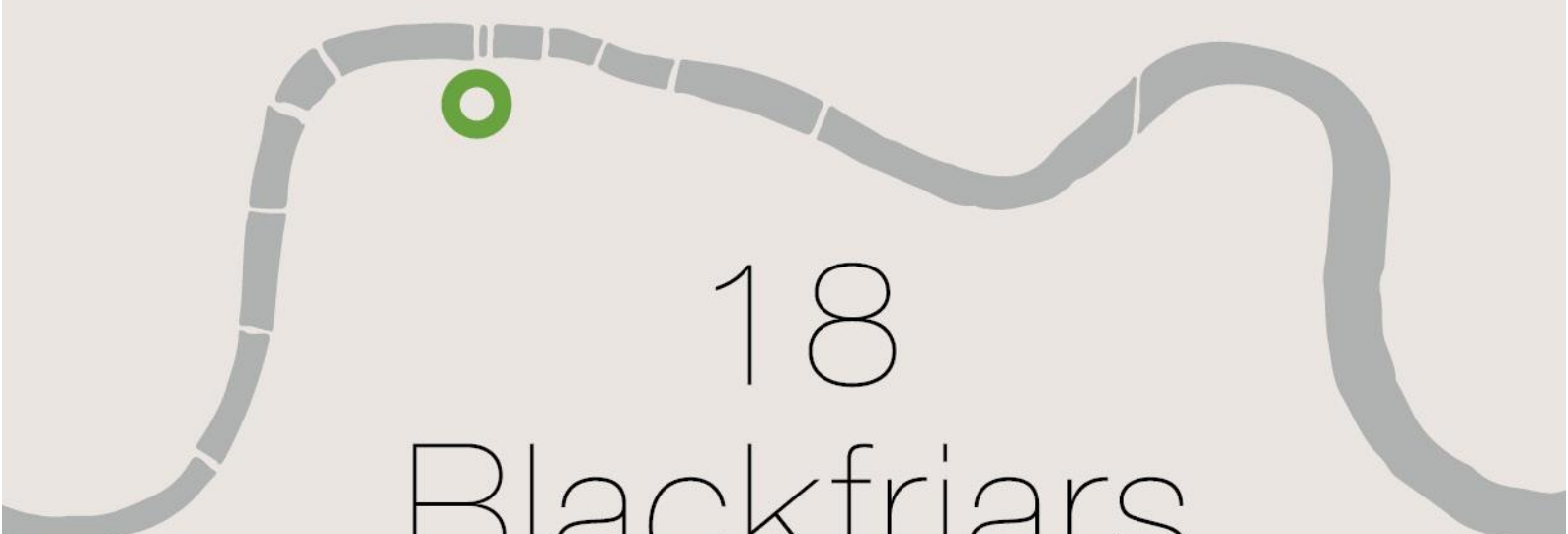




18 Blackfriars Road

Hines



Planning Statement

2023



18 Blackfriars Road

PLANNING STATEMENT

June 2023

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EXECUTIVE SUMMARY

This Planning Statement has been prepared by DP9 Limited on behalf of Black Pearl Limited in relation to the Proposed Development known as 18 Blackfriars Road. The Site comprises of a cleared brownfield site together with two Grade II Listed Buildings referred to as 1 Stamford Street and 3 – 7 Stamford Street (otherwise referred to as the Mad Hatter Public House and Hotel). The Site has been subject to a number of historic planning applications for major development, the latest of which was approved in 2018 (Ref: 16/AP/5239) for a mixed-use hotel and office-led development. Hines acquired the Site in October 2021 with a view to delivering a new mixed-use scheme which makes a positive contribution to Southwark and London.

The vision for the Site is to deliver a new mixed-use development within the strategic Blackfriars Road cluster. It will be of exceptional design quality, delivering new homes, office accommodation, affordable workspace as well as a range of flexible leisure, assembly, educational and retail uses. At its heart will be a new public realm, which will be stitched into the local network via the creation of new pedestrian routes across the Site, linking key transport nodes from Waterloo, Southwark and Blackfriars stations.

The golden thread of sustainability has been intrinsic to the design development of the proposals; guiding decision-making and the overall vision for the Site. The scheme will deliver a highly-sustainable scheme through its embodied and operational carbon performance which has been a key consideration as part of the design development. It will reinforce the collective objective to deliver an outstanding development which positively accords with Southwark's economic, social and environmental objectives together with the principles of sustainable development and Good Growth in London.

As part of the Proposed Development the following key public benefits would be secured:

- **433 residential dwellings:** The Proposed Development would be home to an estimate of 950 residents who are predicted to spend £6.3m each year on goods and services, generate £1.47m of Council Tax and up to £870,000 New Homes Bonus for the borough.
- **Significant affordable housing delivery:** The proposals will deliver 40.5% affordable housing, equivalent to 104 social rent and 56 discount market-rent homes on-site, making a significant contribution towards the borough's housing needs and housing 290 people in immediate housing need.
- **Substantial delivery of high quality new office accommodation:** The scheme will deliver over 100,000sqm of new office accommodation, making a significant contribution towards the aims and objectives of the Blackfriars Road Area Vision, the Central Activities Zone and Bankside and Borough Opportunity Area.
- **Long term job creation and other benefits:** Up to 6,160 employees will generate over £18m of spending each year and up to £17.64m business rates.
- **Affordable workspace:** The scheme includes 2,421sqm (GIA) of space that will be let at a peppercorn rent for at least 30 years for qualifying businesses as part of a future Affordable Workspace Strategy.
- **Community access:** The local community and schools will have access to the Assembly Rooms and part of the Exchange free of charge for a minimum of 30 days/events each year.
- **Flexible spaces:** 18 Blackfriars Road will include a range of flexible spaces which have the potential to facilitate a range of activities and end-users. The

programming of this space has been designed to allow the space to cater for a range of businesses.

- **Provision of new educational space:** The scheme will include the opportunity to deliver modern educational space, linking into local institutions in order to facilitate training (for example for the hospitality sector) and support the local economy in Southwark.
- **New public spaces and links:** The proposals have been designed to deliver a new public space in the heart of the scheme together with the provision of new pedestrian links which will complement the wider network of public spaces and connections around the Site.
- **New Children's Playspace:** A new 320sqm playspace at ground will be provided on-site which will be fully accessible to the public.
- **A new architectural landmark for Southwark and London:** The Proposed Development will introduce exceptionally designed buildings that have been sensitively designed to suit the Site location and context, making a positive contribution to the emerging tall buildings cluster and deliberately responding to local and important strategic views and vistas.
- **Securing high quality, sustainable design:** The scheme has been designed to achieve the highest standards of sustainable design and will be all-electric, targeting BREEAM "Outstanding" and NABERS 5.5* and WELL Platinum ratings for the Office Building and Home Quality Mark of 4.5* for the Residential Buildings. It will aspire to meet the UKGBC Net Zero trajectory for operational emissions for buildings delivered up to 2030 - 2035. The Scheme has been designed to deliver substantially lower upfront embodied carbon emissions than GLA benchmarks.

- **Enhancing urban greening and biodiversity value:** The proposals will deliver significant biodiversity enhancements through the delivery of new public realm and the provision of a new public park, together with extensive tree planting and greening throughout, equivalent to 0.37 Urban Greening Factor and a Biodiversity Net Gain of 152.4% on-site.
- **Creation of new jobs, training and apprenticeship during construction:** As part of delivering 18 Blackfriars Road, the proposals will secure a range of employment and training opportunities, including 1,200 Full Time Equivalent (FTE) construction jobs over the five year period of construction activity on-site.
- **Carbon Off-setting Contribution** of £1,589,255 towards the off-setting on local projects in Southwark.
- **Christ Church Gardens improvements:** In recognition of the increased footfall to the Church Gardens likely to result from the Proposed Development, a contribution towards re-landscaping and enhancing Christ Church Gardens will be secured in the Section 106 agreement. This also includes a contribution towards restoring the Grade II Listed Drinking Fountain. Whether this contribution is by way of works or a payment is to be agreed with the Council.
- **Substantial Section 106 package and Community Infrastructure Levy payment in excess** of £50 million (see Section 10 of this Statement for further detail regarding the proposed planning obligations).

1. INTRODUCTION

1.1 This Planning Statement has been prepared by DP9 Limited on behalf of Black Pearl Limited in relation to the Site known as 18 Blackfriars Road, which comprises of land bound by Paris Garden, Stamford Street, Blackfriars Road and Christ Church Gardens (otherwise referred to as '**18 Blackfriars Road**' or the '**Site**'). The Site includes 1 Stamford Street and 3 – 7 Stamford Street (also known as the Mad Hatter Public House and hotel) which comprise of two Grade II Listed buildings.

1.2 The applicant for both applications is Black Pearl Limited (the '**Applicant**'), the freehold owner of the Site and a company that is 100% owned by an investment fund controlled by Hines. Hines has also been appointed as the Development Manager and Asset Manager for the Proposed Development, and it is intended Hines will also carry out ongoing property management on behalf of the fund.

The Development Team

1.3 Hines is one of the largest and most respected real estate organisations in the world. It operates across 30 countries and has an outstanding track record. Hines' current property and asset management portfolio includes 685 properties, representing over 216 million square feet globally. The firm has more than 170 developments currently underway around the world and has a foundational commitment to environmental, social and governance (ESG) factors in its developments. Hines Europe established in 1991 and is based in London with over 5 million sqft of assets in development or under asset management in the UK. Hines has a strong track record of developments in central London boroughs and is excited to be bringing forward its first project in the London Borough of Southwark.

- 1.4 Alongside Foster & Partners and a variety of highly experienced professionals across all disciplines, Hines is working with Lipton Rogers Developments who bring further design and delivery experience to the project. Both Stuart Lipton and Peter Rogers have been actively engaged in the evolution of the proposals since inception. Together they have delivered a large number of major iconic developments in London over the last 35 years and have a team with extensive experience.

The Proposed Development

- 1.5 Full Planning Permission is sought for the following:

“Part demolition to the rear of 1 and 3 – 7 Stamford Street together with: the erection of a ground plus three-storey podium comprising retail, leisure, office, education, gallery, library and assembly room uses; two levels of basement for servicing, plant, car and cycle parking plus pit access within a partial basement at level three; two residential buildings of 22 and 40 storeys above podium; an office building of 45 storeys above podium; improvements to the existing public house; landscaping at ground and podium levels; replacement boundary at the southern edge of the Site; plant and all other associated, enabling and ancillary works.”

- 1.6 Associated Listed Building Consent is sought for:

“Demolition of rear extension at 3-7 Stamford Street together with removal of roof-level plant and modern elements at 1 and 3-7 Stamford Street; internal and external renovation and alterations throughout including replacement of windows and stairs, works to connect the listed buildings including a glazed infill and all other associated and ancillary works.”

Report Structure

1.7 The purpose of the Planning Statement is to assess the planning considerations associated with the Proposed Development in the context of national, regional and local planning policy and guidance. To this end, the Planning Statement comprises the following:

- Chapter 2: describes the Site and the surrounding area;
- Chapter 3: describes the planning history of the Site;
- Chapter 4: summarises the consultation process undertaken as part of the application proposals;
- Chapter 5: provides a description of the Development;
- Chapter 6: explains the Development content;
- Chapter 7: assesses the Development against planning policy and guidance;
- Chapter 8: sets out the heritage assessment of the Development;
- Chapter 9: outlines the benefits of the Development;
- Chapter 10: details the draft Section 106 Heads of Terms and anticipated Community Infrastructure Levy.
- Chapter 11: provides a summary and conclusions.

1.8 This Statement should be read and considered in conjunction with a number of planning application documents, as set out in Appendix Three of this Statement.

1.9 Due to the nature of the Proposed Development, an Environmental Impact Assessment has been both formally and informally scoped and undertaken in

accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

1.10 Appendices to this Statement comprise:

- Appendix One: Adopted Site Allocation
- Appendix Two: Site Location Plans (showing the application redline boundary) associated with the applications for Full Planning Permission and Listed Building Consent respectively
- Appendix Three: List of Application Documents

2. SITE CONTEXT

The Site

- 2.1. 18 Blackfriars Road (the 'Site') comprises of a cleared brownfield site together with two Grade II Listed buildings known as 1 Stamford Street and 3 – 7 Stamford Street (otherwise known as the Mad Hatter Public House and Hotel). The Site is bound by Stamford Street to the north, Blackfriars Road to the east, Christ Church and Gardens to the south and Paris Garden to the west.
- 2.2. The Site is located at a point of landmark significance; where important routes converge and where there is a concentration of activity. It is a transitional site which balances the residential and commercial characters of Blackfriars Road, the South Bank and Waterloo. Almost immediately to the west is the boundary with the London Borough of Lambeth ('LBL') which intersects along Hatfields (see Figure 1 below).

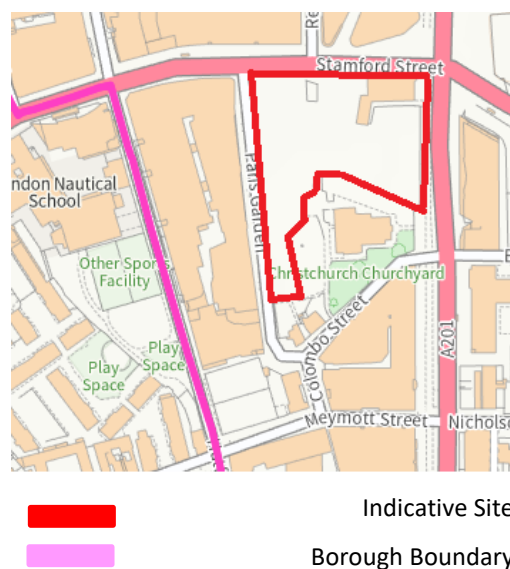


Figure 1: Borough Boundary

- 2.3. The Mad Hatter Public House and Hotel currently operate out of 3 – 7 Stamford Street, with 1 Stamford Street currently comprising of vacant office space.
- 2.4. A copy of the Site Location Plan showing the planning application redline boundary is set out below at Figure 2 with the application redline boundary for the Listed Building Consent shown in Figure 3:

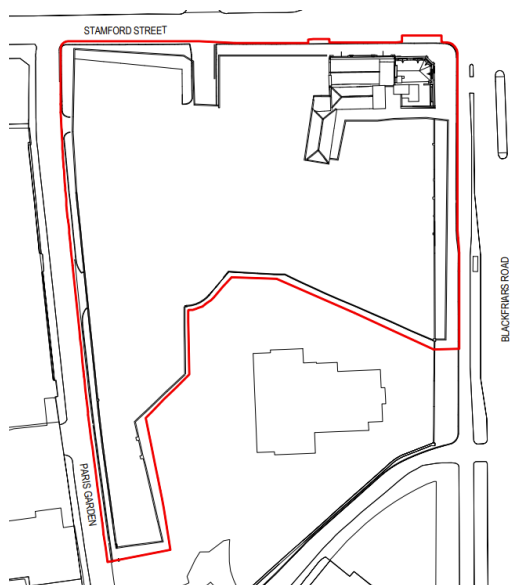


Figure 2: Existing Site Location Plan (Full Planning Permission)

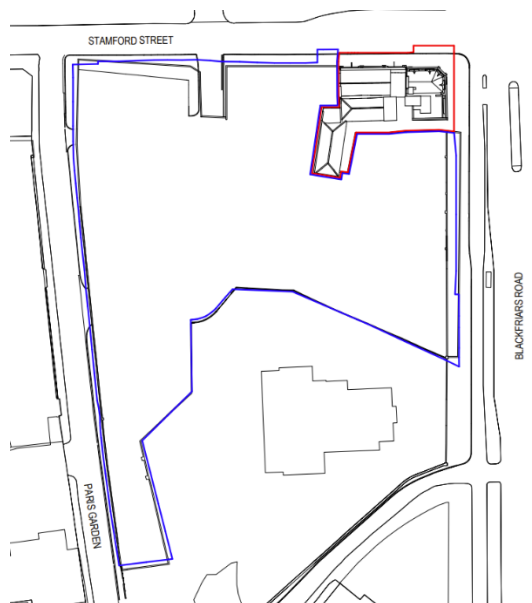


Figure 3: Existing Site Location Plan (Listed Building Consent)

- 2.5. The majority of the Site is allocated in the New Southwark Plan (2022) for a mixed-use development (Ref: NSP22), delivering employment floorspace (i.e., Use Class E(g) or B), together with ground floor active frontages including retail, community or leisure uses. The site allocation also references that new homes should also be delivered. A copy of the site allocation is included at Appendix One of this Planning Statement for reference.
- 2.6. Historically, the Site has been subject to a number of planning applications for large-scale development, which is explained in further detail at Chapter 3 of this document. Of note, an application for full planning permission (also referred to as the 'first permission') was approved by the Secretary of State on 25th March 2009 (Ref: 07/AP/0301) for the following:

"Demolition of existing buildings and redevelopment to provide a mixed use development totalling 83,915m² Gross External Area (GEA) comprising 286 residential flats (Class C3), 25,769m² of office floorspace (Class B1), 1,170m² of retail floorspace (Class A), 562m² of Class D1 (community) uses, creation of new open space, reconfigured vehicular and pedestrian access and works to the public highway together with associated works including landscaping and the provision of a basement car park for 82 cars, plus servicing and plant areas. The development consists of two towers: an office tower of 23 storeys (maximum height 105m Above Ordinance Datum), a residential tower of 42 storeys (maximum height 148m Above Ordinance Datum) and lower rise buildings of up to 7 storeys fronting Stamford Street and Paris Gardens."

