms. The NSL reductions to the seven affected bedrooms is considered acceptable and to put these reductions into context they would affect between 0.1 sqm and 0.4 sqm of the aforementioned rooms. Rowland Hill House would remain unaffected in terms of sunlight.

1 The Cut

145. 1 The Cut lies immediately to the south of the application site. There are eight windows serving seven rooms within the four single aspect dwellings facing the site.

| Vertical Sky Component (VSC) | | | | | |
|------------------------------|------|---------------|-----------|-----------|-------|
| Window | | | Loss | | |
| Total | Pass | BRE Compliant | 20%-30% | 30% - 40% | 40% + |
| 8 | 0 | 0% | 0 | 0 | 8 |
| No Sky Line (NSL) | | | | | |
| Room | | | Loss | | |
| Total | Pass | BRE Compliant | 20% - 30% | 30% - 40% | 40%+ |
| 7 | 0 | 0% | 0 | 0 | 7 |

146. As detailed in the table above, all eight windows assessed for VSC and all seven rooms assessed for NSL would see major reductions which would be noticeable for occupiers and would have an impact on their amenity. At present the properties at 1 The Cut benefit from unobstructed views across the site which lies undeveloped beyond the single storey entrance structure. It would be unrealistic to assume this situation could be maintained in central London. This

results in unimpeded access to daylight and views of the sky that are not typical for such a central London location.

147. The site has been identified in policy as being suitable for a tall building and it is anticipated that there would be a degree of impact as a result of a reasonable development. The SPD envisages a building up to 70 metres in height; the additional impact arising from the slight increase in height above 70 metres is not noticeable, but the impact derives to some extent due to the length of the building. This form arose following the agreement in principle by the Council to allow Joan Street and parts of the Styles House area to be incorporated into the development site.
148. It should be noted that the site is also constrained by the existing underground station which has informed the location of the building's lift and stair core. This had to be located outside of the ticket hall and circulation void, which has caused the mass of the building to extend along The Cut. In effect, the greatest mass of the building is located directly opposite a small number of flats, and it is these flats which are the most severely affected in terms of their day light and outlook (sunlight is not affected due to the northerly outlook).
149. The architects were asked to look, in conjunction with the daylight consultants, and options to improve the daylight amenity of the flats in 1 The Cut. This indicated that a very significant reduction in height would be required in order to make a meaningful improvement to the flats. This would effectively render the development deliverable, as well as failing to address the landmark position of the site, as indicated by the Blackfriars Road SPD.
150. The harm to the daylight amenity of these four flats is a factor which weighs against the application, and must be considered in the balance against the wider economic and regeneration benefits of the development.

Ring Court

151. This property is located to the south of the site on The Cut and includes residential accommodation on the upper floors. In terms of layouts it should be noted that the principal living accommodation is located on the southern façade which would be unaffected by the proposals. The windows facing the application site serve bedrooms and kitchens.

| Vertical Sky Component (VSC) | | | | | |
|------------------------------|------|---------------|-----------|-----------|-------|
| Window | | | Loss | | |
| Total | Pass | BRE Compliant | 20%-30% | 30% - 40% | 40% + |
| 15 | 1 | 6.7% | 0 | 2 | 12 |
| No Sky Line (NSL) | | | | | |
| Room | | | Loss | | |
| Total | Pass | BRE Compliant | 20% - 30% | 30% - 40% | 40%+ |
| 14 | 5 | 35.7% | 0 | 8 | 1 |

152. 15 windows have been assessed for VSC with one window remaining compliant with the BRE guidance. Of the remaining 14 windows, nine are positioned in kitchens that measure less than 11sqm and as such are not

considered habitable rooms for the purposes of the assessment. The remaining five affected windows would serve bedrooms and whilst there would be noticeable impacts, it is recognised that bedrooms are less sensitive to reductions in daylight. Of these five bedrooms, four would retain VSC levels of between 20% and 25% which is positive for a highly urbanised environment. The remaining bedroom would see a retained VSC level of 8% which is low; however the use of the room as a bedroom reduces its reliance on daylight under the terms of the BRE and the main living accommodation would be on the southern façade and as such would be unaffected by the proposal.

153. Of the 14 rooms assessed for NSL, five (35.7%) would remain compliant with the BRE guidelines and experience no noticeable alteration in daylight distribution. Five of the remaining nine rooms are small kitchens and as outlined above these are not considered further as they are not habitable rooms. The remaining four rooms are all bedrooms and continue to experience in excess of 55% NSL which is considered acceptable given the use of the rooms as bedrooms and the site's location within a central London environment. It should be noted that Ring Court, by virtue of its position and orientation, would remain unaffected by the proposed development in terms of sunlight.

Styles House

154. Styles House lies to the west of the application site and comprises flatted dwellings in a building of 12 storeys. It would not be appropriate to test the low rise 'chalet' dwellings since these would need to be removed, as part of the wider land swap arrangement, to allow this office development to proceed.

| Vertical Sky Component (VSC) | | | | | |
|------------------------------|------|---------------|-----------|-----------|-------|
| Window | | | Loss | | |
| Total | Pass | BRE Compliant | 20%-30% | 30% - 40% | 40% + |
| 104 | 70 | 67.3% | 5 | 25 | 4 |
| No Sky Line (NSL) | | | | | |
| Room | | | Loss | | |
| Total | Pass | BRE Compliant | 20% - 30% | 30% - 40% | 40%+ |
| 24 | 24 | 100% | 0 | 0 | 0 |

155. At Styles House a total of 104 windows and 24 rooms have been assessed for VSC and NSL respectively. All of the assessed rooms would remain fully compliant with the BRE in terms of NSL. With regards to VSC, whilst there would be 34 windows that would see noticeable reductions, these windows all serve rooms that benefit from additional windows that would be unaffected in terms of VSC and would remain compliant with the BRE guidelines.
156. The impact of the development on Styles House is considered acceptable given that all rooms are dual aspect and benefit from windows that would remain unaffected in terms of VSC and that all rooms would remain BRE compliant in terms of NSL. In terms of sunlight, Styles House would remain unaffected by the proposed development.

Styles House TMO development scheme

157. The applicant has assessed the impact of the proposed development on the proposed Styles House TMO scheme for new housing to the west of the proposed office building. In line with BRE guidance, the appropriate test for quantifying the quality of daylight to new homes is the Average Daylight Factor (ADF) and the applicant has considered this alongside NSL.

In terms of NSL, 25 rooms have been assessed and all of them would be compliant with the BRE in terms of daylight distribution with all rooms achieving the target value of 80%.

