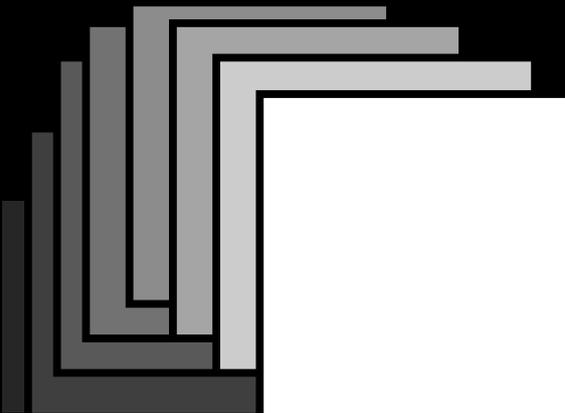


RED LION COURT

TOWN PLANNING STATEMENT

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APRIL 2022



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Town Planning Statement

Red Lion Court

46-48 Park Street, London, SE1 9EQ

On behalf of LS Red Lion Court Limited

27 April 2022

NJB/NLR/AJA/J7812

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1 Executive Summary

- 1.1 This Planning Statement (the 'Statement') has been prepared by Gerald Eve LLP, on behalf of our client, LS Red Lion Court Limited (herein referred to as 'the Applicant' or 'Landsec') part of the Landsec Group, in support of an application for full planning permission for part demolition and redevelopment of the existing building at Red Lion Court (the "Site"). The proposed development seeks to bring forward comprehensive redevelopment of the existing office building at Red Lion Court, in an important location upon the South Bank and fronting the Thames Path.
- 1.2 This Statement provides a comprehensive review of the relevant national, regional and local planning policy and guidance which is applicable to the Proposed Development. It sets out the planning justification for the Proposed Development, having full regard to development plan policies and other material considerations.
- 1.3 The proposals are being brought forward by leading office developers and occupiers Landsec who have unparalleled experience in delivering and managing high quality commercial led developments across Central and Greater London for Grade A office occupiers. Landsec have extensive experience within Southwark including The Forge on Park Street which is nearing completion, and Timber Square at Lavington Street. Their current pipeline of developments in Southwark covers 5 sites, totals over 1 million square feet of space and represents an investment of over £1 billion into the Borough.
- 1.4 Landsec appointed renowned international architects Bjarke Ingels Group (BIG) to conceive and deliver a building design of the highest architectural and environmental quality for this important site.
- 1.5 The scheme proposals for which planning permission is sought, reflect extensive dialogue with Southwark planning, design and highways officers, together with extensive engagement with local stakeholders and groups, and other statutory consultees including the GLA and Historic England. This planning statement and the design and access statement explain how the scheme has evolved in a positive way to respond to the comments received in relation to the building form and design, public realm and neighbouring residential stakeholders amenity considerations.
- 1.6 In land use terms the proposals are fully in accordance with the London Plan and Southwark Plan policy requirements and priorities for the Site within the Central Activities Zone (CAZ) and will optimise the delivery and provision of Grade A office

floorspace to meet the defined need, policy requirement and will be attractive to future office occupiers.

- 1.7 In accordance with Southwark planning policies the scheme will deliver 10% of the new office space as affordable workspace with a 25% reduction on market rental levels over a 30-year period, to foster and encourage affordable office accommodation to meet the defined local need. Landsec understands the flexible workspace market and has prior experience of marketing and managing workspace in Central London through their established workspace brand, Myo. They will leverage these expertise to provide local Southwark start-up businesses with a unique opportunity to take affordable space in a landmark office building.

- 1.8 From an early stage Landsec considered the options around refurbishment and re-position but for the reasons set out in the DAS and sustainability statements, the full redevelopment scheme was considered the optimum solution having regard to the wider sustainability benefits, the delivery of substantial flexible Grade A office floorspace, the wider architectural and environmental enhancements, and the significant public benefits including delivery of major new public realm, affordable workspace and social value.

- 1.9 Landsec are fully committed to be net zero carbon by 2030 as a business and are leading the way in terms of their sustainability credentials. At Red Lion Court the proposals are to deliver a new building which achieves embodied and operational net zero carbon through highly efficient and adaptable floorplates. It has been designed to achieve the GLA's aspirational 2030 target for whole life carbon of 600 kg CO₂e/m² GIA. The design proposal has progressed with sustainability at the centre of decision making and exceeds the GLA and Southwark targets set for sustainability, with certification commensurate with a Grade-A workplace building of the highest industry standards.

- 1.10 The scheme will retain part of the existing basement which is beneficial in relation to embodied carbon and Landsec are fully committed to the recycling of existing materials in accordance with Southwark and the GLA's guidance upon circular economy principles.

- 1.11 The scheme design has evolved positively following extensive dialogue with Officers and local stakeholders, including addressing the evolving constraints of the local view height thresholds from Nunhead Cemetery and One Tree Hill, as well as the emerging development proposals for the former FT building immediately to the west, the listed Anchor pub to the east and addressing the scale and residential amenity on Park Street to the south.
- 1.12 BIG have designed a scheme proposal which will be transformational for this location (a currently unmemorable section of the South Bank), which will also respond well to its surrounding context including the FT's own permitted scheme for extension and refurbishment of their building, and the listed Anchor pub. The scheme design is of the highest quality both conceptually in relation to the stepped approach to the elevations and cantilevered public space, and the materiality and how this changes across different elevations to reflect the context. The scheme will represent a very positive and welcome addition to the townscape along this part of the South Bank.
- 1.13 The scheme has been extensively tested in the full range of views from within the local and wider area and will not have any material harm upon designated heritage assets including listed buildings and will have a major positive impact in design and townscape terms. The proposals comply with planning policy and the statutory tests in relation to Conservation Areas and listed buildings and will enhance their character, appearance and setting.
- 1.14 In accordance with place-shaping objectives and the requirements of the Site Allocation, the proposals will deliver significant new public realm for residents and visitors in two major areas; a) a major new public space adjacent to The Anchor pub which will encourage animation and dwell time on the Thames Path, and b) a separate new public space within the heart of the site which will be a co-ordinated new north-south route and space with the former FT Building scheme, delivering the objective of the site allocation. Landsec has extensive experience of delivering and managing new public spaces. The Applicant has worked with local stakeholders to ensure the management and design of the public space has taken account of their comments.
- 1.15 The primary consideration in response from local stakeholders has been the potential for the delivery of new high quality public space(s) and enhanced greening. The public

realm and landscaping proposals have been worked up to maximise the quantity, quality and use-ability of the place-shaping offer.

- 1.16 The scheme will also deliver new retail and restaurant space which will enhance the animation of the Thames Path and will be curated to deliver occupiers which are beneficial to visitors, office workers and residents. The bike repair facility included as part of the cycle services on Park Street will be available for use by local residents and office occupiers alike and will be an important local facility.
- 1.17 The proposed scheme will deliver in the region of 6,654 new full time equivalent jobs in the first ten years of occupation including commitments to local employment and training initiatives, in the region of 880 jobs (or 88 full-time equivalent) through the construction process and over the construction phase, 10 years of estate management and 10 years of occupation the total additional social and local economic value created by the Red Lion Court development could be up to £411m, or 249% of the original construction costs..
- 1.18 Landsec are committed to the delivery of significant and long-lasting social value for the local community and stakeholders. This development will make a substantial contribution towards social value through its impact on the local area and communities in terms of jobs and skills, support for local businesses and SMEs, support for the local community and environmental improvements by developing and implementing a coherent and holistic Social Value Strategy.
- 1.19 The development proposals are fully compliant with planning policy within the London Plan and Southwark Plan upon land use, environment and sustainability, design and public realm and in other respects, and will deliver significant public benefits for this part of the Borough and local residents and stakeholders. It will not have any material impacts upon residential amenity.
- 1.20 The proposals accord with the objectives and detailed requirements of the Site Allocation and Landsec has brought forward the scheme in a co-ordinated manner to ensure that the Site Allocation objectives can be delivered in a comprehensive way.

2 Introduction

2.1 This Statement is submitted in support of a full planning application made on behalf of the Applicant, LS Red Lion Court Limited, for the Proposed Development at Red Lion Court, 46-48 Park Street (herein referred to as ‘the Site’). This Statement sets out the planning justification in support of the application. It summarises the planning history of the Site and assesses the Proposed Development in the context of relevant policies and guidance.

2.2 Planning permission is sought for the following (“the Proposed Development”):

“Demolition of the existing above ground building and part-basement and redevelopment of the Site to provide an 11-storey plus basement building providing office, retail, restaurant and wellness uses alongside external terraces, landscaping, public realm works, new plant equipment, cycle parking spaces and other associated works.”

2.3 The development will provide 32,036 sqm (GIA) of office floorspace, including 3,204 sqm (GIA) of associated affordable workspace, 338 sqm (GIA) of restaurant floorspace, 229 sqm (GIA) of retail floorspace, and 105 sqm (GIA) of wellness use floorspace with public realm improvements, new plant, 1 disabled car parking space and 719 long-stay plus 168 short-stay cycle parking spaces

2.4 This Statement is structured as follows:

- Section 3 - A description of the Site and surroundings;
- Section 4 - Details of the Site’s planning history;
- Section 5 - Consultation and Community Engagement;
- Section 6 - Details of the Proposed Development;
- Section 7 - Planning Policy Framework;
- Section 8 - Land use;
- Section 9 – Affordable Workspace
- Section 10 - Energy and Sustainability;
- Section 11 - Design;
- Section 12 - Townscape, Views and Heritage;
- Section 13 - Landscaping, Trees and Ecology;
- Section 14 - Access, Transport and Servicing;

- Section 15 - Daylight, Sunlight and Overlooking;
 - Section 16 - Other Technical Considerations; and
 - Section 17 - CIL and draft S106 Obligations.
 - Section 18 – Conclusion
- 2.5 The Proposed Development, designed by BIG Architects is summarised in Section 6 of this Statement. This Statement should be read in conjunction with the application plans submitted in support of this application and the Design and Access Statement, which also explains the evolution of the scheme.
- 2.6 The Applicant is bringing forward this major planning application for an office-led scheme delivering an enhanced quality and quantity of Grade A office floorspace to this part of the Central Activities Zone in accordance with Southwark’s policy objectives.
- 2.7 The project brief was to provide a landmark office-led development which embraces this prominent waterfront position to provide a new market leading, contemporary, inspiring workplace focused on wellness, flexibility and environmental responsibility. The design proposal meets and exceeds the targets set for sustainability, with certification commensurate with a Grade-A workplace building of the highest industry standards, introducing such innovations as a ‘front-of-house’ lobby for cyclists and active travellers including a valet bicycle parking facility for visitors.
- 2.8 The proposed development would also deliver an exciting new building of the highest quality, rich in form and materials, with a unique architectural language and activated streets. It would deliver a highly sustainable transformation of an existing building in this part of Southwark.
- 2.9 This Statement is one of a number of documents, which have been submitted in support of the application. The other supporting application documents include:
- Application Forms and Certificates, prepared by Gerald Eve;
 - CIL Form, prepared by Gerald Eve;
 - Covering Letter, prepared by Gerald Eve;
 - Site Location Plan and Site Plan, prepared by BIG Architects;

- Existing, proposed and demolition plans, sections and elevations, prepared by BIG Architects;
- Design and Access Statement, prepared by BIG Architects;
- 3D Model, prepared by BIG Architects;
- Development Charter Engagement Summary, prepared by Kanda;
- Statement of Community Involvement, prepared by Kanda;
- Daylight and Sunlight Assessment, prepared by Point 2;
- Townscape, Heritage and Visual Impact Assessment, prepared by Tavernors;
- Transport Assessment, prepared by Momentum;
- Air Quality Assessment, prepared by Hilson Moran;
- Biodiversity Report, prepared by Greenage;
- Fire Statement, prepared by Astute;
- Flood Risk Assessment and SUDs Proforma, prepared by AKT II;
- Land Contamination Assessment, prepared by Hydrock;
- Foul Sewage Assessment, prepared by Hilson Moran;
- Utilities Assessment, prepared by AKT II;
- Lighting Assessment, prepared by Hilson Moran;
- Plant Assessment, prepared by Hilson Moran;
- Energy Statement and BREEAM preassessment, prepared by Hilson Moran;
- Whole Life Carbon Assessment, prepared by Arup;
- Sustainability Statement, prepared by Arup;
- Circular Economy Statement, prepared by Arup;

- Construction Environment Management Plan, prepared by RPM;
 - Servicing and Refuse Management Plan, prepared by Momentum;
 - Structural Survey, prepared by AKT II;
 - Archaeological assessment, prepared by MOLA;
 - Health Impact Assessment, prepared by Trium;
 - Microclimate Assessment, prepared by RWDI;
 - Basement Impact Assessment, prepared by AKT II;
 - Ventilation/Extraction Statement, prepared by Hilson Moran;
 - Social Value Statement, prepared by Social Value Portal.
- 2.10 A formal screening opinion (ref: 21/AP/4003) was received from the London Borough of Southwark on 8 December 2021 and concluded that an Environmental Impact Assessment (EIA) is not required. The list of supporting documents above has been agreed with the Council. There have been no material changes to the scheme since the screening opinion and therefore re-screening is not required.
- 2.11 The application has been brought forward following early and extensive dialogue with the London Borough of Southwark’s planning, design, transport and highways officers to establish key principles and criteria for the assessment of the Proposed Development on the Site. Detailed pre-application consultations have been held with the London Borough of Southwark since November 2016 on a range of design approaches up to the submission of the applications in April 2022. Consultations and discussions have also been held with the GLA and TfL. Detailed pre-application consultations have also been held with local stakeholders, local residents, Ward Councillors and community groups as set out within the Statement of Community Involvement. The Proposed Development has evolved over the pre-application period and has responded to accommodate advice and comments received.
- 2.12 The Applicant has responded to comments received in relation to the design, massing and architectural approach and the overarching principles of access and management of the public spaces, amongst others detailed points.

- 2.13 Government Guidance, the London Plan and Southwark's adopted planning policy all fully recognise and actively encourage high quality workspace within the Central Activities Zone. The Proposed Development therefore aligns with ambition of the London Plan and Southwark Plan which supports business and employment.
- 2.14 This Statement sets out a planning assessment of the Proposed Development against development plan policies and other material considerations. The statutory development plan for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act (2004) comprises the London Plan (2021) and the London Borough of Southwark Local Plan 2019-36 (2022). Both are up to date development plans.
- 2.15 The proposals have been assessed in accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004 and the statutory duties found in section 66(1) and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the policies in the National Planning Policy Framework.
- 2.16 Guidance within the National Planning Policy Framework (2021) is also a material consideration against which the proposals have been considered.
- 2.17 The Applicant is LS Red Lion Court Limited (part of the Landsec Group). Landsec aim to build and invest in buildings, spaces and partnerships to create sustainable places, connect communities and realise potential.
- 2.18 Landsec, build and invest in buildings, spaces and partnerships to create sustainable places, connect communities and realise potential. Landsec are one of the largest real estate companies in Europe, with a £11 billion portfolio of retail, leisure, workspace and residential hubs. Landsec is shaping a better future by leading the industry on environmental and social sustainability while delivering value for their shareholders, great experiences for their customers and positive change for their communities.

3 Site and Surrounding Context

3.1 This section describes the Site, its location, character and land use in the context of the surrounding area.

The Site and Background

3.2 The Site is situated within the London Borough of Southwark and measures 4,333 sqm (0.433 hectares). The full extent of the Site is shown within the red line boundary on the Site Plan (ref. PA-10-LP) submitted in support of this application.

3.3 The existing building on the Site, Red Lion Court, was originally constructed in 1989. The existing building is seven storeys in height above ground level and is in Class E use. There is also an existing basement to the building.

3.4 The Site is bound by the River Thames to the north, the Anchor Bankside public house (a Grade II Listed Building) and a Premier Inn hotel to the east and south-east, Park Street and the adjoining Porter Street, which is largely residential, with a combination of terraced houses and low-rise apartment buildings to the south and the former 'Financial Times (FT) building' at 1 Southwark Bridge Road to the west.

3.5 The existing Site is comprised of the Red Lion Court building, that was previously used for commercial office space. Since construction it had always been occupied by Lloyds until their vacation in 2021.

3.6 However, the entire property has now been let on a meanwhile use to Aspire Via Studio who are a unique property-based charity, sourcing and managing artist's studios and event spaces.

3.7 The building was originally constructed as offices (Class E) and has remained in Class E use since its first occupation. The meanwhile use is also within Class E.

3.8 The existing building provides 17,335 sqm (GIA) of Class E floorspace across seven floors plus two basement levels.

3.9 The Site is subject to the following planning policy designations:

- Bankside and the Borough Area Vision;
- Central Activities Zone (CAZ);

- Thames Policy Area;
 - Bankside and Borough District Town Centre;
 - Bankside, Borough and London Bridge Opportunity Area;
 - North Southwark and Roman Roads Archaeological Priority Area;
 - South Bank Strategic Cultural Quarter Strategic Cultural Area;
 - Better Bankside BID Area;
 - Environment Agency Flood Zone 3 Area;
 - Site Allocation NSP06;
 - Local View 1: The London panorama of St Pauls Cathedral from One Tree Hill;
 - Local View 2: The linear view of St Pauls Cathedral from Nunhead Cemetery;
 - Background Assessment Area of the LVMF view 1A.2 - Alexandra Palace Viewing Terrace to St Paul's Cathedral; and
 - Background Assessment Area of the LVMF view 3A.1 - Kenwood Viewing Gazebo to St Paul's Cathedral.
- 3.10 The existing building is not listed and is not located within a Conservation Area but is located near several designated heritage assets. The site is located within close proximity of the Grade II listed Southwark Bridge, Anchor Terrace (1 Southwark Bridge Road), Anchor Public House (1 Bankside) and Union Works. The Bear Gardens Conservation Areas is located to the west, the Thrale Street Conservation Area is located to the south east and the Borough High Street Conservation Area is located to the east.
- 3.11 The site is located within close proximity to the internationally important Globe Theatre and Rose Theatre, both scheduled ancient monuments.
- 3.12 The site lies within the Borough Views of St Paul's Cathedral from Nunhead Cemetery and One Tree Hill. The site lies within the river prospect Borough View from Kings Stairs Gardens to Tower Bridge. The majority of site lies within the Background Assessment Area of the LVMF view 1A.2 - Alexandra Palace Viewing Terrace to St Paul's Cathedral. The site also partially lies within the Background Assessment Area of the LVMF view 3A.1 - Kenwood Viewing Gazebo to St Paul's Cathedral.
- 3.13 The Site is specifically allocated within the Southwark Local Plan as part of a joint allocation with the FT building. The site requirements of Site Allocation NSP06 state:

“Redevelopment of the site must:

- **Provide at least the amount of employment floorspace (E(g), B class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater; and**
- **Enhance the Thames Path by providing public realm and active frontages with ground floor retail, community or leisure uses (as defined in the glossary); and**
- **Provide new north-south green links; and**
- **Provide new open space of at least 15% of the site area - 1,183m²**

Redevelopment of the site should:

- **Provide new homes (C3).”**

NB: Site Allocation NSP06 can be found in Appendix 1.

- 3.14 The site includes a section of the Thames Path, a publicly accessible pedestrian footpath along the south bank of the River Thames. Pedestrian access to the existing Red Lion Court building is provided from Park Street to the south of the Site and from the Thames Path on Bankside to the north of the Site. Pedestrian access to the existing Red Lion Court building is also possible via a secure access arrangement with no general public access to or through the Red Lion Court area of the Site.
- 3.15 Vehicular access to the existing Red Lion Court building is provided from Park Street to the south of the Site at two points via a secure gated arrangement. These provide access to the land around the building, to 13 car parking spaces and for servicing and deliveries.
- 3.16 The Site has a Public Transport Accessibility Level (PTAL) of 6b, the highest level attainable. London Bridge Underground Station is located 450m east of the Site, and Borough Underground Station is located c.650m to the south of the Site. The two nearest stations offering mainline railway services are London Bridge, 600m to the east, and Waterloo East, 1km to the southwest. Regular bus services operate along Southwark Bridge Road, with Southwark Bridge Bus Stop located 80 metres to the

west. The pedestrian routes around the Site provide easy access to the bus stops and underground stations.

Surrounding Context

3.17 The surrounding area is varied in terms of building height and land uses. There are a number of different land uses adjacent to and beyond the Site:

- Immediately north of the Site is the River Thames.
- East and south-east of the Site is a pedestrianised street, Bank End, with several restaurants, a public house (the Anchor Bankside public house, a Grade II Listed Building) and a Premier Inn hotel. 60m east of the Site is Cannon Street Railway Bridge, which bounds Bank End. Clink Street and the surrounding area (100m east of the Site) is accessible via an arch under the Cannon Street Railway Bridge, and features a mixed land use; including office space, restaurants, a museum, apartments and Southwark Cathedral.
- Immediately south of the Site is Park Street, the main point of access for vehicles. Park Street and the adjoining Porter Street are largely residential, with a combination of terraced houses and low-rise apartment buildings, with an office building (30 Park Street).
- The former FT building is located adjacent to the Site, directly west. Southwark Bridge Road (and Southwark Bridge) is located 80m west of the Site and is the primary arteriole road within the immediate surroundings of the Site. Southwark Bridge Road is accessible by pedestrians via a set of two stairwells located along Park Street, next to the former FT building, and along Bankside.

3.18 The Site is not within or near any statutory ecological designations. However, the River Thames and the embankment located immediately north of the Site is designated as a Site of Importance for Nature Conservation (SINC).

4 Planning History

- 4.1 This section provides an overview of the recent planning history associated with the Site and other relevant planning applications.
- 4.2 An examination of LBS's Planning Register has been carried out to identify planning permissions which are of relevance to the history of the Site.
- 4.3 There is limited relevant planning history for the site. All applications made at the Site have been included below.
- 4.4 On 18 November 2021 an EIA Screening Opinion request (ref: 21/AP/4003) was submitted for "Request for an EIA Screening Opinion for demolition of the existing commercial office building and the redevelopment of the site with the construction of an 11 storeys (G+10) office led development with retail and restaurant space at ground floor and improved public realm." On 8 December 2021 it was confirmed that an Environmental Impact Assessment (EIA) is not required.
- 4.5 An application for advertisement consent (ref: 10/AP/0859) was approved on 2 June 2010 for "The display of a non-illuminated entrance plaque."
- 4.6 Planning permission (ref: TP/1519G/MD) for the existing building was approved on 26 July 1988 for "The erection of part eight, part five storey office building, with basement and 20 car parking spaces on the Site bounded by Bankside, 'Anchor' Public House, Park Street & 'Horseshoe Court' (Building under Construction).

1 Southwark Bridge Road Planning History

- 4.7 Due to Site Allocation NSP06, which includes 1 Southwark Bridge Road, the relevant planning history for 1 Southwark Bridge Road has also been provided.
- 4.8 Southwark Council resolved to grant planning permission (ref: 21/AP/0599) at Committee on 7 September 2021 for the "Refurbishment, recladding and extension of the existing office building to provide office floorspace, a retail unit, public realm and landscaping, and other associated works."
- 4.9 This application sought to refurbish and extend the existing office building by providing an extra storey at roof level to a height of 34.3m above ground floor (37.5m AOD), infill extensions to the west and east elevations, and extension to the south elevation,

extend the existing building to provide 7,763 sqm (GIA) of new office floorspace resulting in a total floorspace of 26,399 sqm (GIA), plus alterations to the façade, cycle parking, plant and the provision of public realm improvements.

- 4.10 In relation to the public realm improvements the Thames Path has been opened up to increase visual permeability and activate this space. Whilst the north-south permeability has been increased through the creation of a new through-route providing pedestrian access between Park Street and the Thames Path. These areas have also been subject to landscaping.
- 4.11 Servicing for the development is proposed to take place off Park Street, with a new internal loading bay proposed. 375 long stay and 30 short stay cycle parking spaces are proposed.
- 4.12 The proposed development will provide 10% of the uplift in office floorspace as affordable workspace which can be accessed via the Pocket Park. The Pocket Park is intended to be gated between at 9pm in the evening and 7am the following day.