- 2.7. A second application for full planning permission (known as the 'second permission') was later granted on 21st June 2018 (Ref: 16/AP/5239) for the following:

"Redevelopment of site to create four levels of basement and the erection of six buildings ranging from five to 53 storeys plus plant (heights ranging from 23.1m

AOD - 183.5m AOD) to provide; office space (Class B1); 548 room hotel (Class C1); 288 residential units (Class C3); flexible retail uses (Classes A1/A2/A3/A4); restaurant (Class A3); music venue (Class D2); storage (Class B8); new landscaping and public realm; reconfigured vehicular and pedestrian access; associated works to public highway; ancillary servicing and plant; car parking and associated works.”

- 2.8. Both permissions set out above benefit from a Certificate of Lawfulness confirming that works carried out lawfully implemented the respective permissions. This included the demolition and clearance of buildings then on-site, with the exception of 1 and 3 – 7 Stamford Street which did not form part of either permission.

Policy and Statutory Designations

- 2.9. The Site is covered by the following adopted policy designations:
- Air Quality Management Area ('AQMA');
 - Area Vision (Blackfriars Road);
 - Bankside and Borough District Town Centre;
 - Bankside, Borough and London Bridge Opportunity Area;
 - Better Bankside Business Improvement District ('BID');
 - Bankside Neighbourhood Plan Area;
 - Central Activities Zone ('CAZ');
 - North Southwark and Roman Roads Archaeological Priority Area ('APA');
 - and
 - South Bank Strategic Cultural Quarter.
- 2.10. In addition, the Site has a PTAL Rating of 6b (the 'best' public transport accessibility level) and is located within Flood Zones 2 and 3 (benefitting from Flood Defences).

Surrounding Context

Immediate Context

- 2.11. The immediate surrounding context of the Site comprises a mix of character areas and uses. The Site itself forms part of an urban block, comprising of Christ Church (Grade II Listed) and its associated Gardens with Drinking Fountain (Grade II Listed) to the south, together with the Rose and Crown Public House which sits on the apex between Colombo Street and Paris Garden. Of note, Cycle Super Highway 6 ('CS6') borders the Site along Blackfriars Road.
- 2.12. Christ Church and its associated Gardens include a number of trees subject to Tree Preservation Orders ('TPOs') and is designated as Borough Open Land ('BOL') and a Site of Importance for Nature Conservation ('SINC'). Given the close proximity, the team have worked collaboratively with representatives of Christ Church as part of a considered and comprehensive approach to developing the Site. Further details on engagement is set out within Chapter 4.
- 2.13. To the north of Stamford Street is Rennie Court, South Bank Central and the 1 Blackfriars development (completed in 2018). The ground floor of these buildings includes a series of retail and commercial uses along Stamford Street, which meander down Rennie Street towards Upper Ground. To the north-east of the Site is the Bankside Yards development which is currently under construction; this will provide new pedestrian links towards the River Thames, Blackfriars Station and Tate Modern.
- 2.14. To the east of the Site is Southwark Street and the 240 Blackfriars Road development (completed in 2014) which comprises of 19 storeys of office accommodation and ground floor retail.
- 2.15. Further south of Colombo Street is the Hoxton Hotel (completed in 2019), the Colombo Sports and Community Centre as well as Friars Bridge Court. The

Blackfriars Medical Practice sits on the south-west junction of Colombo Street, and Paris Garden.

- 2.16. To the west of the Site is a series of commercial properties including Dorset House, Bastille Court (also known as the Former Clay's Printing Works) which is Grade II Listed, together with 6 Paris Garden – a student accommodation development managed by iQ. Planning permission was granted in January 2021 (Ref: 17/AP/4230) in relation to the Site known as 1 – 5 Paris Garden and 16 – 19 Hatfields for the part-demolition and redevelopment of the site to deliver a commercial-led mixed-use development of up to 26 storeys. This includes a new public route connecting Hatfields and Paris Garden (shown in Figure 3 below) that has helped inform the proposals for 18 Blackfriars Road in relation to permeability within the wider context of emerging developments.

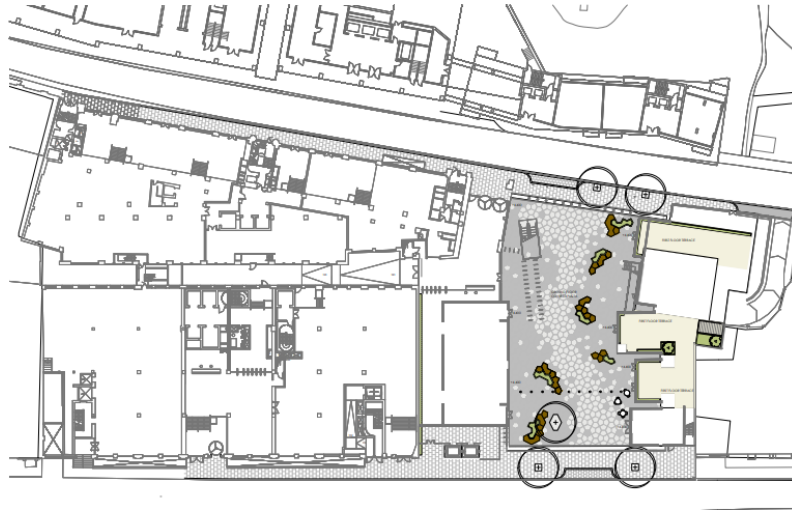


Figure 3: Proposed Route between Hatfields and Paris Garden

Wider Context

- 2.17. The wider context of the Site and surrounding area is characterised by national and local landmarks. This includes the Tate Modern Gallery, the OXO Tower and

the National Theatre, together with the Southwark Playhouse, the Young Vic and the Old Vic playhouses.

- 2.18. In addition, the regeneration of the area over the last three decades has helped deliver a reimagined network of public routes, including the Low Line which stretches east-west along Southwark Street together with the Thames Pathway, which provides a continuous pedestrian footpath along the River Thames. As set out in this statement, the Cycle Super Highway ('CS6') sits alongside the Site along Blackfriars Road, which connects Elephant & Castle to King's Cross. A series of Cycle Hire Docking Stations sit within close proximity to the Site, including Stamford Street, Colombo Street and Blackfriars Road.
- 2.19. Within the wider context, the Site sits centrally amongst a host of key transport nodes, including Blackfriars Station to the north (0.2m), London Bridge Station and Underground to the east (0.9m), Southwark Station and Underground to the south (0.3m) and Waterloo Station to the west (0.6m).
- 2.20. The Site is not in a Conservation Area, but there are several within the wider proximity including Old Barge Alley Conservation Area to the north (within the London Borough of Southwark) and Roupell Street and Waterloo Conservation Areas (both in the London Borough of Lambeth). In addition, there are a series of listed buildings within the vicinity of the Site, which are illustrated in Figure 4 below:



Figure 4: Map of Listed Buildings

- 2.21. A series of developments have been consented over the past twenty or so years as part of the vision for Blackfriars Road to deliver transformative change along the “Blackfriars Mile” from St George’s Circus to Blackfriars Bridge¹. A number of these sites have either been brought forward or are currently under construction, cumulatively representing a “*globally significant central London business district*”². A number of remaining allocated sites (including 18 Blackfriars Road) are identified within the New Southwark Plan (2022).

¹ As set out within the original Blackfriars Road SPD (2014) which has subsequently been discontinued.

² As set out within the Blackfriars Road Area Vision of the New Southwark Plan (2022).

3. PLANNING HISTORY

3.1. The Site has an extensive planning history which is summarised as part of this Chapter. This is broadly split between the previous consents secured for the Site (i.e., the first and second permissions)³ and the series of applications for full planning permission and listed building consents for 1 and 3 – 7 Stamford Street.

3.2. The first permission was granted on 25th March 2009 (Ref: 07/AP/0301) after a Public Inquiry (Secretary of State Call-in, which was conjoined with the Inquiry for 1 Blackfriars Road to the north) for the following:

“Demolition of existing buildings and redevelopment to provide a mixed use development totalling 83,915m² Gross External Area (GEA) comprising 286 residential flats (Class C3), 25,769m² of office floorspace (Class B1), 1,170m² of retail floorspace (Class A), 562m² of Class D1 (community) uses, creation of new open space, reconfigured vehicular and pedestrian access and works to the public highway together with associated works including landscaping and the provision of a basement car park for 82 cars, plus servicing and plant areas. The development consists of two towers: an office tower of 23 storeys (maximum height 105m Above Ordinance Datum), a residential tower of 42 storeys (maximum height 148m Above Ordinance Datum) and lower rise buildings of up to 7 storeys fronting Stamford Street and Paris Gardens.”

3.3. A Certificate of Lawfulness confirming that works to implement the consented were carried out was approved on 20th March 2012 (Ref: 12/AP/0413).

3.4. The second permission was later granted on 21st June 2018 (Ref: 16/AP/5239) for the following:

“Redevelopment of site to create four levels of basement and the erection of six buildings ranging from five to 53 storeys plus plant (heights ranging from 23.1m

³ Noting that these excluded 1 and 3 – 7 Stamford Street.

AOD - 183.5m AOD) to provide; office space (Class B1); 548 room hotel (Class C1); 288 residential units (Class C3); flexible retail uses (Classes A1/A2/A3/A4); restaurant (Class A3); music venue (Class D2); storage (Class B8); new landscaping and public realm; reconfigured vehicular and pedestrian access; associated works to public highway; ancillary servicing and plant; car parking and associated works.”

- 3.5. A Certificate of Lawfulness was submitted and later approved by LB Southwark in June 2021 (Ref: 21/AP/1409) to confirm that the works carried out on-site lawfully implemented Planning Permission Ref: 16/AP/5239. It is considered that this extant consent establishes the latest parameters of height, massing and uses.
- 3.6. A series of applications relating to 1 and 3 – 7 Stamford Street have also been submitted and approved over the past ten years. A summary of the relevant applications is included in Table 1 below:

1 Stamford Street		
Application Ref	Description	Status
14/AP/1029 and 14/AP/1030 (LBC)	Change of use from offices (Use Class B1) to additional bedrooms for ancillary use for the adjacent Mad Hatter Hotel (Use Class C1), together with a rear infill extension at first and second floors. A roof terrace is proposed at third floor level to the rear (southern elevation); and external plant at third floor level to the rear (southern elevation).	Approved: 05.11.2014
15/AP/3915	Internal refurbishment and minor external repairs to the existing four storey Grade II listed building with basement.	Approved: 23.11.2015
16/AP/3473	Change of use from Use Class B1 (office) to a flexible use for either Use Class B1 (office) or Use Class C1 (hotel).	Approved 20.10.2016
18/AP/1684 (LBC)	Refurbishment to existing party wall forming Part of Grade 2 Listed Building.	Approved: 04.07.2018
18/AP/2328 (LBC)	Installation of a glass partition wall and door within existing third floor office to accompany the interior	Approved 06.09.2018

	alterations granted by approved Listed Building Consent 15/AP/3915.	
19/AP/1333 and 19/AP/1334 (LBC)	Listed Building Consent for repairs to the wall and render the façade with lime based render.	Approved: 26.06.2019
19/AP/1335 and 19/AP/1336 (LBC)	Install a pair of fixed windows with double glazing to the existing south elevation.	Approved: 01.07.2019
3 - 7 Stamford Street		
Application Ref	Description	Status
96/AP/0756	Conversion from offices to public house/restaurant on ground floor & hotel on upper floors.	Approved: January 1997
97/AP/0107	New roof plant room, glazed canopy to front entrance and fire escape door to main frontage.	Approved: March 1998
12/AP/3752	Cleaning of external facade to front elevation.	Approved 11.01.2013
14/AP/2360	Display of additional x1 externally illuminated hanging sign and x1 fascia sign.	Approved 10.11.2014
15/AP/2244	Replacement of existing covered over pavement light with cellar delivery flaps.	Approved 11.08.2015
19/AP/1337 and 19/AP/1338 (LBC)	Repair and rendering of the previously covered facades with a lime render.	Approved 27.06.2019

Table 1: 1 and 3 – 7 Stamford Street Planning History

- 3.7. The extent of works carried out pursuant to the above planning permissions and associated Listed Building Consents is unknown, but the consents establish the principle for extensive remodelling of these buildings, including the rear of 1 Stamford Street.

4. PRE-APPLICATION DISCUSSIONS & CONSULTATION

- 4.1. As part of developing proposals for the Site, the applicant team has engaged in wide-reaching and extensive pre-application discussions with a number of key stakeholders since late 2021. This has helped inform the emerging design as explained within the accompanying Design and Access Statement.
- 4.2. This Chapter provides a detailed description of the statutory consultation process undertaken, including the pre-application process with the London Borough of Southwark (LBS), the Greater London Authority (GLA), Transport for London (TfL) and other consultees. It also summarises the public consultation exercise set out in detail in the Statement of Community Involvement. Overall the pre-application process and engagement is considered to represent a comprehensive and pro-active approach as encouraged within Paragraphs 39 – 42 of the NPPF (2021).

Pre-application Engagement

- 4.3. A series of 17 pre-application meetings have been held with the London Borough of Southwark ('LBS') between November 2021 – May 2023 as part of developing the proposals for 18 Blackfriars Road. This has included meetings to discuss the design development and technical considerations associated with the proposals, as well as site visits to inspect the existing listed buildings on Site. Specific correspondence has also been undertaken directly with officers regarding technical assessments associated with the Proposed Development.
- 4.4. In addition to regular pre-application meetings, the applicant team has also presented the proposals to the Council's Design Review Panel ('DRP') in September 2022 and May 2023. This feedback has informed the emerging design of the proposals as part of the iterative design process.

- 4.5. Alongside engagement with LBS, the applicant team has also engaged in pre-application discussions with the GLA on strategic matters. In addition, a series of meetings have been held with TfL alongside LBS highways team given the nature of the surrounding infrastructure and red routes around the Site. This has helped to inform the overall assessment for the Proposed Development as well as developing the proposals for highway improvement works. The detail of these off-site highway works will be agreed in Section 278 Agreements with the relevant highway authorities, which will be secured by the Section 106 Legal Agreement.