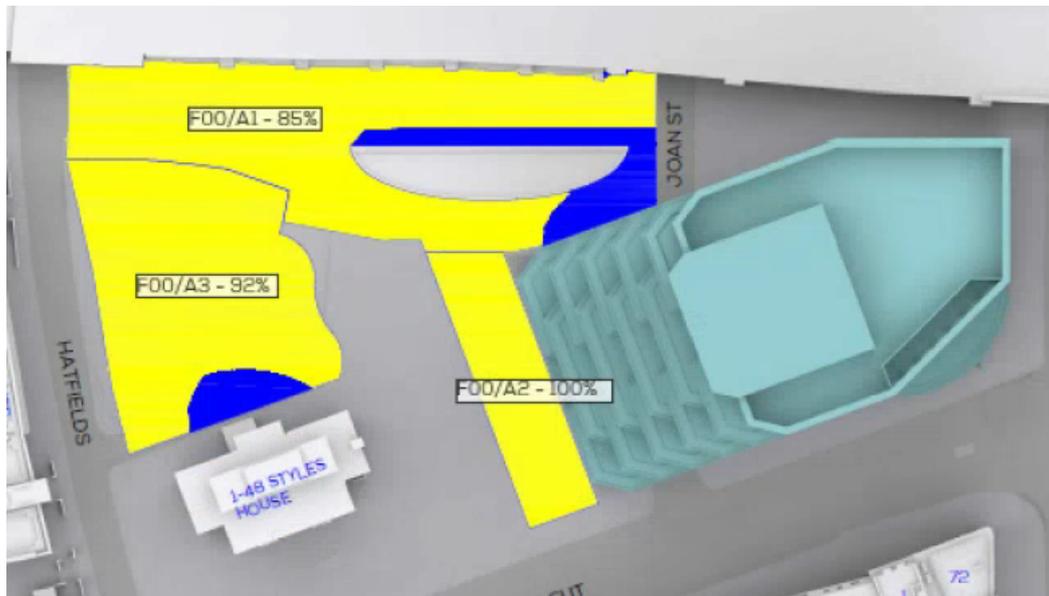
158. In terms of ADF, 14 of the 25 rooms would meet the target ADF value for their specified room use. Target ADF values are as follows:

| Room | ADF Target |
|----------------------|------------|
| Living/Kitchen/Diner | 2% |
| Kitchen | 2% |
| Living Room | 1.5% |
| Bedroom | 1% |

159. The 11 rooms which do not meet the target ADF levels are Living/Kitchen/Diners which have a target ADF value of 2%. Of these 11 L/K/Ds, a total of seven would achieve ADF levels in excess of 1.5% which is an acceptable level for a living room. It should also be noted that all L/K/Ds are positioned such that they benefit from multiple windows and as a result all meet the BRE guidelines with regards to NSL. Furthermore, all rooms assessed for sunlight would be compliant with the BRE standards.

Overshadowing of amenity spaces

160. The applicant has undertaken an overshadowing study to assess the impact of the development on the open spaces surrounding the site. The BRE recommends that at least half of the amenity area space should achieve at least two hours of direct sunlight on the 21st March. The image set out below shows in yellow, those parts of the site that would achieve a minimum of two hours of sunlight of sunlight on 21 March and the blue indicates those areas that would not meet that target. All areas comfortably meet the BRE guidelines with regards to overshadowing.



Conclusion on daylight and sunlight

161. Developing sites in highly urbanised environments often results in some unavoidable impacts to daylight and sunlight. Recognising the challenges associated with developing inner city sites, the numerical targets given in the BRE are expected to be treated with a degree of flexibility, having due regard for the existing and emerging context within which these sites are located. The application site is within a Central London Opportunity Area.
162. In this instance, the site has been designated as an appropriate location for a tall building up to 70 metres in height. The Blackfriars Road SPD accepts the principle of a tall building in this location in order to provide a focal point to the existing Southwark Underground station, as does the Blackfriars Road Area Vision (AV.04) of the NSP. The daylight assessment shows that a small number of windows/homes would experience significant reductions in the amount of daylight, classified as 'major' impacts. Sunlight is not affected due to the orientation. Looking at the nature of the rooms affected, many are bedrooms, where the primary use means that the BRE gives these rooms a lower expectation in terms of daylight. Other affected rooms are small kitchens, which are not recognised as habitable rooms under the BRE guidance. The flats in Ring Court are dual aspect, with their principal living rooms on the south façade, which is unaffected. However, it must be acknowledged that a small number of flats in 1 The Cut would have both living and bedroom spaces affected. This harm should be recognised and given weight in the determination of the application. On balance, officers consider that, when reading the BRE guidance with the required flexibility, and in view of the positive benefits of the development proposal, the degree of harm to amenity would not justify withholding planning permission in this case.

Solar glare

163. Various nearby viewpoints have been considered for impacts as a result of solar glare. This analysis has identified instances of solar glare that may occur throughout the year at various times of the day depending on the exact point of observation.

164. Due to the multi faceted design of the building facades, windows are angled and only visible as narrow strips from a number of viewpoints and as such instances of solar reflection would be limited when seen from a moving vehicle. It is therefore concluded that there will be no significant impacts resulting from the proposed development with regards to solar glare.

Noise and vibration

165. A noise and vibration survey has been undertaken on the site of the proposed Southwark OSD with the intention of assessing the potential noise impact of the proposed development on the surrounding area and occupiers.
166. The focus of the assessment is on noise from plant once the building is completed and is operational. The report concludes that the recommended plant noise emission limits will be achieved in line with the Council's standards and notes further that typical noise mitigation measures may be required in order to meet these limits, such as in duct attenuators and plant screens. The noise limits will be secure by condition alongside mitigation measures. Officers consider that there would be no adverse impact in terms of noise from plant once the development is completed and operational. Other sources of noise and vibration during the construction phases will be controlled under a Construction Environmental Management Plan

Transport and highways

167. The NPPF states that planning decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.
168. Core Strategy Strategic Policy 2 encourages walking, cycling and the use of public transport rather than travel by car. Saved Policy 5.1 of the Southwark Plan states that major developments generating a significant number of trips should be located near transport nodes. Saved Policy 5.2 advises that planning permission will be granted for development unless there is an adverse impact on transport networks; and/or adequate provision has not been made for servicing, circulation and access; and /or consideration has not been given to impacts of the development on the bus priority network and the Transport for London (TfL) road network.

Site context

169. The site benefits from an exceptional level of accessibility to the London public transport network with immediate access to Southwark Underground station on the Jubilee Line as well being within easy walking distance of Waterloo and Waterloo East stations which offers onward connections to the mainline train network. Blackfriars Road offers many bus routes and Cycle Superhighway 6 lies immediately adjacent to the site on Blackfriars Road. A cycle hire docking station is located immediately to the north of the current station on Isabella Street and provides 82 cycle parking spaces. The site sits within Controlled Parking Zone C1 which operates Mon – Fri 8 – 23:00 and Sat 9.30 – 12.30. Joan Street, which connects The Cut to Hatfields, dissects the site in a north south orientation