5 Consultation and Community Engagement

- 5.1 Paragraph 39-46 of the NPPF highlights the importance of pre-application engagement and front loading; early engagement has significant potential to improve the efficiency and effectiveness of the planning system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improves outcomes for the community.
- 5.2 Policy GG1 part A of the London Plan encourages early and inclusive engagement with stakeholders and local communities on the development of proposals.
- 5.3 Local Plan Policy IP7 states consult on planning applications and draft planning policy and guidance documents, in accordance with the Statement of Community Involvement. Landsec and Kanda are fully committed to the principles set out within the Developer's engagement charter, which have been followed through this scheme engagement.
- 5.4 Local Planning Authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage and the more issues that can be resolved at pre-application stage, the greater the benefit.

Pre-application discussions with London Borough of Southwark (LBS)

- 5.5 The Proposed Development has been subject to extensive discussions over an extended period with LBS Officers. Pre-application meetings have been held with officers in respect of design, planning, highways, townscape, servicing, daylight and sunlight, energy and sustainability, landscaping and public realm.
- 5.6 During the early pre-application discussions, which have been ongoing with Southwark since 2016, various scheme designs were presented to LBS Officers, including the Pixel Market, Pixel Wave and Layers proposals. In the summer of 2021, the Seven Block design approach was agreed with Officers to be the design that was to be progressed through the detailed pre-application process. Following this, the following pre-application meetings have been held with Southwark Officers to discuss the Seven Block design:
- Pre-application meeting 1: Design, Townscape, Public Realm and Highways;
 - Pre-application meeting 2: Design, Massing, Public Realm, Façade, Townscape and Sustainability;

- Pre-application meeting 3: Design, Transport, Daylight and Sunlight, Landscape and Affordable Workspace;
- Pre-application meeting 4: Highways and Energy;
- Pre-application meeting 5: Design Workshop;
- Pre-application meeting 6: Design, Façade, Landscape, Daylight and Sunlight and Highways; and
- Pre-application meeting 7: Affordable Workspace and Heads of Terms.

5.7 During the pre-application discussions, the change in approach to local views thresholds from One Tree Hill and Nunhead Cemetery to St Paul's have had a major constraining impact upon the achievable building height, form and hence floorspace and employment capacity at this important allocated site within a highly central location on the South Bank and within the CAZ and Opportunity Area.

5.8 Any redevelopment of the Red Lion Court building has been heavily constrained by these local views such that only a limited number of additional floors could feasibly be added to the building. The emerging proposals were materially higher than now applied for but have been revised and reduced in scale to comply with the now adopted local views thresholds.

5.9 The implications of this have been worked through during the pre-application process to date to provide a deliverable scheme, which has led to an office-led redevelopment scheme being brought forward. This proposed scheme would deliver major new jobs, Grade A office floorspace, policy compliant affordable workspace provision and GVA added spend in the local economy, in accordance with Southwark policy objectives, as well as handing over a significant portion of the Site to the public realm as sought by the site allocation.

5.10 The feedback provided by LBS officers from the pre-application meetings to date has been broadly positive and all outstanding comments have been considered and addressed as part of this planning application submission.

5.11 A full overview of the design evolution of the proposals during the pre-application process can be found within Chapter 2 of the Design and Access Statement, prepared by BIG. In particular the scheme designs have responded in relation to the architectural appearance upon each of the elevations, the relationship with the listed pub (the Anchor), the interface with the former FT Building scheme and the context on Park Street.

Design Review Panel (DRP)

- 5.12 The Proposed Development was presented to a Design Review Panel on 10 January 2022.
- 5.13 The DRP noted there were positives in terms of the height, the approach to breaking down the massing and the activation of ground floor uses, but they had some concerns over the overall scale of the building in relation to the listed pub, the overbearing nature of the cantilevered massing and the design of the public realm and solidity of the elevations.
- 5.14 The Panel appreciated the architectural concept of the stepped form in plan and section and the potential of the graduated elevations and the activation of the ground floor uses was welcomed.
- 5.15 After updating the design to respond to the various points raised by the Panel and officers at a design workshop, it was agreed with Southwark Officers that the scheme would not need to go back to the Panel.

Statutory and Non-Statutory Consultations

- 5.16 Paragraph 42 of the NPPF confirms that **“The participation of other consenting bodies in pre-application discussions should enable early consideration of all the fundamental issues relating to whether a particular development will be acceptable in principle, even where other consents relating to how a development is built or operated are needed at a later stage. Wherever possible, parallel processing of other consents should be encouraged to help speed up the process and resolve any issues as early as possible.”**
- 5.17 Proactive and positive consultations have taken place throughout the pre-application process, including consultation with statutory and non-statutory bodies.

GLA and TfL

- 5.18 On 14 January 2022, a pre-planning application meeting was held with the GLA, which was attended by the Applicant team, GLA Officers and a TfL Officer.
- 5.19 Following a presentation of the Applicant’s proposals for the Site, meeting discussions covered strategic issues with respect to the principle of development; affordable

workspace; urban design; heritage; environment and transport. Advice with respect to all main strategic issues was issued to the Applicant team.

- 5.20 GLA officers supported the proposed office-led redevelopment of the site in principle. Officers welcomed the proposal to increase the public realm offering, along with sustainability credentials of the scheme.
- 5.21 Comments relating to urban design, heritage, public realm and transport have been addressed as part of this planning application submission. The scheme designs have responded to the interface with the former FT Building scheme and the context on Park Street, the relationship with the Anchor Pub, the architectural elevations and design of the public realm.
- 5.22 A follow up meeting was held with GLA on 9 February 2021 in relation to energy and sustainability matters, as this was not covered during the first meeting.
- 5.23 A further informal follow up meeting was held on 1 April 2021 with GLA Planning and Design Officers to provide an update on the proposals and show how responses to previous design comments had been responded to.
- 5.24 Following early engagement with Historic England, they were content for Southwark to lead upon considerations upon potential effects to designated heritage assets as the proposals do not raise any significant heritage issues.

Public Consultation

- 5.25 The Applicant has developed and implemented a thorough, multi-stage engagement strategy with political stakeholders, community groups and the wider community in LBS in order to obtain and understand feedback about the proposals ahead of the submission of the application.
- 5.26 The three-stage consultation, which is outlined in the Statement of Community Involvement, prepared by Kanda Consulting provided the opportunity for local residents and stakeholders to learn more about the proposals at different stages of the proposals, whilst also allowing them appropriate time to provide their feedback and thoughts about the plans to ensure that their feedback was considered throughout the consultation process.

- 5.27 Much of the period developing the proposals was impacted by the Covid-19 pandemic. In accordance with the Coronavirus Act 2020 and advice published by the Government, the Applicant sought to deliver the optimum form of consultation within the prevailing public health guidelines and regulations. This meant that initially the Applicant had to move the consultation to ‘at-a-distance’ engagement via online, virtual, and postal briefings, avoiding face-to-face contact. Once restrictions around Covid-19 had eased, more in-person events took place, with the second and third rounds both including face-to-face meetings and events.
- 5.28 Throughout the three-stage consultation process, there were various different types of community engagement which took place including: two public exhibitions in December 2021 and March 2022, letters and newsletters issued to local stakeholders, a dedicated consultation website was set up, social media adverts, pop-up events, meetings with local stakeholders and door-to-door canvassing.
- 5.29 Over the course of the consultation process:
- There were 2,058 visitors to the consultation website;
 - 20,338 people were reached by social media adverts;
 - 192 people attended in-person events, including pop-ups and drop-ins;
 - 27 one-to-one meetings were held with stakeholders; and
 - There were 103 responses to various surveys undertaken on the vision, emerging proposals, and detailed plans for the site.
- 5.30 Throughout the pre-application process, feedback from local residents and stakeholders has been considered and incorporated into the design approach wherever possible. This has included extensive discussion with neighbouring residents about their concerns, and proposed mitigations in the design and management plans. There have been several key themes that have come out of the public consultation, including:
- Overwhelming support for the expansion and improvement of pedestrian routes along the Thames Path and around the Site;
 - Overwhelming support for the creation of new, green public spaces – with questions and suggestions regarding the management of these spaces;

- Support for the provision of high-quality, flexible workspace – including affordable workspace supporting local businesses;
- Support for ground floor retail and community uses – including a wellness centre and social spaces such as cafés or restaurants;
- Mixed views regarding the design approach and the impact of the proposed building on local character and the setting of nearby heritage assets e.g., the Anchor Pub;
- Concerns on the design and materiality of the proposed building;
- Questions regarding the use of office terraces and potential noise and disruption; and
- Concerns regarding the prevalence of alcohol-led uses within the area and associated disruption and anti-social behaviour.

5.31 Community feedback has directly shaped some key elements of the proposals, including:

- The nature of the landscaping design, which has sought to respond to the desire for genuine green space
- The provision of significant public open space – with the proposed building lifted in places to maximise the amount of public realm
- The proposed ground floor retail spaces – which will include a ‘wellness centre’ use, supporting community health and wellbeing
- The proposed approach to managing the use of office terraces, to minimise disruption to neighbours

5.32 Overall, the proposals have demonstrably responded to stakeholder feedback received during the pre-application consultation process and the Applicant intends to continue to communicate regularly and openly with all stakeholders throughout the planning process and, should planning permission be granted, subsequently the construction phase.

5.33 A Statement of Community Involvement and Engagement Summary Development Consultation Charter have been prepared by Kanda Consulting and submitted as part of this planning application. Which outlines the engagement in more detail and the responses to comments in design and management plans.

6 Proposed Development

- 6.1 The key details of the Proposed Development are summarised in this section. Further detail of the individual elements is provided within sections 8 – 16.
- 6.2 The Proposed Development seeks to create an exemplary office led, mixed use development through the provision of high-quality architecture, public realm and landscaping, which encourage activity and permeability through the Site. The proposal also delivers a highly sustainable approach, in the energy and sustainability strategy for the future, operational building.
- 6.3 This Statement should be read in conjunction with the Design and Access Statement and application drawings prepared by Bjarke Ingels Group, and the suite of technical documents submitted with the application, as listed in Section 1 of this statement.
- 6.4 Full Planning Permission is sought for:

“Demolition of the existing above ground building and part-basement and redevelopment of the Site to provide an 11-storey plus basement building providing office, retail, restaurant and wellness uses alongside external terraces, landscaping, public realm works, new plant equipment, cycle parking spaces and other associated works.”

- 6.5 The Proposed Development is office-led and proposes 32,965 sqm GIA of high specification Class B1 floorspace, alongside a mix of other complementary uses.
- 6.6 The existing and proposed land uses are provided below. This demonstrates that the Proposed Development will result in 15,630 sqm additional floorspace in total across all land uses.

Table 1: Proposed Floorspace by Land Use (GIA)

Land Use	Proposed sqm GIA
Office (Class E)	28,596
Restaurant (Class E)	338
Retail (Class E)	229

Wellness Use (Class E)	105
Plant	3,697
Total	32,965

NB: The above table does not include the apportionment of plant and ancillary facilities.

- 6.7 The existing building was previously occupied as a fully office (Class E) building set over basement, ground and six upper storeys. The existing building although only constructed in the 1980's, is functionally obsolete in the sense that the building structures and cores would preclude a major refurbishment and extension which would deliver Grade A office floorspace and it would always have a very high level of operational carbon as a result. The Whole Life Carbon Assessments LPG and the Circular Economy LPG require priority consideration to retrofit buildings but neither Policy SI2 nor SI7 of the London Plan prohibits demolition if it will result in a sub-optimal development in terms of meeting the planning objectives for the Site.
- 6.8 The proposals are to deliver a new building which achieves operational net zero carbon through highly efficient and adaptable floorplates and use of materials, and will reduce embodied carbon emissions to practical completion under 600kgCO₂e/m² in line with the GLA's targets for embodied carbon set out within their SPG. The applicant has chosen to work within the GLA's aspirational benchmark for whole life carbon.
- 6.9 The scheme will retain part of the existing basement and will re-use the majority of the existing piles, which is beneficial in relation to embodied carbon and Landsec are fully committed to the recycling of existing materials in accordance with Southwark and the GLA's guidance upon circular economy principles.
- 6.10 The existing building offers inactive frontages and does not visually engage with the street or public realm. The facades are not architecturally pleasing and respond poorly to the character of the building and surrounding area.
- 6.11 The existing basements will be deepened across the whole building footprint to incorporate two levels. The basement will also be extended in an area (404 sqm) to the east of the current basement retaining wall.

- 6.12 Given the building's prominent location on the River Thames, there is an opportunity to replace the existing building which makes very limited contribution to the River Thames, is energy inefficient and no longer meets the needs of office occupiers.
- 6.13 Red Lion Court holds a commanding position on the River Thames and is a prominent feature in views across the Thames. Despite its prominent location, on the Thames Path the building provides limited connection to the public realm at ground level, and a lack of active frontage.
- 6.14 The Proposed Development will provide a new primarily office (Class E) building arranged over basement, lower ground, ground and ten upper levels. The office floorspace will include a policy compliant level of affordable workspace at 10% of the gross floorspace. Retail and restaurant (Class E) uses are proposed at part ground and part first floor levels. Plant, machinery and ancillary building uses, such as cycle parking and end of trip facilities, would be located at basement and lower ground floor levels.
- 6.15 The office accommodation would be designed to the highest standards, with best-in-class facilities, accessibility and environmental performance standards. It is the aspiration of the proposed development to achieve a 'Platinum' rating under the WELL version 2.0 scheme which shows the commitment of the Applicant to design the building to the highest quality, in order to benefit the future occupiers of the Site. The design of the new office space has had full regard to occupier requirements post the pandemic, including amenities and ventilation.
- 6.16 As the redevelopment will be speculative, it will be undertaken without the certainty of knowing who the end occupier will be. The building therefore needs to be designed with the maximum flexibility, to appeal to a wide range of occupiers from various sectors. Office floorplates of various sizes will make the space suitable for a wide range of business occupiers and will be easily divisible to provide more flexibility for incoming tenants. Core locations have been developed to make the floorplates as efficient as possible and enabled subdivision for multiple tenants.
- 6.17 The proposed building would be a high quality, contemporary office space which would seek to improve the building's relationship with its surroundings through an appropriate scale, form and use of materials.

- 6.18 It would enliven the public realm by vastly increasing the quality and quantity of public realm around the building by increasing the size of the Thames Path and north-south through route and provide best in class office accommodation executed to the highest environmental and wellbeing standards.
- 6.19 The Proposed Development aims to facilitate the enrichment of the immediate neighbourhood through reclamation of the ground plane and to contribute to the transformation of the wider area, especially in terms of public space, street-level activity and character. At ground level, the lifted mass provides two new, generous public spaces linked together by the building's lobby. At the North a new 'Bankside Square' is created adjacent to the Grade II listed Anchor Pub enhancing its setting and relating in negative to the Pub's height. At the south, in conjunction with the neighbouring former Financial Times building, a centralised, tranquil 'Pocket Park' is created in association with a new north-south route through the site.
- 6.20 The Proposed Development is arranged, in massing terms, as a series of 'jumping' blocks of differing sizes that opens up the ground plane to create a series of new and enhanced public urban spaces. In aggregate the mass delivers a transformative overall building form that responds specifically to the different scales of Park Street's smaller, residential context at the south; and the more contemporary and larger scaled former Financial Times building at the east to deliver a sophisticated overall form informed by sightlines from the surrounding street-scape.
- 6.21 The overall form delivers a significant expanse of external terraces; each one landscaped and forming a valuable amenity in connection with the workspace within the building. A series of 'pocket terraces' are deployed throughout ensuring that each level has access to the outdoors.
- 6.22 At street level, the proposals would establish a more active presence on the Thames Path and create a dramatic and welcoming arrival.
- 6.23 Servicing would be made entirely within the off-street loading bay, which is accessed from Park Street.
- 6.24 Cycle storage and the cycling agenda has been designed to be integral to, and a key feature of, the Proposed Development. A total of 719 long stay cycle parking spaces will be provided and cycle facilities have been developed with specialists Five At Heart. Cycle parking will be accessed from an entrance on Park Street to a dedicated cycle.

It is also proposed to introduce 168 short stay cycle spaces located within the first basement level or at-grade around the site to ensure that they are publicly accessible.

7 Planning Policy Framework

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise.
- 7.2 Planning policy operates at local, regional and national levels. The statutory development plan for the Site comprises the London Plan (2021), and the Southwark Plan 2022 (2022).
- 7.3 At a national level, the revised National Planning Policy Framework (NPPF) was published in July 2021 which is a material consideration.

National Guidance – National Planning Policy Framework (‘NPPF’) (2021)

- 7.4 The revised NPPF (2021) sets out the Government’s planning policies for England. Taken together, these policies articulate the Government’s vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.
- 7.5 The NPPF sets out the Government’s requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and local planning authorities can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

Planning Practice Guidance (PPG) (March 2014 and updated regularly since)

- 7.6 In March 2014, the Department for Communities and Local Government (DCLG) launched the web-based Planning Practice Guidance (PPG) resource. This aims to provide guidance which is useable in an up-to-date and accessible manner. With regard to decision taking, the PPG is a material consideration in the determination of planning applications.

Regional Planning Policy

- 7.7 The London Plan is the overall strategic plan for Greater London, defined to include the 32 Boroughs and the City of London. The aim of the London Plan is to set out a framework to co-ordinate and integrate economic, environmental, transport and social

considerations over the next 20 to 25 years. The London Plan forms the London-wide policy context within which the Boroughs set their local planning agendas, and forms part of the statutory development plan.

7.8 The new London Plan was formally adopted on 2 March 2021. This means that it is not an alteration or an update to previous London Plans. This new London Plan is the third London Plan and replaces all previous versions.

7.9 This London Plan is different to those that have gone before it. It is more ambitious and focused than the previous London Plans. The concept of Good Growth – growth that is socially and economically inclusive and environmentally sustainable – underpins the London Plan and ensures that it is focused on sustainable development. The London Plan forms the London-wide policy context within which the Boroughs set their local planning agendas, and forms part of the Statutory Development Plan.

7.10 The following GLA Supplementary Planning Guidance (SPG) documents are also material considerations:

- Accessible London: Achieving an Inclusive Environment (July 2014).
- Character and Context (June 2014).
- London View Management Framework (March 2012).
- Public London Charter (October 2021).
- Social Infrastructure (May 2015).
- ‘Be seen’ energy monitoring guidance (September 2021).
- The control of dust and emissions during construction and demolition (July 2014).
- Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy (April 2013).

Local Planning Policy – Southwark Core Strategy and Saved Policies

7.11 The Local Plan (called the ‘Southwark Plan 2019-36’) was adopted by LBS on 23 February 2022. The Local Plan is designed to help Southwark achieve their wider objectives – a reduction in inequality, a means to tackle the climate emergency, and to support an economy that provides new jobs and works for everyone.

7.12 The following LBS Supplementary Planning Guidance (SPG) documents are also material considerations:

- Heritage SPD (2021);
- Design and Access Statements SPD (2007);
- Section 106 and CIL SPD (2020);
- Sustainability Assessments SPD (2009); and
- Sustainable Design and Construction SPD (2009).

8 Planning Consideration – Land Use

8.1 This section assesses the proposed land uses and their acceptability, in principle, in planning policy terms. It concludes that the proposed mix of uses is acceptable in land use terms and that the uses are of an appropriate scale and balance in line with relevant planning policies.

8.2 This section considers the introduction of the following land uses:

- a) Office (Class E)
- b) Affordable Workspace (Class E)
- c) Retail (Class E)
- d) Wellness Centre (Class E)

Office (Class E)

8.3 Chapter 6 of the NPPF sets out the need for planning policies and decisions to support economic growth and productivity, stating that planning policies should meet the needs of local businesses and proactively encourage sustainable economic growth. Paragraph 81 of the NPPF specifies that significant weight should be placed on supporting economic growth and productivity, taking into account both local business needs and wider opportunities for development.

8.4 The London Plan Policy SD4 part B states that the nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier.

8.5 The Mayor's CAZ SPG (2016) suggests that greater weight should be given to office functions relative to residential development in Opportunity Areas within the CAZ. It adds that London Plan policy should be implemented in ways that promote and incentivise office and other commercial development.

8.6 The London Plan Policy E1 acknowledges that improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and

larger enterprises) should be supported by new office provision, refurbishment and mixed-use development.

- 8.7 The London Plan Policy E1 (D) states that the diverse office markets in outer and inner London, where viable, should be extended, focusing new development in town centres and other existing office clusters supported by improvements to walking, cycling and public transport connectivity and capacity.
- 8.8 Furthermore, London Plan Policy E1 supports the increase in the current stock of offices in the CAZ.
- 8.9 London Plan policy E2 (D) states that development proposals for new B Use Class business floorspace greater than 2,500 sqm (gross external area), should consider the scope to provide a proportion of flexible workspace or smaller units suitable for micro, small and medium-sized enterprises.
- 8.10 Policy AV.02 of the Southwark Plan sets out the Bankside and The Borough Area Vision. This policy acknowledges that the area is **“a globally significant central London business district, home to international headquarters and local enterprise.”**
- 8.11 Policy AV.02 states that development in the area should **“to consolidate Bankside and The Borough as part of the London Central Activities Zone; an international destination for business headquarters, small businesses, tourism and transportation that is entwined with historic communities with local services, open spaces and excellent transport links;”**.
- 8.12 Policy AV.02 states that development in the area should **“Bankside and Borough are part of the London Central Activities Zone, the Bankside, Borough and London Bridge Opportunity Area delivering 10,000 new jobs and the Bankside and Borough District Town Centre.”**
- 8.13 Policy SP4 of the Southwark Plan confirms the borough’s aspiration to make sure that Southwark has a strong, green and inclusive economy where all of our existing and new residents, businesses and workers benefit. This will be achieved through, among other things, creating new green jobs, delivering new office and employment

floorspace, delivering affordable workspace and making Southwark a place where the town centres and high streets thrive and are a place to do business.

- 8.14 Policy P30 requires office and business development in the CAZ to retain or increase the amount of employment floorspace on site (Gross Internal Area (GIA) of E(g), B2, B8 class use or sui generis employment generating uses).

Assessment

- 8.15 The Proposed Development would deliver a significant quantum of dedicated Class E office floorspace (including a proportionate amount of ancillary facilities) of the highest specification (32,036sqm (GIA)).
- 8.16 The Proposed Development will help Southwark meet its need to accommodate for a significant growth for office space and other workspaces which are growing in demand contributing to the central London economy and status as a world city. The Site is located within the Central Activities Zone which are Sites that are most in demand for the delivery of offices and should contribute to this growth by providing an increase in the amount of employment floorspace.
- 8.17 The proposal is estimated to create new jobs, both in construction and once the development is operational. The proposed scheme will deliver in the region of in the region of 6,654 new full time equivalent jobs in the first ten years of occupation including commitments to local employment and training initiatives, in the region of 880 jobs (or 88 full-time equivalent) through the construction process and over the construction phase, 10 years of estate management and 10 years of occupation the total additional social and local economic value created by the proposed development could be up to £411m, or 249% of the original construction costs
- 8.18 The development will also support up to 318 weeks of training, apprenticeships and work placements on the contract over the 3.7 years of construction. Where possible, the Applicant will also work with their construction partner and their supply chains to employ local people and advertise new jobs locally. Targets have been set to employ disadvantaged people who are most in need of support into employment. This includes employing up to 11 FTE people from disadvantaged backgrounds over the 3.7 years of construction period. Full details of the training, apprenticeships and employment generated by the development through construction and operation will be agreed in

the Construction Industry and Employment Training Report and Employment and Skills Plan within the Head of Terms.