Neighbouring Authorities

- 4.6. In conjunction with on-going pre-application engagement with LBS, the applicant team has also met with officers from Westminster City Council, LB Lambeth and the City of London. Alongside a presentation of the proposals, these discussions also included townscape matters.

Historic England

- 4.7. A number of meetings have been held with representatives at Historic England ('HE') throughout the pre-app process. This has included a presentation to HE's London Advisory Committee on the proposals in September 2022.

Environmental Scoping Request

- 4.8. Due to the nature of the Proposed Development, an Environmental Impact Assessment has been formally scoped and undertaken in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. A draft Scoping Opinion prepared by Land Use Consultants ('LUC') was issued on 5th October 2022 with a final Scoping Opinion issued in December 2022 (Ref: 22/AP/3336).

Neighbouring Organisations

- 4.9. The Site sits adjacent to a number of neighbouring organisations and businesses. As part of a holistic approach to development of the Site, extensive engagement has been undertaken with Christ Church and the John Marshall Charity. This has focused on discussions regarding Christ Church Gardens which sit to the south of the Site. Together with West 8, proposals for a meditation garden have been explored and a contribution towards these works is proposed to be included in the Section 106 agreement (in the same way as the second permission for the Site, which also secured upgrade works to the Church Gardens). A number of meetings have also been held with the Rose and Crown Public House, The Hoxton and Blackfriars Medical Centre regarding the proposals.

Community Consultation

- 4.10. A Statement of Community Involvement is enclosed as part of this submission which explains all public consultation carried out during the pre-application stage, together with an explanation of the approach to consultation that will continue through the determination of the planning application and beyond. A series of events has been carried out as part of the consultation on the Proposed Development. This includes:

- Public consultation 01: 24.02.2022
- Public consultation 02: 18.07.2022
- Pop-up events held at various locations close to the Site: 16 – 17.03.2023
- Public consultation 03: 18.05.2023

- 4.11. In addition to the above, a series of emails, social-media posts and flyer correspondence has been issued out to the surrounding area as part of promoting the public exhibitions and other events including community fun

days, together with general updates on the proposals. A website regarding the proposals for 18 Blackfriars Road is currently live and updated on a regular basis.

- 4.12. Separate to public consultation, a number of meetings have been held with individual stakeholder groups including: Coin Street Community Builders (CSCB), Colombo Centre, Bankside Open Spaces Trust (BOST), Middle Temple and Somerset House. A complete list of organisations who have been contacted during the pre-application process is set out within the accompanying Statement of Community Involvement ('SCI').
- 4.13. This has been carried out in accordance with best practice together with the principles set out in LBS's SCI and its Development Consultation Charter.

5. APPLICATION PROPOSALS

- 5.1. This chapter provides a summary of the Proposed Development including the envisaged layout, height and massing, land uses, access and parking together with energy and sustainability. Further detail in relation to the proposals is set out within the accompanying Design and Access Statement.

Description of Development

- 5.2. Full Planning Permission is sought for the following:

“Part demolition to the rear of 1 and 3 – 7 Stamford Street together with: the erection of a ground plus three-storey podium comprising retail, leisure, office, education, gallery, library and assembly room uses; two levels of basement for servicing, plant, car and cycle parking plus pit access within a partial basement at level three; two residential buildings of 22 and 40 storeys above podium; an office building of 45 storeys above podium; improvements to the existing public house; landscaping at ground and podium levels; replacement boundary at the southern edge of the Site; plant and all other associated, enabling and ancillary works.”

- 5.3. Associated Listed Building Consent is sought for:

“Demolition of rear extension at 3-7 Stamford Street together with removal of roof-level plant and modern elements at 1 and 3-7 Stamford Street; internal and external renovation and alterations throughout including replacement of windows and stairs, works to connect the listed buildings including a glazed infill and all other associated and ancillary works.”

- 5.4. Together, the proposals are referred to as the “Proposed Development” for the purposes of this Planning Statement.

Buildings

5.5. The Proposed Development comprises of three tall buildings, linked together at podium level. These are summarised as follows:

- **The Podium:** The Podium comprises of ground plus three storeys which includes ground floor retail (Use Class E (a, b)) together with a range of spaces on the upper floors described below.

The Incubator

The Incubator will provide 1,394 sqm GIA of affordable workspace on the first and second floors of the Podium below the Stamford Building. The space will be delivered as either affordable offices, retail or other cultural uses (Use Class E (a, b, d and g) and F1 (a, b and d)).

Knowledge Hub

The Knowledge Hub, above the public house at ground floor of 1 and 3 – 7 Stamford Street, provides a further 965 sqm GIA of affordable workspace, which will be provided either as employment or educational space (Use Class E(g)/ F1(a)). The space is being considered as a hospitality training centre, however, this concept is subject to further development with the Council to ensure that the affordable workspace area offers the greatest benefit for the needs of the borough.

The Exchange

The Exchange comprises of 3,687 sqm GIA flexible spaces (Use Classes E(g, b, d and g) and F1 (a, b and d)) on the first to third floors of the Podium. Flexible uses are required to ensure that the spaces can be curated to suit the demands of post Covid living and working, but may

include co-working, maker space, galleries, library, performance, education and/or wellness facilities.

The Assembly Rooms

The Podium will also include a 550 sqm GIA auditorium at the second floor known as the Assembly Rooms (Use Class F1(e)).

- **The Paris Building:** A 22-storey residential building above the Podium, comprising of affordable residential accommodation, equivalent to 40.5% on-site. This will include internal shared amenity space, suitable for families and children to use for socialising and after-school activities in addition to internal playspace. Access to a Podium roof-level playspace will also be provided, shared between the residents in both Paris and Stamford.
- **The Stamford Building:** A 40-storey residential building above the Podium, comprising of private residential accommodation. This includes a series of external amenity spaces at levels 4 and 33 together with shared Podium roof-level playspace available to both residents in both Paris and Stamford.
- **The Office Building:** A 45-storey building above Podium which sits to the east of the Site, comprising of office accommodation. This will operate independently, however, is linked to the rest of the Podium levels via a bridge-link to the north over Hatters Yard.

- 5.6 Below ground are two levels of basement (together with pit access at level 3) which predominantly comprise of Back of House ('BOH') areas including plant, together with end of journey facilities for cyclists, blue badge car parking and servicing for the Proposed Development.

Affordable Workspace

- 5.7 The Incubator and Knowledge Hub will together deliver 2% of the total employment floorspace of the Proposed Development as affordable workspace. The spaces will be operated under the terms of an affordable workspace lease, which will secure a peppercorn rent for a minimum term of 30 years. Tenant eligibility and uses will be agreed with the Council and controlled in the Section 106 Agreement.
- 5.8 The remaining affordable workspace provision (to meet the policy requirement of 10% of the gross employment floorspace) will be provided by an off-site payment in lieu that the Council can use for the benefit of start-ups and SMEs across the Borough.

Community Access

- 5.9 An area of no less than 2,000sqft GIA within the Exchange will be available free of charge for community groups and schools for a minimum of 30 days during the year for organised events and activities.
- 5.10 The Assembly Rooms will also be bookable by community groups and schools at no charge for a minimum of 30 events during the year. Free of charge use of these spaces and monitoring arrangements will be controlled by a Community Access Strategy secured by the Section 106 agreement.

Public access and routes through the Site

- 5.11 The Section 106 Agreement will also secure routes through the Site and public access to the Rotunda, Hatters Yard and the public playspace (all described further in paragraph 5.16 below), with ongoing management and maintenance staying with the Applicant.

Heritage

- 5.12 The proposals for both Listed Buildings principally seek to sensitively retain and restore the buildings, introducing new uses and providing a new life-cycle for enjoyment and appreciation by the public. Further detail is provided in the Heritage Assessment prepared by Donald Insall Associates.
- 5.13 As part of a comprehensive approach to the Site, the Proposed Development includes the removal of the existing rear wing to the Mad Hatter Public House and Hotel as part of facilitating a new pedestrian route known as Hatters Yard. This facilitates opening up the public realm into the Site and stitching the Proposed Development into the wider network of public routes and desire lines to key transport nodes. It also allows public access to the rear of the Listed Buildings, which will allow the buildings and their heritage significance to be enjoyed away from the busy roads to the front.
- 5.14 In addition to the internal restoration and refurbishment, the external works to both buildings will seek to reinstate the original windows within the Mad Hatter Public House and Hotel which have been removed through years of alterations, together with openings at ground level to facilitate access and permeability into the ground floors.
- 5.15 The original roof structures will be retained and re-tiled as part of the heritage-led approach to the buildings together with the removal of all modern plant and structures. The street frontages along Blackfriars Road and Stamford Street will be restored, including the railings outside both buildings. Existing windows will be refurbished and where necessary, replaced with timber window replacements as part of a heritage-led approach.

Public Realm and Playspace

5.16 The proposals include a series of curated public spaces, which will be accessible to the public. These are summarised as follows:

- **The Rotunda:** A generous central plaza in the heart of the Site. The space will provide spill-out space for the retail units but also areas for residents, office workers and visitors to sit and dwell. It will also have the potential to host events in conjunction with the Assembly Rooms.
- **Hatters Yard:** A new pedestrian link which will sit to the rear of the Mad Hatter Public House and Hotel and 1 Stamford Street, providing a new access into the Site from Blackfriars Road. The route will provide space for demountable stalls and seating associated with the newly refurbished Mad Hatter Public House.
- **Blackfriars and Paris Garden Alleys:** These two public routes connect into the development from the east and west and the southern ends of the Site.
- **Public Playspace:** A new publicly-accessible playground ('the Children's Village') will be located in the south-west corner of the Site, directly adjacent to the Paris Building. This will provide play equipment and furniture for younger age groups (0 – 4 and 5 – 11 years). Private playspace for the residential units will be available via a shared space above the Podium at Level 4. As part of the overall offer, internal playspace will also be available at Level 4, which will have direct access onto the external playspace. Provision for older ages is anticipated to be met by a payment in lieu towards improving existing off-site facilities.

5.17 The publicly accessible space (excluding the playspace) will be equivalent to 0.36ha across the Site. In addition, new tree planting will be included together

with a bespoke landscaping strategy across the Site. In total the Proposed Development will achieve an Urban Greening Factor (UGF) of 0.37 and a Biodiversity Net Gain (BNG) of 152.49% increase in habitat units.

Residential

- 5.18 The Proposed Development includes two residential buildings as set out above, known as the Paris and Stamford Buildings. Collectively, the buildings will deliver 433 residential units, of which 160 will be delivered as affordable homes, equivalent to 40.5% on-site by habitable room. The design of the residential units has focused on optimising the layouts to deliver the highest quality accommodation, including dual-aspect, external amenity space and sustainability standards.

Office

- 5.19 The proposed Office Building will include approximately 111,273sqm GIA of office floorspace. As the tallest component of the Proposed Development, the building has been designed to respond to the setting of cluster and key views as set out in the accompanying Environmental Statement Volume 2 (Built Heritage, Townscape and Visual Impact Assessment). The building includes a series of 11 sky gardens for private external amenity space for the office occupiers (approximately 2,570sqm GIA), which will be landscaped to respond to the various climates up the building. The top of the building incorporates the use of reflective aluminium unitised cladding panels which visually dissipates into the skyline. This component comprises of state-of-the-art technology in order to deliver an all-electric, sustainable scheme.

Retail

- 5.20 The ground floor of the Podium will provide a series of ground floor retail spaces (Use Class E (a and b)), which will enliven the ground floor and public realm, providing active frontages as envisioned under the site allocation (Ref: NSP22). The Exchange and The Incubator will also provide the opportunity for retail as part of a flexible use in these areas.

Fire Strategy

- 5.21 The Fire Strategy for the Site has been designed to provide two stairs for each of the three buildings above podium. In addition, two firefighting stairs will be provided in the Office Building, whilst one firefighting stair will be provided in each of the residential buildings. Details regarding the number of firefighting and evacuation lifts are described in detail within the accompanying Fire Statement prepared by ARUP. It has been designed to fully accord with Policy D5 and D12 of the London Plan and BS 9991.

Car and Cycle Parking

- 5.22 The scheme will provide a significant amount of cycle parking, well in-excess of the London Plan Standards with an aspiration towards meeting the Southwark Plan Standards. In total the scheme will provide 3,187 long-stay spaces and 321 short-stay spaces, across a range of cycle typologies. A state-of-the-art end of trip facility will be delivered as part of encouraging sustainable transport modes, ensuring that the scheme contributes towards the long-term aspirations for car-free development across the capital.
- 5.23 The Proposed Development will also provide 12 Blue Badge car parking spaces, equivalent to the 3% sought under the London Plan for all residents within the Proposed Development. A further single Car Club Bay will also be provided and managed by a third-party operator.

Energy and Sustainability

- 5.24 The Proposed Development has been designed to be one of the most sustainable building of its kind in London – it will maximise its performance to achieve the highest performance against the industry benchmarks including BREEAM, to deliver an outstanding scheme, which will be of the highest standards, It has been designed to be all-electric and incorporate state-of-the-art technologies and engineering to minimise carbon emissions.
- 5.25 This core principle of the Proposed Development has informed the overall approach to design, including the choice of materials and technical considerations, acting as the golden thread throughout the proposals.
- 5.26 This includes the provision of Air Source Heat Pumps (ASHPs) and Ground Source Heat Pumps (GSHPs) together with Photovoltaic Panels (PVs). The long-term decarbonisation of the national grid means that there is the potential in the future for the Proposed Development to be completely Net Zero in operational terms.
- 5.27 When compared to Building Regulations Part L (2021), the Proposed Development will deliver an on-site reduction of 39%, beyond the target of 35% sought under the London Plan, with a payment in-lieu of £1,589,255 to meet its Net Zero target.

Servicing

- 5.28 The proposed servicing strategy for the Site focuses on optimising off-site consolidation to minimise the number of vehicular movements to and from the Site. All servicing associated with the development will take place off-street via a loading bay along Paris Garden, which has also been designed to provide space for short-stay deliveries (such as takeaway services or grocery deliveries).

Highway Works

- 5.29 As part of the wider proposals, it is envisaged that highway improvement works will be carried out, including new cross-overs for cyclists along Blackfriars Road, together with works along Stamford Street and Paris Garden. Additional public realm works (such as tree planting and cycle hoops) may also be provided.

6. PLANNING POLICY FRAMEWORK AND OVERVIEW

- 6.1. The purpose of this Chapter is to identify the key national, regional and local planning policy and guidance relevant to the determination of the application for the Development, and to which the proposals have had regard during design development. An analysis of the key policies and tests is included in the relevant sections.

The Development Plan

- 6.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.3. For the purposes of this Site, the Development Plan comprises of the following documents:
- The London Plan (2021); and
 - The Southwark Plan (2022).
- 6.4. The Development Plan policies referred to in this Planning Statement carry significant weight in the decision-making process.

National Planning Policy Framework and Planning Practice Guidance

- 6.5. National planning policy is set out in the form of the adopted National Planning Policy Framework (NPPF), which was published in March 2012 and most recently revised in July 2021. The NPPF is subject to updates by the Government and is supplemented by the Planning Practice Guidance (PPG) which is updated on a regular basis. Both of these documents carry significant weight.