Site layout

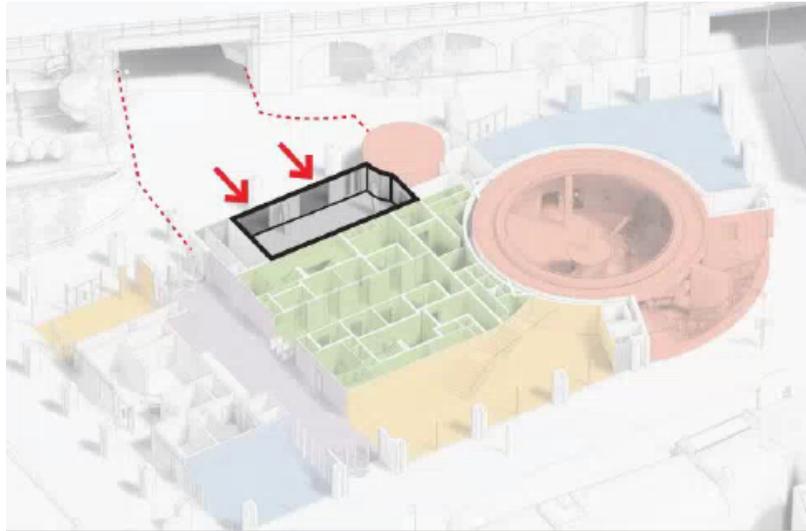
170. The proposed building would be arranged as a single block around the principal boundaries of Isabella Street, Blackfriars Road and The Cut. Due to the land swap agreement, the western boundary would be located within what is currently the Styles House communal garden (shown below) and Joan Street would be stopped up. The layout is rational and would maintain principal pedestrian routes with the added benefit of wider pavements on The Cut and the area immediately adjacent to the entrance to the Underground station. There would be a single point of access for vehicles and this would be located at the junction of the retained leg of Joan Street and Isabella Street on the north side of the proposed building where a servicing bay within the curtilage of the building would be provided.

Stopping Up of Joan Street

171. Then proposed development would necessitate the closure and stopping up of Joan Street in order to enable the development of the OSD as well as the delivery of the Styles House development and the public realm benefits.
172. Joan Street currently connects The Cut to Hatfields, passing beneath the railway viaduct and provides access to Colombo House, occupied by British Telecom (BT) and the rear of the Isabella Street retail units. It is the southern section of Joan Street which would need to be stopped up (south of the railway viaduct). The access to Colombo House and the Isabella Street businesses would be maintained from the northern leg of Joan Street. This is shown on the image below.



173. The applicant has undertaken traffic surveys which demonstrate that Joan Street is lightly trafficked and that the majority of vehicles using Joan Street are servicing vehicles for businesses including the retail units on Isabella Street and the Colombo House which is an important BT asset. The applicant has undertaken various studies that demonstrate that the servicing of these businesses can continue with the proposed new layout as shown below.



174. There would be some impact on pedestrian permeability as a result of the closure of Joan Street. Those wishing to access Isabella Street would need to enter via Blackfriars Road or Hatfields, to the east or west of Joan Street. The council would normally wish to maintain maximum pedestrian permeability, and when an existing route is stopped up, a new route offering equivalent access should be proposed. However, on balance the diversions are minimal and would not inconvenience users.
175. As well as the main public routes, a north south route is provided through the ground floor of the office building which would be a semi public route that would offer a north south pedestrian connection during business hours which would to some degree offer a replacement Joan Street connection, although it would be less obviously 'public' and only open during limited hours, and not to cyclists. A colonnade space is also created along the western edge of the building, which office workers could use to access cycle stores and secondary entrances. This colonnade route would be kept private at the request of the Styles House TMO who wish to mitigate the potential for adverse amenity impacts such as noise, nuisance and antisocial behaviour. The proposed arrangement is therefore considered acceptable in this instance only due to the site specific constraints placed on the development as a result of the land swap and the requirements of the Styles House TMO.
176. If the Committee resolves to grant planning permission, the applicant would need to make an application to Southwark Council as Highways Authority to formally close ("Stop up") Joan Street. This application, under s247 of the Town and Country Planning Act 1990 would be subject to consultation including site notices. If any objections are received and these are not resolved by negotiation then the application is referred to the Mayor of London and there would potentially be a public inquiry. The Mayor of London would then either decide that under section 252 (5A) "*in the special circumstances of the case*" an inquiry is unnecessary, in which case the borough may confirm the order, or that an inquiry is necessary, in which case a Public Inquiry would be held before a formal Order is issued. The road could not be closed unless an Order is issued, and any planning permission could not proceed to be built out without the Order being carried out.

Trip generation

177. The Council's Transport Officer has undertaken an independent review of trip generation for the site using the TRICS database. The use of TRICS is supported by TfL.
178. The Transport Officer, using TRICS, has calculated that in terms of servicing, the development would produce approximately 44 and 29 two-way net additional vehicle movements in the morning and evening peak hours respectively. Whilst these figures differ slightly from those provided by the applicant, the additional vehicle movements they would not have any noticeable adverse impact on prevailing vehicle movements on surrounding roads or any adverse impact on the transport network.
179. The applicant's consultants have estimated that this development proposal would create an additional 613 and 558 two-way public transport trips in the morning and evening peaks hours respectively. The Council's Transport Officer's own investigations show that there would be 596 and 645 two-way public transport trips in the morning and evening peaks hours. Following a detailed review of bus, rail and underground provision as well as station/escalator capacity, it is considered that the increase in public transport trips can be sufficiently catered for within the existing network capacity and that there would be no detrimental impact on accessing public transport. A s106 contribution for additional bus capacity has been requested and agreed.

Servicing and deliveries

180. The complexities of the site's location and the adjoining road network is such that servicing the development from the north via Hatfields and the northern leg of Joan Street, passing beneath the railway viaduct, is the most appropriate and practical option following the stopping up of southern section of Joan Street at The Cut. A servicing bay will be created within the curtilage of the development with access from Joan Street.
181. The servicing bay will have capacity for two servicing vehicles at a time and will allow them to park safely within the site curtilage whilst undertaking deliveries and this will meet the servicing demands of the building. Given that the vehicle movements would be restricted to the hammerhead created around the existing area of Joan Street to the north of the proposed building, it is not considered to have any adverse impact on pedestrian movement along Isabella Street, particularly the areas outside the existing businesses in the railway arches. It is recommended that full details of servicing, how it will be managed and how deliveries could be consolidated be secured by a Service Management Plan as part of the S106 Agreement.

Refuse storage arrangements

182. A large consolidated refuse store will be located at basement level 2 and there will be access from this store to a service lift that will bring the refuse to ground floor level. Refuse collection will be undertaken from within the turning area to the north of the building (fronting the serving bays). Refuse vehicles will use the turning head provided to manoeuvre and reverse next to the loading bay where refuse collection will be undertaken.

Car parking

183. Saved Policy 5.6 (Car Parking) of the Southwark Plan and Core Strategy Policy 2 (Sustainable Transport) state that for office use, a maximum of one space per 1500sqm is permitted which would equate to a maximum of six spaces. No parking (except disabled provision) is permitted for retail or culture uses.
184. The proposed development would be completely car free. Parking standards usually require a minimum of one accessible parking bay for commercial uses regardless of the car free nature of a development or its location within the CAZ. In this instance the proposal is fully car free and does not propose any accessible car parking spaces. This is acceptable in this instance, given the the step free accessibility and proximity of Southwark Station in addition to the existing disabled parking bays on Hatfields. Future occupiers of the new offices and retail units will be exempt from obtaining parking permits and this will be secured as part of the legal agreement.