- 8.19 The proposed floorplates, core positioning and services provision have been designed and developed to ensure the space is flexible and future proofed. Incorporating flexibility from inception will enable the space to be let to a single tenant or split floorplates for multiple tenancies dependent of market demands, in line with London Plan Policy E2 (D).
- 8.20 The proposed commercial floorspace will provide generous floor to ceiling heights and large floorplates, all constructed to a high standard. On-site provisions are to be extensive with amenity space, ample bike storage and workshop facilities, changing rooms and landscaped gardens.
- 8.21 The proposed quantity and quality of commercial floorspace will comply with the economic and employment policies and objectives identified above. The newly constructed employment accommodation will provide high quality, flexible floorspace which has been designed to respond to market requirements. The proposals will provide occupiers with a high degree of flexibility through well designed floor plates with good day lighting to its interior.
- 8.22 The post-pandemic office building needs to provide occupiers with workspaces that are appealing in character and features, responsive to an increasing drive for outstanding wellness and carbon/energy credentials. The proposed design strives to meet such standards through its design, through measures such as:
- Large flexible floor plates with high ceiling heights are proposed, that can be subdivided in numerous ways to suit multi-tenant scenarios.
 - Open plan arrangements to allow for flexible fit-out designs and customisation.
 - Central locations of the main cores to place occupied areas closer to natural light at the facade.
 - Demountable cross-laminated timber floor areas, that can be removed to create vertical connections between stacked floors.

- At least two exterior terrace spaces per main office floor, with the upper floors having access to an extensive landscaped roof.
- Accessible flat floorplates, with level crossing to on-floor terraces and ramped access to roof terraces. With all floors accessible via the main passenger lift bank.
- 10% affordable workspace allocation, allowing mixing of office users and business types.
- Panoramic views across the River Thames and verdant 'Pocket Park'.
- Use of ground floor wellness amenities.
- Promotion of active travel, capacity for office users to store bikes, use servicing facilities and basement showers.
- Self-shading masonry façade, with overhangs that minimise solar gain and reduce cooling demands on the office floors.
- A structural and façade system designed to reduce embodied carbon, with the CLT infills, slim post-tensions concrete floor slabs and a façade that utilises ultrahigh performance concrete (UHPC) to minimise material quantities.
- Smart building technologies to limit energy use and carbon emissions; to ensure optimal interior conditions based on actual occupancy.

8.23 Every floor and each tenant will have access to exterior space. This can be accommodated as the proposed building form recedes at the upper levels to provide generous roof terraces. However, these are only accessible from certain floors leaving others requiring a different solution.

8.24 A minimum of two on-floor terraces have been introduced on every floor, allowing the amenity to be shared between split floor tenancies. The terraces are concentrated to the eastern and western elevations, cascading to create variety but allowing a clean northern face and minimising overlooking on south along Park Street. The river facing terraces will offer panoramic views towards the City and River Thames, whilst the 'Pocket Park' ones will look over verdant landscaping.

- 8.25 A terrace management strategy will be developed and conditioned to the development to control activities allowed to take place. Restrictive evening and weekend access hours will also be implemented, to minimise potential for disturbance to the residential areas along Park Street.
- 8.26 The proposed building would be highly desirable to future tenants driven to deliver a responsive, connected, best practice workplace that provides flexibility for their business, and their people, over the lifetime of occupation.
- 8.27 The provision of additional office floorspace in the Central Activities Zone and, in particular, the Bankside, Borough and London Bridge Opportunity Area is strongly supported by both local and regional planning policy objectives.
- 8.28 The Proposed Development would significantly increase the amount of Class E Grade A flexible office space in the CAZ and, as such, would comply with policies in the London Plan and Southwark Plan, to support business and employment in the Central Activities Zone.
- 8.29 The proposals are therefore considered to be in full accordance with the London Plan and the Southwark Plan in terms of office floorspace provision.

Introducing Retail Uses (Class A1/A3/A4)

- 8.30 One of the core principles of the NPPF is to promote mixed use developments and encourage multiple benefits from the use of land in urban areas. Paragraph 85 of the NPPF seeks to promote “positive, competitive” town centre environments and to direct retail development to town centres in the first instance, recognising town centres as the heart of their communities.
- 8.31 Policies within the London Plan are supportive of ancillary retail facilities for their role as a component for mixed use development, and their contribution to increasing the vitality at street level. The London Plan policy E9 states that a successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported in line with the wider objectives of this Plan, particularly for town centres.
- 8.32 The Mayor’s CAZ Supplementary Planning Guidance (1.4.5) identifies the need to have a sensitive approach to the application of mixed-use development within the

CAZ. **“This is to ensure that the mix of uses support the CAZ strategic functions, maintain an appropriate balance between offices and residential use, encourage active ground floor frontages where appropriate and supporting a mix of uses that contributes to the unique character of the CAZ including culture, leisure and tourism uses, retail and food/drink.”**

8.33 Local Plan Policy SP4 seeks to make sure that Southwark has a strong, green and inclusive economy where all of our existing and new residents, businesses and workers benefit. In particular, the policy seeks to ensure the distinctive town and local centres will be places where shops, leisure, office and community uses are competitive and popular, providing customer choice for local communities.

8.34 Local Plan Policy P35 requires new development within Town and Local Centres to, among other things, provide an active use at ground floor in locations with high footfall and ensure main town centre uses including markets, community, civic, leisure and cultural uses are located in town centres and local centre. The supporting text of this policy states that **“town and local centres should be the main focus for new developments providing new shops, education, healthcare and community facilities, offices and workspaces, leisure facilities and entertainment venues.”**

Assessment

8.35 The Proposed Development will deliver small retail units at ground floor and a restaurant unit at part ground and part first floor. At ground floor level, on Park Street a cycle hub and repair facility is proposed to serve the cycle facilities, whilst a café unit and will be provided on the Bankside Path.

8.36 The Site is located within Bankside and The Borough District Town Centre. It is located in a popular area for retail, restaurant and café operators, being located on the Thames Path and only a few hundred metres from the busy commercial hubs of Bankside and Borough High Street. The Site is also fully accessible by public transport, walking and cycling.

8.37 The Proposed Development will provide an active use at ground floor and, in accordance with Local Plan Policy P35, the retail uses will provide facilities for local residents and contain shops to boost the local economy. This also accords with the London Plan which seeks to support and improve the retail and leisure offer of the CAZ

for residents, workers and visitors. These proposed retail spaces also encourage small, start-up businesses to establish and grow their business.

8.38 The retail uses provide activity and the café accessed via the Thames Path presents an active frontage and draws in passers-by into the development, whilst the cycle hub will encourage sustainable transport uses. Furthermore, the proposed retail offering will provide an on-site service for office tenants. Overall, it is considered that the proposed retail provision would add to the vitality and vibrancy of this mixed-use development.

8.39 It is therefore considered that the Proposed Development will complement the surrounding retail uses within the area, will ensure the provision of main town centre uses in this location, and comply with the aspirations for sites within the CAZ and the Bankside and Borough District Town Centre, as set out within regional and local planning policy.

Wellness Centre

8.40 London Plan Policy S1 states development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported.

8.41 Local Plan Policy P47 states development will be permitted where new community facilities are provided that are accessible for all members of the community.

Assessment

8.42 The Proposed Development will include a 105 sqm (GIA) Wellness Centre at ground floor level. This exact use within this unit is yet to be determined but it is expected that the use will promote positive health and wellbeing.

8.43 The introduction of a wellness centre was raised by local residents during public consultation, as something that they would like to see included as part of the development. Potential operators of this unit might include physiotherapy, a yoga or pilates studio, GP clinic or other health related uses.

- 8.44 The provision of high quality, inclusive community uses is supported by regional and local planning policy and will compliment the surrounding uses within the area, supporting local people.

Residential

- 8.45 The site requirements of Site Allocation NSP06 states redevelopment of the site should provide new homes.

Residential – Assessment

- 8.46 The Southwark Plan does not contain any mixed-use policy requirements including residential and, as set out above, the priority land use in this location in the CAZ and Opportunity Area is offices. This is reflected in the site allocation wording which requires increases in office space alongside major new public realm.
- 8.47 The site allocation does also reference the potential for inclusion of residential across the wider joint site, including the FT site. In discussions with officers the scheme proposals at Red Lion Court are commercial led reflecting the existing uses, and do not include residential. There are a number of reasons for this which we set out below.
- 8.48 In 2016 when Southwark were first preparing the Site Allocations for the Southwark Plan, Landsec requested that the Red Lion Court site was included as part of a wider site allocation with the former FT Building.
- 8.49 The Applicant was hopeful of acquiring the former FT building and were eager to progress a site allocation which covered the more comprehensive site. Given the scale of the site and potential for a wider comprehensive redevelopment it was agreed with officers that whilst the primary land use objective within the CAZ and Opportunity Area, was offices (Class E), that there could be a reference to residential use as part of a fully comprehensive redevelopment scheme. This was how the reference to "should include residential" was introduced to the site allocation.
- 8.50 In 2018, the former FT Building was subsequently sold to WPP who have since submitted a planning application (ref: 21/AP/0599) which the Council resolved to grant on 7 September 2021 for a refurbishment and extension scheme, which will keep the building in office use together with public realm enhancements. This makes a comprehensive redevelopment scheme of the two buildings highly unlikely in the

medium to long term. Clearly the FT Building scheme has not been required to provide residential, even though it is part of Site Allocation NSP06. The context of the site allocation, i.e.: comprehensive redevelopment of both sites, has therefore changed since its inception.

- 8.51 Accordingly, the Applicant is now dealing solely with their existing major office building asset at Red Lion Court. Although containing significant office floorspace (17,335 GIA square metres), the building does not offer anything to the wider community in terms of public realm, ground floor animation or engagement with the Thames Path.
- 8.52 In full accordance with London Plan and Southwark Plan policies for this location in the Opportunity Area and CAZ, the primary focus for the redevelopment of Red Lion Court has been upon workspace growth and associated employment and spend in the economy, together with ground floor activity/animation and new public realm. This is reflected fully in the site allocation wording as a requirement and priority land use in this location, and is planning policy compliant.
- 8.53 The approach to local views constraints from One Tree Hill and Nunhead Cemetery to St Paul's have had a major constraining impact upon the achievable building height, form and hence floorspace and employment capacity at this important allocated site within a highly central location on the South Bank and within the CAZ and Opportunity Area. Any redevelopment of the Red Lion Court building has been heavily constrained by these local views such that only a limited number of additional floors could feasibly be added to the building.
- 8.54 The reference to residential use as part of the site allocation was included as it was contemplated that Red Lion Court and the former FT Building maybe brought forward together to provide a fully comprehensive redevelopment scheme. Since the former FT Building is no longer proposed to be comprehensively redeveloped and represents a refurbishment and extension scheme there is already very limited opportunity to provide the residential element of the site allocation as Landsec are working solely with Red Lion Court, even before the feasibility of doing so within the existing boundaries of Red Lion Court is fully considered.
- 8.55 Residential is not an absolute requirement under the Southwark Plan or the site allocation, and in light of the likely long-term unavailability of the former FT Building, would constitute a further constraint upon development meaning that redevelopment

on Red Lion Court was in practice unlikely. Residential at this site is also not included or required for in the Council's strategic housing delivery numbers.

- 8.56 Where Site Allocations require that development 'must' achieve certain land uses or requirements this represents an absolute requirement whereas 'should' confers an element of discretion on the party responsible for compliance. In the context of NSP06, the provision of employment-use floorspace, public realm and open space improvements are therefore absolute requirements, whereas the provision of residential is subordinate. Taking account of the medium/long term unavailability of the FT Building site, any attempt to deliver residential units as part of the scheme at Red Lion Court would compromise delivery of one or more of the absolute requirements.
- 8.57 The introduction of residential within the proposed development would require a significant re-configuration necessitating separate building cores and inefficiencies within a redevelopment scheme, impacting upon the quantity and quality of Grade A office space such that a redevelopment scheme would not come forwards. Given that the primary office entrance is accessed via Park Street, in practice the residential would need to be upon the river frontage which would raise issues relating to the proximity of the Anchor pub and external terrace and residential amenity issues. Given the pedestrian flows and activity upon the Thames Path, levels of noise and disturbance (which already affect the Park Street residents) would mean that residential would not be compatible.
- 8.58 For the reasons set out above an all-commercial office-led scheme represents the most appropriate and policy compliant proposal in land use terms, in full accordance with London and Southwark Plan objectives, and there is no reasonable proposition of residential being provided as part of the proposals. Additionally, the introduction of a residential element would severely compromise the ability of the proposed development to deliver against the absolute requirements of NSP06.
- 8.59 It has therefore been agreed with LBS Officers that residential is not required to form part of the proposed redevelopment of the Site.

9 Planning Consideration – Affordable Workspace

- 9.1 This section assesses the proposed affordable workspace offer and its acceptability, in principle, in planning policy terms.
- 9.2 The London Plan (at policies E2 and E3) and Southwark Plan (at policy P31) require new office developments to provide a proportion of the new office floorspace as affordable workspace.
- 9.3 London Plan Policy E1 (G) states that development proposals related to new or existing offices should take into account the need for a range of suitable workspace including lower cost and affordable workspace
- 9.4 Southwark Plan Policy P31 states developments must explore the opportunities for long term management of employment space and the delivery of affordable workspace by workspace providers.
- 9.5 Developments proposing 500sqm GIA or more employment floorspace must:
1. Deliver at least 10% of the proposed gross employment floorspace as affordable workspace on site at discount market rents; and
 2. Secure the affordable workspace for at least 30 years;
 3. Provide affordable workspace of a type and specification that meets current local demand; and
 4. Prioritise affordable workspace for existing small and independent businesses occupying the site that are at risk of displacement. Where this is not feasible, affordable workspace must be targeted for small and independent businesses from the local area with an identified need; and
 5. Collaborate with the council, local businesses, business associations relevant public sector stakeholders and workspace providers to identify the businesses that will be nominated for occupying affordable workspace.

Assessment

- 9.6 The Proposed Development seeks to create a total of 32,965 sqm GIA of floorspace. Of this, 32,036 sqm is proposed to provide office accommodation (including a proportionate amount of ancillary facilities).
- 9.7 In line with the local plan policy, the Proposed Development will provide 3,204 sqm of affordable workspace, amounting to 10% of the overall new floorspace (GIA), which would provide a key public benefit associated with the proposals and in accordance with the identified requirement.
- 9.8 The affordable workspace is proposed to be located at ground and first floors. The design and specification will be bespoke to suit the customer base and will aim to create an atmosphere conducive to start-up businesses. The spaces will target small and independent businesses from the local area, with a focus on new and start-up businesses that are vital to the future of Southwark's thriving economy.
- 9.9 Being located at ground and first floor, this will provide the affordable workspace with a prime active frontage on the ground floor with river views. This makes the space highly visible and easily accessible to attract and encourage new users. It will have a dedicated 24-hour entrance on the ground floor accessed via the Pocket Park and is located in proximity to the former FT's Affordable Workspace, to enable collaboration and synergies between the two. A large floor plate at first-floor level will provide flexibility and a variety of spaces to suit businesses at varying stages of growth, it will be fitted out to a Cat A specification and will have access to the cycle services.
- 9.10 The ground floor is intended to be a more communal workspace and lounge facility, that is informal and welcoming. Access to the first floor is via lift lobby or connecting stair to the first floor, where there is a large floor plate. This provides the flexibility needed to include a variety of workspaces to suit businesses at varying stages of growth, including small and medium cellular offices as well as hybrid spaces for the more agile businesses. There would also be meeting rooms and other facilities available to support the various businesses in the space.
- 9.11 Interaction between the Affordable Workspace users and the other office occupiers in the building will be encouraged to increase synergies and collaboration and the Applicant intends to run curated events and networking opportunities to act as a catalyst to this.

- 9.12 All of the proposed affordable workspace has been designed so that it can be sublet to more than one occupier.
- 9.13 The Applicant has extensive experience of operating and managing workspace throughout its portfolio including the separate Myo brand.
- 9.14 The Applicant is fully aware of the current market value of office floorspace in the location, given Landsec's extensive land holdings in the Borough, which are occupied by commercial tenants. It is proposed to offer the affordable workspace at a discounted market rate, commencing at peppercorn rent and increasing incrementally to no greater than 75% market value, on the following basis:
- 0-6 months – peppercorn rent
 - 7-12 months – 25% market rent
 - 13-23 months – 50% market rent
 - 24 months thereafter – 75% market rent
- 9.15 This reduced market value shall be maintained for a 30-year period commencing first occupation of the unit.
- 9.16 As discussed with the Council's employment and skills officer, the affordable workspace will be directed to foster and encourage small and local businesses. Although there will be a general 25% reduction on market rents, Landsec acknowledge that certain businesses will require more of a discount than more established businesses and there will be a varied approach taken to reflect this within the overall agreed level of discount.
- 9.17 We will discuss and agree with the Council through the S106 Agreement how we control and manage this, including annual reporting upon the affordable workspace offer.
- 9.18 It is possible that the space could be co-working, smaller units within the space, or a larger impact-based tenant across the whole space. The Applicant would like to keep this flexible at this stage and to be agreed with the Council.
- 9.19 The Applicant has not yet entered detailed discussions about the planning obligations associated with the planning permission but anticipates that this would include securing the affordable workspace on the terms set out above through submission of

Affordable Workspace Plans, Affordable Workspace Specification, Affordable Workspace Marketing Strategy and agreement of Local Market Rents. The proposed S106 Heads of Terms are enclosed in Appendix 2.

- 9.20 The proposed affordable workspace will, therefore, contribute to the aspirations of London Plan Policy E1 and Local Plan Policy P31.

10 Planning Consideration – Energy and Sustainability

- 10.1 This section assesses the proposed whole life carbon, circular economy, energy and sustainability strategy and its acceptability in planning policy terms. It concludes that

the Proposed Development is highly sustainable in accordance with relevant planning policies.

- 10.2 At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.
- 10.3 Paragraph 8 of the NPPF states that achieving sustainable development means that the planning system has three overarching objectives: an economic objective, a social objective, and an environmental objective. The latter is in place to contribute to protecting and enhancing the natural, built and historic environment including making effective use of land, helping to improve biodiversity, minimising waste and pollution and mitigating and adapting to climate change including moving to a low carbon economy.
- 10.4 Section 14 and paragraph 152 of the NPPF identifies the role that planning plays in helping shape places to secure radical reductions in greenhouse emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure.
- 10.5 Paragraph 154 of the NPPF states new development should be planned for in ways that:
- avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and
 - can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

10.6 London Plan Policy GG5 states GG6 states to help London become a more efficient and resilient city, those involved in planning and development must:

- A. seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero-carbon city by 2050;
- B. ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating and avoiding contributing to the urban heat island effect;
- C. create a safe and secure environment which is resilient the impact of emergencies including fire and terrorism; and
- D. take an integrated and smart approach to the delivery of strategic and local infrastructure by ensuring that public, private, community and voluntary sectors plan and work together.

10.7 London Plan Policy D3 seeks development to aim for high sustainability standards and take into account the principles of the circular economy.

10.8 Part A of the London Plan Policy SI 2 states that major developments should be net carbon zero. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:

- 1) Be lean: use less energy and manage demand during operation.
- 2) Be clean: exploit local energy resources and supply energy efficiently and cleanly.
- 3) Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site.
- 4) Be seen: monitor, verify and report on energy performance.

10.9 Part C of the London Plan Policy SI 2 sets the following targets to be achieved by major developments:

- A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major developments.
- Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures.
- Where it is clearly demonstrated that zero-carbon target cannot be fully achieved on-site any shortfall should be provided either through a cash in lieu contribution or off-site provided that an alternative proposal is identified, and delivery is certain.

10.10 Part E of London Plan Policy SI 2 states that major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations i.e. unregulated emissions.

10.11 Policy SI 4 of the London Plan states that development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials, and incorporation of green infrastructure. Part B states that major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:

- Reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure.
- Minimise internal heat generation through energy efficient design.
- Manage the heat within the building through exposed internal thermal mass and high ceilings.
- Provide passive ventilation.

- Provide mechanical ventilation.
- Provide active cooling systems.

10.12 In support of the policies of the London Plan, the Mayor's SPG on Sustainable Design and Construction provides the context for all developments and provides a mechanism for addressing climate change impacts through new developments. As an update to the 50% carbon reduction target set out in London Plan policy 5.2, the SPG states that the Mayor will adopt a flat carbon dioxide improvement target beyond Part L 2013 of 35% to both residential and non-residential development.

10.13 Local Plan Policy P69 states development must achieve a BREEAM rating of 'Excellent' for non-residential development and non-self-contained residential development over 500sqm and reduce the risk of overheating, taking into account climate change predictions over the life time of the building, in accordance with prioritised measures set out in the following cooling hierarchy:

1. Reduce the amount of heat entering a building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
2. Minimise internal heat generation through energy efficient design; then
3. Manage the heat within the building through exposed internal thermal mass and high ceilings; then
4. Passive ventilation; then
5. Mechanical ventilation; then
6. Active cooling systems (ensuring they are the lowest carbon options).

10.14 Local Plan Policy P70 states development must minimise carbon emissions on site in accordance with the following energy hierarchy

1. Be lean (energy efficient design and construction); then
2. Be clean (low carbon energy supply); then
3. Be green (on site renewable energy generation and storage).

10.15 Local Plan Policy P70 also stated development must reduce operational greenhouse gas emissions and minimise both annual and peak energy demand and must be net zero-carbon. Development proposals referable to the Mayor must calculate whole life cycle carbon emissions through a nationally recognised assessment and demonstrate actions taken to reduce life cycle carbon emissions. Major development must be designed to incorporate decentralised energy in accordance with the following hierarchy:

1. Connect to an existing or planned decentralised energy network; then
2. Be future-proofed to connect to a planned decentralised energy network; or
3. Implement a site-wide low carbon communal heating system; and
4. Explore and evaluate the potential to oversize the communal heating system for connection and supply to adjacent sites and, where feasible be implemented.

Energy and Sustainability - Assessment

10.16 Sustainability has been a key aspect of the Proposed Development from the very early design stages. Environmentally sustainable measures have been fully integrated into the design and will be incorporated during the construction and operation of the Proposed Development. Sustainability is a key aspect of the Proposed Development in all respects, not only in terms of BREEAM and carbon reduction but in its operational phase in terms of health and wellbeing, in terms of WELL accreditation.

10.17 This application is supported by an Energy Statement, prepared by Hilson Moran and a Sustainability Statement, prepared by Arup, which summarise the key measures proposed to reduce the development's carbon emissions. The Energy Statement and Sustainability Statement identify that the Proposed Development seeks to adopt a sustainable approach during the complete lifecycle including design, construction and operational stages.

10.18 As outlined in the Energy Statement and the Sustainability Statement, the energy and sustainability measures for the Proposed Development have been developed in line

with the green energy hierarchy set out at London Plan Policy SI2 and Southwark Plan.

- 10.19 By adopting a sustainable approach in design, construction and operation, the Proposed Development is well positioned to establish itself as an exemplar sustainable development, satisfy the requirements of the local planning policy and exceed the Building Regulations standards, wherever it is technically, functionally and economically viable.
- 10.20 A summary of the proposed key measures to reduce carbon emissions is provided below against the four sections of the Mayor's current energy hierarchy (be lean, be clean, be seen and be green).
- 10.21 In terms of Be Lean, it is proposed to incorporate high levels of passive and energy efficient design measures in order to exceed the Building Regulations requirements (Part L 2013) through demand reduction measures alone. A wide range of passive and energy efficiency measures are incorporated in the design, including good levels of thermal insulation, high levels of building air tightness, good levels of internal daylight reducing reliance on artificial lighting, efficient artificial lighting and controls, as well as high efficiency building services that reduce the overall CO2 emissions of the scheme.
- 10.22 In terms of Be Clean, the potential for connecting the development to an existing or planned heat network has been investigated and LBS has been contacted. It is however, approximately 650 m from the proposed South Bank Employers' Group (SBEG) District Heating Network and at the time of writing, the timescales and capacities for the Proposed District Heating Network are uncertain and plans for extending closer to the development site are not provided.
- 10.23 Due to the relatively low amount of heat required by the proposed land use and the impact on local air quality, an individual Combined Heat and Power system has been dismissed for the Proposed Development. Gas boilers were also dismissed due to air quality constraints. The Development proposes an electric heating system to overcome air quality constraints and due to the predicted rapid decarbonisation of the electrical grid. The heat pump in heating mode is considered in the 'be green' step of the energy hierarchy covering both heating and Domestic Hot water requirements. The impacts of the development on local air quality have been considered during

design. No combustion on site is proposed and this is expected to help to limit the negative impacts of the development on local air quality.