Supplementary Planning Documents and Guidance

- 6.6. In conjunction with the Development Plan and the NPPF, the following documents have also been considered as part of this application:

- GLA London View Management Framework (LVMF) (2012)
- GLA Play and Informal Recreation SPG (2012)
- GLA Affordable Housing and Viability SPG (2017)
- GLA Social Infrastructure SPG (2015)
- GLA Accessible London: Achieving an Inclusive Environment (2014)
- GLA The Control of Dust and Emissions during Construction and Demolition (2014)
- GLA Character and Context SPG (2014)
- GLA All London Green Grid (2015)
- GLA Housing SPG (2016)
- GLA Contaminated Land Process Note (2020)
- GLA Energy Planning Guidance (2022)
- GLA Urban Greening Factor Guidance (2023)
- LPG: 'Be Seen' Monitoring Guidance (2021)
- LPG: Circular Economy Statements (2022)
- LPG: Whole-life Carbon Assessments (2022)
- LPG: Sustainable Transport, Walking and Cycling Guidance (2022)

- LPG: Air Quality Positive (2023)
- LPG: Air Quality Neutral Guidance (2023)
- LPG: Characterisation and Growth Strategy (2023)
- LPG: Housing Design Standards (2023)
- LPG: Optimising Site Capacity: A Design-led Approach (2023)
- LBS Affordable Housing SPD (2011)
- LBS Development Viability SPD (2016)
- LBS Design and Access Statements SPD (2007)
- LBS Heritage SPD (2021)
- LBS Residential Design Standards SPD (2011)
- LBS Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD (2020)
- LBS Sustainability Assessments SPD (2009)

6.7. The following supplementary London Plan Guidance documents are currently in draft but has also been considered for completeness as part of this Planning Application:

- LPG: Fire Safety (2022)
- LPG: Good Quality Homes for all Londoners (2020)
- LPG: Public London Charter (2023)
- LPG: Affordable Housing (2023)
- LPG: Development Viability (2023)

Listed Buildings and Conservation Areas⁴

- 6.8. The Levelling-up and Regeneration Bill was introduced to Parliament on 11 May 2022 and is now at report stage in the House of Lords. It includes (at section 96(1)) a new, proposed section 58B, *“Duty of regard to certain heritage assets in granting permissions”*, to be inserted into the Town and Country Planning Act 1990. This provides (in sub-section (1)) as follows: *“In considering whether to grant planning permission or permission in principle for the development of land in England which affects a relevant asset or its setting, the local planning authority or (as the case may be) the Secretary of State must have special regard to the desirability of preserving or enhancing the asset or its setting.”* This includes *“preserving or enhancing any feature, quality of characteristic of the asset or setting that contributes to the significance of the asset”* (sub-section (2)). *“Relevant assets”* and their *“significance”* are identified in sub-section (3), and for example, a World Heritage Site is a *“relevant asset”* and its *“significance”* is the outstanding universal value referred to in the UNESCO World Heritage List.

⁴ Note that this relates to the planning policy assessment as opposed to the standalone heritage assessment which is set out at Chapter 7 and which set out the legislative and associated policy context for designated heritage assets.

7. PLANNING POLICY ASSESSMENT

- 7.1. This Chapter assesses the Proposed Development in the context of key national, regional and local planning policy and guidance relevant to the determination of the application set out in Chapter 6.
- 7.2. The Proposed Development as a whole is assessed within this Chapter. Where relevant additional commentary on the Proposed Development is provided to reflect the greater level of detail submitted as part of the planning application.
- 7.3. A full assessment of the impacts of the Proposed Development is included in the ES for the associated topics. The ES also recommends any mitigation measures that may be required as a result of the Proposed Development.

The Principle of Development

National Planning Policy

- 7.4. The NPPF was published in March 2012 and most recently revised in July 2021. This sets out the Government's economic, environmental and social planning policies as part of securing sustainable development.
- 7.5. This is enshrined in Paragraph 8 of the NPPF which states that *“achieving sustainable developments means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways...”* These are as follows:
- *an economic objective: to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

- *a social objective: to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- *an environmental objective: to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

7.6. The NPPF goes onto state (at Paragraph 10) that “[so that] sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development”. For decision-taking, Paragraph 11 of the NPPF states that this means that development proposals which accord with the development plan should be approved without delay.

7.7. Paragraph 124 of the NPPF states that local planning authorities should support development which makes the most efficient use of land which takes into account:

- *the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
- *local market conditions and viability;*
- *the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*

- the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- the importance of securing well-designed, attractive, and healthy places.

7.8. The national strategic objectives are supported by the Planning Practice Guidance, which sets out further detail on how the Government's objectives can be achieved through plan-making and decision-taking.

The London Plan

7.9. The London Plan (LP) principally plans for Good Growth in order to improve health and quality of life and create a city which is a better place to live, work and visit; this is set out within its core Good Growth objectives. Of note, LP Policy GG2 seeks to make the best use of land, by enabling development on brownfield land, particularly in Opportunity Areas, and prioritising sites which are well-connected by existing and planned public transport.

7.10. LP Policy SD1 seeks to ensure that Opportunity Areas fully realise their growth and regeneration potential, outlining that development should be supported in Opportunity Areas which create employment opportunities and housing choices for Londoners. London Plan Table A2.1 identifies indicative capacity for 4,000 new homes and 5,500 new jobs in the London Bridge, Borough and Bankside Opportunity Area over the lifetime of the Plan.

7.11. LP Policy SD4 identifies the unique international, national and London-wide roles of the Central Activities Zone ('CAZ'), including the significant office functions of the CAZ which should be supported, together with the range of cultural arts, entertainment, night-time economy and tourism functions. Paragraph 2.4.4 outlines the strategic functions of the CAZ including the agglomeration of nationally and internationally significant offices and

headquarters. In conjunction with SD4, LP Policy SD5 notes that offices and other strategic functions of the CAZ are to be given greater weight relative to new residential development⁵. Paragraph 2.5.8 notes that affordable housing should be provided on-site as part of mixed-use schemes within the CAZ.

The Southwark Plan

- 7.12. The Site is allocated within the New Southwark Plan (Ref: NSP22) to deliver employment floorspace, active ground floor frontages, including retail, community and leisure, together with residential accommodation and improved connectivity.
- 7.13. The area vision for Blackfriars (Ref: AV.04) sets out a series of principles which should be delivered as part of development proposals coming forward along Blackfriars Road. This includes increasing the number of the new homes (including social rented and intermediate accommodation), new employment floorspace, new linkages together with the protection and enhancement of the historic value and character of surrounding neighbourhoods.

Assessment

- 7.14. The Proposed Development for 18 Blackfriars Road principally seeks to deliver the comprehensive redevelopment of the Site to deliver a high-quality mixed-use development which positively accords with the Development Plan.
- 7.15. As a point of Landmark Significance⁶, the Site represents the last significant brownfield site to come forward along the Blackfriars Road to complete the emerging tall buildings cluster, marking the entrance to the borough and complement the globally significant business district which has been

⁵ Note the relevant exceptions do not including the London Bridge and Bankside Opportunity Area.

⁶ Note that this is referenced within Policy P17 which is assessed in further detail under the Tall Buildings sub-section of this assessment.

established. Despite its prominent and highly accessible location within the Bankside, Borough and London Bridge Opportunity Area, the existing cleared site (except for the two Grade II listed buildings, 1 and 3-7 Stamford Street) is underutilised.

- 7.16. The proposed mix of uses are representative of the Applicant's aspiration to deliver a truly mixed-use scheme which will deliver 433 new homes (including 160 affordable units) together with a significant uplift in office floorspace of 111,273 sqm GIA alongside a range of flexible uses across the Podium (including the retained Public House) that activate the ground floor frontages, responding to the needs of Southwark and regional economy and in accordance with the site allocation (Ref: NSP22).
- 7.17. Similarly, it will significantly improve legibility and connectivity for London through the creation of new pedestrian routes which will be publicly accessible. It will provide new and improved linkages to key transport nodes in the surrounding area, representing a significant public benefit.
- 7.18. The retention and sensitive restoration of the existing Grade II Listed buildings will re-establish their presence on the street as an anchor on the Stamford Street/Blackfriars Road axis. The proposals will enable greater appreciation of their significance through the removal of the rear wing and creation of a new pedestrian route and proposed set of uses including the ground floor Public House and Knowledge Hub above.
- 7.19. The golden thread of sustainability which is intrinsic to the embodied and operational design of the building, will reinforce the collective objective to deliver an outstanding development which positively accords with the economic, social and environmental objectives of the NPPF and the principles of sustainable development and Good Growth.

- 7.20. Overall, it is considered that the Proposed Development positively accords with the policies and guidance set out in relation to the principle of development at 18 Blackfriars Road.

Land Use

Loss of Hotel Accommodation

- 7.21. There are no policies within the Development Plan which seek to protect existing hotels within the borough. The existing hotel at 3 – 7 Stamford Street sits above the Mad Hatter Public House which operates at ground and basement level. Overall, given the overriding provision of permanent residential accommodation within the Proposed Development together with the broader aspirations set out with the Development Plan, it is considered that the loss of the existing accommodation is acceptable.

Office Floorspace

- 7.22. The London Plan identifies demand for 3.5million sqm of office floorspace within the CAZ and North Isle of Dogs ('NIOD') over the period between 2016 – 2041. LP Policy E1 supports the provision of high quality, flexible and adaptable office space, with "[the] unique agglomerations and dynamic clusters" of the CAZ developed and promoted. New development should, therefore, be focused in existing office clusters supported by sustainable transport modes.
- 7.23. Part D of LP Policy E2 outlines that proposals comprising of 2,500sqm of B uses⁷ should consider the scope to provide a proportion of flexible workspace or smaller units suitable for micro, small and medium-sized enterprises.
- 7.24. Locally, Part 2 of SP Policy SP4 states that the principles of a green and inclusive economy will be secured through the delivery of approximately 460,000sqm of

⁷ Note: This is based on the former Use Class Order that has subsequently been superseded.

new office space between 2019 – 2036, with around 80% delivered within the CAZ and 10,000 new jobs provided within the Borough, Bankside and London Bridge Opportunity Area.

- 7.25. SP Policy P30 sets out that development within the CAZ, town centres and opportunity areas must retain or increase the amount of employment floorspace. As set out within the site allocation (Ref: NSP22), the Site is identified to deliver an increase in employment floorspace with at least the amount of employment floorspace (E(g) or B) currently on the site or at least 50% of the development provided as employment floorspace (whichever is the greater).

Residential Use

- 7.26. The London Plan sets a strategic 10-year housing target of 23,550 new homes in Southwark up and until 2028/29. The Southwark Plan sets an annual target of 2,355 homes per annum. In the London Bridge, Borough and Bankside Opportunity Area (the 'Opportunity Area'), 4,000 new homes are anticipated to come forward. 119 new homes have been completed in the Opportunity Area since 2019.

Retail Floorspace

- 7.27. Part 9 of Southwark Plan Policy SP4 outlines that that 76,670sqm of new retail space will be delivered between 2019 – 2036, including 19,670sqm in the CAZ and local town centres.

Leisure, Arts, Culture and Community Spaces

- 7.28. Policy HC5 of the London Plan states that proposals should identify and promote new, or enhance existing, locally-distinct clusters of cultural venues and related uses, especially where they can provide an anchor for local regeneration and

town centre renewal. In addition, Part A(5) outlines that development in *“Opportunity Areas and large-scale mixed-use developments [should] include new cultural venues and/or facilities and spaces for outdoor cultural events.”*

- 7.29. Part B of LP Policy S5 states that development proposals should maximise the use of facilities and encourage the co-location of uses between a range of sports providers and educational institutions and other community facilities.
- 7.30. Locally, SP Policy P46 states that development for new leisure, arts and cultural uses will be permitted where it would deliver or support the delivery of public arts projects, independent theatres and museum and where they are local in a arts and cultural venues are delivered in designated locations including the South Bank Cultural Quarter, which stretches east – west from Bermondsey to the South Bank.
- 7.31. SP Policy P47 states that development will be permitted where new community facilities are provided that are accessible for all members of the community.

Educational Use

- 7.32. Part B of LP Policy S3 states that proposals for education facilities should locate in areas of identified need, in accessible locations with good public transport accessibility and access by walking and cycling. It encourages the multiple use of educational facilities for community and recreational use through appropriate design measures. Southwark Plan Policy P27 states that educational facilities will be permitted proposals meet an identified need and where there are sports, arts, leisure cultural or community facilities which are shared with local residents and the community.

Retention of Public House

- 7.33. LP Policy HC7 outlines that public houses should be protected where they have a heritage, economic, social or cultural value, this is reinforced under SP Policy P42.

Assessment

- 7.34. The proposals include a range of uses which will make a significant contribution towards the role and function of the Opportunity Area and the CAZ, through the provision of 111,273sqm GIA of office floorspace, 9,962sqm GIA of other commercial, community and leisure floorspace, together with 433 new homes to meet identified housing need. It will fulfil the aspiration set out in the Site Allocation to deliver a significant uplift in employment floorspace, together with new homes (in-excess of the indicative capacity of 288 homes), together with ground floor active frontages, including retail, community and leisure.
- 7.35. At a regional level, the proposals will contribute towards meeting 3% of the London Plan's requirement for office floorspace and up to 6,160 new jobs which will contribute towards the overall delivery of new jobs in the Opportunity Area (circa 112% against the Opportunity Area target employment). When compared against Southwark's requirements it will deliver 24% of the total Plan requirement for office floorspace, representing a significant opportunity to deliver Good Growth in a highly sustainable location.
- 7.36. The provision of new homes will similarly make a significant contribution towards meeting Southwark's housing target and more specifically in the Opportunity Area, where 119 new homes have been delivered since 2019 against the London Plan homes capacity figure,⁸ of which 25 have been affordable. Comparatively, the provision of 160 new affordable homes in the

⁸ For further information please refer to the GLA's London Bridge, Borough and Bankside OA statistics.

Proposed Development will make a significant contribution towards meeting the Development Plan requirements.

- 7.37. The provision of ground floor retail uses will create a suite of active frontages both within the central Rotunda and also around the perimeter of the Site along Stamford Street. This will be complemented through the provision of primary entrances into the scheme. The provision of 1,830sqm GIA of dedicated retail floorspace will contribute towards the vitality and function of the Bankside and Borough District Town Centre together with the CAZ more widely, equating to circa 9% of the Southwark Plan target for new retail floorspace.
- 7.38. As part of the proposals, 18 Blackfriars Road will include provision for a range of leisure, cultural and community uses to come forward in the flexible spaces referred to collectively as the Exchange, the details of which will be developed and curated to suit demand by Hines. The flexible nature of the Exchange will be designed to include co-working, maker space, galleries, library, performance, education and/or wellness facilities. Alongside the Assembly Rooms, community groups and schools will be able to access part of the Exchange free of charge for a minimum of 30 days per year subject to a management plan to be secured in the Section 106 agreement.
- 7.39. The associated central Rotunda space also has the potential to be used for outdoor cultural events, which will be programmed and delivered by Hines. The layout of the Proposed Development with the Assembly Rooms facing onto the Rotunda will provide opportunities for arts and cultural events to be hosted. The combination of these spaces will make a significant contribution towards the Southbank Cultural Quarter and complement the host of cultural institutions in the area.
- 7.40. Likewise, the option for the affordable workspace within the Knowledge Hub to be used as educational space presents an opportunity to potentially bring

forward a hospitality training centre to help support the sector in the local area (subject to further development with LBS to ensure the space offers the greatest benefit for the needs of the borough). This will be considered within the affordable workspace framework to be agreed in the Section 106 agreement, where the space will be leased on a peppercorn rent to a provider.

7.41. Embedded within the proposals is the retention of the Public House which currently resides on-site. This will be retained in 3 – 7 Stamford Street at ground and basement level and extended into 1 Stamford Street, effectively doubling the existing floorspace provision. This will enhance the existing offer and will be fully integrated into the Proposed Development with a new entrance from Hatters Yard. As set out within this Planning Statement, the existing hotel will not be retained.

7.42. Overall, it is considered that the type and mix of uses proposed across the Site positively accord the development plan policies and will make a significant contribution towards job creation and new homes in the CAZ and Opportunity Area as well as Southwark and London more widely.