Cycle parking and cycling facilities

185. The development would provide a total of 402 cycle parking spaces which would include 371 long stay spaces in the upper basement level and 31 short stay spaces distributed across the ground floor. This complies with current policy as well as the standards set out in the Publication London Plan. It is noted that the draft New Southwark Plan would require additional cycle parking however until the Examination in Public is concluded on the draft plan this policy can only be afforded limited weight. As is the approach taken on similar applications, a condition will be imposed on any consent issued that will obligate the developer to use best endeavours to increase the number of cycle parking spaces on site. The location, layout and associated facilities relating to the cycle parking are all considered acceptable.
186. There are currently 82 cycle hire docking station spaces to the rear of the site on Isabella Street and it is proposed that 30 of these spaces be retained onsite and the remaining 52 be relocated within the local area. This will be secured under the S106 Agreement.

Public realm improvements

187. The pavement space to the south of the site on The Cut and immediately outside the station entrance on the corner with Blackfriars Road is limited and this has implications for pedestrian flow and comfort. It is not possible to set back the building line to widen the pavement due to the existing structure of the station entrance. As part of the proposals the developer seeks to widen the footway on The Cut through removing the left turn lane on the approach to Blackfriars Road. This would create a wider footway which would provide the required level of acceptable space for pedestrians post-development. This proposal would provide a clear footway width of approximately 3.5m and the provision of a cycle approach lane to the advance stop line (ASL) at the traffic signals. It is considered that this would improve the pedestrian experience on the approach to this significant junction and transport node, as well as reducing traffic and improving safety for cyclists.



Conclusions on transport

188. The proposed site layout including the vehicular access points, position of buildings in relation to highways and the improvement to the footway on The Cut are all welcomed. The proposed development would minimise car parking whilst encouraging walking and cycling which supports the Council's sustainability agenda.
189. The site has excellent access to public transport and the development has been shown to have a very limited impact on the public transport network in terms of vehicle trips and the proposed servicing arrangements would minimise any highways impacts.
190. Whilst the closure of Joan Street would have some impacts on pedestrian permeability, these are not considered to be significant. However, the ability to implement any planning permission will be dependent on the applicant securing a stopping up order for the southern leg of Joan Street. This is outside of the planning process, being a decision of the highway authority.
191. The S106 Agreement should secure details of a Demolition/Construction Environmental Management Plan; Construction Logistics Plan, Delivery Consolidation Strategy; Service Management Plan including servicing bond; Car Parking Exemption; and Travel Plan. Additionally, financial contributions will be secured in relation to public transport improvements, cycle hire and site specific transport improvements such as raised tables and resurfacing of footways.

Construction management

192. Demolition and construction activities including associated traffic could give rise to some noise disturbance at nearby homes and adjacent buildings as well as affecting pedestrians at street level. These impacts are associated with the demolition and construction of the development and whilst they have the potential to cause disturbance they would be short term and temporary and relevant planning conditions would be imposed to offer mitigation and control hours of work as well as agreeing routes for construction vehicles. The Plan would also have to demonstrate measures to ensure safe operation of the underground station during construction.

Flood risk

193. The application site is located within Flood Risk Zone 3 and as such a Flood Risk Assessment, Basement Impact Assessment and Drainage Strategy have been submitted as part of the application. The Environment Agency and Thames Water have both been consulted on the proposed development and neither has raised any objections subject to conditions. The relevant conditions would be imposed on any consent issued.
194. The Drainage Strategy proposes to retain the existing discharge rates due to the complexity of the drainage in the area and the function of the station. As such it is recommended that a financial contribution be secured which can be used to fund local flood risk mitigation and/or SUDS in the area, helping to reduce surface water runoff. With a catchment area of approximately 1,924sqm for Isabella & Joan Street this would equate to £129,870. Based on comparisons with the Council's ongoing SUDS projects in the London Bridge area this would fund a sizable rain garden with attenuation storage.

Land contamination

195. A Geo-Environmental Desk Study has been submitted with the application in order to examine potential ground contamination risks and to assess both ground and groundwater conditions. The eastern part of the site was developed as Southwark Underground station in 1999 and given the significant excavations that took place as part of that construction project, no unacceptable land quality risks have been identified.
196. The study has identified that the western part of the site has the potential to include made ground and the chemical/physical nature of these soils is unknown. It is acknowledged that the proposed basement excavations will remove much of this material and that the proposed development is a relatively low sensitivity land use.
197. It is therefore recommended that further site investigation is undertaken on the western side of the site to evaluate the chemical and physical ground conditions as well as groundwater analysis. These requirements will be imposed as conditions on any consent issued.

Air quality

198. An Air Quality Assessment has been submitted as part of the application and considers the construction phase of the proposed development, and the impact on local air quality of emissions from road traffic associated with the site during the construction and operational phases. The pollutants of primary concern in the borough are particulate matter (PM10 and PM2.5) and NO2.
199. It is anticipated that there would be some impacts on air quality as a result of the construction phase of the development. During the demolition and construction phase it is recognised that there would be impacts such as dust in the air as well as dust and dirt on the highway as a result of construction vehicle movements. Officers consider that this can be suitably managed and mitigated through a Construction Environmental Management Plan which

would be a conditioned requirement of any consent issued.

200. The proposed development would be car free and there would be a net reduction in car parking spaces as a result of the closure of Joan Street. As such the development is expected to generate minimal additional traffic movements on the local network. Whilst the development would be car free it would use electricity in order to power the building and there would be a requirement for a back up diesel generator on the site.
201. As part of the study, an Air Quality Neutral assessment has been undertaken which demonstrates that the proposed development would be air quality neutral in regards to both transport and building related emissions. It is therefore considered that the development would not contravene any national or local planning policies related to air quality.

Wind

202. A Wind Assessment has been submitted that quantifies the risk of excessive windiness to pedestrians as well as wind comfort analysis. This report considers the wind impact of the planned over station development (OSD) and focuses on three distinct phases:
 - The site in its current state;
 - The site with the OSD in place;
 - The site with the OSD in place alongside any planned developments that would have a significant impact on the wind microclimate (future surrounds).
203. The study concluded that, for all configurations, wind speeds are tolerable in terms of both comfort and safety. The addition of the OSD produces areas at street level where long periods of sitting or using an entrance could exceed the comfort criteria albeit remaining well within the tolerable range.
204. The area most affected lies on the south side of The Cut, including The Tortilla restaurant, The Ring pub, the Tesco Express and Southwark College. All four entrances and the outdoor seating areas of the pub and restaurant would at times exceed their respective comfort criteria but remain well within the tolerable range. The assessment includes a study of the future townscape, including the proposed Council block at Styles House just to the west of the site and the simulations suggest that this block will generally improve the wind microclimate in the affected areas.
205. The plans for the OSD include significant soft landscaping, making use of trees and vertical climbing plants to reduce wind speeds. This mitigation has not been included in the wind study in order to maintain a conservative (worst case scenario) result from the simulations. The inclusion of the proposed landscaping is likely to mitigate some of the discomfort caused by the new building. In order to maximise the effectiveness of mitigation including physical mitigation on the façade of the building, it is recommended that a Wind Mitigation Assessment be secured as part of the S106 Agreement. Overall, there is no significant adverse impact on amenity as a result of the wind environment caused by the new development.