- 10.24 In terms of Be Green, it has been determined that roof mounted photovoltaic (PV) arrays, providing renewable electricity, is a viable technology for integration into the scheme, as well as the use of air source heat pumps (ASHP) throughout the building for space heating and cooling, and hot water generation. An active area of 360m² of photovoltaics are proposed at roof level. The estimated electricity generation of the photovoltaics is 61,842 kWh/annum which will result in a total CO₂ reduction of 6.5%.
- 10.25 In terms of Be Seen, upon operation of the proposed development, the applicant will endeavour to provide estimates of the performance indications in terms of contextual data, building energy use, and carbon emissions.
- 10.26 Consideration has also been given to water efficiency and where water use can be minimised by installing water-efficient equipment and appliances and increasing awareness of water consumption.
- 10.27 A BREEAM Pre-Assessment has been carried out for the proposed development. The current pre-assessment estimates provide a targeted score of approximately 86.9%.
- 10.28 The BREEAM pre-assessment of the proposed development demonstrates that the design will holistically incorporate sustainable principles into the full range of sustainability aspects covered by BREEAM: management, health & wellbeing, energy, transport, water, materials, waste, land use & ecology and pollution. Formal assessments will take place once the tender documentation is produced and will require submission of a full evidence bundle from the client and the design team to show compliance with the credits.
- 10.29 It is the aspiration of the proposed development to achieve a 'Platinum' rating under the WELL version 2.0 scheme. WELL accreditation seeks a series of certifications and performances to promote occupant wellbeing. The targeted score for the office assessment is estimated to 94no. points which equates to a 'Platinum' score with all pre-conditions targeted. There are seven key concepts which WELL assesses, these are: air, water, nourishment, light, fitness, comfort, and mind.

- 10.30 Additionally, as noted in the land use section, the proposed development will provide an additional 32,036 sqm of additional office accommodation, in a highly sustainable location, in accordance with local and regional policy, which will contribute to meeting the Council's targets for the delivery of accommodation for an additional jobs.
- 10.31 As described in the transport section below, the proposed development will also promote more sustainable transport modes, including by removing existing vehicle parking and replacing it with cycle parking that meets current London Plan standards, as well as the associated end of trip facilities.
- 10.32 In summary, the proposals to redevelop the Site have progressed with sustainability at the centre of decision making and this approach will continue through all lifecycles of the development process (including design, construction and operation). The proposed development seeks to reduce embodied carbon emissions to practical completion under 600kgCO₂e/m². The proposed development will be a net-zero carbon building: upfront embodied carbon as well as operational carbon, this involves the commitment to voluntarily offset all embodied carbon emissions at completion, in addition to the required GLA offsets. On this basis, we consider that the Proposed Development complies with the relevant energy and sustainability policies at a national, regional, and local level.

Circular Economy and Whole Life Carbon – Policy

- 10.33 London Plan Policy GG5(H) states that planning and development should recognise and promote the benefits of a transition to a low carbon economy to strengthen London's economic success.
- 10.34 To minimise the use of new materials, the following circular principles should be taken into account in line with figure 3.2 of the London Plan:
- building in layers – ensuring that different parts of the building are accessible and can be maintained and replaced where necessary;
 - designing out waste – ensuring that waste reduction is planned in from project inception to completion, including consideration of standardised

components, modular build and re-use of secondary products and materials;

- designing for longevity;
- designing for adaptability or flexibility;
- designing for disassembly; and using systems, elements or materials that can be re-used and recycled.

10.35 London Plan Policy SI 2 Part F requires referable proposals to calculate whole-life cycle carbon emissions and to demonstrate actions taken to reduce life-cycle emissions.

10.36 London Plan Policy SI 7 encourages waste minimisation and waste prevention through the reuse of materials and fewer resources. Referable applications should promote circular economy outcomes and aim to be net zero waste.

10.37 The Mayor has subsequently published London Planning Guidance on Whole Life Carbon Emissions, and Circular Economy.

10.38 The WLC Guidance explains that WLC emissions are the total carbon emissions resulting from the construction and use of a building, including its demolition and disposal. They include regulated and unregulated energy use. The Guidance confirms that the net zero-carbon target applies to the “operational emissions” of a building and the WLC requirement is not subject to the Mayor’s net zero-carbon target. Applicants are – as set out in Policy SI2 F - required to calculate operational and embodied energy and show how both can be reduced. Principle 1 of Table 2.1 advises that “Retaining existing built structures for reuse and retrofit, in part or as a whole, should be prioritised before considering substantial demolition, as this is typically the lowest-carbon option.”

10.39 Appendix 2 of the WLC provides benchmarks for the whole life carbon performance of buildings. These are based upon the stages of the building’s life cycle as defined in the RICS Guidance, excluding modules on operational energy and operational water, and impacts beyond the system boundary. This accounts, therefore, for construction,

operation and end-of-life. Benchmarks are expressed in terms of kgCO₂e/m² GIA. Additional, aspirational, benchmarks representing a 40% reduction are also provided.

- 10.40 The WLC Guidance sets out a template for the calculation and reporting of the whole life assessment.
- 10.41 The Mayor of London’s draft Energy Assessment Guidance sets out the approach that should be taken to the assessment of regulated operational energy use, and the comparison of that use with 2013 Part L.
- 10.42 The Mayor’s Circular Economy LPG sets out how the requirements of Policy SI 7 can be met. It “also includes guidance on how the design of new buildings, and prioritising the reuse and retrofit of existing structures, can promote CE outcomes.” Para 1.1.3. The LPG indicates a decision tree should be followed to inform the design process for a site, which includes, for existing buildings, considering firstly, whether it is technically feasible to retain the building and, secondly, if the existing building, or parts thereof, would be suited to the requirements of the site.
- 10.43 At a local level Local Plan Policy P62 requires new development to adhere to requirements that are closely linked to the broader circular economy principles. These requirements are:
- Following a construction waste management hierarchy consisting of the following steps:
 - Avoid creating waste; then
 - Reduce the amount of waste produced; then
 - Prepare waste materials for re-use; then
 - Recycle and compost waste materials; then
 - Recover energy from waste materials; then
 - Dispose waste material in landfill.
 - Providing adequate recycling, composting and waste disposal, collection and storage facilities on site;
 - Providing a suitable off-site waste management strategy that does not adversely impact amenity, access or the environment where on site waste management provision is not possible.

10.44 Local Plan Policy P63 requires new and extended waste management facilities to be planned and designed so that they support the circular economy principles to provide social, economic and environmental benefits. However, this policy does not include requirements for other types of development to pursue in order to facilitate a functioning circular economy.

Circular Economy and Whole Life Carbon – Assessment

10.45 The Mayor of London, in his updated Stage 2 report on the potential redevelopment of Marks and Spencer, at Marble Arch, has provided a helpful explanation of the way in which the combination of these recently adopted local and regional policies and supplemental guidance should be applied.

10.46 The report states: “This Mayor’s WLC Assessments LPG and Circular Economy Statement LPG both require the retention and retrofitting of existing buildings to be prioritised” (paragraph 2). The report goes on to note that officers accept “that the retrofit and reuse of buildings can play an important role in meeting national and London Plan carbon reduction targets”. The report explains that the WLC Assessments LPG and the Circular Economy LPG require priority consideration to be retrofitting of buildings but that “neither Policy SI2 or SI7 of the London Plan prohibits demolition”.

10.47 This approach has been followed in respect of the proposed development at Red Lion Court.

10.48 The proposed development involves the demolition of the existing upper-floor levels of the building, with some demolition and some retention of the basement. The Whole Life Carbon Assessment, Design and Access Statement, Sustainability Statement and Circular Economy Statement collectively demonstrate that the requirements of SI2 and SI7 have been satisfied.

10.49 The DAS and Sustainability Statement, demonstrate the extensive consideration given to the re-use of the existing building, through the light-touch refurbishment and reposition options, which were both explored in detail.

- 10.50 As part of the initial Feasibility Study, a preliminary assessment was carried out to understand the carbon and wider sustainability impact of the three options; 'Light Touch' Refurbishment, Reposition and Redevelopment. The assessment focused on balancing two drivers: achieving the project and Landsec's wider sustainability aspirations and minimising the whole life carbon impact of the development. The Carbon and Sustainability Assessment, was undertaken which outlines that if the proposed development is designed with an Aspirational Embodied Carbon Target of 600 kgCO₂e/m² (in line with GLA targets for 2030) it has the potential to achieve a better carbon performance than the Reposition.
- 10.51 An early appraisal identified that the 'Light Touch' Refurbishment scenario cannot meet the project's Sustainability Commitments. The Reposition, which includes an extension, would also not be feasible achieve the ambitious sustainability aspirations. The full Redevelopment, however, provides more flexibility for this ambition, but presents two clear challenges in embodied carbon and circular aspirations.
- 10.52 Through analysis and assessment completed during the Stage 1 Feasibility Study the Design Team have been able to demonstrate that Redevelopment (the proposal) of the existing building meets the widest set of Sustainability Considerations/ Criteria.
- 10.53 From these findings it is clear that a development that meets the widest set of principles can only be achievable with a Redevelopment scheme. Therefore, the design brief for the Proposed Redevelopment, includes mitigation strategies to be implemented for carbon and circular economy in order to fully comply with all of Landsec's sustainability principles. Full details of which can be found in the Sustainability Statement, prepared by Arup.
- 10.54 The development has, sought to minimise the amount of embodied, and whole life, carbon. It will commit to achieving reduce embodied carbon emissions to practical completion under 600kgCO₂e/m², which meets the Mayor's benchmarks in Appendix 2 of the WLC Guidance, and exceeds the LETI standards as well. The Sustainability Statement explains how this will be achieved, including through the use of low carbon materials such as cross-laminated timber (CLT). This is a substantial improvement on 'standard' levels of embodied carbon, consistent with the objectives of Policy SI7 and Policy 36.

10.55 The proposed development also complies with Policy SI7, in adopting a Circular Economy approach. The Circular Economy Statement, prepared by Arup provides an overview of the strategies to be implemented in order for it to meet circular economy principles. The statement covers the relevant planning policies relating to circular economy and describe how these policies will be achieved within the development in order to minimise the environmental impact and reduce waste

10.56 The following strategic approach, key commitments and targets have been formed with the design team:

- Designing with the past: Secure the value of existing asset
- Designing for the future: Longevity, resilience adaptability, flexibility
- Implementation approach

10.57 In terms of securing the value of the existing asset, the circular economy commitments heavily focus on controlling the impact of the deconstruction of the existing building. The basement is being part-retained, with over 50% of the piles from existing foundations being reused. There will also be a zero-waste approach, with careful deconstruction of all elements and materials that cannot be re-used on or offsite, which will be recycled and converted for beneficial use. The Pre-deconstruction Audit has identified quantities, potential uses, markets and targets. The Applicant will commit to diverting 100% of non-hazardous waste from landfill and 95% of total waste from landfill.

10.58 In terms of longevity, resilience adaptability, flexibility, the proposed development respond to the high standards of durability, adaptability and flexibility that the existing building could not fulfil. Therefore, proposed development incorporates ambitious circular economy targets based on the following principles:

- Durability: The building substructure and superstructure will be designed to a 120-year lifespan. Most building components are also designed to deliver longer lifespans than current practice (MEP: 30 years; Façade: 60 years). A 'loose fit' approach to most systems will ensure easy modification, replacement of parts, expansions and alterations, ensuring the durability of the whole development.

- **Resilience:** Following a Climate Change Adaptation Strategy appraisal, Red Lion court will be a Net-Zero in alignment with the UKGBC's framework definition of a net zero carbon building (both upfront embodied carbon and operational carbon), and an all-electric building, avoiding any dependency on fossil fuels for its daily operation. The servicing strategy meets future occupant needs in projected future climate scenarios.
- **Adaptability:** The development is designed to meet the needs of the present, but with consideration for how those needs might change in the future. Therefore, it is designed to allow for easy alterations and replacement of non-structural parts. The structural parts have also been developed with future adaptability in mind.
- **Flexibility:** The proposed development will be designed to be able to respond to the needs of a future changing pool of potential occupants through horizontal and vertical flexibility. In terms of horizontal flexibility, multiple layouts demonstrated for various occupation options catering for different sectors. In terms of vertical flexibility, Cross-Laminated Timber (CLT) infills enable the connection of multiple floors and adaptability of the internal space.

10.59 In terms the implementation strategy, the Circular Economy Statement demonstrates that the project's approach has addressed the following elements as per the London Plan Policy SI 7 Reducing Waste and supporting the Circular Economy'. In particular, it addresses the following issues:

- How all materials arising from demolition and remediation works will be re-used and/or recycled;
- How the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life;
- Opportunities for managing as much waste as possible on site;
- Adequate and easily accessible storage space and collection systems to support recycling and re-use;
- How much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy; and

- How performance will be monitored and reported.
- 10.60 Additionally, the proposed development will target BREEAM Outstanding, and all the processes required to achieve the ambitious circular targets of Red Lion Court will be structured by the different targeted credits.
- 10.61 The design will reduce the consumption of potable water for sanitary use in new buildings through the use of water efficient components and water recycling systems. The proposed development will result in a 40% reduction in water consumption compared to traditional office building
- 10.62 In summary, consideration has been given to the re-use of the existing building. The analysis has confirmed that a repositioned approach to the development could not achieve a development that would deliver the use that development plan policy requires on-site, namely continued premium high quality office use. The existing building, , is functionally obsolete as premium office space, and the building structure and core location preclude a major refurbishment and extension which would deliver Grade A office floorspace. It would always have a very high level of operational carbon as a result. Considerable steps have been taken to ensure that the redeveloped building would have low embodied and whole-life carbon, including through the use of innovative materials and features, and the Mayor’s aspirational targets for embodied carbon have been met.
- 10.63 The proposed development therefore complies fully with Policies SI2 and SI7 of the London Plan and Policy P62 of the Southwark Local Plan.

11 Planning Consideration – Design

- 11.1 The Applicant and the project team have sought to develop a scheme which demonstrates the highest quality architecture and is befitting of a significant office building within the context of this part of Southwark.
- 11.2 The Applicant has a track record of delivering developments and BIG Architects have experience of delivering buildings of exceptional and innovative design.
- 11.3 The evolution of the proposed design, including original concepts and design development, as well as the underlying design rationale, are set out in more detail in BIG's Design and Access Statement submitted with this planning application. The final scheme design has evolved throughout the pre-application process in response to feedback from a range of stakeholders including the London Borough of Southwark, the GLA, TfL, local amenity groups and local residents.
- 11.4 This section assesses the proposed design against relevant design planning policies contained in national and local planning policy documents. Further details on the design can be found in the submitted Design and Access Statement, prepared by BIG Architects.
- 11.5 The Government attaches great importance to the design of the built environment in the NPPF. Paragraph 126 states that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
- 11.6 Paragraph 130 of the NPPF stipulates that it is important to plan positively for the achievement of high quality and inclusive design for all development, which will function well over the lifetime of the development, are visually attractive, sympathetic to local character, establish a strong sense of place, optimise the potential of the site, and create places that are safe.
- 11.7 Paragraph 134 of the NPPF states that LPAs should give great weight to outstanding or innovative designs which help to raise the standard of design in the area and are sensitive to local character and the surrounding environment.
- 11.8 The NPPG on Design, which supports section 7 of the NPPF, states that local planning authorities are required to take design into consideration and should give great weight

to outstanding or innovative designs which help to raise the standard of design more generally in the area: **“Planning permission should not be refused for buildings and infrastructure that promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal’s economic, social and environmental benefits)”**.

11.9 The NPPG states that new or changing places should have the following qualities commonly exhibited by successful, well-designed places:

- be functional;
- support mixed uses and tenures;
- include successful public spaces;
- be adaptable and resilient;
- have a distinctive character;
- be attractive; and
- encourage ease of movement.

11.10 London Plan Policy D1-D3 apply to the design and layout of the development and set out a range of urban design principles relating to the quality of the public realm, the provision of convenient, legible movement routes and the importance of designing out crime by maximising the provision of active frontages.

11.11 London Plan Policy D1 provides a framework for delivering Good Growth through good design. Part A of this policy sets out the requirements for assessing an area’s characteristics and Part B sets out the steps for using this information to establish the capacity for growth of different areas and ensure that sites are developed to an optimum capacity that is responsive to the site’s context and supporting infrastructure.

11.12 London Plan Policy D2 states that the density of development proposals should consider and be linked to, the provision of future planned levels of infrastructure and be proportionate to the site’s connectivity and accessibility by walking, cycling and public transport to jobs and services (including both PTAL and access to local services).

- 11.13 London Plan Policy D3 states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned support infrastructure capacity.
- 11.14 London Plan Policy D4 sets out how the design of development proposals should be thoroughly scrutinised by borough planning, urban design and conservation officers.
- 11.15 London Plan Policy D5 sets out that development should achieve the highest standards of accessible and inclusive design.
- 11.16 London Plan Policy D8 states that development proposals should “encourage and explore opportunities to create new public realm where appropriate”, and “ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain.” The public realm should be seen as a series of connected routes and spaces that help to define the character of a place. Its design should be based on an understanding of how the public realm in an area functions and creates a sense of place.
- 11.17 The Public London Charter LPG (2021) outlines the eight principles that set out the rights and responsibilities for the users, owners and managers of new public spaces. The Charter aims to ensure that London’s public spaces are safe, accessible, inclusive, attractive, well-connected and easy to understand, well maintained and serviced. It promotes public space that is open and offers the highest level of public access irrespective of land ownership, with landowners promoting and encouraging public use of public space for all communities.
- 11.18 Southwark Plan Policy AV.02 states development in the Bankside and Borough should increase or improve the number and quality of local open spaces, squares and public realm.
- 11.19 Southwark Plan Policy P13 requires development to:

- Ensure height, scale, massing and arrangement respond positively to the existing townscape, character and context; and
- Better reveal local distinctiveness and architectural character; and conserve and enhance the significance of the local historic environment; and
- Ensure the urban grain and site layout take account of and improve existing patterns of development and
- movement, permeability and street widths; and
- Ensure buildings, public spaces, open spaces and routes are positioned according to their function, importance and use; and
- Ensure a high quality public realm that encourages walking and cycling and is safe, legible, and attractive, and eases the movement of pedestrians, cyclists, pushchairs, wheelchairs and mobility scooters and vehicular traffic. Street clutter should be avoided; and
- Provide landscaping which is appropriate to the context, including the provision and retention of street trees, and
- Provide the use of green infrastructure through the principles of water sensitive urban design, including quiet green spaces, tree pit rain gardens in addition to green grid spaces for people and surface water run off; and
- Provide accessible and inclusive design for all ages and people with disabilities; and
- Provide opportunities for formal and informal play; and
- Provide adequate outdoor seating for residents and visitors.

11.20 Southwark Plan Policy P14 requires high standards of design quality with appropriate fabric, function and composition. The policy requires development to:

- Innovative design solutions that are specific to the site’s historic context, topography and constraints; and

- Adequate daylight, sunlight, outlook, and a comfortable microclimate including good acoustic design for new and existing residents; and
- Respond positively to the context using durable, quality materials; and
- Buildings and spaces which are constructed and designed sustainably to adapt to the impacts of climate change; and
- Buildings and spaces that utilise active design principles that are fitting to the location, context, scale and type of development; and
- Active frontages and entrances that promote activity and successfully engage with the public realm in appropriate locations; and
- Adequate servicing within the footprint of the building and site for each land use; and
- Accessible and inclusive design for all; and
- A positive pedestrian experience; and
- Basements that do not have adverse archaeological, amenity or environmental impacts.

11.21 Policy P50 of the Southwark Plan requires new development to, among other things:

- Enhance the borough's walking networks by providing footways, routes and public realm that enable access through development sites and adjoining areas; and
- Ensure routes and access are safe and designed to be inclusive and meet the needs of all pedestrians, with particular emphasis on disabled people and the mobility impaired. Street furniture must be located to allow the movement of pushchairs, wheelchairs and mobility scooters

Assessment

11.22 The proposed building is designed by BIG Architects and considered to be of a world class design and architectural detail reflective of the importance of this riverfront site, in accordance with regional and local planning policy which require exemplary design quality and inclusive urban design and architecture. The Proposed Development will create a building of exceptional quality and sustainable and enduring design.

11.23 Sustainability has played a large role throughout the development of the design, with the scheme targeting BREEAM 'Outstanding'. The principles and measures highlighted

by BREEAM will ensure a holistic approach to sustainability, rather than 'just' considering energy, resulting in the consideration of life-cycle carbon, water consumption, waste minimisation, responsible and ethical sourcing of materials, ecology and occupant comfort and wellbeing.

- 11.24 The design proposal also anticipates that in the context of the ongoing 'climate emergency', corporate disaster recovery strategies may be less reliant on expensive and environmentally damaging features such as diesel generators; and more focused on ensuring that adequate measures are put in place to revert to working remotely periodically in the event of infrastructure failures or future health directives, whilst also reducing carbon emissions.
- 11.25 The Proposed Development takes an imaginative and sensitive design approach and creates a positive relationship to the surrounding context including heritage assets. The development will deliver an office-led mixed-use development of the highest specification whilst also delivering substantial social, economic and environmental benefits.
- 11.26 The proposed design has evolved iteratively throughout the pre-application process and through discussion with relevant stakeholders. Throughout the process, the project team have sought to develop a scheme that displays the highest quality architecture to create a landmark piece of architecture for this building in a prominent river location.
- 11.27 BIG Architects has a track-record of delivering exceptionally designed and innovative buildings across the world. They have a reputation for pioneering, innovative workplace design strategies, combining commercial expertise with creative originality.
- 11.28 The design vision underlying the proposals is explained in detail in the Design and Access Statement which accompanies the application.
- 11.29 The Proposed Development is arranged, in massing terms, as a series of 'jumping' blocks of differing sizes that opens up the ground plane to create a series of new and enhanced public urban spaces. In aggregate the mass delivers a transformative overall building form that responds to the different scales of Park Street's smaller, residential context at the south; and the more contemporary and larger scaled former Financial Times building at the east to deliver a sophisticated overall form informed by sight lines from the surrounding streetscape.

- 11.30 The Proposed Building presents a unified and coherent façade treatment employing a simple, standardised grid that accentuates the building's stepped massing. Articulated with solid infill panels, the facade responds to both solar exposure and the need for privacy around the building. Pocket terraces are introduced at each level allowing each floor to have access to a terrace and breaking down the grid with small patches of green.
- 11.31 The riverfront elevation will have large expanses of glass, which will maximise the visual permeability but also respond to the northern aspect of that elevation, whilst the east and southern elevations will have inset metal panels, the breadth of which will be patterned to give the building greater opacity to the south and east, where the sunlight is strongest on the Site and where the building addresses a residential area. In addition, the outer grid of the building will be composed of modules constructed off-Site, reducing the environmental impact of the building's construction and allowing for variation in their form.
- 11.32 The materiality of the façade uses a subtle palette of materials to emphasis the historic warehouse context of the Site and to deliver a refined appearance. Glazing for the typical facade is intended to include Low-E coated glass to the interior leaf in order to achieve best performance in combination with solar control blinds. The facade grid is proposed in brick cast in a high-performance concrete to minimise the material thickness keeping the grid light and minimising carbon impact. The solid portions of the infill panels and the glazing frames are proposed in metal for robustness and longevity. A finish 'bronze' may be applied via a metallic plating finish over aluminium or steel components for all framing components. Balustrades are proposed in laminated glass, with a metal cap to match the solid panels and glazing frame. The terraces will be finished in appropriate natural materials in harmony with the extensive landscaping.
- 11.33 The Proposed Development also provides new publicly accessible spaces within the building and private external terraces on floors 6, 8, 9 and 10. These spaces provide communal facilities for occupiers and residents. The total publicly accessible space equates to 1,930 sqm, which represents 44.5% of the site boundary. This public space provision is drastically in excess of the requirement to provide 15% of the site area of Site Allocation NSP06 (1,183 sqm) as public space, which also includes the former FT Building site area. The generous public realm offer is a major public benefit of the proposals.