Affordable Housing

7.43. The NPPF requires (at Paragraph 63) that where local planning authorities identify a need for affordable housing, planning policies should *“specify the type of affordable housing required and expect it to be met on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified; and the agreed approach contributes to the objective of creating mixed and balanced communities.”*

7.44. Policy H4 of the London Plan sets a strategic target of 50% for all new homes delivered in the capital to be genuinely affordable. The policy states that the Mayor will apply a threshold approach to applications which trigger affordable

housing requirements in accordance with the Affordable Housing and Viability SPG (2017) whereby applications meeting or exceeding 35% affordable housing without public subsidy can follow the 'Fast Track Route'. Affordable housing should be provided on-site⁹, with off-site or alternative payments in-lieu delivered only in exceptional circumstances. Policy H5 sets out the threshold approach to affordable housing delivery.

- 7.45. Policy H6 of the London Plan sets out the split of affordable tenures to be applied to residential development. This sets a split of 30% low-cost rented homes (either as London Affordable Rent or Social Rent), 30% Intermediate (London Living Rent or Shared Ownership) with the remaining 40% determined by the local authority.
- 7.46. The Mayor's Affordable Housing and Viability SPG identifies that Opportunity Areas are a key source of housing for London, with the potential to create fundamentally new places and communities due to the scale of development (paragraph 2.80).
- 7.47. Paragraph 2.80 also identifies that Opportunity Areas are complex to bring forward and often require significant investment in infrastructure. Against this backdrop of creating new places and infrastructure requirements, paragraph 2.84 notes that LPAs may also consider a local approach in terms of housing mix and tenure through the plan process.
- 7.48. Paragraph 2.84 of the SPG states that the SPG threshold approach will apply in Opportunity Areas, Housing Zones and for industrial land where a localised approach has not been progressed by the relevant LPA. The SPG also sets out the Mayor's approach to transparency of information and states that the Mayor will treat information submitted as part of, and in support of, a viability

⁹ Reinforced under Paragraph 2.5.8 of the London Plan referenced in this assessment.

assessment transparently. The GLA Draft Affordable Housing and Development Viability LPG retains the threshold approach to applications.

- 7.49. Southwark Plan Policy P1 states that developments which create 10 or more new homes must provide the maximum amount of affordable homes, including a minimum of 35%. Where developments provide a minimum of 40% affordable housing, together with a policy compliant tenure mix and no grant subsidy, the fast-track route can be followed. The tenure mix comprises a minimum of 25% social rent and 10% intermediate as per Table One of the Southwark Plan.

Assessment

- 7.50. The Proposed Development will provide 40.5% on-site affordable housing by habitable room split 26.4% social rent and 14.1% intermediate. This is in accordance with and in-excess of the 25% social-rent and 10% intermediate tenure split. The proposed housing mix is consistent with the local plan requirements, with all affordable homes benefitting from private amenity space, consistent with policy requirements, with family homes within the Paris Building directly facing onto the playspace.
- 7.51. In order to meet the GLA's Fast Track Route, LP Policy H5 states that applications must meet or exceed the relevant threshold level without public subsidy, be consistent with the relevant tenure split, meet other relevant policy requirements and have taken into consideration the strategic 50% target under Policy H4.
- 7.52. As set out within the accompanying Affordable Housing Statement, the Proposed Development clearly exceeds the minimum threshold level and is consistent with the tenure split (see Table 2 below). The type, quality and standard of accommodation is in accordance with the broader policy requirements set out under Southwark Plan policies SP2, P8 and P15. The

proposed affordable housing is not reliant on grant funding in order to come forward.

- 7.53. On the above basis, the proposals meet the requirements under the Fast Track Route both under the London Plan (and associated Housing and Viability SPG) and Southwark Plan.

Housing Mix

- 7.54. Policy H10 of the London Plan states that residential schemes should generally consist of a range of unit sizes, with applicants and decision-makers having due regard to a number of considerations, including the housing evidence base¹⁰, delivering mixed and inclusive neighbourhoods, the nature and location of the Site together with the aim of optimising the potential of housing site. Southwark Plan Policy P2 sets out the housing mix for major residential developments. This includes a maximum provision of 5% studios, minimum of 60% of two or more bedroom units and a minimum of 20% family-sized homes (three bedroom +).

Assessment

- 7.55. Table 2 below summarises the proposed housing mix against the requirements set out in the Southwark Plan.

Unit Size	Number	% of total units*		Policy Requirement	
Studios	19	4%		Maximum 5%	
One Bed	136	32%			
Two Bed	174	40%	64%	Minimum 60%	
Three Bed	100	23%			Minimum 20%
Four Bed	4	1%			
TOTAL	433	100%		-	-

* denotes rounded figures.

Table 2: Proposed Housing Mix

¹⁰ Where not available, the London Strategic Housing Market Assessment (2017)

- 7.56. The proposed housing mix meets the requirements under Policy P2 and therefore is acceptable in principle.

Housing Quality

- 7.57. The London Plan also sets out a number of key policies relevant to the design of buildings, including LP Policy D5 which states that the Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design and support the principles of inclusive design.
- 7.58. LP Policy D6 sets out the Mayor's requirements for housing quality and standards. This includes meeting the Nationally Described Space Standards (NDSS) which minimum floor areas, requirements for outdoor amenity space for new dwellings as well as maximising the number dual-aspect units. Policy D6 is supplemented by the Housing Design Standards LPG (2023) which sets out a number of best practice standards for new homes.
- 7.59. LP Policy D7 sets the requirements for the delivery of accessible housing through the provision of 10% wheelchair adaptable units under M4(3) and ensuring that all dwellings are accessible and adaptable under M4(2). Policy D11 states that development should include measures to design out crime and contribute to a sense of security.
- 7.60. Part 4 of SP Policy SP2 states that developments should encourage greater tenure integration and equality in order to foster the conditions for properly mixed and integrated communities. It should mitigate stark visible differences and a sense of tenure segregation.
- 7.61. SP Policy P8 states that 10% of new homes on major developments should meet Building Regulations M4(3) standard, with the remaining meeting Building Regulation M4(2). 10% of social-rented homes must be provided as wheelchair

accessible and meet Building Regulation M4(3)(2)(b). The policy also provides separate space standards for wheelchair accessible homes.

- 7.62. SP Policy P15 sets out the specific expectations for residential design as part of delivery exemplary standards of living. They must all take into account their site context as well as the impact on the amenity of adjoining occupiers and the quality of accommodation.

Assessment

- 7.63. The proposals for the Paris Building and Stamford Building ('the Residential Buildings') have been designed to deliver high-quality accommodation for all taking into consideration Development Plan policies and associated guidance. It follows the principles of inclusive design, with all units to meet M4(2) standards – this includes 10% delivered as wheelchair adaptable under M4(3), including 10% of the social rented units required under SP Policy P8. The size of all units meet the NDSS as a minimum, with dual-aspect units maximised throughout, totalling 96%. Both buildings will deliver the minimum 50sqm of communal amenity space respectively.
- 7.64. The quality of residential design of both buildings has been developed to be tenure blind; both buildings are representative of exceptional design quality and contribute towards the family of buildings proposed across the Site. Careful consideration has been given to the distances between the buildings as part of minimising overlooking and maximising daylight and sunlight into units. All homes will have joint access to the shared Podium 'Rooftop Gardens' between the two Residential Buildings, which will comprise of playspace and outdoor amenity for all occupiers. Overall, it is considered to positively accord with Development Plan requirements.

Affordable Workspace

- 7.65. Part G of LP Policy E1 states that proposals for offices should consider providing for a range of workspaces including low-cost and affordable spaces.
- 7.66. Part 4 of SP Policy SP4 states that 10% of all new office space should be delivered as affordable, suitable for start-ups alongside new and existing businesses in the borough. This principle is explained in further detail within Policy P31. This set out that proposals for affordable workspace should be secured for at least 30 years, and be of a type and specification to meet current local demand. Where this is not feasible to be delivered on-site, a payment in-lieu will be required to deliver off-site affordable workspace. In exceptional circumstances, affordable retail or affordable cultural uses may be provided as an alternative to affordable workspace. This will only be acceptable where the need for the affordable use has been demonstrated and has a named occupier.

Assessment

- 7.67. The affordable workspace proposals for 18 Blackfriars Road comprise a hybrid offer, which proposes 2,421sqm (GIA) on-site provision (equivalent to 2% of the employment floorspace¹¹) alongside a Payment in-Lieu (PIL) which would meet the shortfall in policy to be equivalent to 10% overall.
- 7.68. The on-site provision will be provided within the Incubator and the Knowledge Hub at Podium Level. It will be offered on a lease at a peppercorn rent to end-users and in place for 30 years. The details for the operation, leasing and management of the space will be secured via an Affordable Workspace Strategy secured under the Section 106 agreement.

¹¹ As defined in the Southwark Plan.

- 7.69. Flexible use classes have been proposed for these spaces. It is envisaged that any alternative end-users (i.e., those other than affordable office providers) for the spaces will be assigned through consultation with LBS to ensure that it secures the optimal benefit for the borough. If prior to occupation it is considered preferable, the space will be delivered as traditional affordable office space.
- 7.70. The proposed land uses within the Incubator and Knowledge Hub will allow for a range of businesses to come forward, the details of which will be developed in consultation with LB Southwark. This may take the form of hospitality training or traditional workspace within the Knowledge Hub, alongside a range of uses in the Incubator such as affordable retail, workspace and/or cultural space.
- 7.71. Overall, it is considered that the proposals accord with the development plan requirements and will make a significant contribution through the provision of affordable workspace that will suit the needs of the borough as well as the provision of new spaces for the community and schools to benefit from.

Design

- 7.72. Paragraph 73 of the NPPF outlines that large-scale development have the ability to make a significant contribution towards the provision of new homes. In such scenarios, the strategic policy-making authority should identify suitable locations for development and in doing so, set clear expectations for the quality of places and ensure appropriate tools such as design codes and masterplans are used to secure a variety of well-designed and beautiful homes to meet the different needs of the community. Similarly, Paragraph 124 states that these tools a be used to help ensure that land is used efficiently while also creating beautiful and sustainable places.

- 7.73. Chapter 12 of the NPPF sets out in further detail the expectation for achieving well-designed places, which is fundamental to what the planning and development process should achieve¹². Paragraphs 126 and 127 within the NPPF states that good design is a key aspect of sustainable development, is indivisible from good planning, creates better places in which to live and work and helps make development acceptable to communities. Planning policies and decisions should ensure developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.
- 7.74. LP Policy D3 states that all development must make the best use of land by following a design-led approach. Higher density developments should be located in areas with good connectivity. Part D of Policy D3 outlines the requirements of development proposals including the form and layout; experience; quality and character. LP Policy D4 sets out the requirements in bringing forward high-quality and well-designed developments; this includes a requirement to optimise the design review process early on for referrable schemes. LP Policy S3 states that childcare facilities should be located in areas of identified need and which are in accessible locations. The policy also states that entrances to childcare facilities and playgrounds should be located away from busy roads with traffic calming measures.
- 7.75. Southwark Plan Policy P13 sets out the principles for development to follow in respect of design. This includes ensuring that development is of a height, scale, massing and arrangement that positively respond to the existing townscape, character and context; better reveal local distinctiveness and architectural character and ensures the urban grain and site layout take account of and improve existing patterns of development and movement. Further details regarding design quality is set out within Southwark Plan Policy P14 including

¹² Please refer to Paragraph 126 of the NPPF.

the highest standards of design (including fabric, function and composition), innovative design solution to the historic context; constructed and designed sustainably to adapt to the impacts of climate change; utilising active design principles which are fitting to the location context, scale and type of development.

- 7.76. Southwark Plan Policy P16 states that development must be designed in accordance with the Secure by Design Principles as well as creating routes which have good visibility, together with signage and effective street lighting. Security measures for buildings must be proportionate to their function.

Assessment

- 7.77. The proposed development has followed a design-led approach, informed through discussions with key stakeholders and pre-application discussions with LBS, the GLA and HE as well as sessions with the Council's Design Review Panel. The scheme has been designed to respond to the character of the local context as well as key townscape views. This has informed the scale, appearance, orientation and layout of the Proposed Development as a compositional arrangement of tall buildings. Further detail regarding the design development and townscape analysis of the proposals is set out within the Design and Access Statement prepared by Foster + Partners alongside the Townscape Visual Impact Assessment (Volume 2 of the Environmental Statement) prepared by the Tavernor Consultancy.
- 7.78. The golden thread of sustainability has informed the design from the outset of the design development. This has informed the structural arrangements and materials which have been designed to minimise embodied and operational carbon, the sustainability-led approach has informed the architecture expression – increasing solidity and using this as an opportunity to use of colour to draw upon the local colour and material palette.

- 7.79. The design evolution of the proposals has been designed from the ground upwards, whereby the ground floor design lines and routes together with the existing listed buildings have informed the layout and form of the development. The location of uses at ground has also been informed through delivering safe and accessible public realm and playspace; deliberately locating the new playspace to the quieter end of Paris Garden where there is significantly less road traffic, with the mutual benefit of natural surveillance by virtue of the new pedestrian routes. This has incorporated generous routes and public realm to create safe, visible spaces and maximise natural surveillance throughout.
- 7.80. Overall the scheme is considered to be of exceptional design quality, providing high-quality public realm, new homes and commercial accommodation. Overall, it is considered to positively accord with the Development Plan and supplementary design guidance.

Tall Buildings

- 7.81. Policy D9 of the London Plan provides the strategic approach to tall buildings. Part A defines tall buildings as those of a height more than six storeys or 18 metres from the ground to the uppermost floor. Part B sets out the framework for the location of tall buildings, noting that boroughs are expected to identify the appropriate locations for tall buildings, which should be identified on development plan maps. Part C of Policy D9 outlines the impacts which should be assessed as part of proposals for tall buildings; this incorporates townscape, functional, environmental and cumulative impacts. Part D states that where appropriate, public access should be incorporated into proposals. A detailed assessment is covered against each of these constituent parts below.
- 7.82. Southwark Plan Policy P17 sets out the requirements for tall buildings in Southwark. The areas where tall buildings are expected to come forward include

the CAZ and by reference, the Site. Part 2 of Policy P17 sets out the general parameters for tall buildings, including:

1. Be located at a point of landmark significance;
2. Have a height which is proportionate to the significance of its location and size of the Site;
3. Make a positive contribution towards the London skyline and landscape, taking into consideration the cumulative effect of tall buildings;
4. Not cause a harmful impact on the strategic¹³ or borough views;
5. Respond positively to local character and townscape;
6. Provide a functional public space appropriate to the height and size of the building; and
7. Where appropriate, provide publicly accessible space near the top of the building together with communal facilities for users and residents.

7.83. The policy also sets out design expectations for tall buildings.

Assessment

7.84. The Proposed Development comprise of three tall buildings of 199.28m, 155m and 97.91m AOD (including the ground plus three-storey Podium, which is 23.45m AOD). The Site is located at a point of landmark significance and is identified as a location suitable for tall buildings.

7.85. Whilst no longer forming part of the Development Plan, the former Blackfriars Road SPD (2014) explicitly stated that *“the tallest buildings should be at the north end of Blackfriars Road. The tallest heights must be set back from the river and cluster around the main junction of Blackfriars Road, Stamford Street and Southwark Street.”*

¹³ In accordance with the LVMF.

7.86. This designation and appropriateness for tall buildings on the Site was previously opined upon extensively within the Committee Report for the second permission (Ref: 16/AP/5239) where the tallest component comprised 183.5m. This set out the appropriateness of tall buildings in this location, and specifically, that the height (being the tallest consented scheme at the time) would consolidate the cluster.

7.87. The height of the buildings within the Proposed Development are considered to be proportionate to the significance of the Site's location as a gateway between Southwark and the City and compositionally would positively contribute towards the hierarchy of the Blackfriars cluster. As part of assessing the Proposed Development, consideration has also been given to the cumulative effect of other forthcoming developments as part of a robust approach to the application as set out within the accompanying Design and Access Statement.