Energy and sustainability

206. The London Plan Policy 5.2 sets out that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy Be lean: use less energy; Be clean: supply energy efficiently; Be green: use renewable energy. This policy requires development to have a carbon dioxide improvement of 35% beyond Building Regulations Part L 2013 as specified in Mayor's Sustainable Design and Construction SPG.
207. Policy 5.3 states that developments should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process. London Plan policy 5.7 requires that major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.
208. Strategic Policy 13 of Core Strategy states that development will help us live and work in a way that respects the limits of the planet's natural resources, reduces pollution and damage to the environment and helps us adapt to climate change. The applicants have submitted an energy strategy and a sustainability assessment for the proposed development which seek to demonstrate compliance with the above policy.
209. Policy S12 of the Publication London Plan seeks to minimise greenhouse gas emissions in accordance with an energy hierarchy with a minimum 35% reduction to be achieved on site and financial offsets to help achieve carbon zero.

Whole life cycle and the circular economy

210. Policy GG5 (Growing a Good Economy) of the Publication London Plan promotes the benefits of transitioning to a circular economy as part of the aim for London to be a zero-carbon city by 2050. Policy D3 (Optimising Site Capacity Through the Design-Led Approach) requires the principles of the circular economy to be taken into account in the design of development proposals in line with the circular economy hierarchy. Policy SI7 (Reducing Waste and Supporting the Circular Economy) of the Publication London Plan requires referable applications to develop circular economy statements.
211. The applicant's consultant has undertaken a Whole Life Carbon Assessment that demonstrates that the majority of the carbon emissions (58%) can be attributed to the processing and production of the construction materials to be used, particularly the large quantities of steel and concrete in substructure elements, the steel frame, and aluminium and glass for the façade and curtain walling systems.
212. During the scheme development and as part of the appraisal, the large impact from using aluminium in the curtain wall and façade cladding was shown. Minimising the quantity of aluminium and using aluminium with a high recycled content would assist in reducing the embodied carbon of the entire building. Additional improvements are shown using Cross Laminated Timber (CLT) over concrete and steel for the upper floor slabs, and in using aluminium clad timber

frames for the glazed curtain walling.

Carbon emission reduction

213. In terms of the energy hierarchy the Be Lean and Be Green measures would achieve a total carbon reduction of 42% taking into account SAP10 and decarbonising of the electricity grid and would exceed the requirements of the policy. This is set out in more detail below.

Be Lean (use less energy)

214. The proposed development is estimated to achieve a reduction of 74 tonnes per annum (22%) in regulated carbon dioxide emissions for the 'Be Lean' case compared to a 2013 Building Regulations compliant development, based on SAP 10 emissions factors. This exceeds the Publication London Plan targets. The reduction in carbon dioxide emissions has been achieved by maximising the energy efficient measures and will include:

- Energy efficient HVAC systems
- Energy efficient lighting
- High thermal insulation standards and air tightness.

Be Clean (supply energy efficiently)

215. The proposed development would incorporate an individual centralised energy centre located on the roof and Air Source Heat Pumps (ASHPs) will meet the all the demands for heating, cooling and hot water. Two large heat pumps are proposed in order to maximise efficiency and meet the building's base/simultaneous load. These would be supplemented by smaller modular heat pumps which will be sized to meet the peak loads such as the peak cooling load in summer. The proposed carbon reduction under Be Clean would equate to 20%.

Be Green (Use low or carbon zero energy)

216. Photovoltaic panels are proposed as part of the Be Green requirement. The development would incorporate 4.7 kWp of PV panels located on the restricted available roof area. The potential space for PV panels on the roof is limited due to the space taken up by the plant area and the air source heat pumps. A total of 45sqm of net PV area and a predicted 3,370 kWh of electricity generation per annum would be achieved on site.

Carbon Zero

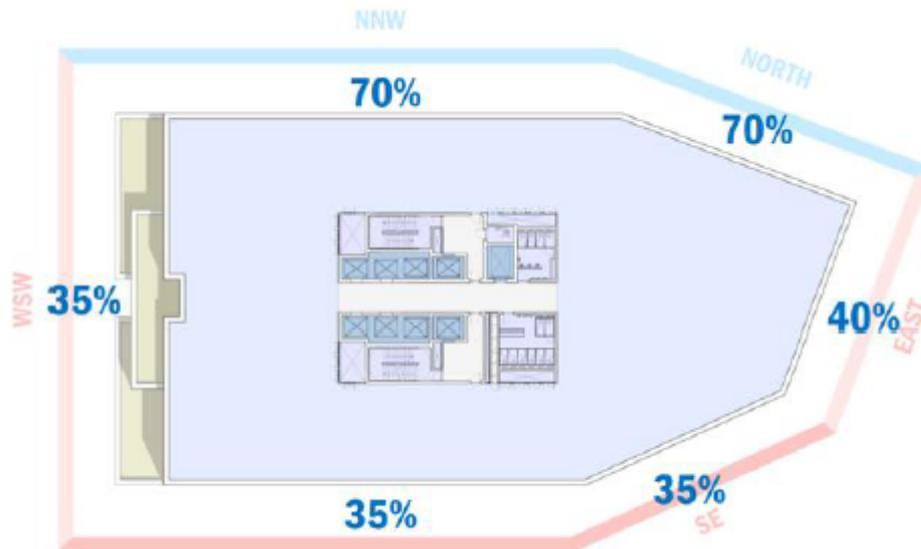
217. TfL have made a commitment for the development to achieve carbon zero status in order to comply with the zero carbon target set by the Publication London Plan. As such a financial contribution of £544,350 representing £95 per tonne of CO₂ will be secured as part of the legal agreement.

Overheating

218. The Publication London Plan Policy SI4 Managing heat risk and The New

Southwark Plan policy P68: Sustainability standards set out the cooling hierarchy that should be followed when developing a cooling strategy for new buildings.

219. The main aim of the strategy is to minimise heat loss and solar gain through energy efficient design. The proposal includes the provision of energy efficient heating, ventilation and air conditioning (HVAC) equipment and lighting. The scheme has also been designed to reduce the amount of heat entering the building in summer through orientation, shading, fenestration, insulation and green roof. Central to this is variable glazing ratios across the different facades of the building as set out below:



220. The image above demonstrates that the building is designed with low façade glazing ratios for the south and south-east facing façades reducing the direct solar gains during the summer months. The building will be equipped with high performance and low reflectivity double glazing and the lower levels of the east and south-east façades will be protected by adjacent buildings and as such would not be subjected to direct solar heat gain.
221. Heat within the building can also be managed through exposed internal mass and high ceilings. Additionally, incorporating Cross Laminated Timber in the construction process delivers a number of sustainability benefits.
222. The scheme has been designed with responsive facades which would be equipped with openable panels to provide ventilation and allow air to penetrate the building, providing natural ventilation. This will supplement the mechanical ventilation system that will further reduce unwanted heat gains and overheating.