- 11.34 The public realm has been designed to incorporate the principles of the Public London Charter, by incorporating design that makes sure the public space is safe, accessible, inclusive, attractive, well-connected and easy to understand, well maintained and serviced, by encouraging public use of the space for all communities.
- 11.35 The proposed building has carefully articulated the massing and materiality according to its immediate setting, which has a range of different characteristics.
- 11.36 As set out within the submitted Townscape, Heritage and Visual Impact Assessment (“THVIA”), the proposed massing would not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough views and would respond positively to local character and townscape.
- 11.37 The Proposed Development, therefore, delivers a building design of the highest architectural and environmental quality for this important site. The proposed development would provide an exciting new aesthetically pleasing building of the highest quality, rich in form and materials, with a unique architectural language and activated streets. It would deliver a highly sustainable transformation of an existing building in this part of Southwark. Therefore, the design of the proposed development accords with the NPPF, and regional and local design policies.

Amenity

- 11.38 London Plan Policy D1B requires new development to achieve indoor and outdoor environments that are comfortable and inviting for people to use. In addition, development should provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.
- 11.39 Local Plan Policy P56 states that development should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users.
- 11.40 The proposed landscaping of the public realm and terraces will improve the natural environment through the use of urban greening to reduce flood risk and improve air quality. The proposed greenery will also help to achieve a substantial increase in biodiversity on-site. It will also create a substantial amount of amenity space for office tenants to enjoy.

- 11.41 At levels 6, 8, 9 and 10 within the Proposed Development terraces are proposed, which would provide private amenity space for modern office occupiers and encouraging wellness.
- 11.42 Additionally, the Proposed Development includes a 105 sqm (GIA) Wellness Centre, which will promote positive health and wellbeing. The introduction of a wellness centre was raised by local residents during public consultation, as something that they would like to see included as part of the development. The provision of high-quality wellness centre will private amenity space for occupiers and local residents alike.

Inclusive Access

- 11.43 In accordance with NPPF design principles, London Plan Policy D5 and Policy P13, P14 and P45 of the Southwark Local Plan, throughout the design process accessibility of the final scheme has been a key consideration. Full details of how the scheme has incorporated inclusive design principles can be found in the Design and Access Statement.
- 11.44 Part B of London Plan Policy D5 requires that development proposals should achieve the highest standards of accessible and inclusive design. Proposals should deliver high quality people focused spaces, which are convenient and welcoming with no disabled barriers.
- 11.45 The scheme has sought to incorporate the principles for inclusive design wherever possible, with inclusive access to all parts of the proposed building.
- 11.46 The design of the external space has been carefully curated to ensure that all surfaces, routes and access points are clearly defined through the architecture and landscape design. All entrance levels are at grade. All circulation ramps and staircases comply with Building Regulations requirements.
- 11.47 The development meets Fire Regulations, and both the means of escape for occupants, and accessibility for the Fire Brigade, has been carefully considered in the design of the proposed building.
- 11.48 The café / reception and landscape around it has been developed to include ramped and stepped access directly from street level.

Design Summary

- 11.49 During design development, and through extensive pre-application discussions with officers and local stakeholders, careful consideration has been given to the overall design and massing of the proposal.
- 11.50 Overall, the proposed design is considered to be of exceptional quality. The proposals have been designed to the highest quality and sustainable design. The Proposed Development provides an active frontage and visually interesting street level elevations at the local scale and an overall attractive appearance when viewed from a distance and from the River.
- 11.51 In addition, the building ensures the highest standards of accessibility and inclusive design as set out in the Design and Access Statement. Careful consideration has also been given to the public realm improvements and the proposals are considered to represent a public benefit, with significant improvements made to Bankside Path and Pocket Park.
- 11.52 The proposed building in design terms is therefore considered to comply with the objectives of the NPPF, London Plan policies London Plan policies GG1, D1 and D8 and Local Plan policies P13, P14, P17 and P50.

Tall Buildings – Policy

- 11.53 Chapter 11 of the NPPF, entitled ‘making efficient use of land’, clearly sets out that the government’s objective is for the effective and efficient use of land. Paragraph 119 promotes the effective use of land to meet the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 11.54 Paragraph 124 of the NPPF states planning policies and decisions should support development that makes efficient use of land.
- 11.55 London Plan Policy D9 states Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan.

11.56 London Plan Policy D9 Part C states development proposals for tall buildings should address the following impacts:

- A. Visual impacts.
- B. Functional impacts.
- C. Environmental impact.
- D. Cumulative impact.

11.57 London Plan paragraph 3.9.1 notes that tall buildings of exemplary architectural quality and in the right place can make a positive contribution to London's cityscape.

11.58 Local Plan Policy P17 Part 1 states the areas where LBS expect tall buildings are shown on the adopted Policies Map. These are typically within Major Town Centres, Opportunity Area Cores, Action Area Cores and the Central Activities Zone. Individual sites where taller buildings may be appropriate have been identified in the site allocations.

11.59 Local Plan Policy P17 Part 2 states tall buildings must:

- 1. Be located at a point of landmark significance; and
- 2. Have a height that is proportionate to the significance of the proposed location and the size of the site; and
- 3. Make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings; and
- 4. Not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough views; and
- 5. Respond positively to local character and townscape; and
- 6. Provide a functional public space that is appropriate to the height and size of the proposed building; and

7. Provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents where appropriate.

11.60 Local Plan Policy P17 Part 3 states the design of tall buildings will be required to:

1. Be of exemplary architectural design and residential quality; and
2. Conserve and enhance the significance of designated heritage assets and make a positive contribution to wider townscape character. Where proposals will affect the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) clear and convincing justification in the form of public benefits will be required; and
3. Avoid harmful and uncomfortable environmental impacts including wind shear, overshadowing, and solar glare; and
4. Maximise energy efficiency and prioritise the use of sustainable materials; and
5. Have a positive relationship with the public realm, provide opportunities for new street trees, and design lower floors to successfully relate to and create a positive pedestrian experience; and provide widened footways and routes to accommodate increased footfall.

Tall Buildings – Assessment

11.61 Tall buildings are defined in the Southwark local plan as buildings which are above 30m except where they are 25m in the Thames Special Policy Area, and also where they are significantly higher than surrounding buildings or their emerging context. The maximum height of the proposed building is 46.70m AOD. Therefore, the proposed development is considered to be a tall building by local planning policy and must comply with London Plan Policy D9 and Local Plan Policy P17.

11.62 The Site does falls within the Central Activities Zone where tall buildings are expected. Whilst Site Allocation NSP06 also states the comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape. The design of the development should respond to its prominent, yet sensitive setting as an arrival point into Southwark from Southwark Bridge. Redevelopment must be sensitive to the Thames Policy Area, where building

heights should be lower in close the proximity to the River Thames. The Site therefore represents an individual site where a taller building may be appropriate, as it has been identified as such in site allocation NSP06.

- 11.63 Additionally, the existing building at 39.49m AOD is already considered a tall building, therefore, the concept of a tall building in this location has already been agreed.
- 11.64 Therefore, it is deemed that a tall building could be acceptable in this location if meeting local and regional planning policy. In principle the proposed development will be a high density development rather than a “tall building” under the old CABE definition but nevertheless the development has been assessed against the tall building policies.
- 11.65 The proposed development responds well to its surrounding context including the former FT Building’s own permitted scheme for extension and refurbishment of their building, and the listed Anchor pub and has been extensively tested to ensure that it does not have any material impact on heritage aspects. Although the proposed development is considered a tall building, it maximises its density across the Site, whilst also offering a large portion of the Site over to the public realm.
- 11.66 The height and massing of the proposed building has been carefully considered and has evolved through extensive pre-application discussions with officers at LBS and the GLA in relation to identified key townscape views. As demonstrated in the Design and Access Statement, the heights of the taller element of the proposed development have been rigorously tested through extensive modelling. Of particular note, in detailed dialogue with planning and design officers, the proposed tallest element was lowered from G+11 to G+10 storeys to ensure that it did not have any undue impact on the local view height thresholds from Nunhead Cemetery and One Tree Hill.
- 11.67 The Proposed Development would form a high-quality addition to the local skyline through its height, scale, form, massing and proportion.
- 11.68 As set out above, the proposal has been designed to achieve exceptional architectural quality with appropriate sustainability measures being incorporated. Through the high-quality design, the proposal will enhance the character of the area through visual design and also the incorporation of active frontages which will seek to improve the local streetscapes. Careful consideration has also been given to the microclimate, and

daylight/sunlight, impacts the proposal may have on the surrounding area and appropriate mitigation measures have been undertaken, where required, as set out in the report below.

11.69 Consideration should also be given to how the proposed development addresses the impacts set out within London Plan Policy D9 Part C. These are as follows:

- Visual Impacts

- As demonstrated within the supporting THVIA, the proposal has been assessed against a range of long and mid-range, and immediate views, and is considered it would add positively to the townscape character wherever visible and it would transform the pedestrian experience around the Site. It would have a neutral or beneficial effect on all views in which it is seen. It would fully comply with the View Management Guidance set out for all relevant LVMF and LBS Borough Views. The Proposed Development would preserve the heritage significance of all heritage assets and enhance the townscape setting of the Grade II Listed Anchor pub. Furthermore, the building will be of an exemplary architectural design made of high-quality material.

- Functional impacts

- Regular discussions have been held with the design team and planning officers and the building has been designed to find appropriate emergency exit routes and so it can be serviced and maintained to preserve safety and quality of the surrounding area including the public realm. Furthermore, all access routes, entrances and ground floor uses have been carefully designed to ensure there is no adverse overcrowding or isolation in the surrounding areas
- The supporting Transport Assessment demonstrates that proposal can be accommodated by the existing transport network
- The fundamental aspect of this proposal is to bring forward a proposal that optimises the delivery and provision of Grade A office floorspace to meet the defined need and policy requirement of the Central Activities Zone (CAZ) and will be attractive to office occupiers.

- Environmental impact

- Careful consideration has been given to the environmental conditions both on site and in the surrounding area. Through appropriate mitigation, where required, the proposal is not considered to have any adverse impact in terms of wind, air quality, daylight/sunlight, or noise. Furthermore, the proposal will increase the comfort and enjoyment of open space around the building and result in significant increases in biodiversity and open space.
 - o Cumulative impact
 - The proposal has been considered in terms of the wider site context and the THVIA demonstrates that the cumulative effects would be positive. The combined relationship of the Proposed Development and remodelled former FT building will bring major, positive change to close views and the pedestrian experience around the Site.
- 11.70 Discussions have been held with both LBS and the GLA throughout the pre-application process with regards to the provision of a tall building in this location. In summary, it was concluded a tall building in this location could be acceptable subject to there being no adverse impact on the local view height thresholds from Nunhead Cemetery and One Tree Hill. As demonstrated in the supporting THVIA, the proposal will not have an adverse impact on these factors.
- 11.71 Therefore, it is considered that the Proposed Development meets all of the criteria required by London Plan Policy D9 and Local Plan Policy P17 for tall building proposals.

12 Planning Consideration – Townscape, Views and Heritage

- 12.1 This section assesses the Proposed Development within the context of its historic environment and the statutory duty to have special regard to the desirability of preserving the listed buildings, their settings, or any features of special architectural or historic interest, and conservation areas. This chapter sets out the significance of the designated and non-designated heritage assets (the adjacent conservation areas and surrounding listed buildings) in order to inform an assessment of the proposals according to the criteria set out in the NPPF in relation to harm and benefit. The proposals are then considered in the light of regional and local planning policy.
- 12.2 A full analysis of the impact of the Proposed Development on designated heritage assets is included within the Townscape, Heritage and Visual Impact Assessment, prepared by Tavernors and submitted as part of the application and should be read alongside this section of this Statement.
- 12.3 The Site itself is not a listed building or located within a Conservation Area. The Site is located within the Borough Views of St Paul's Cathedral from Nunhead Cemetery and One Tree Hill. The site lies within the river prospect Borough View from Kings Stairs Gardens to Tower Bridge. The majority of site lies within the Background Assessment Area of the LVMF view 1A.2 - Alexandra Palace Viewing Terrace to St Paul's Cathedral. The site also partially lies within the Background Assessment Area of the LVMF view 3A.1 - Kenwood Viewing Gazebo to St Paul's Cathedral.
- 12.4 The Government has attached great importance to conserving and enhancing the historic environment in the NPPF. The NPPF advises that decisions on applications with implications on designated heritage assets should be made on the basis of the significance of the asset, and the harm (substantial or less than substantial) that the proposal would cause to the significance of the heritage asset.
- 12.5 Under paragraph 194 of the NPPF, in determining applications, local planning authorities should require an Applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.
- 12.6 Paragraph 197 of the NPPF states that in determining planning applications, local planning authorities should take account of:

- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness; and
- the desirability of new development making a positive contribution to local character and distinctiveness.

12.7 Paragraph 199 of the NPPF states that in assessing impact, the more important the asset, the greater the weight should be given to its conservation. It notes that significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

12.8 Paragraph 202 of the 'NPPF' states that, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm shall be weighed against the public benefits of the proposals.

12.9 Paragraph 7 of the PPG acknowledges that the public benefits which flow from a development can be anything that delivers economic, social or environmental progress. The benefits should flow from the proposals and be of a nature and scale to be of benefit to the public interest at large and should not just be a private benefit. However, benefits do not have to be visible or accessible to the public in order to constitute public benefits.

12.10 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) provides that, with respect of listed buildings, special regard should be had to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

12.11 Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) provides that, with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

- 12.12 London Plan Policy HC1 Part C states that development proposals affecting heritage assets, and their settings should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.
- 12.13 London Plan Policy HC3 Policy HC3 Strategic and Local Views outlines a list of designated Strategic Views and states that "Development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view."
- 12.14 London Plan Policy SD4 states the distinct environment and heritage of the CAZ should be sustained and enhanced.
- 12.15 Local Plan Policy P21 requires development to conserve and enhance the significance of heritage assets and their settings. Furthermore, this policy requires robust justification for any harm to the significance of the heritage asset that results from the development.
- 12.16 Local Plan Policy P22 requires new development to:
- **“Preserve and where possible enhance the borough views of significant landmarks and townscape; and**
 - **Ensure the viewing locations for each view are accessible and well managed; and**
 - **Enhance the composition of the panorama across the borough and central London as a whole.**
- 12.17 Heritage SPD (2021) sets out Southwark's vision to preserve, conserve, celebrate and enhance its unique, but also fragile and irreplaceable historic environment. The SPD outlines that to assess the impact of a proposal on an heritage asset, the following steps must be taken: first to identify the significance or importance of the asset, then to understand the impact or effect of the proposal on the asset, and finally to consider whether that impact is justified or necessary.

Assessment

12.18 A THVIA prepared by Tavernors Consultancy is submitted as part of the application. In agreement with LBS officers, 23 viewpoint positions were chosen to illustrate the visual effects of the proposed development in the local townscape and environment. The views have been prepared by Miller Hare and are described in detail in the Townscape and Visual Assessment.

12.19 The Assessment sets out and confirms the townscape receptors and visual receptors, including the neighbouring conservation areas, and listed buildings including the Grade II listed Southwark Bridge, Anchor Terrace (1 Southwark Bridge Road), Anchor Public House (1 Bankside) and Union Works

12.20 The verified views are as follows, and each assessed in detail in the THVIA

- LVMF View 1A.2 - Alexandra Palace Viewing Terrace
- LVMF View 3A.1 - Kenwood Viewing Gazebo
- LBS Borough View 1 One Tree Hill
- LBS Borough View 2 Nunhead Cemetery
- LBS Borough View 4: River prospect from Kings Stairs Gardens
- Tower Bridge LVMF 10A.1
- Millennium Bridge
- Southwark Bridge 12B.1
- Southwark Bridge 12B.1 - night
- Southwark Bridge, towards south end
- North Bank Thames Path: Three Cranes Walk
- London Bridge, north
- London Bridge, south
- Southwark Street at Thrale Street
- Park Street, south of Maiden Lane
- Southwark Bridge Road, corner with Sumner Street
- Southwark Bridge Road, looking east along Park Street
- Park Street, west end
- Porter Street/ Perkins Square
- Park street, corner with Bank End

- Clink Street, east
- Clink Street, west
- Clink Street, west end at viaduct
- Bankside at Anchor pub

12.21 Consideration within the assessment has also been given to relevant cumulative developments, which include the former FT building (ref: 21/AP/0599) which has resolution to grant permission and would result in the most cumulative effect due to the adjacency of that scheme. The relationship between the buildings has been considered in all respects throughout the design process. The buildings will relate well visually and together will transform that part of the Queen's Walk.

12.22 The THVIA states the proposed development would replace the low-quality building and space on Site with a high-quality new building, two new areas of landscaped public realm and a new route beside the former FT building. The scale and character of the proposed design will be appropriate to its prominent riverside location, and the composition and expression of its form has been conceived to respond equally well with the smaller scale context of the townscape to the south and east.

12.23 The designs of the Proposed Development have developed through a process of pre-application consultation with stakeholders to respond in scale and mass, to the existing townscape and with regard to potential effects on the significance of conservation areas, listed buildings and a full range of views. Likely adverse effects have been considered during the design process and mitigated by design through an iterative design evolution process.

Impact on LVMF Views

12.24 The THVIA concludes the Proposed Development would have no or negligible impact on relevant LVMF Protected Vistas (LVMF 1A.2 Alexandra Palace and LVMF 3A.1 Kenwood viewing gazebo).

12.25 It would have a minor, neutral impact on LVMF River Prospect 10A.1 from Tower Bridge due to its distance and scale, resulting in little visibility in the view.

12.26 The Proposed Development would have a major, beneficial effect on LVMF River Prospect 12B.1 from Southwark Bridge, however this view has been centred on the

Site for the purposes of the assessment. The field of view in the LVMF View 12B.1 is centred on the Southwark Cathedral, which is out of this frame, and the View Management Guidance relates to the Cathedral. The Proposed Development would have no impact on the setting of the Cathedral in the view.

Impact on Borough views

- 12.27 The Proposed Development would appear in the foreground of St Paul's Cathedral in two Borough Views (View 1 from One Tree Hill and View 2 from Nunhead Cemetery). These views are managed in a similar manner to LVMF Protected Vistas, with defined Viewing Corridors and Threshold Planes. The Proposed Development would fully comply with the Visual Management Guidance for foreground development in those views, which requires development to be set beneath the Threshold Plane and to not be unsightly, intrusive or prominent in the view. The nature of the effect is judged to be 'neutral' because the Proposed Development will preserve the view. It will preserve the view through its full compliance with the View Management Guidance set out in the Southwark Plan, and the viewer's ability to recognise and appreciate St Paul's Cathedral within the wider panorama will be fully preserved. The Proposed Development accords with this guidance in both Borough Views.
- 12.28 Borough View 4 from King's Stairs Gardens is cited in Site Allocation in the Southwark Plan. The Proposed Development would not be visible.

Impact on Distant and mid-distant views

- 12.29 The THVIA includes modelled versions of views which have been tested because the Zone of Visual Influence mapping showed potential points of wider visibility of the Proposed Development, but where closer inspection in the London context model showed it would have no or negligible impact. This set of tested views includes Guildhall Yard in the City and points in the London Bridge area where there was potential for the Proposed Development to be seen in conjunction Southwark Cathedral. These tested views show that there would be no visibility of the Proposed Development in these most distant views and, where visible, it would have a negligible impact at most.

12.30 From Millennium Bridge the proposed scale would appear in keeping with the established datum of the river front and the designs would have a positive and memorable character on the riverfront. The effect would be minor, beneficial.

12.31 From London Bridge the north and east elevations of the Proposed Development would be seen clearly and the composition of adjoining volumes will positively address both orientations. The architectural expression and materiality proposed would relate to both the brick wharf and wharf-styled buildings further east on the riverfront and the highly glazed commercial development further west. It will have a moderate, beneficial effect on these views

Impact on Local Views

12.32 The views show that, in the local area around the Site, the Proposed Development would be most fully visible from the north, due to the expanse of the adjacent river. Views from Southwark Bridge and the opposite North Bank show both the strong identity and visual lightness that the Proposed Development will have on the waterfront. It will have a moderate-major, beneficial effect on these views.

12.33 Moving clockwise around the Site, from the east there will be no or negligible visibility in views tested on Clink Street and in the London Bridge area.

12.34 From the south, there will be one glimpsed view of the Proposed Development from Southwark Street, where there is a gap in the north frontage to the street. There would be no visibility south of Southwark Street. The upper levels would be seen from certain points in the residential area between Park Street and Southwark Street. It would be visible due to the low scale of the context in this area, however the generally taller scale and commercial character of built form on the river is an established part of the townscape character here. The Proposed Development will have a minor-moderate effect on these views depending on the proximity of the point. The upper levels of the Proposed Development would be seen cascading down towards the lower context. The outer grid would be clad in brick and articulated with warm panels, responding to the materials and tones in that part of the context. The terraces will be enriched visually with greenery. It will be heavily screened in summer by the street trees.

12.35 From the west, the top of the Proposed Development would be visible, but little noticed within the existing layered roofscape there. There would be no visibility of the proposal

further west due to the large scale of buildings on the west side of Southwark Bridge Road.

- 12.36 The Proposed Development would be clearly seen in the close area around the Site, on the part of Park Street that runs east-west along the south side of the Site and on the river path and around the Anchor pub on Park Street and east of the Anchor pub. It would replace a large-scale, poor-quality office block with a high quality building which has a simple and powerful design concept enjoyed from afar, and crafted new spaces, soft and hard landscaping and a new route, all of which will transform the pedestrian experience around the Site and enliven this part of the Queen's Walk.

Townscape Assessment Conclusions

- 12.37 The Proposed Development would only be clearly seen in relation to two parts of the townscape, the river frontage to the north and the residential area to the south. As noted, there is almost no visibility of the Proposed Development beyond those two areas and very little to the east and west.
- 12.38 The views show that the Proposed Development would fit well into the existing frontage on the south side of the river in terms of height and mass. Its north elevation would have a strong design character and dynamic visual quality appropriate to its key riverfront location. The expression and materiality of the proposed design would be appropriate to its location, set between the historic and modern brick wharf buildings east of the Cannon Street Railway Bridge and the highly glazed, 21st century office buildings west of the Site.
- 12.39 The composition of the proposed mass as adjoining volumes reduces the perception of the building's mass and responds to the smaller scale character of buildings to the south and east. The brick material and warm and textured tones of the materials proposed also relate to the materials and colours that characterise the modern and historic buildings in the area south of the Site.
- 12.40 In the immediate context of the Site, as shown in the Design and Access Statement, the Proposed Development will transform the pedestrian experience around the Site. The inactive part of the Queen's Walk on the north side of the Site will be replaced with a broader footway, uses within the building which will encourage movement to and from the footway, and hard and soft landscaping, including trees which will grow to full heights. The space between the Anchor pub and the Proposed Development

will be larger than the existing space in that location and will be comprehensively landscaped, with a variety of plants, trees and defined routes through the space and seating. There will be a new route between the former FT building and the Proposed Development, aligning with Porter Street to the south, which will meander between the buildings and which will also include planting and places to pause. These will be new spaces of the highest quality which will transform the pedestrian experience around the Site.