Visual Impact

7.88. As demonstrated within the accompanying Townscape, Heritage Visual Impact Assessment (THVIA), the buildings would make a positive contribution to the London Skyline. The orientation of the Office Building has also been carefully designed to visually appear more slender in more sensitive views as experienced in the kinetic sequence of views from the Blue Bridge in St James's Park¹⁴.

7.89. The Proposed Development would not cause harm to strategic views identified in the London View Management Framework (LVMF) or the setting of World Heritage Sites.

7.90. In long-range views, the Proposed Development is considered to either be beneficial or neutral – this is largely due to the exceptional design quality and choice of materials. This would similarly be the case for mid-range views. Whilst

¹⁴ See View 26A.1 and associated kinetic sequence.

the dominance of the Proposed Development would have some negative impact in some immediate views, this is considered to be demonstrably outweighed by the positive impact of the architecture and visual quality of the Proposed Development, such that the overall effect would be neutral.

Functional Impact

- 7.91. The internal and external design has been carefully considered through the choice of materials and have been designed to ensure safety for all. Details regarding the approach to fire safety specifically is set out within the accompanying Fire Statement, set out at Paragraphs 7.117 onwards of this Statement.
- 7.92. All buildings have been designed to be serviced and managed in a manner that will preserve their safety and quality for all users and avoid interacting within the central public realm. All servicing will predominantly take place within the loading bay on Paris Garden and dedicated back of house areas at basement levels 1 and 2. As set out within the accompanying Transport Assessment, it has been demonstrated that there is sufficient capacity on the public transport network to accommodate the number of additional trips created as a consequence of the Proposed Development.
- 7.93. An aviation safeguarding assessment has also been prepared and submitted as part of this application, this confirms that the Proposed Development, both in construction and in its end state, will not impact on the safety or efficiency of aircraft operations.

Environmental Impacts

- 7.94. The applications are accompanied by an Environmental Statement prepared by Trium, the scope of which is in accordance with the Scoping Opinion issued by LBS in December 2022. The Proposed Development has been assessed in

relation to traffic and transport, wind, climate change, archaeology and ground conditions, daylight, sunlight, overshadowing, light pollution and solar glare, noise and vibration, and air quality matters. Such technical considerations together with the likely significant effects of the Proposed Development have been assessed as part of this submission (as set out within the Environmental Statement and accompany technical reports) and when taken together, is considered to be acceptable.

- 7.95. Overall, it is considered that the Proposed Development positively accords with the Development Plan in relation to tall buildings which are strongly supported in this location. Moreover, the delivery of the tallest building within the cluster is considered to successfully complement the surrounding built environment and visually consolidate the rhythm of tall buildings.

Density of Development

- 7.96. Paragraph 122 of the draft revised NPPF requires planning policies and decisions to support development that makes efficient use of land, taking into account the identified need for housing, local market conditions and viability, the availability and capacity of infrastructure and services, the desirability for promoting regeneration and change and the importance of well-designed, attractive places. Paragraph 125 states that, where there is or an anticipated shortage of land to meet identified housing needs... *“it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.”*
- 7.97. Policy D2 of the London Plan states that the density of development proposals should be linked to the provision of future infrastructure. It should also be proportionate to the Site’s connectivity and accessibility by all sustainable transport modes.

7.98. Policy D6¹⁵ of the London Plan requires development proposals to make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to: the site context, its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL) and the capacity of surrounding infrastructure. The Policy goes on to state that proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused. Supporting Paragraph 3.3.22 also states that the following measurements of density should be provided for all planning applications that include new residential units:

- number of units per hectare;
- number of habitable rooms per hectare;
- number of bedrooms per hectare;
- number of bedspaces per hectare.

7.99. SP Policy P18 emphasises the efficient use of land, noting that development will be permitted where it optimises land use on the basis that increasing density is a key requirement of the sustainable use of land.

Assessment

7.100. The proposals represent the optimisation of the Site to deliver the maximum amount of residential accommodation and commercial floorspace through a design-led approach to optimising density in a core, central London location. The Site has a PTAL Rating of 6b meaning that it has the highest accessibility of any location in London and through capacity analysis undertaken by Arup¹⁶, it is

¹⁵ Together with reference made in Policy D3 (Part B) of the London Plan

¹⁶ See Section 6.6.2 of the Transport Statement.

considered that it represents a significant opportunity to deliver high-density development, when taking into account the broader principles of development for the Site overall.

- 7.101. When compared against the benchmarks set out in LP Policy D6, the scheme represents 481 units per hectare (equivalent to 1,561 habitable rooms or 867 bedspaces). This is considered to be commensurate with other comparable mixed-use schemes within Southwark. Overall, it is considered that the Proposed Development positive accords with the principles set out in the Development Plan together with the overarching objectives of the NPPF.

Public Realm, Amenity Provision and Playspace

- 7.102. London Plan Policy D4 includes standards for private outdoor space. This states that a minimum of 5 sqm of private outdoor space should be provided for 1 – 2 person dwellings and an extra 1 sqm per each additional occupant. Private external spaces, including balconies, should be at least 1.5 m deep and wide.
- 7.103. London Plan Policy D8 promotes the need for well-designed public realm to create safe, accessible, inclusive, attractive and well-connected places. Good public realm can encourage active travel and mitigate impacts from traffic. Considered design of public realm can create well-connected places which promote safety, well-being, social interaction and a sense of place. Part B of LP Policy G4 states that proposals should where possible, create areas of publicly accessible open space, particularly in areas of deficiency.
- 7.104. London Plan Policy S4 supports residential development or development likely to be used by children and young people to provide opportunities for play. This states that at least 10 sqm of play space per child should be provided. Highlighting that play should be designed into development as an integral part of neighbourhoods, accessible public realm should incorporate incidental

playable space. This policy also highlights that developments should consider routes to existing play provision, schools and youth centres within the surrounding area. This policy is supported by a separate Supplementary Planning Guidance (SPG) which sets a benchmark requirement of 10sqm of play space per child¹⁷.

- 7.105. LP Policy S6 states that large-scale development which has large areas of public realm should provide free publicly-accessible toilets suitable for a range of users.
- 7.106. Part 2 of Southwark Plan Policy SP2 states that places should be developed to benefit everyone including activities, playspace, leisure, squares and shops, creating a sense of community. In addition, SP Policy P13 states that open spaces should be positioned according to their function, importance and use. It should ensure a high quality public realm which encourages sustainable transport modes. Likewise, it should provide opportunities for formal and informal play.
- 7.107. SP Policy P15 outlines that residential developments should provide private and communal amenity space for all residents together with playspace in accordance with the GLA requirements. Equal access to outdoor space should be provided, regardless of tenure.
- 7.108. Specifically, Part 14 of SP Policy P15 states that development should provide communal facilities including gardens and community rooms as well as communal play areas for children (up to 16 years). Where private and communal amenity space cannot be provided on site, this should be provided as private amenity space with the remainder added to the communal space

¹⁷ Note: This SPG has been superseded by the Council's Planning Obligations SPD (2020)

requirement and a financial contribution towards local provision of public open space or play space.

Assessment

- 7.109. All residential units (with the exception of some studios and over-sized one bed units in the Stamford Building) will have access to private amenity space in accordance with policy requirements. In addition, shared communal amenity space will be provided to each residential building at Level 4, which will provide direct access to the Rooftop Gardens in accordance with Southwark Plan Policy P15.
- 7.110. Separate communal amenity space will be provided in the Stamford Building at Levels 4 and 33 for Stamford Building residents, through the provision of external terraces which will contribute towards meeting the shortfall for private amenity space for units where private amenity space is not provided.
- 7.111. As part of the playspace strategy, the Proposed Development includes formal and informal playspace at ground level around the Rotunda and through the pedestrian routes, including the provision of a new publicly accessible playspace area of approximately 310sqm ('the Children's Village').
- 7.112. The communal amenity space within the Paris Building will comprise a minimum of 50sqm, together with indoor playspace and will provide access onto the Rooftop Gardens, which will include shared playspace for residents in both residential buildings.
- 7.113. Overall, the Proposed Development will provide a policy-compliant level of playspace on-site for 0 – 11 years as demonstrated in Table 3 below when assessed against the GLA Playspace Calculator under LP Policy S4. A financial contribution towards off-site playspace provision for older ages (12 - 17 years)

is proposed in order to improve and enhance existing provision in the nearby vicinity as part of meeting the on-site shortfall.

Age Group	Policy Requirement	GIA (sqm) Internal	GIA (sqm) External	Total
Ages 0, 1, 2, 3 & 4	750	0	750	750
Ages 5, 6, 7, 8, 9, 10 & 11	570	165	460	625
Ages 12, 13, 14 & 15	254	165	0	165
Ages 16 & 17	134	0	0	0
TOTAL	1708	330	1210	1540

Table 3: Playspace Requirement and Provision

7.114. The Proposed Development includes a series of landscaped public amenity spaces at ground level including the Rotunda and a series of terraces on the upper floors of the Podium. In total, the Proposed Development will deliver 3,663sqm (GIA) of publicly accessible space. This will provide a well-connected place which promotes safety, well-being, social interaction and a sense of place in accordance with LP Policy D8. Publicly accessible toilets will be available at the ground floor, either close to the playspace or within 1 and 3 – 7 Stamford Street subject to agreement with LBS and secured via condition.

7.115. Alongside the above, the Proposed Development also includes a series of landscaped terraces on the bustles of the Office Building. This will provide a total of 2,570sqm (GIA) of private office amenity for future tenants.

7.116. Overall it is considered that the proposals positively accord with the Development Plan requirements for public realm, amenity and playspace provision.

Fire Strategy

7.117. LP Policy D5 of the London Plan states that development proposals should be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments, a minimum of one lift core should be

suitably sized for fire evacuation. LP Policy D12 of the London Plan states that to ensure fire safety for all building users, all development proposals must achieve the highest standards of fire safety, inclusive of the requirements set out in policy. In addition, all major applications should be submitted together with a Fire Statement in accordance with the requirements set out in Policy D12.

Assessment

- 7.118. The Proposed Development has been designed to be fully compliant with the requirements under LP Policies D5(B5) and D12. It will also comply with Part B of Building Regulation 2010 (as amended), alongside the Construction (Design and Management) Regulation 2015 and Regulatory Reform (Fire Safety) Order 2005. All means of escape will be compliant with British Standards BS 9999 and BS 9991 as set out within the accompanying Fire Statement.
- 7.119. This includes providing two escape stairs in each of the Residential Buildings, which will be protected with a mechanical smoke extract system together with one firefighting shaft in each building. Two hybrid firefighting and evacuation lifts will also be provided in the Paris Building together with an individual firefighting lift, evacuation lift and one hybrid lift provided in the Stamford Building. The Office Building will include two fire escape stairs, together with two firefighting shafts and two evacuation lifts accessible to all levels.
- 7.120. The split and number of lifts associated with the Fire Strategy for each building accord with the requirements under policy and British Standards. A Gateway One Statement has also been completed and submitted as part of the application in accordance with Article 9A of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended). Overall, it is considered that the proposed fire strategy for the Site fully accords with the Development Plan and all associated legislation and guidance.

Energy

7.121. Paragraph 158 of the NPPF encourages proposals which support renewable and low carbon energy and associated infrastructure. Paragraph 157 states that, in determining planning applications, local planning authorities should expect new development to:

- comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated that it is not feasible or viable; and
- take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

7.122. The London Plan sets out that major development should be designed to be net zero-carbon in accordance with the energy hierarchy set out in LP Policy SI2. Proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within this framework, with a minimum on-site reduction of 35% over Part L. Any shortfall should be met either through a payment in-lieu or off-site provision.

7.123. LP Policy SI3 states that major development proposals within Heat Priority Network Areas should have communal low temperature heating systems. Where a heat network is planned but not in existence, development should be designed for connection at a later date. LP Policy SI4 outlines that major development proposals should demonstrate through the energy strategy that they will reduce the potential for internal overheating and reliance on air conditioning systems, in accordance with the cooling hierarchy.

7.124. SP Policy SP2 states that development should mitigate and adapt in order to meet the net zero carbon target by 2050. SP Policy P70 must reduce operational greenhouse gas emissions and minimise both annual and peak energy demand

in accordance with the energy hierarchy as per LP Policy SI2, with all major development net zero-carbon.

Assessment

7.125. The Proposed Development embodies an ambitious energy and carbon reduction strategy. Through the adoption of innovative and best practice energy reduction measures, the Proposed Development will achieve an overall regulated carbon dioxide emissions of 39% over Part L 2021. In accordance with LP Policy SI2 and SP Policy P70, the shortfall in carbon emissions to meet net-zero will be met by an off-site payment in-lieu. This has been calculated at £1,589,255 towards off-setting the carbon emissions of the Proposed Development.

7.126. A balanced approach has been adopted to manage the acoustic, ventilation and overheating requirements of the Residential Buildings given the surrounding constraints of the Site and background noise levels. In order to achieve Part O 2021 compliance for overheating, there will be limited reliance on openable windows which will be supplemented with façade vents or cooling. Space will be provided in the basement to allow the Proposed Development to connect to a possible future green district heat work. The Cooling Hierarchy set out under LP Policy SI4 has been followed to minimise the operation carbon of the cooling systems.

7.127. Overall it is considered that the Proposed Development positively accords with the energy requirements in the Development Plan.

Sustainability

7.128. LP Policy GG3 of the London Plan states that new development should seek to improve London's air quality, improve access to and quality of green spaces; provide new green spaces and play spaces whilst ensuring that buildings are

well insulated and ventilated. Policy GG6 states that those involved in planning should support the move to a low carbon circular economy, ensuring that buildings can adapt to climate change.

7.129. LP Policy SI2 of the London Plan states that major developments should be net zero-carbon, in accordance with the energy hierarchy. Referrable schemes to the Mayor should calculate whole life-cycle carbon emissions and actions to reduce associated carbon emissions through the submission of a Whole Life-Cycle Carbon Assessment.

7.130. LP Policy SI5 states that new residential developments should achieve mains water consumption of less than 105 litres per person per day and non-residential development should achieve the BREEAM Excellent minimum standard according to credit Wat 01.

7.131. LP Policy SI7 promotes a circular economy as part of improve resource efficiency in material re-use, keeping them for their highest use for as long as possible. This principle together with other collaborative targets are set out in Part A. For referrable applications to the Mayor, Part B states that applicants are required to prepare and submit a Circular Economy Statement and aim to be no-zero waste. Circular Economy Statements should demonstrate how materials on-site will be re-used and recycled throughout the demolition and construction phases, as well as how the completed development will support recycling and re-use and opportunities to manage waste on-site. Such documents should also set out how much waste is likely to be generated and how the performance will be monitored.

7.132. SP Policy P62 states that developments must demonstrate how proposals will follow the waste management hierarchy during construction, with major schemes will be required to provide a Circular Economy Statement. It should

also provide adequate recycling, composting and waste disposal together with storage and collection facilities.

7.133. SP Policy P67 states that development must ensure that residential scheme have safe to drink water of no more than 105 litres per person per day. It must incorporate measure to reduce the demand for main water to be treated to drinking standard. Major development should assess the need for improvements to water supply infrastructure.

7.134. SP Policy P69 sets out the sustainability requirements for new development. This includes achieving a BREEAM rating of 'Excellent' for non-residential development. In addition, development must reduce the risk of overheating, taking into account climate change predictions¹⁸ and prioritise measures set out within the cooling hierarchy.

Assessment

7.135. The Proposed Development has been designed to achieve the highest standards of sustainability, as the golden thread which runs through the design. This includes meeting BREEAM 'Outstanding' WELL Platinum and NABERS 5.5* for the Office Building together with Housing Quality Mark (HQM) of 4.5* for both of the Residential Buildings. Both the Podium together with 1 and 3 – 7 Stamford Street will achieve BREEAM 'Excellent' rating.