BREEAM

223. A BREEAM pre-assessment has been completed which demonstrates that the scheme's anticipated rating would be BREEAM 'Outstanding' which is a positive aspect of the scheme in terms of sustainability and energy efficiency.

Planning obligations (S.106 agreement)

224. 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 recently adopted Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. Strategic Policy 14 'Implementation and delivery' of the Core Strategy states that planning obligations will be sought to reduce or mitigate the impact of developments. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:

- necessary to make the development acceptable in planning terms;
 - directly related to the development; and
 - fairly and reasonably related in scale and kind to the development
- Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight

| Planning Obligation | Mitigation | Applicant Position |
|--|---|---|
| Affordable Housing payment to offset loss of chalets | £1,600,000 | Agreed, this payment will only be required should the housing on the Styles House site not get built. |
| Affordable workspace | 2,652sqm of workspace provided on affordable terms at a discount of 30% off market rent for a period of 30 years. | Agreed. |
| Archaeology | £11,171 | Agreed. |
| Carbon Offset | £544,350 | Agreed. |
| Cycle Hire | Three years membership for all eligible occupiers. | Agreed. |
| Employment During Construction | Provide 57 jobs, 57 short courses and 14 construction industry apprentices for Southwark residents or make a payment of £437,950. | Agreed. |
| Employment in the Development | Provide 178 sustained jobs for unemployed Southwark residents or make a payment of £765,400. | Agreed. |
| Public realm improvements | Footway improvements - £14,592 Resurfacing at The Cut | Agreed. |

| | | |
|---------------------------|---|---------|
| | and Hatfields - £8,000 | |
| SUDS | £129,870 | Agreed. |
| Transport for London | Cycle hire docking station - £120,000. Legible London – £20,000 | Agreed. |
| Transport (site specific) | Raised entry treatments - £60,000 Bus service improvements - £135,000 DSP Bond - £28,500 | |
| Trees | Not specifically required unless unforeseen issues prevent trees from being planted or they die within five years of completion of the development in which case a contribution will be sought - £6,000 per tree. | Agreed. |

225. The legal agreement will also secure an Affordable Workspace Strategy; Construction Environmental Management Plan; Construction Logistics Plan; Delivery Consolidation Strategy; Site Wide Energy Strategy; Service Management Plan; Landscaping Strategy; Parking Permit Exemption; and Wind Mitigation Strategy. The agreement will also secure an admin charge of 2% of the total contributions.

226. The S106 Agreement must also secure the following S278 works:

- Repave the entire footway including new kerbing fronting the development on The Cut using materials in accordance to Southwark's Streetscape Design Manual - SSDM (Yorkstone natural stone slabs and 300mm wide granite kerbs).
- Provide a cycle approach lane to the Advance Stop Line (ASL) at the traffic lights on The Cut.
- Repave Isabella Street in accordance to Southwark's Streetscape Design Manual.
- Resurface The Cut eastbound carriageway fronting the development.
- Offer for adoption the land either side of Joan Street as required to facilitate a turning head for vehicles accessing the service bays.
- Promote all necessary Traffic Management Orders to amend waiting/loading restrictions.
- All utility covers on footway areas are to be changed to recessed

type covers.

- Repair any damage to the highway due to construction activities for the development including construction work and the movement of construction vehicles.

227. In the event that an agreement has not been completed by 30 September 2021, the committee is asked to authorise the director of planning to refuse permission, if appropriate, for the following reason:

228. In the absence of a signed S106 legal agreement there is no mechanism in place to mitigation against the adverse impacts of the development through contributions and it would therefore be contrary to Saved Policy 2.5 Planning Obligations of the Southwark Plan 2007, Strategic Policy 14 Delivery and Implementation of the Core Strategy (2011) Policy 8.2 Planning Obligations of the London Plan (2016) and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015).

Mayoral and borough community infrastructure levy (CIL)

229. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material 'local financial consideration' in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport invests in London as a whole, primarily Crossrail. Southwark's CIL will provide for infrastructure that supports growth in Southwark. In this instance, based on information provided by the applicant, an estimated Mayoral CIL payment of £5,468,719.63 and a Southwark CIL payment of £2,690,396.24 would be due. This figure is an estimate only, and would be calculated in more detail when CIL Additional Information and Assumption of Liability forms are submitted prior to implementation.

Community involvement and engagement

230. The applicant has undertaken a comprehensive programme of pre-application meetings, community engagement and stakeholder meetings. As previously mentioned, the site is subject to a Land Swap Agreement that will enable the transfer of land to enable the development of both the Styles House scheme and the OSD. The applicant for the OSD, TfL, entered into an engagement process with the Styles House TMO and Southwark Council Housing Delivery Board. This process included design workshops and feedback sessions to address the TMO concerns and ensure that the views of the TMO were reflected in the plans that TfL brought forward.

231. TfL then held a number of individual sessions with Styles House residents as well as issuing invitations to residents to attend a meeting with the Deputy Leader and Cabinet Member for Housing on 19 January 2018. These meetings were held at Platform (also known as Algarve House) at the following times:

- Wednesday 31 January 2018 between 18:00 and 21:00
- Wednesday 7 February 2018 between 13.00 and 16.00

- Thursday 8 February 2018 between 18.00 and 21.00

232. TfL continued to work and engage with the residents of Styles House through a number of workshops, 1-2-1's and presentations in advance of public consultations. The public consultations consisted of six separate public consultation events and two public exhibitions to present the final designs. The details of these events are set out below:

Consultation One public consultation dates and times

- Thursday 27 June 2019 from 2pm until 8pm
- Saturday 29 June 2019 from 12pm until 4pm

Consultation Two public consultation dates and times

- Thursday 17 October 2019 from 2pm until 8pm
- Saturday 19 October 2019 from 12pm until 4pm
- Tuesday 19 November 2019 from 4pm until 8pm
- Thursday 21 November 2019 from 4pm until 8pm

January Public Exhibitions date and times

- Thursday 23 January 2020 from 4pm until 8pm
- Saturday 25 January 2020 from 12pm until 4pm

233. The objectives of the consultations were to allow all residents, businesses, commuters and political representatives in the local area to provide feedback and raise any concerns they may have on the development. The formal objectives for both consultations were:

- to provide stakeholders, including local businesses, residents' groups, community groups and station users with clear information about the proposals for the area, understand thoughts about the area and provide feedback;
- to collate and analyse community views about the proposed development so the design team could develop the scheme, meeting local aspirations where possible;
- to understand the level of support or opposition for future development;
- to identify new issues;
- to understand stakeholders' concerns and;
- to allow respondents to make additional suggestions.