Heritage Assessment

- 12.41 The heritage assessment finds no harm to the significance of any heritage assets. There would be no impact on the character and appearance of conservation areas in the area surrounding the Site. There would be no effects on the special interest of any listed buildings. Therefore, the proposals are considered to comply with the statutory duties found in section 16(2), section 66(1) and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 12.42 During the course of the design development, close attention was paid to the neighbouring Grade II Listed Anchor pub. As described in the THVIA, the pub itself was very altered in the 20th century and its present-day setting is also completely different to when it was built in the mid-18th century. It originally adjoined taller wharf buildings to the west, which were set in a continuous line along the river path. The westernmost part of the pub, which includes a roof terrace, and the space between the pub and the existing Red Lion Court, were created close to the time of the construction of the existing Red Lion Court, in the late 20th century. The proposed designs have evolved to significantly enhance that modern space and neighbouring parts of the pub. The concept of the design, comprising smaller volumes which arc across the Site, was conceived partly in response to the small scale and isolated situation of the Anchor pub today, and will enhance its setting through the high quality of the architecture and landscaping proposed. The heritage significance of the Anchor pub will be preserved.
- 12.43 Potential effects on St Paul's Cathedral in the LBS Borough Views were also considered throughout the design process. The proposed building height will not rise above the Threshold Place defined by LBS in those views and will fully comply with all LBS guidance.

- 12.44 The Proposed Development accords with all relevant regional policies set out in the London Plan and the national planning policy requirements of the NPPF and PPG and is in accordance with the Planning (Listed Buildings and Conservation Areas) Act.
- 12.45 There are no heritage assets on Site and no harm has been found to the significance of any heritage asset through impacts on its setting. However, should the decision-maker for the planning application conclude there is some harm, we consider, it would be 'less than substantial' at most and paragraph 202 of the NPPF would be triggered in which "this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use"
- 12.46 The Proposed Development brings substantial townscape and other public benefits of the Proposed Development.
- 12.47 The Proposed Development would enhance and promote sustainable development. It has been conceived as an integral part of the townscape of the locality. The Proposed Development would have a distinctive character and sense of place, drawn from analysis of the specific location and existing and emerging townscape around it. The Proposed Development would comprise a building and spaces of an appropriate high quality and will enhance permeability and connectivity through the local area and create well-defined, active street frontages and new public realm which would significantly enhance the local townscape. The Proposed Development would comply with the Visual Management Guidance set out in relation to relevant LVMF and Borough Views. It would have a positive effect on local views and townscape character. The heritage significance of heritage assets would be preserved.
- 12.48 Overall, it is concluded that the Proposed Development will meet all heritage, conservation and urban design related planning policy requirements at local, regional and national levels.

Conclusion on THVIA

- 12.49 The Proposed Development would mainly be seen in cross-river views, from bridges and from the townscape between Park Street and Southwark Street. It would add positively to the townscape character wherever visible and it would transform the pedestrian experience around the Site. It would have a neutral or beneficial effect on

all views in which it is seen. It would fully comply with the View Management Guidance set out for all relevant LVMF and LBS Borough Views.

- 12.50 The Proposed Development would preserve the heritage significance of all heritage assets and enhance the townscape setting of the Grade II Listed Anchor pub.
- 12.51 The cumulative effects would be entirely positive. The combined relationship of the Proposed Development and remodelled former FT building will bring major, positive change to close views and the pedestrian experience around the Site.
- 12.52 It is therefore considered to comply with the relevant paragraphs of the NPPF. The proposals are also considered to comply with the statutory duties found in section 16(2), section 66(1) and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. The Proposed Development is also considered to comply with policy HC1 and HC3 of the London Plan and Local Plan Policies xxx.

13 Planning Consideration – Landscaping, Trees and Ecology

- 13.1 Paragraph 150 of the NPPF states that new development should be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change and can help to reduce greenhouse gas emissions, such as through its location, orientation and design.
- 13.2 Policy G1 (D) of the London Plan requires that development proposals include appropriate elements of green infrastructure, such as street trees, green roofs, and natural or semi-natural drainage features.
- 13.3 London Plan Policy G7 I requires that development proposals should ensure that, wherever possible existing trees of value are retained. It also states that the planting of additional trees should generally be included in new developments, particularly large-canopied species which provide a wider range of benefits.
- 13.4 At a local level, in terms of landscaping, Policy P13 of the Southwark Plan requires new development to, among other things:
- Provide landscaping which is appropriate to the context, including the provision and retention of street trees, and
 - Provide the use of green infrastructure through the principles of water sensitive urban design, including quiet green spaces, tree pit rain gardens in addition to green grid spaces for people and surface water runoff.
- 13.5 Local Plan Policy P59 requires large scale development to **“provide new publicly accessible open space and green links.”** This policy also states that Green infrastructure should be designed to:
1. Provide multiple benefits for the health of people and wildlife; and;
 2. Integrate with the wider green infrastructure network and townscape / landscape, increasing access for people and habitat connectivity; and
 3. Be adaptable to climate change and allow species migration while supporting native and priority species; and

4. Extend and upgrade the walking and cycling networks between spaces to promote a sense of place and ownership for all.
- 13.6 The supporting text to Policy P59 acknowledges the importance of green infrastructure and the benefits it can provide including improving **“mental health, active lifestyles, recreation, food growing, enhanced biodiversity and ecological resilience, flood risk management, temperature regulation and improved air and water quality.”**
- 13.7 Local Plan Policy P59 requires new development to achieve net gains in biodiversity through, among other things **“features such as green and brown roofs, green walls, soft landscaping, nest boxes, habitat restoration and expansion, improved green links and buffering of existing habitats.**
- 13.8 Southwark Plan Policy P61 states that planning permission will be granted for development **“d if trees are planted as part of landscaping and public realm schemes, commensurate to the scale and type of development, and the character of the neighbourhood.”**

Assessment

- 13.9 The landscaping proposals have been outlined in the Design and Access Statement, prepared by BIG Landscape, with the proposals designed by specialist landscape architects at BIG.
- 13.10 The proposed landscape scheme aims to enhance the public realm by delivering high-quality waterfront and pedestrian connectivity, whilst introducing vitality through increased ground level vegetation and amenity spaces and further seeks to support the local resident’s desire for more greenery and increased biodiversity in its urban public realm.
- 13.11 The Proposed Development utilizes a series of ‘jumping’ blocks the massing to open up the ground plane for the public realm to flow right through from Park Street to the Bankside Path. In total, the public realm provision is 1,930sqm, which is well in excess of the requirements within the Site Allocation NSP06.

- 13.12 The Proposed Development seeks to create a scheme that is as green as possible, maximizing potential green spaces to provide for both people and biodiversity.
- 13.13 Within the public realm the Proposed Development would provide for a total of 48 cycle stands in addition to the basement cycle parking. The cycle parking provision within the public realm are dispersed around the main access routes without obstructing the main pedestrian flows and the main building and river views.

Bankside Path

- 13.14 The Bankside Square delivers a public waterfront square that complements the Bankside Path experience. The square is shaped by the context and the main pedestrian flows from the Bankside Path to the lobby and amenity spaces are carved within vegetated pockets. To further add vitality to the ground plane, the lobby provides for micro-retail fronting the Bankside Square, where outdoor seating is achieved in a semi-private vegetated space. In respecting the Bankside Path experience, additional waterfront seating and vegetation is proposed to frame the views, taking a similar geometry as the outdoor terrace of the Anchor Terrace
- 13.15 In keeping with the redevelopment of the Former FT Building, the Proposed Development aims to continue the Bankside pedestrian flows by maintaining public access along the waterfront. The Proposed Development would implement similar materiality to connect the Former FT building public realm towards the Anchor building, creating a seamless continuity.

Pocket Park

- 13.16 For the Park Street and Porter Street approach, the Proposed Development recognises the importance of an integrated public space between the former FT Building and the Proposed Development. The landscape scheme strives to create a unified design language with the public space of the former FT Building and create a pocket park. The pocket park takes on design considerations such as coordinated levels, hardscape materiality, and fenceless boundary including similar security features as the former FT building to ensure the delivery of one space.

- 13.17 With the former FT Building consented scheme, the Pocket Park vision would require the Proposed Development to integrate and create one vision for the Pocket Park. By implementing coordinated level changes and reflecting materiality continuity, both public realms would look coordinated.
- 13.18 The Pocket Park takes into consideration a similar security approach as the former FT Building's proposal which utilizes an operable door feature instead of the traditional gate. The proposal proposes a retractable system that allows the operable doors to turn and retract into the side of the public realm, allowing maximum permeability for pedestrians. This approach has been included at the request of the local residents, to mitigate the risk of anti-social behaviour.

Roof Terraces

- 13.19 The stepped form of the building opens up the possibility for each floor to have its own garden terrace, providing for additional outdoor amenity and biodiversity habitat creation. The vegetated terraces would include extensive green roofs for the non-usable roof surfaces as biodiversity and solar roof and intensive green roof within the usable outdoor terraces connected to the office floors
- 13.20 Roof terraces are proposed at floors 6, 8, 9 and 10, totalling 1,223 sqm (GIA). The landscape proposals seek to create a robust green infrastructure embedded within the architecture, providing a green skyline to the building. The design is a balance of hard and softscape, with a similar material language to the ground floor public realm.
- 13.21 Planting is concentrated around the edges in raised planters with integrated seating and lighting, providing a garden-like feel to the space. The trees specified are a mixture of wind-resistant evergreen and deciduous species. They can grow to a maximum height of 4m to ensure views from upper terraces are not blocked with growth. The planting zones have been coordinated with structural loadings.
- 13.22 A terrace management strategy will be developed to control activities allowed to take place. Restrictive evening and weekend access hours will also be implemented. To minimise potential for disturbance to the residential areas along Park St.

Urban Greening and Biodiversity – Policy

- 13.23 Paragraph 154 of the NPPF states that new development should mitigate impacts of climate change through suitable adaptation measures including green infrastructure.
- 13.24 London Plan Policy G1 states development proposals should incorporate appropriate elements of green infrastructure that are integrated into London’s wider green infrastructure network.
- 13.25 London Plan policy G5 states that urban greening should be a fundamental element of site and building design and should seek to achieve an Urban Greening Factor (UGF) score of 0.3 for major developments which are predominantly commercial.
- 13.26 The supporting text of Local Plan Policy P13 states that “Provision of urban greening and green infrastructure can deliver multiple health, wellbeing and environmental benefits within buildings and the public realm, such as helping to reduce the urban heat island effect, where urban areas become significantly hotter than rural areas in summer, and the impact of surface water flooding, both of which will be exacerbated by climate change. It can also provide opportunities for recreation and food growing.”

Urban Greening – Assessment

- 13.27 The development proposals are designed to include an extensive urban greening strategy which is a fundamental element of the building in terms of ecology, reduction of heat island effects and contribution towards improving health and wellbeing of both occupiers, residents and visitors.
- 13.28 The maximum greening potential of the Proposed Development has been fully explored. The soft landscaping proposals seek to create an environment where the plants will thrive. Green infrastructure proposals are embedded within the architecture, creating an environment for plants to thrive while working under the loading constraints.
- 13.29 The amount of greening has been maximised with the inclusion of bio solar roof, tree planting and drought tolerant gravel planting integrated into the floor of the terraces, providing an urban greening score of 0.35.

- 13.30 The proposed development would also result in a net gain in biodiversity given the introduction of urban greening. A Biodiversity Report, prepared by Greengage has been submitted in support of the application. The reports demonstrates that the proposals will create 0.56 area based-units, to lead to an 349% biodiversity net gain.
- 13.31 On this basis, it is considered that the proposals have maximised the amount of urban Greening in excess of the target score of 0.3, and fully comply with policy G5 of the London Plan.

14 Planning Consideration – Access, Transport and Servicing

14.1 This section assesses the acceptability of the proposed transport, access, servicing, refuse and trip generation of the Proposed Development in planning policy terms. It concludes that the transport principles accord with relevant planning policies.

14.2 Chapter 9 of the NPPF sets out the Government’s policies with regards to Transport. The overall aims are to promote solutions that support a reduction in greenhouse gas emissions and reduce congestion and will contribute to wider sustainability and health objectives. The NPPF outlines aims for a transport system balanced in favour of sustainable transport modes, in order to give people a real choice about how they travel. It also encourages solutions which support reductions in greenhouse gas emissions and reduce congestion. Paragraph 110 of the NPPF states it should be ensured that:

- appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- safe and suitable access to the site can be achieved for all users;
- the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
- any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

14.3 Paragraph 111 of the NPPF is clear that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.

14.4 Paragraph 112 of NPPF confirms applications for developments should:

- 1) Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use.

- 2) Address the needs of people with disabilities and reduced mobility in relation to all modes of transport.
 - 3) create places that are safe, secure, and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards.
 - 4) allow for the efficient delivery of goods, and access by service and emergency vehicles.
 - 5) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible, and convenient locations.
- 14.5 Policy GG2 of the London Plan seeks to prioritise development sites which are well-connected by existing or planned public transport.
 - 14.6 London Plan Policy T1 states all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London’s transport networks and supporting infrastructure are mitigated.
 - 14.7 London Plan Policy T2 states development proposals should demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance, reduce the dominance of vehicles on London’s streets whether stationary or moving and be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.
 - 14.8 London Plan Policy T3 states development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed.
 - 14.9 London Plan Policy T4 states the cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.
 - 14.10 Local Plan Policy AV.02 states development in Borough and Bankside should improve existing and create new cycle and walking routes, including the Thames Path.
 - 14.11 Local Plan Policy P50 requires development to:

- Minimise the demand for private car journeys; and
 - Demonstrate that the road network has sufficient capacity to support any increase in the number of the journeys by the users of the development, taking into account the cumulative impact of adjoining or nearby development; and
 - Ensure safe and efficient operation of the local road network, the bus network and the Transport for London Road Network; and
 - Ensure safe and efficient delivery and servicing that minimises the number of motor vehicle journeys; and
 - Incorporate delivery and servicing within major development sites and not on the public highway; and
 - Demonstrate how the construction phase of the development that needs to use the public highway can be safely accomplished, and how vehicular movements will be minimised and strictly controlled to reduce danger to vulnerable road users.
- 14.12 Local Plan P51 requires development to enhance the borough's walking networks by providing footways, routes and public realm that enable access through development sites and adjoining areas and ensure routes and access are safe and designed to be inclusive and meet the needs of all pedestrians, with particular emphasis on disabled people and the mobility impaired. Street furniture must be located to allow the movement of pushchairs, wheelchairs and mobility scooters.

Transport - Assessment

- 14.13 In line with the above national, regional, and local planning policies the submitted Transport Assessment has been prepared by Momentum. This assesses the effects of the proposals on transport issues including accessibility, trip generation, parking, and servicing.
- 14.14 As previously explained, the Site has excellent public transport links, with a PTAL (Public Transport Accessibility Level) of 6b (the best). London Bridge Underground Station is located 450m east of the Site, and Borough Underground Station is located c.650m to the south of the Site. The two nearest stations offering mainline railway services are London Bridge, 600m to the east, and Waterloo East, 1km to the southwest. Regular bus services operate along Southwark Bridge Road, with Southwark Bridge Bus Stop located 80 metres to the west. The pedestrian routes around the Site provide easy access to the bus stops and underground stations.

- 14.15 A multi-modal trip generation has been undertaken to assess and quantify the potential impact of the proposed development in terms of the number of trips. Momentum considers that the proposed development, when in operation, is expected to generate 1,166 (two way) net visitor trips in the AM peak hour and 903 net visitor trips in the PM peak hour.
- 14.16 A framework Travel Plan, prepared by Momentum, has been submitted to support the planning application. This document has been prepared to set out the aims and objectives in improving the use of sustainable modes of transport by occupiers of the proposal. Further details are provided within the document and a detailed Travel Plan either through a planning condition or via a S106 Agreement.
- 14.17 It is considered that in transport terms the development proposals are appropriate for the location, would have no material impact on the local transport network, and are in accordance with relevant adopted national, regional and local policy guidance.

Car Parking – Policy

- 14.18 London Plan Policy T6 Part B states that car-free development should be the starting point for all development proposals in places that are (or planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car lite'). Car-free development should still provide disabled persons parking.
- 14.19 London Plan Policy T6 Part E states appropriate disabled persons parking for Blue Badge holders should be provided.
- 14.20 London Plan Policy T6.1 Part G states disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum:
1. Ensure that for three per cent of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset.
 2. Demonstrate as part of the Parking Design and Management Plan, how an additional seven per cent of dwellings could be provided with one designated disabled persons parking space per dwelling in future upon.

- 14.21 London Plan Policy T6.2 set out the maximum parking standards that should be applied to new office development (and summarised in Table 10.4). The policy is clear that new office developments in the CAZ and inner London should be car free.
- 14.22 London Plan Policy T6.5 states disabled persons parking should be provided in accordance with London Plan Policy levels, ensuring that all non-residential elements should provide access to at least one on or off-street disabled persons parking bay. Disabled persons parking bays should be located on firm and level ground, as close as possible to the building entrance or facility they are associated with. Designated bays should be marked up as disabled persons parking bays from the outset. Enlarged bays should be large enough to become disabled persons parking bays quickly and easily via the marking up of appropriate hatchings and symbols and the provision of signage, if required i.e. if it can be demonstrated that the existing level of disabled persons parking is not adequate. The process for converting enlarged bays should be set out in a Parking Design and Management Plan and secured at the planning stage. Designated disabled persons parking bays and enlarged bays should be designed in accordance with the design guidance.
- 14.23 Local Plan Policy P54 states that Southwark will grow sustainably without adverse environmental impacts through car free development in highly accessible areas and reduced reliance on the private car.

Car Parking – Assessment

- 14.24 In accordance with Policy T6.1 of the London Plan 2021, the proposed development will be car-free, except for provision of a disabled parking bay. The disabled parking bay will be located to the south of the development, accessible via Park Street.
- 14.25 The Proposed Development will not have a significant impact on the operation of the surrounding roads as there is high opportunity for non-car-based and active travel to and from the Site. Accordingly, the proposals have incorporated the Healthy Streets principles.
- 14.26 The London Plan states that car-free development should still provide disabled persons parking. Accordingly, one off-street disabled space is proposed within the service yard.
- 14.27 The development proposes to provide one disabled car parking space, and therefore aims to discourage high car usage for employees and visitors to the Site. These measures would contribute towards reducing the reliance on car travel to and from the Site whilst also

provided an increase provision of public realm to encourage more sustainable forms of travel, therefore adhering to TfL's 'Vision Zero' and liveable neighbourhood schemes.

Cycle Parking – Policy

14.28 Policy T5, and table 10.2 of The London Plan sets out minimum cycle parking standards for new developments.

14.29 For office uses, a minimum of one space per 75 sqm GEA of long stay cycle parking should be provided. For short stay cycle parking, the requirement is for 1 space per 500sqm GEA for the first 5,000sqm, and thereafter 1 space per 5,000sqm GEA.

14.30 Local Plan Policy P53 states development must:

1. Ensure the delivery of the Southwark Spine cycle route (Figure 9) and our wider cycling route network. All sites on or adjacent to the network must support and integrate into the network; and
2. Provide cycle parking for building users and visitors in accordance with Tables 9 and 10; and
3. Provide cycle parking that is secure, weatherproof, conveniently located, well lit and accessible; and
4. Provide cycle parking that includes an adequate element of parking suitable for accessible bicycles and tricycles; and
5. For commercial uses, provide associated showers and changing facilities that are proportionate to the number of cycle parking spaces provided; and
6. Contribute toward the provision of cycle hire schemes and docking stations. Financial contributions will be required from major developments that are commensurate to the size and scale of the proposal. This may also include providing space within the development for the expansion of the cycle hire scheme; and
7. Provide a free two-year cycle hire fob per dwelling where a docking station is located within 400m of the proposed development.

14.31 Cycle parking is a key part of the scheme proposals and would be provided in line with the requirements of the Southwark Plan (2022), which itself exceeds requirements in the

London Plan (2021). Table 2 shows the long stay and short stay cycle parking rates set out in these documents.

Table 2: London Plan and Southwark Plan Cycle Parking Requirements

Policy Document	Land Use	Requirement	
		Long Stay	Short Stay
The London Plan (2021)	Class E(c) Office	1 space per 75 sqm (GEA)	First 5,000 sqm: 1 space per 500 sqm. Thereafter 1 space per 5,000 sqm (GEA)
	Class E(b) Food Retail	1 space per 175 sqm (GEA)	1 space per 20 sqm (GEA)
	Class E(a) Non-Food Retail	First 1,000 sqm: 1 space per 250 sqm. Thereafter 1 space per 1,000 sqm	First 1,000 sqm: 1 space per 60 sqm. Thereafter 1 space per 500 sqm
Southwark Plan (2022)	Class E(c) Office	1 space per 45 sqm (GIA)	1 space per 250 sqm (GIA)
	Class E(b) Food Retail	1 space per 175 sqm (GIA)	1 space per 20 sqm (GEA)
	Class E(a) Non-Food Retail	First 1,000 sqm: 1 space per 100 sqm. Thereafter 1 space per 1,000 sqm (GIA)	First 1,000 sqm: 1 space per 60 sqm. Thereafter 1 space per 1,000 sqm (GEA)

Cycle Parking – Assessment

14.32 Cycle parking for the Proposed Development has been calculated in line with Southwark Plan Policies.

14.33 A total of 886 cycle parking spaces are proposed, the cycle parking provision comprises:

- 719 long stay cycle spaces; and
- 168 short stay cycle spaces.

14.34 The significant cycle requirements have undergone extensive design investigation and the applicant seeks to fully comply with the Southwark Local Plan (2022). Provision for cyclists is seen as a key part of the scheme and it is proposed to provide 719 long stay spaces within the building in the first basement level.

14.35 These spaces would be accessed via a dedicated cyclist entrance on the west of the building within the proposed public realm space. This entrance would be located directly off

Park Street for easy access. This is also in a prominent area of building frontage and would therefore encourage cycling to the building.

- 14.36 The applicant is looking to create a first-class experience for those visiting the building by bicycle. This is reflected by way of front of house cycle entrance that includes cycle concierge, repair services and cycle accessories. At ground level will be a cycle hub and repair facility. At basement level, changing rooms with 796 lockers and 54 showers would also be provided as part of the overall cycling offer. The facilities would be accessed via two dedicated cycle lifts and a gullied stairwell.
- 14.37 It is proposed that 167 short stay cycle parking spaces be provided in compliance with the Southwark Plan (2022). A total of 48 spaces are proposed to be provide at-grade within the site ownership and this targeted number has been discussed at length and agreed in principle with the LBS Highways Officer.
- 14.38 The remaining 119 short-stay cycle spaces will be located within the first basement level with cycle access from the Park Street entrance. A concierge service is proposed as a supplementary benefit for short term cycle users. The proposed concierge service forms part of a wider cycle entrance experience which also contains the provision of changing rooms, cycle repair facilities, and cycle-related retail.
- 14.39 In accordance with Policy T5 of the London Plan and Local Plan Policy P53, it is considered that sufficient provision has been made for car and cycle parking spaces.

Waste and refuse – Policy

- 14.40 The London Plan Policy D6 Part E requires that housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste as well as residual waste.
- 14.41 Local Plan Policy P62 requires proposed development to provide adequate recycling, composting and waste disposal, collection and storage facilities on site.

Waste and refuse – Assessment

- 14.42 The proposed storage provision for the Site is based on an assumption that compacted waste would be collected every day. A dedicated waste storage room is located within the

second basement level, which would be brought by Facilities Management to the loading bay area via a servicing elevator lift, on waste collection days. Bins will be moved to the loading bay when the refuse vehicle has arrived for the scheduled collection time. Collections are expected to be made daily but, for contingency, a two-day output has been assumed within the Delivery and Servicing Plan assessment.

- 14.43 The waste generated by the Proposed Development has been forecast in line with the City of Westminster's Waste Guidance which is commonly used as standard practice within London for waste guidance. This policy guidance has been applied as it provides waste generation rates and no equivalent guidance with respect to waste generation rates are available via LBS policy.
- 14.44 It is estimated that the occupation of the commercial units would generate approximately of 11,073 litres of waste per week. Based on this generation rates, the forecast waste bin requirements for the Proposed Development are a need for 41 bins in total, which will be provided within the second basement level.
- 14.45 It is therefore considered that the Proposed Development provides adequate recycling, composting and waste disposal, collection and storage facilities on site as required by planning policy.