7.136. As part of the submission a Whole Life Carbon Assessment (WLCA) has been undertaken which demonstrates that the proposed upfront embodied carbon intensity is 764 kgCO₂/m² GIA, and the Stretched target is 631 kgCO₂/m² (Reported values, comparable with GLA benchmarks). The proposed intensity is already a substantial improvement on the A1-A5 GLA benchmarks for commercial and residential buildings, which are 950 kgCO₂e/m² GIA and 850

¹⁸ Typically through the modelling of DSY files.

kgCO₂e/m² GIA respectively. The design team is striving towards the Stretched target, and have identified a route to achieving it, notwithstanding the risks at this stage of the design process particularly around procurement outcomes. The assessed intensity is already a market leading outcome. Based on a comparison with other buildings of similar massing, the Stretched scenario would be an outstanding achievement. This would put the scheme's performance on an equivalence with many mid-rise schemes (between 10 - 15 storeys) currently in planning and under construction.

7.137. The Proposed Development will seek to minimise waste during construction and operation as required under LP Policy SI7 and set out in the accompanying Circular Economy Statement (CES) and associated technical pro-formas. This will seek to divert a minimum of 95% of demolition and construction waste from landfill and a minimum 65% recycling for municipal waste with 20% of the materials to be recycled or reused content. Lastly, as shown within the Sustainability Statement, the Proposed Development will achieve a mains water consumption of 105 litres per person per day in accordance with Policy SI5.

7.138. Overall, the proposed sustainability strategy and approach to minimising carbon emissions positively accords with the Development Plan, exceeding the GLA benchmarks.

Flooding and Sustainable Urban Drainage

7.139. Paragraph 154 of the NPPF states that new development should be planned for in ways that avoid increased vulnerability to climate change. Paragraphs 159-161 state that inappropriate development should be directed away from areas at risk of flooding, with all plans informed through a Strategic Flood Risk Assessment (SFRA) and adopting a sequential approach to the location of development. Paragraph 166 goes on to state that where planning applications

come forward on sites allocated in the development plan through the sequential test, a further sequential test is not required.

7.140. Paragraph 167 outlines that local planning authorities should ensure that flood risk is not increased elsewhere when determining planning applications. Development in areas of flood risk will only be allowed where it meets the requirements set in sub-paragraphs (a – e). Paragraph 169 outlines the requirements for major developments to incorporate sustainable drainage systems.

7.141. Policy SI12 of the London Plan states that proposals should ensure that flood risk is minimised and mitigated, and that any residual risk is addressed. This should include making space for water and aiming for development to be set back from the banks of watercourses.

7.142. Policy SI13 states that development proposals should seek to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to the source as is possible. There should also be a preference for green over grey drainage infrastructure using the drainage hierarchy.

7.143. SP Policy P68 states that development must not increase flood risk on or off site. For major development, surface water run-off must achieve greenfield run-off rates, through the use of Sustainable Urban Drainage Systems in accordance with the drainage hierarchy.

Assessment

7.144. The Proposed Development is located in a defended Flood Zone 3. An Integrated Impact Assessment (IIA) was carried out as part of the preparation of the Southwark Plan for the site allocation (Ref: NSP22). As the Proposed Development is consistent with the site allocation requirements, it is considered that the requirements under the NPPF have been satisfied.

7.145. As set out within the accompanying Flood Risk Assessment, flood risk from pluvial and artificial sources together with infrastructure failure is considered to be low. Whilst there has been a residual risk identified in the event of a breach scenario of the River Thames, through appropriate mitigation this is considered to be suitably managed. Overall, the Proposed Development will not increase flood risk either on or off-site.

7.146. The Proposed Development has been designed to limit surface water run-off to 3.68 l/s at greenfield run-off rate for all rainfall events, including 1 in 100 year return period and +40% climate change as agreed with Thames Water. An attenuation tank of 820m³ will be provided as part of the optimal approach to sustainable drainage, which will be utilised for rainwater harvesting. For the existing buildings at 1 and 3- 7 Stamford Street, the existing storm and foul water outfalls are expected to be retained.

7.147. The SUDs strategy will include areas of blue roofs above the Residential Buildings as well as geocellular areas at ground. Rainwater harvesting will also be included.

7.148. Overall, it is considered that the Proposed Development is in accordance with the flood risk requirements in the Development Plan and satisfies the requirements under the NPPF with regard to the sequential test.

Archaeology

7.149. Part D of LP Policy HC1 states that development proposals should identified assets of archaeological significance to inform the design and appropriate mitigation. In addition, SP Policy P23 sets out the requirements for archaeological findings on-site.

Assessment

7.150. The Site is located within a Tier 1 APA (North Southwark and Roman Roads) with potential for paleoenvironmental, prehistoric, Roman and post-medieval remains. An Archaeological Desk Based Assessment has been undertaken by MOLA in support of the application and follows on from on-site trial trench evaluation in October 2022.

7.151. Following discussions with LBS's archaeological advisor, it has been recommended that a Strip, Map and Sample excavation is undertaken in the eastern part of the site to ensure any significant remains (if present), are not removed without record. No further work is required across the remainder of the Site.

Digital Connectivity

7.152. Policy SI6 of the London Plan states that development proposals should ensure that proposals include sufficient ducting for full fibre connectivity, meet expected demand for mobile connectivity and undertake appropriate measures to avoid reducing mobile connectivity. In addition, they should also accommodate well-designed and suitably located mobile digital infrastructure on rooftops and in the public realm. Southwark Plan Policy P44 also states that major development must enable the delivery of fibre to premises (FTTP) broadband for future occupiers and users of the development, with superfast speeds offered as a minimum.

Assessment

7.153. The proposals will make provision for full fibre connectivity, including digital infrastructure as required. This will ensure that all commercial and residential end-users will be able to benefit from superfast speeds in accordance with the policy requirements set out above.

Trees, Biodiversity and Nature Conservation

- 7.154. Paragraph 131 of the NPPF states that trees make an important contribution to the character and quality of urban environments and can help mitigate climate change. Planning policies and decision should ensure that new streets are tree-lined and other opportunities are taken to incorporate trees elsewhere.
- 7.155. Policy G1 of the London Plan states that development proposals should incorporate appropriate elements of green infrastructure that are incorporated into London's wider network. Policy G5 states that major developments should contribute to urban greening through the delivery of high-quality landscaping. To determine the level of urban greening, an Urban Greening Factor (UGF) of 0.4 will be sought for residential developments and 0.3 for commercial schemes (excluding B2 and B8 uses).
- 7.156. Policy G7 states that the planting of additional trees should generally be included in new developments, this will be directed towards large-canopied species. Where replacement trees are necessary, these should be based on the existing value of the tree to be removed.
- 7.157. Part I of Policy D8 states that street trees and other vegetation should be incorporated within the public realm and support sustainable drainage alongside biodiversity.
- 7.158. Southwark Plan Policy P59 states that major development must provide green infrastructure with arrangements for long-term stewardship and maintenance. In addition, Southwark Plan P60 states that major developments must contribute towards biodiversity net gains through a variety of measures, including nature conservation in designated sites as well as incorporating features within the development such as green and brown roofs, soft landscaping together with the nesting habitats and improved green links.

7.159. Lastly, Southwark Plan Policy P61 states that development must retain and protect significant existing trees as well as retain and enhance the borough's tree and canopy cover. Where trees are removed to facilitate development these should be replaced by new trees. Where trees are retained these should be protected during construction in accordance with BS Standard BS5837.

Assessment

7.160. The Proposed Development incorporates a significant amount of greening as part of a rich and vibrant landscape strategy throughout. The scheme has been designed to maximise greening through the provision of planting through the ground, podium and upper terraces which respond to the climatic environment up through the buildings. Overall, the scheme will achieve an Urban Greening Factor of 0.37, which is considered to be consistent with the policy expectations for mixed-use developments under LP Policy G5. This is inclusive of the land partially within the red line boundary to the south within Christ Church Gardens. Taking a conservative approach, the Development would achieve a UGF of 0.3 excluding the trees and planting within Christ Church Gardens. It will also achieve a Biodiversity Net Gain of 152.4% in habitat units, representing a considerable uplift over and above the 10% required under policy.

7.161. An Arboricultural Impact Assessment has been prepared and submitted as part of this application, which has assessed existing trees within the Site boundary (some of which are within Christ Church Gardens) and further trees within Christ Church Gardens. As part of the Proposed Development, three U Grade trees will be removed which as set out in the accompany Arboricultural Impact Assessment are considered to be unsuitable for retention. Five Grade B trees will also be removed to the north of the Site; these will be directly replaced by new tree planting along Stamford Street and Paris Garden. New tree planting will also be incorporated along Blackfriars Road, continuing the green corridor

created by the London Plane trees along the boundary with the Christ Church Gardens.

7.162. As part of investigative works, air-spading has been carried out along the southern boundary to determine the extent of the root structures of trees within Christ Church Gardens. This has helped inform the design development to ensure that retained trees are protected in-situ as part of the Proposed Development. All retained trees will be protected throughout construction (in accordance with BS5837) and managed as part of a tree and root protection plan to be approved prior to the commencement of the development. Overall, it is considered that the proposals positively accord with LP Policies G1 and G7 alongside SP Policies P59 and P60.

Transport

7.163. Paragraph 104 of the NPPF states that development should take opportunities to promote walking, cycling and public transport use as part of the earliest stages of development proposals.

7.164. The London Plan promotes car-free development and sustainable transport modes as part of meeting the Mayor's strategic target of 80% of all trips made by foot, cycle or public transport. Development should make the effective use of land, reflecting its connectivity and accessibility by existing and future transport routes. For the purpose of this assessment, the London Plan sets out the following supporting policies:

- Policy GG2 states that proposals must plan for good sustainable transport modes with a strategic target of 80% of journeys using such modes;
- Policy T2 requires developments to demonstrate how they will deliver improvements that support the ten healthy streets indicators and reduce the dominance of vehicles, whilst also being permeable by foot and cycle;

- Policy T3(e) sets out that proposals should support capacity, connectivity and improvements to the bus network as needed.
- Policy T4 sets out the requirement for transport assessments to embed the Healthy Streets Approach in new developments;
- Policy T7 provides the framework expectations for delivery and servicing of new developments.

7.165. Southwark Plan Policy P49 states that development must demonstrate that the public transport network has sufficient capacity to accommodate any increases in trip-generation, taking into account cumulative schemes. Likewise, they should also improve accessibility to public transport nodes as well as walking and cycling connections.

7.166. Southwark Plan Policy P50 states that development must minimise demand for private car journeys and demonstrate that the road network has sufficient capacity to support any increase in the number of journeys by users of the proposed development as well as the cumulative impact of nearby development. In addition, it should also ensure the safe and efficient operation of the local, TLRN and bus networks. The policy also states that development must ensure safe and efficient delivery and servicing that minimises the number of vehicular journeys. For major developments this must include off-site delivery and servicing areas.

7.167. Southwark Plan Policy P51 states that development must also enhance the borough's walking network through the provision of footways, routes and public realm. It must ensure that routes are designed to be inclusive to meet the needs of all pedestrians.

Assessment

- 7.168. The Proposed Development has been designed following TfL's Healthy Streets Approach, Vision Zero and the Mayor's Transport Strategy as sought under LP Policies T2 and T4. This includes promoting sustainable travel through increased permeability, new pedestrian and cyclist access points as sought under SP Policy P51. It is in accordance with the Mayor's Transport Strategy to achieve 80% of all trips to be made by foot, cycle or public transport in accordance with LP Policy GG2.
- 7.169. As demonstrated within the accompanying Transport Assessment, it is considered that there is sufficient capacity on the transport network to accommodate the Proposed Development, taking into consideration cumulative developments in accordance with Southwark Plan Policies P49 and P50.
- 7.170. As part of the proposals, a consolidated delivery and servicing strategy is proposed in order to bring down the number of vehicle trips to the development, further details of how this will be achieved is set out within the Outline Servicing Management Plan in accordance with LP Policy T7. Overall, it is considered that the Proposed Development accords with all policies of the Development Plan.

Parking Provision

- 7.171. Paragraph 108 of the NPPF states that Local Authorities should seek to improve the quality of parking in town centres so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.
- 7.172. Policy T6 of the London Plan sets out the maximum car parking requirements for new developments as well as the requirements for Blue Badge parking (equivalent to three per cent of dwellings). Policy T5 seeks secure cycle parking

at least in accordance with the minimum standards set out in Table 10.2 of the Plan.

7.173. Southwark Plan Policy P53 set out that cycle parking provision for building users and visitors should accord with the borough's local standards (a copy of the standards is enclosed at Appendix Four). It should be secure, accessible and conveniently located. For commercial uses, proposals must also include provision for shower and changing facilities. It should also provide a free two year cycle hire fob for each dwelling where it is located within 400m of a docking station.

7.174. Southwark Plan Policy P54 promotes a maximum standard for car parking in new developments. For schemes with a PTAL rating of 5 and above (including the Site), the policy promotes car-free development on new developments with no on-street permits for commercial tenants or residents.

Assessment

7.175. The Proposed Development has been designed to be car-free and promotes sustainable transport modes. As part of meeting the London Plan requirements, the scheme will include provision for 12 Blue Badge bays (equivalent to 3% on-site) together with one Car Club bay for residents, managed by a third-party operator. These commitments will be secured by the Section 106 agreement.

7.176. The scheme has sought to maximise opportunities to deliver a policy-compliant level of cycle parking on-site and includes the provision of 3,187 long-stay spaces and 321 short-stay spaces. Overall, the Proposed Development will be well in-excess of the London Plan standards and at circa 85% when compared to the Southwark Plan standards. The proposed approach to maximising cycle parking provision across the Site has been discussed with officers and is considered to represent the optimal approach to securing the maximum

provision. 5% of the total provision will be made for large-cycle parking provision in accordance with Policy T6. Further analysis and breakdown is set out within the accompanying Transport Assessment.

- 7.177. In conjunction with the above, a contribution is also proposed towards the provision of a new Cycle Hire Docking Station on the network (circa £162,000). This will improve access to sustainable transport modes on the network and will be secured by way of a financial obligation under the Section 106 agreement. Fob access for each new home in the Proposed Development will also be provided, providing free cycle hire for 2 years.

Noise and Vibration

- 7.178. Paragraph 185 states that development should mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.
- 7.179. Policy D13 sets out that the Agent of Change principle places the responsibility for mitigating the impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. This means that development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue to grow with unreasonable restrictions being placed on them.
- 7.180. Policy D14 of the London Plan requires new noise sensitive development to be separated from major noise sources wherever practicable through the use of distance, screening, or internal layout in preference to sole reliance on sound insulation; and promoting new technologies and improved practices to reduce noise at source.

7.181. Southwark Plan Policy P66 states that development must avoid significant adverse impacts on health and quality of life. It must mitigate against any adverse impacts caused by noise and manage noise by separating sensitive developments from major noise sources. Major development adjacent to designated open space should be designed to protect and enhance positive aspects of the acoustic environment.

Assessment

7.182. The Proposed Development has been designed in accordance with the requirements under national and local planning requirements. As demonstrated within the accompanying Noise and Vibration Report, the levels of re-radiated noise and vibration fall within the acceptability/required ranges.

7.183. A balanced approach has been adopted to meet acoustic, ventilation and overheating ('AVO') requirements across the development, together with other considerations including internal daylight and sunlight. This is primarily driven by the need for new developments to meet the new Part O (2021) Building Regulations.

7.184. As such, a strategy has been developed to achieve acceptable noise-levels within the residential units whilst also delivering compliant Part O (2021) accommodation and set out within the accompany energy, sustainability and noise assessments. This is considered to be a reasonable and justified approach to the Proposed Development.

7.185. Noise limits are also proposed on noise-generating activities within the Podium in order to provide further protection to the residential units. Similar noise limits will be placed on landlord and tenant plant to ensure that these are within the acceptability criteria. Overall, the Proposed Development is considered to be consistent with the requirements under the Development Plan.