234. Various other consultation methods were employed in order to engage with as many people as possible including:

- An email sent to the 105,051 Southwark station users with registered Oyster cards;
- 500 information leaflets distributed to commuters at Southwark Station which outlined the consultation;
- a press release sent out by TfL publicising the consultation;
- a dedicated online consultation portal: <https://consultations.tfl.gov.uk/planning/southwark-osd/>
- a dedicated email address: SouthwarkOSD@tfl.gov.uk and;
- emails and letters sent to political representatives, including Borough and Bankside ward councillors (LBS) outlining the proposals and offering a

- meeting in advance of the consultation;
- emails sent to nearby businesses;
- two days of public consultation were held on a weekend day and weekday, running into the evening;
- a consultation feedback form handed out at the consultation events and;
- a dedicated telephone number and email address for further enquiries.

235. As part of the development process, TfL has undertaken an Equalities Impact Assessment (EqIA). The aim of this document is to examine the impact of our proposals on those who represent the nine protected characteristics (age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex and sexual orientation).

- Unique;
- LGBTQ+ Disability Community Group;
- Southwark LGBT Network, Inclusive Women;
- OBAC - Organisation of Blind Africans & Caribbeans;
- London Senior Social;
- Black Lives and More (BLAM);
- CareTrade Charitable Trust;
- Camden Society;
- Bede House;
- The Redeemed Christian Church of God (RCCG);
- Shekinah Glory of the Living God (SGLG);
- Camberwell Community Building
- South London Inter Faith Group (SLIFG);
- St Andrew's Church;
- Baitul Aziz Islamic Cultural Centre;
- Working Families;
- Britain Has Class;
- Link Age Southwark;
- Rerezent Radio and;
- Group Pregnancy Care.

236. As part of its statutory requirements the Local Planning Authority sent letters to surrounding residents, displayed site notices in the vicinity, and issued a press notice publicising the planning application. Adequate efforts have, therefore, been made to ensure the community has been given the opportunity to participate in the planning process. Details of consultation undertaken by the Local Planning Authority in respect of this application are set out in the appendices. The responses received are summarised later in this report.

Consultation responses from members of the public and local groups

237. Following neighbour consultation, a total of 40 objections were received which are summarised and addressed below:

- The proposed development would have an adverse impact on daylight and sunlight to surrounding residents.
- The proposed new building would block views.

- The proposed building is excessive in scale, height and massing.
- The development is not in keeping with the scale or appearance of the local townscape.
- The proposal would represent overdevelopment.
- The site should be providing housing which is much needed in London/Southwark.
- The design is poor quality.
- There is no need for more office space or retail space in post Covid London.
- The site should be used for affordable housing which is needed more than office space.
- The development would restrict access to Isabella Street and the business in the railway arches and as such will compromise the businesses.
- The development will result in more noise pollution.
- The streets around this area are already congested and this will get worse with more transient workers who come to the area for work and don't contribute in any meaningful way.
- The development will cause significant disruption and nuisance.
- Relocation of the residents of Styles House during a pandemic is unconscionable.
- There doesn't seem to be any proposal to integrate the arts into this new development.
- The removal of the Platform building would be a loss to the community.
- The commercial units should be small in size and limited to independent traders.
- The scheme should use exclusively fossil free fuel and equipment. The development should contribute to the greening of the area.
- There should be segregated cycle lanes on The Cut and a diagonal crossing at the main junction.
- The development doesn't propose any improvements to Southwark Underground Station
- The development fails to address climate change or the net zero target.
- The development fails to promote sustainable forms of transport like cycling and scooters.
- The development would impact on the privacy of the Rochester Estate
- The development would result in increased traffic.
- The development would result in more pollution and would affect the health of residents and visitors.
- The development exceeds the height limit set out in the SPD.
- The development would impact on the character and setting of the nearby listed buildings and Nelson Square
- The proposed development and the influx of workers will have an adverse impact on Nelson Square as a result of rubbish, noise, wear and tear and inconvenience for residents.
- The scheme will result in a wind tunnel effect on Union Street.
- The design should have more of a relationship to the Southwark underground Station.
- The design for the building should be more in keeping with the original design of Southwark station. The iconic design for the station would be lost. Any new development on top of the station should be inspired by the existing station.

- The curved shape of the existing station is at odds with the angular shape of the proposed development.
- The closure of Joan Street will impact on the attractiveness and openness of Isabella Street and the railway arches.
- The closure of Joan Street will reduce pedestrian connectivity and restrict access to the railway arches and would conflict with the aspirations of the emerging local plan.
- The loss of the Joan Street access will impact on the businesses function and operation of the railway arches.
- The development fails to define and improve the public realm or create permeable routes.

238. An objection has been received from British Telecom (BT) who operate the Colombo House Telephone Exchange. For commercial sensitivity reasons, BT have asked that the detail of their objection remain confidential however the main issue of objection relates to construction impacts, flood risk and impacts on the vehicle and servicing arrangements to Colombo House as a result of the closure of Joan Street. During the course of the application TfL have undertaken a significant amount of work to demonstrate that the servicing arrangements and plant replacement operations at Colombo House can continue with the closure of Joan Street as the relevant vehicles can approach the site from Stamford Street/Hatfields and The Cut/Hatfields. To inform this study TfL have completed tracking diagrams and employed the advice of specialist logistics consultants. Issues raised by BT in relation to flood risk and construction impact can be adequately mitigated by way of planning conditions.

Consultation responses from external and statutory consultees

239. Environment Agency – No objection subject to conditions.
Response – Noted, the relevant conditions will be imposed on any consent issued.
240. Greater London Authority – In terms of the main strategic issues, the GLA is fully supportive of the principle of unlocking the development potential of the application site and the Styles House site through the land swap agreement that would allow delivery of affordable housing on the Styles House site and a significant uplift in high quality office and retail space within the CAZ and an opportunity area.
241. The GLA considers that the development optimises the site capacity and provides flexible and efficient floorplates for the new offices. In terms of height, the GLA are clear that the proposal raises no strategic issues and the detailed design, architectural approach and the use of colour on the building facades is fully supported.
242. In terms of energy and sustainability, the GLA consider that the applicant should demonstrate that the site has been future proofed for connection to a future district heating network should one become available. Additionally, the applicant is encouraged to maximise energy efficiency measures and the use of PV panels. The GLA also consider that all possible measures in the cooling hierarchy have been investigated and adopted where feasible.
243. Concerns have been raised about the Urban Greening Factor which should be

0.3 and contributions are sought regarding Legible London signage, bus service improvements and cycle hire.