Delivery and Servicing – Policy

- 14.46 London Plan Policy T7 Part G states that development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible.
- 14.47 Local Plan Policy P50 requires development to, among other things:
- ensure safe and efficient operation of the local road network, the bus network and the Transport for London Road Network
 - incorporate delivery and servicing within major development sites and not on the public highway

- demonstrate how the construction phase of the development that needs to use the public highway can be safely accomplished, and how vehicular movements will be minimised and strictly controlled to reduce danger to vulnerable road users

Delivery and Servicing – Assessment

- 14.48 A Framework Delivery and Servicing Plan has also been prepared by Momentum in support of this application. The Plan seeks to minimise the impact of delivery and servicing vehicle movements through planning, sustainable procurement practices, and a reduction in waste generation. The Plan sets out the proposed delivery, servicing, and waste management strategy for the Proposed Development
- 14.49 Access into the proposed service yard would be in forward gear via Park Street located to the east of the site. Once inside the Site, vehicles would perform a turning manoeuvre before reversing into one of the loading bays where goods would then be unloaded. Vehicles would egress the Site via Park Street in a forward gear. A booking system would be in place to ensure compliance and to ensure that deliveries are scheduled so as not to cause congestion along Park Street.
- 14.50 The maximum sized vehicle that would service the Site would be 8m in length. This vehicle size restriction has been discussed with the LBS Highways Officers and is a welcomed solution as larger vehicle access is difficult at the site as a result of the spatial constraints that exist along Park Street.
- 14.51 It is proposed that trips to the Site will be managed by FM via a robust booking system. This system would ensure that a more equal spread of trips would occur across the day, thereby avoiding congested peaks and ensuring a more efficient operation. In the absence of a consolidation strategy, there would be approximately 53 delivery vehicles visiting the Site per day and a maximum of 5 vehicles per hour under a managed scenario.
- 14.52 It is proposed that a consolidation management strategy would be implemented for the Site. This will effectively minimise the delivery vehicle trips expected to attend the Site. Approximately 25% of deliveries to the Site would be sent to a consolidation centre from the supplier origin to be consolidated into fewer vehicles prior to being delivered to the Site.

The consolidation strategy will reduce the number of delivery vehicles visiting the Site per day to approximately 43.

- 14.53 Full swept path analysis is included within the Transport Assessment, which demonstrates that there are no issues with vehicles manoeuvring within the loading bay. Overall, it is considered that the proposed delivery and servicing strategy comply with the objectives of the NPPF and local and regional planning policy.

Trip Generation

- 14.54 The Transport Assessment provides a multi-modal trip generation assessment associated with the Proposed Development. Various methodologies are applied to provide the most representative trip generation possible for each land use. All of the multi-modal trip generation assessments indicate that the Proposed Development is unlikely to generate significant parking pressures due to the car-free nature of the development. Furthermore, it is anticipated that the majority of trips will be made by sustainable modes. The Proposed Development is therefore not likely to have a detrimental impact on the local highway network in terms of congestion or road safety in accordance with planning policy.

15 Policy Consideration – Daylight, Sunlight and Overlooking

- 15.1 At the national level, the Building Research Establishment (BRE) Report ‘Site Layout Planning for Daylight and Sunlight 2011’ comprises tests to assess the impact that a new development will have on the light to neighbouring properties. The tests within the document are given as advice and are not mandatory. As such they are not planning policy.
- 15.2 The examples given with the BRE guide can generally be applied to any part of the UK, from urban to rural locations. The BRE Guidelines specify that the daylight and sunlight results be considered flexibly and in the context of the Site. Clearly there would be a higher expectation for daylight and sunlight in a rural or suburban environment than in a dense location such as this. Therefore, the guide needs to be applied sensibly when assessing daylight and sunlight to allow for a more practical approach to central London urban design.
- 15.3 London Plan policy D6(D) states that the design of developments should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.
- 15.4 Local Plan Policy P14 requires development to provide adequate daylight, sunlight, outlook, and a comfortable microclimate including good acoustic design for new and existing residents.
- 15.5 In relation to new housing development, Standard 28 of the Mayor’s Housing SPG requires habitable rooms within each dwelling to be provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces. Whilst the development does not include any residential development, the SPG provides some guidance on design and separation distances with regard to residential properties.
- 15.6 In relation to new housing development, Standard 28 of the Mayor’s Housing SPG requires habitable rooms within each dwelling to be provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces. Whilst the development does not include any residential development, the SPG

provides some guidance on design and separation distances with regard to residential properties.

- 15.7 Supporting paragraph 2.3.36 of the Housing SPG states that designers should consider the position and aspect of habitable rooms, gardens and balconies, and avoid windows facing each other where privacy distances are tight. The SPG states that in the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18 – 21m between facing homes (between habitable room and habitable room as opposed to between balconies or terraces or between habitable rooms and balconies/terraces). The SPG states that these can still be useful yardsticks for visual privacy but adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city and can sometimes unnecessarily restrict density.
- 15.8 LBS' Residential Design Guide SPD (2.7) states that **“Development should seek to minimise overshadowing or blocking of light to adjoining properties.”**
- 15.9 Paragraph 2.8 of the SPD states that new development should not subject neighbours to unacceptable noise disturbance, overlooking or loss of security. In addition, it states that **“care must be taken so that private amenity space such as roof terraces and balconies does not adversely affect neighbouring residents' privacy or sunlight. Roof gardens should be located appropriately to avoid problems of overlooking.”**

Assessment

- 15.10 Point 2 have prepared a Daylight, Sunlight and Overlooking Assessment which is submitted with this planning application. The assessments have been undertaken with regard to the London Borough of Southwark (LBS) Council's planning policy and, the advice and recommendations set out in the Building Research Establishment (BRE) report entitled 'Site layout planning for daylight and sunlight: A guide to good practice'.
- 15.11 The proposed development at Red Lion Court has been developed taking daylight and sunlight into account from the project inception, through an iterative process of testing, feedback, and design. Point 2 have worked closely with BIG, to ensure that the Proposed Development has been designed sensitively to ensure that future occupants

will enjoy adequate levels of daylight and sunlight and to ensure that the development does not result in unacceptable overshadowing.

- 15.12 As outlined in the enclosed Point 2 Daylight Sunlight, and Overshadowing Report, the effects of the Proposed Development have been fully assessed upon sensitive uses near to the site. Assessments have been carried out to the surrounding residential properties on Southwark Bridge Road and Park Street.
- 15.13 The assessment considers the daylight and sunlight effects of the redevelopment of the Site under 2 scenarios:
- The Existing Scenario – The assessments are undertaken with the surrounding properties as they stand today; and
 - The Cumulative Proposed Scenario – The assessments are undertaken with the surrounding properties as they stand today with the exemption of the Former FT building (1 Southwark Bridge Road) which is being considered based upon the resolution to grant scheme (Ref: 21/AP/0599).
- 15.14 Overall, the results show that the majority of daylight or sunlight reductions to the surrounding residential properties are within the BRE guidelines recommended criteria.
- 15.15 Those windows/rooms which experience reductions beyond the BRE guidelines, are predominantly located beneath the existing balconies and/or roof overhangs and secondary assessments show that it is predominantly the presence of the balconies/ roof overhangs, rather than the scale and bulk of the massing, which is causing the adverse effects. In addition, any windows/rooms which are not located beneath the existing balconies or the roof overhangs generally retain good levels of daylight/sunlight for an urban area.
- 15.16 The overshadowing results to the Anchor Bankside terrace show that it should experience very little additional overshadowing on the 21st March (the suggested assessment date), and any reduction will be well within the BRE guidelines. The proposed amenity space to the north-east of the Site, which adjoins the Thames Path Walk, (to be known as Bankside Square) and the Bankside Path will also enjoy good levels of sunlight in accordance with the BRE guidelines. With regard to the proposed

shared amenity space (known as Pocket Park) between the Site and the former FT Building at 1 Southwark Bridge Road, the results show that once both buildings are completed, the proposals will slightly improve the levels of sun on ground. The effect is therefore not considered adverse.

15.17 On this basis, we consider the proposals comply with London Plan Policy London Plan Policy D6 and Local Plan Policy P14.

16 Planning Consideration – Other Technical Considerations

16.1 This section assesses the Proposed Development against other technical considerations. It concludes that the Proposed Development fully accords with technical requirements as set out within relevant planning policies.

Air Quality – Policy

16.2 The NPPF states that development should not contribute to or be put at unacceptable risk of, or be adversely affected by unacceptable levels of pollution, including air pollution (paragraph 174e). Planning should seek to comply with national and local policies for controlling air pollution (paragraph 186).

16.3 Policy SD4 part D of the London plan states that **“taking account of the dense nature of the CAZ, practical measures should be taken to improve air quality, using an air quality positive approach where possible (Policy SI 1 Improving air quality) and to address issues related to climate change and the urban heat island effect.”**

16.4 The London Plan Policy SI 1 Part B requires that development proposals should not:

- Lead to further deterioration of existing poor air quality.
- Create any new areas that exceed air quality limits.
- Create unacceptable risk of high levels of exposure to poor air quality.

16.5 In order to meet the requirements in Part 1, as a minimum:

- Development proposals must be at least Air Quality Neutral.
- Development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures.

- Major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1.
- 16.6 Local Plan Policy P65 states development must achieve or exceed air quality neutral standards and address the impacts of poor air quality on building occupiers and public realm users by reducing exposure to and mitigating the effects of poor air quality. To achieve this, design solutions must be achieved that include:
- Orientation and layout of buildings, taking into account vulnerable building occupiers, and public realm and amenity space users; and
 - Ventilation systems; and
 - Urban greening appropriate for providing air quality benefits proportionate to the scale of the development.

Any shortfall in air quality standards on site must be secured of site through planning obligations or as a financial contribution.

Air Quality – Assessment

- 16.7 The Site is in an Air Quality Management Area therefore an Air Quality Assessment (AQA) has been submitted with this planning application which assesses the impact of the scheme in terms of its effect on local air conditions and neighbouring amenity.
- 16.8 The Air Quality Assessment presents the findings of the air quality assessment, which addresses the potential air quality impacts during both the construction and operational stages of the Proposed Development. The assessment has been undertaken in line with the relevant policy and guidance, and where necessary outlines the required mitigation measures to minimise impacts.
- 16.9 The Proposed Development has been designed to be sustainable as possible and minimise the construction impacts. A qualitative assessment of construction phase impacts has been carried out. Good site practice and the implementation of suitable mitigation measures, the high risk of dust soiling during demolition and a medium risk during earthworks, construction and trackout activities will be minimised. With regards to fugitive PM10 emissions, where there is there is a medium risk during demolition

and a low risk during earthworks, construction and trackout, again, good site practice and mitigation measures will minimise the impact. The residual effect of the construction phase on air quality is therefore not significant.

16.10 Road traffic generated by the Proposed Development does not breach the threshold detailed in the IAQM and EPUK Air Quality Planning Guidance and there is no on-site combustion plant proposed for the purpose of heating and hot water, therefore detailed modelling of the operational phase development traffic has been scoped out of the assessment. However, a summary of the current and potential future baseline concentrations using information from the LAEI for 2019 (updated in February 2022) in the vicinity of the Application Site has been provided. The findings of this assessment indicate the following:

- The 2019 LAEI baseline annual mean NO₂ concentrations are below the AQS objective of 40 µg/m³ within and in the vicinity of the Application Site, therefore mitigation is not required.
- The 2019 LAEI baseline data indicating annual mean NO₂ concentrations below 60 µg/m³, exceedances of the 1-hour mean NO₂ AQS objective are unlikely to occur, therefore mitigation is not required.
- The 2019 LAEI baseline annual mean PM₁₀ and PM_{2.5} concentrations are below the relevant AQS objectives (40 and 25 µg/m³, respectively), therefore mitigation is not required.

16.11 Based on the above findings it is concluded that site specific mitigation to protect existing and future users of the Proposed Development from poor air quality is not required.

16.12 In line with the London Plan, an air quality neutral assessment has been undertaken for the proposed redevelopment. This concludes that the development would be air quality neutral, therefore mitigation or additional off-setting is not required

16.13 Additionally, a number of design interventions are proposed within the scheme which could bring some benefit to local air quality in the operational phase, including substantial planting and landscaping at ground level.

16.14 Overall, with the recommended mitigation measure in place, during the construction phase only, the proposals would be compliant with legislation and London Plan Policy SI 1 Part B and Local Plan Policy P65.

Noise and Vibration – Policy

16.15 The NPPF contains guidance on noise management in planning decisions. Paragraph 174 of the NPPF requires planning decisions to contribute and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of, among other things, noise.

16.16 London Plan Policy D13 discusses the principles of the Agent of Change. New proposed residential development and other noise sensitive development which is located near noise and other nuisance-generating uses should put in place measures to mitigate and manage any noise impacts.

16.17 London Plan policy D14 states that development proposals should manage noise by:

- avoiding significant adverse noise impacts on health and life;
- reflecting Agent of Change principle;
- mitigating and minimising the existing and potential adverse impacts of noise without placing unreasonable restrictions on existing noise-generating uses;
- improving and enhancing the acoustic environment and promoting appropriate soundscapes;
- Separating new noise-sensitive development from major noise sources through the use of distance, screening, layout, orientation, uses and materials.

16.18 Local Plan Policy P66 reflects the planning policy at both regional and national level, and requires major development to demonstrate how the noise pollution impacts created during the construction process will be reduced, mitigated and managed appropriately to minimise harm to present occupiers of the site and adjoining neighbours. To address this, a noise impact assessment has been submitted as part of this application.

Noise and Vibration – Assessment

- 16.19 The submitted Noise Impact Assessment (NIA), prepared by Sandy Brown assesses the potential noise impact of the proposed building services equipment. The assessment has considered the type and location of various plant items likely to be introduced and the location of noise sensitive receptors.
- 16.20 The NIA explains that an environmental noise survey has been undertaken at the site to establish the background noise levels at the properties surrounding the existing building. The background noise levels have been used to determine noise emission limits for each plant area.
- 16.21 The lowest background sound levels measured during the survey were $L_{A90,15min}$ 51 dB during the daytime and $L_{A90,15min}$ 48 dB at night.
- 16.22 Based on the requirements of the London Borough of Southwark and on the results of the noise survey, all plant must be designed such that the cumulative noise level at 1m from the worst affected windows of the nearby noise sensitive premises does not exceed LAeq 40 dB during the daytime and LAeq 37 dB during the night. These limits are cumulative and apply with all plant operating under normal conditions.
- 16.23 An initial assessment has been carried out to predict plant noise egress at the nearby noise sensitive premises for both normally operating plant and emergency plant items. The plant noise egress criteria for normally operating plant are expected to be achievable, provided that additional attenuation is incorporated into the design. The tenant generator proposed is expected to allow the proposed emergency plant noise egress criteria to be achieved.
- 16.24 Recommended operational noise egress limits have been provided, which are set 10 dB below the representative background sound levels as measured 1m from the nearest residential or noise sensitive premises. These operational noise egress limits are LAeq 40 dB during the daytime and LAeq 37 dB during the night-time.
- 16.25 Therefore, the Proposed Development is considered to be in accordance with the NPPF, London Plan Policies D13 and D14 and Local Plan Policy P66.

Flood Risk Assessment and Drainage – Policy

- 16.26 Paragraph 167 of the NPPF states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Paragraph 169 states that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.
- 16.27 The London Plan states that the frequency and consequence of fluvial, surface water and sewer flooding are likely to increase as a result of climate change.
- 16.28 The London Plan Supplementary Planning Guidance (SPG) entitled ‘Sustainable Design and Construction’, published in April 2014, provides further information on how to achieve the objectives of the London Plan.
- 16.29 Policy SI 12 of the London Plan requires developments to ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.
- 16.30 The Proposed Development should aim to achieve greenfield run-off rates by maximising the use of above ground Sustainable Urban Drainage Systems (SuDS) in line with Policy SI 13 of the London Plan.
- 16.31 Local Plan Policy P67 states development must not increase food risk on or off site, by ensuring that it is designed to be safe and resilient to flooding, finished floor levels are set no lower than 300mm above the predicted maximum water level where they are located within an area at risk of flooding and major development reduces surface water run-off to greenfield run-of rates. This must be through the application of water sensitive urban design and Sustainable Urban Drainage Systems (SUDS), in accordance with the following drainage hierarchy.
- 16.32 Local Plan Policy P67 states development located on sites on or adjacent to the River Thames frontage should be set back from the River defence wall by 10m. This space should be designed and delivered for dual purposes by incorporating the required food

defence measures and providing an enhanced public amenity and environmental benefit.

16.33 Local Plan Policy P68 states development must not increase flood risk on or of site, by ensuring that it is designed to be safe and resilient to flooding, finished floor levels are set no lower than 300mm above the predicted maximum water level where they are located within an area at risk of flooding and major development reduces surface water run-off to greenfield run-of rates. This must be through the application of water sensitive urban design and Sustainable Urban Drainage Systems (SUDS), in accordance with the following drainage hierarchy:

1. Store rainwater for later use; then
2. Use infiltration techniques; then
3. Attenuate rainwater in ponds or open water features for gradual release; then
4. Discharge rainwater direct to a watercourse; then
5. Discharge rainwater to a surface water sewer/drain; then
6. Discharge rainwater to the combined sewer; and
7. Hard surfacing of any gardens is permeable.

Flood Risk Assessment and Drainage – Assessment

16.34 The Site is located within Flood Zone 3a which is considered to be an area of high risk of flooding due to the proximity of the Site to the River Thames, an area assessed as having a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%). However, the site benefits from the presence of well-maintained flood defences along the River Thames. According to the SFRA, the Thames Barrier and associated defence system has a 1 in 1000-year standard which means it ensures that flood risk is managed up to an event that has 0.1% annual probability.

16.35 In accordance with the NPPF, the proposed office, retail and restaurant uses are "less vulnerable" use within Flood Zone 3a.

- 16.36 The site has been assessed as being at very low risk of flooding from rivers or tidal sources. The site has also been assessed as being at low risk from surcharging sewers, groundwater sources and artificial sources.
- 16.37 With regards to surface water flooding, it is considered that the site is at low risk of flooding from surface water. To avoid any surface water flooding of the development, it is recommended some design measures are incorporated into the scheme as it is considered that the implementation of the recommended measures would reduce the risk and the potential recovery cost and time following a surface water flood event. Temporary, demountable or permanent protection should be provided to the building entrances from flooding in a breach event or surface water flooding.
- 16.38 It is also recommended that the development is registered for the Environment Agency's Flood Warning Service as a precaution. In the event of a breach, the occupants can evacuate to higher levels and safely remain inside or can leave the site early having been alerted by the Flood Warning Alert Service.
- 16.39 In line with P67 of the Local Plan, the Proposed Development will not increase flood risk on-or off-site, subject to implementation of the mitigation measures. Therefore, the proposed redevelopment has an acceptable flood risk within the terms and requirements of the National Planning Policy Framework, subject to implementation of the mitigation.

Archaeology – Policy

- 16.40 Paragraph 194 of the NPPF requires LPAs to describe the significance of any heritage assets that may be affected, including any contribution made by their setting. y. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
- 16.41 London Plan Policy HC1 Part D states development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes.

The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.

16.42 Local Plan Policy P23 states that development must:

- conserve the archaeological resource commensurate to its significance;
- preserve archaeological remains of national importance in situ and preserve archaeological remains of local importance in situ unless the public benefits of the development outweigh the loss of archaeological remains; and
- consider the archaeological interest and significance of sites that lie outside of an APA.

Archaeology – Assessment

16.43 The site lies within the North Southwark and Roman Roads Archaeological Priority Zone designated by the London Borough of Southwark but does not contain any designated heritage assets. The scheduled monument constraint areas of the 16th century Rose and Globe Theatres are situated to the south and west of the site respectively.

16.44 An Archaeological desk-based assessment has been prepared by MOLA which assesses the impact of the scheme on buried heritage assets (archaeological remains).

16.45 Archaeological survival is expected to be localised with areas of medium or high survival predicted outside the footprint of the existing late 20th century building. Within the footprint of the Red Lion Court basement, construction will have truncated or completely removed all but the deepest alluvial deposits.

16.46 The submitted assessment states that the Site has:

- Palaeoenvironmental remains. The site lies on the Thames floodplain. Prior to rising water levels the floodplain was broader and the Thames was a braided, rather than single, channel. One such channel runs through the site. There is high potential outside the footprint of Red Lion Court and low potential beneath parts of the existing basement for a sequence of alluvial deposits containing

preserved pollen and other organic material which could provide evidence of past environments from the prehistoric period onwards, of low or medium heritage significance.

- Prehistoric remains. There is low potential outside the footprint of Red Lion Court and very low potential beneath parts of the existing basement for evidence of wetland resource exploitation within and beneath the underlying alluvium. The significance of such remains, if present, would depend on their nature and extent but might be medium or high.
- Later medieval remains. The site has potential outside the footprint of Red Lion Court for further evidence of land reclamation including ditches and dump deposits, of low significance, and in the northern part of the site, beyond the existing basement, remains of the 14th century river wall, of medium or possibly high significance, and truncated building remains of medium significance could survive.
- Post-medieval remains. The site has potential outside the footprint of Red Lion Court for evidence of land reclamation (drainage ditches, dump deposits), along with wall footings, demolition deposits, cut features and cellars associated with 17th century and later buildings of low to medium significance and the late 18th century brewery and commercial wharves of low or potentially medium significance. Along the northern edge of the site there is potential for further remains of the Bankside surface and the river wall which would be of medium significance.

16.47 Archaeological survival is expected to vary across the site as a result of 19th and 20th century developments. Outside the footprint of the existing Red Lion Court archaeological survival is predicted to be moderate or high due to the depth of archaeological deposits and the relatively shallow impacts of 19th–20th century warehouses.

16.48 The report acknowledges the proposed development seeks the deepening of the existing basement to –6.4m OD, an extension of the basement area to the eastern side of the current basement, new piled foundations, a new secant pile wall, mostly within the footprint of the existing basement and landscaping around the perimeter of the building. The impact of the deeper basement construction is likely to be limited and recent boreholes indicate that much of the site could have been cleared to the

level of terrace gravels prior to construction. However, there are areas where there is likely to be a higher level of impact, including in the area of the eastern basement extension and the new secant piled wall on the western perimeter of the site.

- 16.49 It is recommended that any further site investigation works are monitored to better understand the depth of disturbance beneath the existing basements.
- 16.50 In light of this, it is recommended that any further site investigation works are monitored to confirm the depth of modern disturbance beneath the existing basements and the depth of made ground on the eastern side of the site where the new basement extension is proposed.
- 16.51 Further specifically archaeological site investigation may also be required to fully understand the nature, extent and significance of potential archaeological deposits in areas where there may be an impact from the scheme. This is likely to involve geoarchaeological boreholes beneath existing basements and in the area of the eastern basement extension and possibly archaeological trial trenches to confirm whether post-medieval deposits survive beneath modern ground levels.
- 16.52 The Proposed Development is therefore considered to be in accordance with the tests set out within the NPPF, London Plan policy HC1 and Local Plan Policy P23.

Fire – Policy

- 16.53 London Plan Policy D12 requires that developments proposals must achieve the highest standards of fire safety. Part B of Policy D12, states that all major development proposals should be submitted with a Fire Statement produced by a third party suitable qualified assessor.
- 16.54 Part B(5) of London Plan Policy D5 requires that for all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.

Fire – Assessment

- 16.55 The Fire Statement prepared by Astute and submitted as part the application, summarises the fire strategy principles for the scheme. The fire strategy has been

developed in accordance with the requirements of Building Regulations 2018. To comply with these requirements the recommendations of fire safety guidance, BS9999:2017, have been considered.

- 16.56 The Proposed Development is therefore considered to accord with Policy D12 and D5 of the London Plan.

Ventilation and Extraction – Policy

- 16.57 London Plan policy D6(C) requires housing developments to provide, inter alia, adequate passive ventilation.
- 16.58 Southwark’s Air Quality Strategy and Action Plan sets out the borough’s commitment to tackle air pollution on a high level, without specific numeric targets. The Air Quality Strategy and Action Plan does not list any further requirements regarding ventilation.

Ventilation and Extraction – Assessment

- 16.59 A Flue Extract and Ventilation Report has been prepared by Hilson Moran. This report describes the flue, ventilation and filtration preliminary design detail for the proposed Red Lion Court development.
- 16.60 The proposed design shall utilise electric heat pumps for space heating, cooling and domestic hot water demands. Ventilation for the majority of the building shall be provided via centralised air handling plant located at basement level B2.
- 16.61 Air handling plant shall have MERV13 or higher internal filtration to clean the ventilation supply air.
- 16.62 Flue terminations shall be positioned as far from possible receptors as is feasible in the design. The shortest distance between a flue and a possible receptor is 26.5m. Flues are located several stories above any receptors, meaning the actual distance when all three dimensions are considered is significantly greater, additionally any discharge from the flues will likely not negatively affect any receptors due to their elevated location.

16.63 The proposed building energy strategy shall avoid the direct use of fossil fuels on site for normal operation. Electric heat pumps at roof level shall provide space heating, cooling and domestic hot water. The electrical heat pumps do not require combustion and therefore do not require flues for discharging emissions.

16.64 The proposed design includes the following flue and ventilation details:

- A diesel-powered life safety generator that also supports critical power loads located at roof level shall exhaust locally at roof level.
- Diesel powered sprinkler and wet riser pump flues shall terminate at roof level.
- Kitchen extract ventilation from the proposed ground floor level restaurant space shall discharge at roof level.
- Kitchen extract ventilation future allowance for office tenant areas that shall discharge at roof level.
- General office areas, basement level plant areas and basement cycle storage & facilities shall intake air at roof level and exhaust air at ground level via an external grille to the west of the façade.
- Toilet extract shall be via a separate system and shall intake, terminate and exhaust at roof level.
- Proposed retail units at ground level shall utilise a through façade ventilation strategy, intake and exhaust air via local ventilation openings in the ground floor facade.
- The proposed loading bay shall be ventilated via a dedicated system, exhaust air shall exit through the façade to the north of the loading bay via a louvred façade section. Make up air shall enter via free area in the loading bay gate.
- Smoke ventilation from fire fighting lobbies and basement systems shall terminate at roof level.
- Soil vent drainage pipework shall vent at roof level

16.65 The proposed development is considered to accord with the relevant regional and local planning policies.

Ground conditions and contamination – Policy

16.66 Policy P64 of the Southwark Plan requires development to,:

- Provides for safe storage, transportation or usage of hazardous substances on a site; and
- Mitigates any contaminated land within the development site and land outside of, but related to, the development site.

16.67 The supporting text to this policy states that the regeneration of vacant or under-used land and buildings in Southwark requires development to deal with contamination from past uses and carry out construction in close proximity to neighbours.

Ground conditions and contamination – Assessment

16.68 The submitted Phase 1 Contamination Study concludes that based on historical land uses and its current operational use, the overall risk from land contamination at the site is considered to be low for the current development and the proposed development as the basement is to be retained. It is considered unlikely that the site would be classified as Contaminated Land under Part 2A of the EPA 1990.

16.69 It is therefore considered that the development is in accordance with Local Plan Policy P64.

Construction Management – Policy

16.70 Local Plan Policy P25 states development within the Thames Policy Area must Consider the use of the River Thames as an alternative means of transport during construction.

16.71 Local Plan Policy P50 states development must demonstrate how the construction phase of the development that needs to use the public highway can be safely

accomplished, and how vehicular movements will be minimised and strictly controlled to reduce danger to vulnerable road users.

Construction Management – Assessment

- 16.72 A Construction Management Plan, prepared by RPM has been prepared to outline the proposed methodology for the demolition and construction of Red Lion Court. The existing site location and its relationship with the local area requires a tailored approach to the works. The Construction Management Plan has been prepared to undertake the construction works in the most efficient way possible, whilst limiting the impact on nearby neighbours.
- 16.73 Although construction activities could potentially result in adverse levels of noise and vibration at nearby sensitive receptors, it is considered that implementation of a suitable mitigation and communication strategy will provide a means to reduce / offset any significant impacts.
- 16.74 The Applicant will also provide subsequent details to ensure that the construction impacts of the proposed development are appropriately monitored, controlled and managed when undertaking construction.

Wind and Microclimate – Policy

- 16.75 London Plan D8 states consideration should also be given to the local microclimate created by buildings, and the impact of service entrances and facades on the public realm.
- 16.76 Local Plan Policy P14 states development must provide comfortable microclimate including good acoustic design for new and existing residents

Wind and Microclimate – Assessment

- 16.77 A Wind Microclimate Assessment, prepared by RWDI has conducted a pedestrian level wind microclimate assessment using CFD simulations for the Proposed Development.

- 16.78 The report presents a description of the methodology used and the results of the single configuration tested using Computational Fluid Dynamics (CFD) simulations, namely:
- Configuration 1: Proposed Development with Existing Surrounding Buildings and Proposed Landscaping.
- 16.79 The existing Site conditions have been assessed qualitatively through a review of the local meteorological data and a review of the surrounding terrain. Conditions at the existing Site would be expected to be suitable for sitting and standing use throughout the year.
- 16.80 With the Proposed Development in situ, wind conditions at the majority of areas assessed would be suitable for the intended uses. All areas at ground and balcony levels would have suitable wind conditions. There would, however, be areas on the terraces and at the north-western, south-eastern and southern corners which, without mitigation measures would be up to three categories windier than suitable as well as strong wind exceedances which pose safety concerns for more vulnerable pedestrians. Mitigation measures have therefore been introduced at these terrace spaces.
- 16.81 Mitigation measures have been recommended, in the form of increasing the balustrade height, and implementing additional landscaping such as shrubs, hedging and perforated screens.
- 16.82 The recommended mitigation measures have been included in the landscape design of the terrace levels. With the implementation of these measures, wind conditions in all parts of the Site are expected to be acceptable for the intended pedestrian uses. It is recommended mitigation be assessed through further simulations to confirm the effectiveness.
- 16.83 It is therefore considered that the development is in accordance with London Plan D8 and Local Plan Policy P14.

Health Impact – Policy

16.84 London Plan Policy GG3 states to improve Londoners' health and reduce health inequalities, those involved in planning and development must assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments.

16.85 Local Plan Policy P45 states development must:

- Be easily accessible from the walking and cycling network; and
- Provide, or support opportunities for healthy activities; and
- Retain or re-provide existing health, community, sport and leisure facilities.

Health Impact – Assessment

16.86 A Health Impact Assessment ('HIA') has been prepared by Trium Environmental Consultants to assess the Proposed Development (during both construction and upon occupation) against the wider determinants of health, where relevant, to establish potential direct and indirect health impacts.

16.87 The HIA has been prepared in line with relevant legislation, policy and guidance. A baseline review has identified information relating to the following eight key determinants of health:

- Access to Open Space and Nature;
- Air Quality, Noise and Neighbourhood Amenity;
- Accessibility and Active Travel;
- Crime Reduction and Community Safety;
- Access to Healthy Food;
- Access to Work and Training;

- Minimising the Use of Resources; and
- Climate Change.

16.88 The health impacts relating to the above eight health determinants have been assessed against the Proposed Development, in the context of the Site location, using the 'HUDU Rapid Health Impact Assessment Matrix'. Impacts on the future Site users of the Proposed Development and on the local community, have been identified and are detailed in the HIA.

16.89 No adverse health effects have been identified in relation to the Proposed Development.

16.90 The primary health benefits of the Proposed Development identified, include but are not limited to:

- The Proposed Development will be car free, with the exception of one blue badge parking space, provided on Site. The low number of available car parking spaces on-site will promote more sustainable forms of transport to the Site, including cycling, walking or public transport. In turn this will promote more active lifestyles through passive exercise built into the commute to and from the Site as a place of work;
- Cycle parking spaces will be provided with shower and locker facilities within the office accommodation. The provision of secure cycle facilities in addition to lockers and showers for those travelling to the Site by bicycle will encourage this healthy mode of transport, so promoting active lifestyles which in turn leads to increased physical and mental health and wellbeing;
- Create a high quality and active frontage that complements the existing context and improves the streetscape. Active frontages and improved streetscape help create passive surveillance, thus improving safety within the area, which is positive in reducing stress and creating a sense of security, as well as creating more aesthetic environments to work in;
- The Proposed Development is to provide 1,930 sqm of public realm provision, including ownership of the Bankside Path, which will include measures to

enhance landscaping and encourage the use of the public realm, plus increasing pedestrian links through the Site. Additionally, 1,223sqm of private amenity space (terrace areas) will be incorporated within the scheme for use by the future occupiers. This therefore increases Site users ability to permeate the surrounding areas;

- The Proposed Development includes well-designed accessible spaces that cater for the needs of the disabled as well as for the able-bodied. The Proposed Development therefore promotes inclusive design which enables disabled patrons to have full access to the amenity space on site. Inclusive design also aids greater independence and reduced isolation for disabled persons which contributes to better overall wellbeing;
- The inclusion of LZC technologies including the use of air source heat-pumps for providing hot water and space heating. Thus, eliminating the need for the use of fossil-fuels and emission-releasing sources on Site for heat and power production. The Proposed Development will also be air quality neutral, and so would not contribute to any air quality related health effects, by utilising an all electric solution avoiding combustion on site and the release of air pollutants;
- The provision of new private amenity space for the commercial office space, and access to a wellness centre. The availability of amenity on the Site promotes physical activity and creates a space for people to meet and socialise. Thus, promoting better physical health and overall wellbeing through improved social cohesion. A more aesthetic environment and availability of green spaces is also linked to greater mental wellbeing. Further to this, the Proposed Development is targeting WELL Core Platinum standard, which shows the commitment of the Applicant to design the building to the highest quality, in order to benefit the future occupiers of the Site; and
- The jobs that will be created during the construction and operational phase. Employment offers many benefits from a health perspective, including being able to purchase essential goods (including health food items). They can provide an opportunity to foster social relationships with other workers and for those in fulfilling and engaging roles employment, can have a positive impact on ones sense of self and result in improved wellbeing. The Applicant is committed to providing jobs for local and disadvantaged people and will also

provide 10% of the total workspace as affordable workspace (refer Baseline Section – Health Determinant 8).

16.91 The HIA concludes these measures have been developed as part of the Proposed Development to promote health and wellbeing. Through good design and the creation of a sense of place, the Proposed Development will therefore provide a positive health impact to future users and those that live in the surrounding area.

17 CIL and s106 Planning Obligations

- 17.1 Under Section 106 of the Town and Country Planning Act 1990, as amended, local planning authorities have the power to enter into planning obligations with any person interested in land in their area for the purpose of restricting or regulating the development or use of the land.
- 17.2 On 6 April 2010 the Community Infrastructure Levy Regulations 2010 came into force which makes it unlawful for a planning obligation to be taken into account as a reason for granting planning permission for a development, or any part of a development, whether there is a local CIL in operation or not, if the obligation does not meet all of the following three tests:
- Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development
- 17.3 Paragraph 55 of the NPPF supports that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 17.4 Under paragraph 56 of the NPPF, planning obligations should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. It goes on to state that agreeing conditions is beneficial to all parties involved in the process and can speed up decision making. Conditions that are required to be discharged before development commences should be avoided, unless there is clear justification.
- 17.5 The NPPF states that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. It repeats the tests set out above and then states that where planning obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, where appropriate, be sufficiently flexible to prevent planned developments being stalled.
- 17.6 LBS's Section 106 Planning Obligations and Community Infrastructure Levy (CIL) Supplementary Planning Document was adopted on 1 April 2015, and subsequently updated in November 2020. Southwark's CIL has replaced S106 Planning Obligations

as the main source of developer funded contributions towards community infrastructure. Affordable housing, affordable workspace, local training, employment and enterprise, carbon offsets, and other site-specific mitigation continues to be delivered through planning obligations.

- 17.7 Local Plan Policy IP3 of confirms that LBS will seek to use planning obligations to reduce or mitigate the impact of developments. Obligations will be used to mitigate the impact or pay the council a financial contribution to enable the council to will be used to mitigate the impact.
- 17.8 The Applicant would enter into a legal agreement with LBS to secure the reasonable and necessary planning obligations associated with the Proposed Development in accordance with Regulation 122 of the CIL Regulations, Local Plan Policy IP3, and LBS's Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD.
- 17.9 A separate Section Heads of Terms Schedule, prepared by Gerald Eve LLP has been submitted in support of this application and can found in Appendix 2. The Heads of Terms Schedule outlines the obligations and contributions that are expected to be included as part of the legal agreement. The Applicant anticipates the following planning obligations may be required (inter alia);
- Affordable Workspace Plans, Specification and Marketing Strategy;
 - Construction and Demolition Environmental Management Plans;
 - Construction Industry and Employment Training Report and Contribution;
 - Employment and Skills Plan;
 - Delivery and Servicing Management Plan;
 - Carbon Offset Payment;
 - Public Realm Management Plan and Specificaiton; and
 - Terrace Management Plan;

Community Infrastructure Levy (CIL)

- 17.10 On 6 April 2010, the Community Infrastructure Levy Regulations 2010 (as amended) came into force to fund the provision, improvement, replacement or maintenance of

infrastructure required to support development, as set out within each Local Authority's Regulation 123 list (a 'living' document which provides a summary of the infrastructure which CIL receipts should fund).

17.11 The Site is current occupied and meets the vacancy test introduced in February 2014.

MCIL 2

17.12 Mayoral CIL, now chargeable on the revised Charging Schedule referred to as MCIL2, is payable at the following rates:

- Office - £185 per sqm (plus indexation);
- Retail - £165 per sqm (plus indexation);
- Other uses - £80 per sqm (plus indexation).

LBS CIL

17.13 The LBS Revised CIL Charging Schedule came into effect on 1 December 2017. The CIL charges vary depending on the type of development and where development is located in Southwark. The Proposed Development is located within CIL Charging Zone 1. According to the adopted charging schedule the LBS CIL would be charged at the following rates:

- Retail - £136 per sqm (plus indexation);
- Office - £76 per sqm; and
- All Other Uses - £0 per sqm.

17.14 A CIL Additional Information Form has been submitted with this application.

18 Conclusion

- 18.1 The proposed development will provide a landmark office-led development which embraces this prominent waterfront position to provide a new market leading, contemporary, inspiring workplace focused on wellness, flexibility and environmental responsibility. The design proposal meets and exceeds the targets set for sustainability, with certification commensurate with a Grade-A workplace building of the highest industry standards, introducing such innovations as a 'front-of-house' lobby for cyclists and active travellers including a valet bicycle parking facility for visitors.
- 18.2 The design philosophy and project brief has been to bring forward a major office-led scheme, working with the existing building to deliver high quality, functional and flexible commercial space with a clear and strong identity. Not only this, the development's ambition is to be highly sustainable, relevant and contextual to this part of Southwark, and be part of its local community delivering publicly accessible space and landscaping.
- 18.3 The application for the Proposed Development follows pre-application consultation with the London Borough of Southwark, GLA, TfL and statutory consultees, local residents and local community groups including public exhibitions. During this process, the team has positively responded within the proposed design.
- 18.4 The Proposed Development will deliver an enhanced quality and quantity of Grade A office floorspace to this part of the Central Activities Zone in accordance with Southwark's policy objectives.
- 18.5 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 18.6 This Planning Statement has assessed the proposals against the development plan and other relevant planning policy and guidance at national, regional and local policy level.

- 18.7 It concludes that the Proposed Development meets the aspirations of the statutory development plan, which actively supports office development in this location. The environmental, social and economic benefits of the Proposed Development are also material considerations of compelling weight in favour of the proposals.
- 18.8 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that when considering whether to grant planning permission for development which affects a listed building or its setting, the decision maker shall 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. A statutory presumption exists in favour of preservation unless it can be outweighed by material considerations powerful enough to do so.
- 18.9 Section 72 also provides that, in respect of development affecting conservation areas, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.
- 18.10 The Proposed Development at the Site has been considered against the statutory tests at Section 66 and 72. It has shown that the Proposed Development will cause no harm to the nearby heritage assets.
- 18.11 The Proposed Development will deliver significant publicly accessible space, the detail of which is intended to be secured through a section 106 agreement.
- 18.12 The Proposed Development meets the aspirations and requirements of development plan policy and satisfies the relevant statutory tests. Other material considerations of substantial weight also indicate that planning permission should be granted.

Appendix 1 – Site Allocation NSP06

NSP06: 1 Southwark Bridge Road and Red Lion Court



- Site Boundary
- Improved connectivity for pedestrians and cyclists
- Conservation Area
- Open Spaces
- Grade I Listed Building
- Buildings of architectural and historic merit
- Grade II Listed Building
- Buildings of townscape merit
- Grade II* Listed Building
- Locally Significant Industrial Sites
- Opportunity for Active Frontages
- Strategic Protected Industrial Land
- Cycleways
- New Public Open Space

Site Area	<ul style="list-style-type: none"> 7,887m² 	
Existing uses (GEA)	<ul style="list-style-type: none"> Office (E)(G)(i)) - 32,098m² 	
Indicative residential capacity	<ul style="list-style-type: none"> 261 homes 	
Site requirements	<p>Redevelopment of the site must:</p> <ul style="list-style-type: none"> Provide at least the amount of employment floorspace (E(g), B class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater; and Enhance the Thames Path by providing public realm and active frontages with ground floor retail, community or leisure uses (as defined in the glossary); and Provide new north-south green links; and Provide new open space of at least 15% of the site area - 1,183m². <p>Redevelopment of the site should:</p> <ul style="list-style-type: none"> Provide new homes (C3). 	
Design and accessibility guidance	<p>Redevelopment should provide a new link from Park Street to the Thames Path and improvements to the Thames Path. Redevelopment should also provide links to Cycle Super Highway 7 on Southwark Bridge Road.</p> <p>Southwark needs to accommodate significant growth for offices and other workspaces which are growing in demand contributing to the central London economy and status as a world city. Sites that are within the Central Activities Zone are most in demand for delivery of offices and will be required to contribute to this growth by providing an increase in the amount of employment floorspace.</p> <p>Open space will be secured because:</p> <ul style="list-style-type: none"> Bankside and the Borough are deficient in parks and other green space, which the new space will address; and It will mitigate the pressure from development on existing open space; and The site is large enough to accommodate a meaningful open space at an achievable level; and It will improve enjoyment of the Thames Path; and It will mark an arrival point into Southwark. 	
	The site location	
	Approach to tall buildings	<p>Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape. The design of the development should respond to its prominent, yet sensitive setting as an arrival point into Southwark from Southwark Bridge. Redevelopment must be sensitive to the Thames Policy Area, where building heights should be lower in close the proximity to the River Thames.</p>

Impacts Listed Buildings or undesignated heritage assets	The site is located within the setting of the Grade II listed Southwark Bridge, Anchor Terrace (1 Southwark Bridge Road), Anchor Public House (1 Bankside) and Union Works.
Impacts a Conservation Area	The site is located in the setting of the Bear Gardens and Thrale Street Conservation Areas.
Impacts a distinctive Borough View or London View Management Framework View (LVMF)	The site lies within the Borough Views of St Paul's Cathedral from Nunhead Cemetery and One Tree Hill. The site lies within the river prospect Borough View from Kings Stairs Gardens to Tower Bridge. The majority of site lies within the Background Assessment Area of the LVMF view 1A.2 - Alexandra Palace Viewing Terrace to St Paul's Cathedral. The site also partially lies within the Background Assessment Area of the LVMF view 3A.1 - Kenwood Viewing Gazebo to St Paul's Cathedral.
Impacts an Archaeological Priority Area	Tier 1 APA designation. The site is located in APA1 - North Southwark and Roman Roads.
Impacts a Scheduled Ancient Monument	The site is within a few metres of the internationally important Globe Theatre and Rose Theatre scheduled monuments.
Is in close proximity to the River Thames	Yes, the site is within the Thames Policy Area.
Is in a Town Centre	Bankside and Borough District Town Centre
Is in an Opportunity Area	Bankside, Borough and London Bridge Opportunity Area
Is in the Central Activity Zone (CAZ)	Yes
Can provide Low Line walking routes	No
Impacts a designated open space	No

Appendix 2 – Draft Heads of Terms



Red Lion Court

Draft Section 106 Heads of Terms

Introduction

1. This Draft Section 106 Heads of Terms has been prepared by Gerald Eve LLP on behalf of LS Red Lion Court Limited ('the Applicant'), part of the Landsec group in support of an application for full planning permission for the redevelopment of Red Lion Court ('the Site') within the London Borough of Southwark ('LBS').
2. The development will provide additional office, restaurant and retail floorspace through the redevelopment of the existing building, together with new external terraces, landscaping, public realm works, new plant equipment, cycle parking spaces and other associated works.
3. The description of development is as follows:
"Demolition of the existing above ground building and part-basement and redevelopment of the Site to provide an 11-storey plus basement building providing office, retail, restaurant and wellness uses alongside external terraces, landscaping, public realm works, new plant equipment, cycle parking spaces and other associated works."
4. The draft document has had full regard to the Southwark Plan (February 2022), Southwark's S106 and CIL SPD (2020), the London Plan (March 2021) and pre-application discussions with the London Borough of Southwark upon potential heads of terms related to the proposed development. We have also had full regard to the statutory tests in Regulation 122 (as amended by the 2011 and 2019 Regulations) regarding the appropriate use of planning obligations.
5. For clarity the S106 heads of terms below do not include Mayoral or Borough CIL calculations. There are also numerous matters which in accordance with Government Guidance, would be better dealt with via planning condition than S106 clause.

Heads of Terms

Affordable Workspace

6. The proposed development will secure 3,182 square metres GIA of office floorspace as affordable workspace across the ground and first floors of the development as shown on the application drawings and BIG design and access statement.
7. The affordable workspace will be provided at an overall discount of 25% below market rental levels over a 30 year period in accordance with Southwark Plan policy P31 to support start ups, small and independent businesses in the north of the Borough.
8. Landsec will provide the affordable workspace at a peppercorn rent for the first 6 month period, then a graded approach to 25% of market rental levels over months 7-13, 50% between months 13 and 23, and then 75% of market rental levels at month 24.
9. The affordable workspace will be provided to Category A specification.
10. The S106 Agreement will contain clauses in relation to the Affordable Workspace strategy and the procurement of affordable workspace and suitable occupiers including details of the



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affordable workspace provider, marketing, lease, governance, rights and obligations (landlord and tenant), hours of operation, occupation/layout, license, business support, voids and a reporting mechanism of the performance of the affordable workspace to the London Borough of Southwark.

Employment and Skills

11. The S106 Agreement will in accordance with Southwark Plan policy P28 contain obligations in relation to local employment initiatives and targets from both the construction phase and end state development.
12. The S106 will contain the requirement to submit an employment and skills plan to the Council for approval dealing with both the construction and end state.

Public Realm and Highways

13. The design of the proposed public realm and landscaping shall be dealt with via planning conditions. The detailed specification of the public realm works will be contained within the S106 Agreement.
14. The delivery and management of the public realm will be dealt with through the submission and approval of a landscape strategy and estate management plan, in specific clauses within the S106.
15. These will include details of public access across the public realm including hours of access.
16. The S106 Agreement will include an obligation to enter in to a S278 Agreement in respect of the identified works including resurfacing, required to the public highway.
17. The S106 Agreement will include clauses dealing with any highways or public realm works upon the public highway under S278.
18. There will be a specific clause dealing with mechanism for the relocation of the parking bay.
19. There will be a specific clause seeking a delivery and servicing management plan.

Demolition and Construction

20. The S106 Agreement will contain separate requirements for the submission and approval of 1) a demolition environmental management plan and 2) a full construction environmental management plan.

Sustainability and Energy

21. The S106 Agreement will contain a clause requiring the measures set out within the Arup energy statement.
22. There will be a clause requiring a carbon offset and/or carbon green fund contribution where the development cannot achieve net zero carbon emissions through design measures on site.



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23. The S106 Agreement will require a circular economy post completion report and a commitment to be seen energy monitoring.

Other Matters

24. Monitoring of S106 commitments and deliverables