244. Response – In terms of energy and sustainability, the developer has submitted additional information that demonstrates that the use of PV panels has been maximised in site. Additionally, further information on overheating has demonstrated that all possible measures have been investigated. The ability to connect to any future district heating network will be secured as part of an Energy Strategy in the S106 Agreement and a contribution will be secured that will meet the carbon zero target. Financial contributions towards signage, bus service improvements and cycle hire would be secured in the S106 Agreement.
245. In terms of the Urban Greening Factor (UGF), it is noted that the target for 23 an office development is 0.3 and the scheme would only achieve 0.2 however, this is a result of the site conditions and constraints, namely the underlying underground station and infrastructure that limits opportunities for trees and planting due to the poor soil depths and impacts on root systems. Planters will be used where appropriate but it is recognised that these can be obstructive to pedestrian movement. The greened terraces on the western face have been optimised. Having reviewed all possible opportunities and constraints it is considered that the scheme maximises potential greening.
246. Heathrow Airport – No safeguarding objections.
Response – Noted.
247. Historic England – Historic England do not wish to offer any comments on the application and suggest that the views of the Council's specialist conservation advisors are taken into account.
Response – Noted and agreed.
248. London Borough of Lambeth – No objection.
Response – Noted.
249. London Fire and Emergency – The LFB have responded to the consultation to confirm that they do not usually comment on planning applications at the application stage, instead they would only provide comments after planning permission has been granted and the formal application is received from the building control body. They have confirmed that this will also be the case for any comments about the closure of Joan Street and any operational issues.
Response – As set out above, the London Fire Brigade will not comment on the application until after permission has been granted. This includes providing comments on any potential operational issues as a result of the closure of Joan Street. It should be noted that the applicant has undertaken pre-application meetings with the London Fire Brigade, including the operational team and as such discussions have been taking place. No operational issues were raised to the closure of Joan Street as a result of the earlier meetings between the developer and the Fire Brigade. Furthermore, the vehicle access arrangements are such that Joan Street would remain accessible from Hatfields and the Fire Brigade could also use Isabella Street as part of any emergency response. It would only be the southern section of Joan Street south of the Eyelid that would be subject to closure. The London Fire Brigade have made it clear that they think the appropriate time for them to comment on the application will be

the building control stage and it should be noted that they will also have the opportunity to respond to a future application for the stopping up of Joan Street

250. London Underground – London Underground can confirm that the applicant is in communication with London Underground engineers with regard to the development. Subject to the applicant fulfilling their obligations to London Underground and Transport for London under the legal requirements between parties and the promoter of the development, including post planning, London Underground have no objection to make on this planning application.
Response –Noted.
251. Natural England – Do not wish to offer any comments on the application.
Response – Noted.
252. Network Rail – Recommend the inclusion of various informatives to protect Network Rail assets and operations during construction and once the development is completed.
Response - Noted and agreed, the relevant informatives will be added to any consent issued.
253. Metropolitan Police – Recommend that the Secured By Design condition is imposed in order to ensure that the scheme will achieve SBD standards and accreditation.
Response -
254. Thames Water – No objection subject to conditions.
Response –Noted and agreed.

Community impact and equalities assessment

255. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
256. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
257. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three "needs" which are central to the aims of the Act:
1. The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
 2. The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
 - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
 - Take steps to meet the needs of persons who share a relevant

protected characteristic that are different from the needs of persons who do not share it

- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low

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

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

Human rights implications

259. 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.

260. This application has the legitimate aim of providing new office space and retail units. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

Positive and proactive statement

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

262. The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.

263. Positive and proactive engagement: summary table

| | |
|--|-----|
| Was the pre-application service used for this application? | YES |
| If the pre-application service was used for this application, was the advice given followed? | YES |
| Was the application validated promptly? | YES |
| If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval? | YES |

To help secure a timely decision, did the case officer submit their recommendation in advance of the agreed Planning Performance Agreement date? YES

CONCLUSION

264. The intention to redevelop the land around the Southwark underground station site for a commercial scheme within a tall building is one that is supported by current and emerging planning policy and the Blackfriars Road SPD. The substantial uplift in employment space through the creation of high quality offices, and the provision of new retail opportunities that will enliven the streets whilst supporting the functions of the District Town Centre, is consistent with the NSP site allocation and the objectives for the Opportunity Area.
265. The development would be provide a substantial uplift in employment floorspace to create up to 2,000 new jobs in a location highly accessible by various modes of public transport and by bicycle. The provision of affordable workspace will secure low cost space for micro to medium sized enterprises.
266. The immediate townscape is varied with lower rise buildings on The Cut and taller buildings located to the east and north of the site on Blackfriars Road. The development plan expects tall buildings to be located in areas which having the highest accessibility to public transport, and the Blackfriars Road SPD specifically identifies this site as suitable for a landmark tall building. The building would, along with the Palaestra building opposite, mark this important point in the long Blackfriars Road boulevard. The building would be of the highest design quality and would incorporate climate mitigation measures and planting into its design language.
267. Whilst there would be public realm improvements such as the quality landscaping scheme proposed around Isabella Street and the 'Eyelid' in addition to the widened pavement widths on The Cut, it is acknowledged that the closure of Joan Street would result in reduced pedestrian permeability. However this is considered acceptable on balance given the site specific circumstances and the need to unlock the Styles House site to develop new affordable housing.
268. The ability to develop the Styles House site for additional affordable housing is reliant on this development and the associated land swap agreement. The approval of this over station development will majority fund the provision of 25 affordable homes on the Styles House site.
269. It is fully acknowledged that there would be significant impacts in terms of daylight and sunlight impacts to a small number of homes, particularly to the property at No. 1 The Cut. Recognising the challenges associated with developing inner city sites, the numerical targets given in the BRE are expected to be treated with a degree of flexibility, having due regard for the existing and emerging context within which these sites are located. Having considered the number of rooms affected, the use of those rooms, and setting this in the context of the wider benefits of the development, it is concluded that it would not be reasonable to refuse planning permission on the basis of the amenity impacts.

270. The development would be energy efficient and sustainable with an on site carbon reduction of 42% above the 2013 Building Regulations in addition to a carbon offset payment that would help the development achieve Carbon Zero status. Furthermore the development would be car free and would promote sustainable forms of transport such as walking, cycling and public transport.
271. The impacts identified in the application documents and through officer assessment in this report should be considered in determining the application. No impacts of a significant scale have been identified which are not capable of being mitigated through detailed design, through conditions, or through provisions in the S106 agreement.
272. The application is considered to be in compliance with the development plan, and emerging documents, when read as a whole, and It is therefore recommended that planning permission be granted, subject to conditions, the timely completion of a S106 Agreement and referral to the Mayor of London.

BACKGROUND INFORMATION

BACKGROUND DOCUMENTS

| Background Papers | Held At | Contact |
|--|--|---|
| Southwark Local Development Framework and Development Plan Documents | Chief Executive's Department 160 Tooley Street London SE1 2QH | Planning enquiries telephone: 020 7525 5403 planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 0254 Council website: www.southwark.gov.uk |

APPENDICES

| No. | Title |
|------------|---|
| Appendix 1 | Consultation undertaken |
| Appendix 2 | Consultation responses received |
| Appendix 3 | Planning History (of the site and nearby sites) |
| Appendix 4 | Recommendation (draft decision notice) |

AUDIT TRAIL

| | | |
|---|-----------------------------------|--------------------------|
| Lead Officer | Simon Bevan, Director of Planning | |
| Report Author | Terence McLellan, Team Leader | |
| Version | Final | |
| Dated | 17 February 2021 | |
| Key Decision | No | |
| CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER | | |
| Officer Title | Comments Sought | Comments included |
| Strategic Director of Finance and Governance | No | No |
| Strategic Director of Environment and Leisure | No | No |
| Strategic Director of Housing and Modernisation | No | No |
| Director of Regeneration | No | No |
| Date final report sent to Constitutional Team | | 26 February 2021 |