Air Quality

- 7.186. Paragraph 174 within the NPPF seeks to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.
- 7.187. Paragraph 186 further states that development proposals should contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas (AQMA).
- 7.188. Policy SI1 of the London Plan states that in order to tackle poor air quality, proposals should be at least air quality neutral. As part of this, proposals should use design solutions to prevent or minimise increased exposure to existing air pollution. In order to assess the impacts of development proposals, Air Quality Assessments should be provided as part of the application submission.
- 7.189. Southwark Plan Policy P65 states that development must achieve or exceed air quality neutral standards. It must address the impacts of poor air quality for building occupiers and public realm users through design solutions. This includes the orientation of the buildings, public realm and amenity space users; ventilation systems; and urban greening appropriate for providing air quality benefits proportionate to the scale of development.

Assessment

- 7.190. As set out within Chapter 9 of the ES and the associated Air Quality Report included in the ES Volume 3, the Proposed Development will have a negligible impact over and above the baseline air quality in the local area. The building is considered to be better than air quality neutral given that there will be no direct building emissions and will follow air quality positive measures. Overall, it is

considered to positively accord with the requirements under the development plan.

Daylight, Sunlight and Overshadowing

- 7.191. Part C of Paragraph 125 of the NPPF (2021) states that local planning authorities should refuse applications which they consider fail to make efficient use of land and when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site.
- 7.192. Paragraph 0006 (Ref: 66-006-20190722) of the PPG states that local authorities will need to consider whether applications for proposed developments would give rise to an unreasonable impact on the daylight and sunlight levels enjoyed by neighbouring occupiers. It should also consider whether the daylight and sunlight within the development would provide satisfactory living conditions. Paragraph 0007 (Ref: 66-007-20190722) states that when assessing appropriate levels of sunlight and daylight, this will depend to some extent, on the context of the development and its detailed design.
- 7.193. Policy D6 of the London Plan states that development should provide sufficient daylight and sunlight to new and existing housing that is appropriate to its context, whilst avoiding overheating, minimising overshadowing and maximising the useability of outdoor amenity spaces. This is similarly reflected in the requirements under Policy D9.
- 7.194. The Mayor's Housing SPG broadly summarises the need to adopt an *"appropriate degree"* of flexibility when applying the BRE Guidance when assessing the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves.

Assessment

7.195. A comprehensive Daylight, Sunlight and Overshadowing assessment using the BRE Guidance has been undertaken by GIA as part of the planning application submission. This has taken into consideration three scenarios in order to robustly assess the proposals and associated effects comprising:

- Pre-demolition vs. Proposed;
- Pre-demolition vs. Proposed (no balconies); and
- Consented vs. Proposed.

7.196. This approach is considered to proportionate in order to demonstrate how the scheme performs when taking into account other material considerations, such as self-limiting factors on existing buildings such as balconies and canopies, alongside a comparison between the consented (and deliverable) scheme against the proposals.

7.197. Overall, whilst some properties will experience changes outside of the BRE recommendations, the daylight and sunlight amenity is considered to be appropriate and proportionate with the surrounding urban context, with all properties retaining sufficient and adequate daylight and sunlight. On this basis, it is considered that the Proposed Development accords with the Development Plan and associated guidance.

Contaminated Land

7.198. Southwark Plan Policy P64 states that development will be permitted where it mitigates any contaminated land within a site; where there is an adverse impact on the environment, proposals will not be permitted.

Assessment

- 7.199. A geo-environmental assessment has been prepared by Arup and submitted as part of this planning application and which sets out the potential for below ground contaminants. Based on the ground investigations, the report recommends a series of measures to target potential below ground contaminants through the provision of a detailed quantitative assessment of the contamination risk. This is anticipated to be dealt with by way of conditions, with the reports completed prior to the commencement of works on-site. Where required, a remediation strategy will be put in place. This is considered to be a standard approach to dealing with potential below ground contaminants and as such is acceptable.

Wind Microclimate

- 7.200. Part J of Policy D8 of the London Plan states that development should take into consideration microclimate considerations including wind for the purposes of people in the public realm. Similarly, Section 3 of Policy D9 states that environmental impacts of tall buildings (18m or more) should be assessed including wind. This should be carefully considered to ensure that comfort and enjoyment of open spaces is not compromised. Supporting paragraph 3.3.8 of the London Plan emphasises the importance in creating comfortable pedestrian environments with regard to matters including wind.

Assessment

- 7.201. Extensive wind tunnel testing has been undertaken and a Wind Assessment has been prepared to accompany the planning application. The results of the modelling demonstrate that, other than at three off-site probes where the conditions are no worse than the second permission (Ref: 16/AP/5239) and

could be resolved with some minor off-site adjustments, the proposals will result in a negligible impact on the surrounding pedestrian environment.

7.202. In particular, the Proposed Development will have a negligible effect on all outdoor recreational spaces within the public realm, meaning that this will provide a comfortable environment for people to enjoy in accordance with Policy D9 and the Proposed Development is considered to be consistent with the Development Plan.

8. HERITAGE ASSESSMENT

Introduction

- 8.1. This section should be read in conjunction with the Heritage Statement prepared by Donald Insall Associates, the heritage assessment included in Part B of Volume 2 of the Environmental Statement prepared by Tavernor Consultancy and the Design and Access Statement, prepared by Foster + Partners.

Listed Buildings and Conservation Areas

The Planning (Listed Building and Conservation Areas) Act 1990 (as amended)

- 8.2. The legislation that determines how applications for planning permission and listed building consent are determined where the development affects heritage assets is the Planning (Listed Building and Conservation Areas) Act 1990. Section 66 (1) of the Act requires decision makers to ‘have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses’ when determining applications which affect a listed building or its setting. Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation area to pay “special attention...to the desirability of preserving or enhancing the character or appearance of that area”.
- 8.3. This duty sits alongside the general duty under section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine applications in accordance with the development plan, unless material considerations indicate otherwise.

National Planning Policy Framework

- 8.4. Section 16 of the NPPF establishes national level policy on the conservation and enhancement of the historic environment. Paragraph 194 requires applicants to

describe the significance of any heritage assets affected, including any contribution made by their setting. Paragraph 197 of the NPPF states: “In determining applications, local planning authorities should take account of:

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

8.5. Paragraph 199 provides that when considering the impact of a Proposed Development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation irrespective of whether the potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Paragraph 200 emphasises that any harm to significance of a designated heritage asset (including from development within its setting) requires clear and convincing justification.

8.6. Paragraph 202 is engaged where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset. In this case the harm should be weighed against the public benefits of the proposal.

8.7. Local planning authorities are asked, under paragraph 206 of the NPPF, to look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance; and proposals that preserve those elements of the setting that make a positive contribution should be treated favourably.

Development Plan

London Plan

- 8.8. The London Plan promotes development of the highest architectural quality. Policy D3 sets out a design-led approach for developments to optimise the potential of sites and be designed in consideration of the local context, which would include potential impact on heritage assets. Policy D9 requires development proposals to take account of, and avoid harm to, the significance of London's heritage assets and their settings. As set out in the NPPF, proposals resulting in harm require clear and convincing justification and clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area. D9 further requires buildings in the setting of a World Heritage Site to preserve the Outstanding Universal Value and the ability to appreciate it.
- 8.9. LP Policy HC1 states that proposals affecting heritage assets and their settings should conserve their significance and avoid harm; and the integration of heritage considerations should be incorporated early on in the design process. LP Policy HC2 requires proposals within the setting of a World Heritage Site to conserve, promote and enhance its Outstanding Universal Value. LP Policies HC3 and HC4 make reference to the Mayor's Strategic Views which are set out within further detail in the London View Management Framework (LVMF) and how these should be managed and assessed as part of development proposals.

Southwark Plan

- 8.10. LBS's adopted development framework is similarly reflective of the guidance set out in the NPPF and the requirements set out within the Act as set out above.

- 8.11. Southwark Plan Policy P19 states that development relating to listed buildings and their settings will only be permitted if it conserves or enhances their special significance in relation to:
- i. their historic fabric, architectural style and features, curtilage, site layout, plan form and land use;
 - ii. the contribution of the buildings to their setting;
 - iii. views that contribute positively to the significance of the buildings and their setting; and
 - iv. the viable use of the listed buildings consistent with their on-going and long-term conservation.
- 8.12. Any harm to the significance of the listed buildings must be robustly justified.
- 8.13. Southwark Policy P20 states that development relating to conservation areas will only be granted where it preserves or enhances the character or appearance of conservation areas. Any harm to the significance of the conservation area or its setting must be robustly justified. Development should take into consideration the setting and heritage significance of conservation areas, including views in and out. Southwark Plan Policy P21 includes, amongst other things, trees within the curtilage of a listed building and trees subject to a Tree Preservation Order (TPO) as heritage assets. Any harm to their significance should also be robustly justified.
- 8.14. Southwark Plan Policy P22 states that developments should enhance the composition of the panorama across the borough and central London as a whole. Southwark Plan Policy P24 states that development will only be permitted where the significance of the Outstanding Universal Value of World Heritage Sites and their settings are sustained and enhanced.

Assessment

- 8.15. The Proposed Development comprises two key component parts in relation to heritage assessment, namely:
- The impacts arising on the designated heritage assets within the Site from the Proposed Development (i.e. 1 and 3- 7 Stamford Street, which are both Grade II Listed); and
 - The impacts arising on the settings of designated heritage assets in the vicinity of the Site.
- 8.16. A detailed assessment of the Proposed Development in relation to the above is set out within Volume 2 of the Environmental Statement (Built Heritage and Townscape Visual Impact Assessment) prepared by Donald Insall Associates and the Tavernor Consultancy; and the further Heritage Statement prepared by Donald Insall Associates that specifically considers the on-Site heritage assets together with the neighbouring Church and listed Drinking Fountain within the Church Gardens.
- 8.17. Overall, whilst no harm is identified to the settings of any of the 84 off-Site heritage assets assessed, less than substantial harm has been identified to 1 and 3 – 7 Stamford Street (Grade II Listed). This is largely due to the proposed level of alteration to these buildings, including the removal of the rear wing to 3 – 7 Stamford Street as part of facilitating a new public route through the Site. As concluded by Donald Insall Associates, the proposals are considered to cause a moderate amount of less than substantial harm to these assets.
- 8.18. In accordance with Paragraph 202 of the NPPF, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits.

-
- 8.19. A series of heritage benefits from the Proposed Development have also been identified by Donald Insall Associates as set out in detail at Section 5.5 of the Heritage Statement.
- 8.16. When taken together with the wider public benefits outlined in Chapter 9 of this Planning Statement, the moderate level of less than substantial harm identified to the two on-Site heritage assets is demonstrably and significantly outweighed.
- 8.20. On this basis, it is considered that the Proposed Development accords with the statutory obligations under the Planning (Listed Buildings and Conservation Areas) Act 1990 and the requirements of the Development Plan and the associated NPPF tests.

9. BENEFITS OF THE PROPOSED DEVELOPMENT

- 9.1. The Proposed Development would realise the regeneration of the Site and secure growth on a strategic scale. It would bring about a range of social, economic, heritage and environmental benefits and fulfil the potential of the Site, significantly contributing to the Blackfriars Road Area Vision and the vision and aspirations for the Opportunity Area. Moreover, the Proposed Development would create an exciting new architectural destination to live, work and visit thereby enhancing London's status as a World City.
- 9.2. This Planning Statement has described and analysed the wide-ranging benefits of the Proposed Development and has demonstrated that it complies with the development plan when considered as a whole.
- 9.3. In summary, the Development will deliver the following public benefits:
- **433 residential dwellings:** The Proposed Development would be home to an estimate of 950 residents who are predicted to spend £6.3m each year on goods and services, generate £1.47m of Council Tax and up to £870,000 New Homes Bonus for the borough.
 - **Significant affordable housing delivery:** The proposals will deliver 40.5% affordable housing, equivalent to 104 social rent and 56 discount market-rent homes on-site, making a significant contribution towards the borough's housing needs and housing 290 people in immediate housing need.
 - **Substantial delivery of high quality new office accommodation:** The scheme will deliver over 100,000sqm of new office accommodation, making a significant contribution towards the aims and objectives of the Blackfriars Road Area Vision, the Central Activities Zone and Bankside and Borough Opportunity Area.

- **Long term job creation and other benefits:** Up to 6,160 employees will generate over £18m of spending each year and up to £17.64m business rates.
- **Affordable workspace:** The scheme includes 2,421sqm (GIA) of space that will be let at a peppercorn rent for at least 30 years for qualifying businesses as part of a future Affordable Workspace Strategy.
- **Community access:** The local community and schools will have access to the Assembly Rooms and part of the Exchange free of charge for a minimum of 30 days/events each year.
- **Flexible spaces:** 18 Blackfriars Road will include a range of flexible spaces which have the potential to facilitate a range of activities and end-users. The programming of this space has been designed to allow the space to cater for a range of businesses.
- **Provision of new educational space:** The scheme will include the opportunity to deliver modern educational space, linking into local institutions in order to facilitate training (for example for the hospitality sector) and support the local economy in Southwark.
- **New public spaces and links:** The proposals have been designed to deliver a new public space in the heart of the scheme together with the provision of new pedestrian links which will complement the wider network of public spaces and connections around the Site.
- **New Children's Playspace:** A new 320sqm playspace at ground will be provided on-site which will be fully accessible to the public.
- **A new architectural landmark for Southwark and London:** The Proposed Development will introduce exceptionally designed buildings that have been sensitively designed to suit the Site location and context, making a positive

contribution to the emerging tall buildings cluster and deliberately responding to local and important strategic views and vistas.

- **Securing high quality, sustainable design:** The scheme has been designed to achieve the highest standards of sustainable design and will be all-electric, targeting BREEAM “Outstanding” and NABERS 5.5* and WELL Platinum ratings for the Office Building and Home Quality Mark of 4.5* for the Residential Buildings. It will aspire to meet the UKGBC Net Zero trajectory for operational emissions for buildings delivered up to 2030 - 2035. The Scheme has been designed to deliver substantially lower upfront embodied carbon emissions than GLA benchmarks.
- **Enhancing urban greening and biodiversity value:** The proposals will deliver significant biodiversity enhancements through the delivery of new public realm and the provision of a new public park, together with extensive tree planting and greening throughout, equivalent to 0.37 Urban Greening Factor and a Biodiversity Net Gain of 152.4% on-site.
- **Creation of new jobs, training and apprenticeship during construction:** As part of delivering 18 Blackfriars Road, the proposals will secure a range of employment and training opportunities, including 1,200 Full Time Equivalent (FTE) construction jobs over the five year period of construction activity on-site.
- **Carbon Off-setting Contribution** of £1,589,255 towards the off-setting on local projects in Southwark.
- **Christ Church Gardens improvements:** In recognition of the increased footfall to the Church Gardens likely to result from the Proposed Development, a contribution towards re-landscaping and enhancing Christ Church Gardens will be secured in the Section 106 agreement. This also includes a contribution

towards restoring the Grade II Listed Drinking Fountain. Whether this contribution is by way of works or a payment is to be agreed with the Council.

- **Substantial Section 106 package and Community Infrastructure Levy payment in excess** of £50 million (see Section 10 of this Statement for further detail regarding the proposed planning obligations).

10. PLANNING OBLIGATIONS AND COMMUNITY INFRASTRUCTURE LEVY

10.1. This section sets out a summary of the draft Heads of Terms for the Proposed Development and provides an early indication of the anticipated Community Infrastructure Levy (CIL) payment. The draft Heads of Terms have been considered in relation to LB Southwark's Section 106 Planning Obligations SPD (2020).

10.2. Discussions relating to the Section 106 Agreement will continue with LB Southwark during the determination of the planning application, but at this stage it is anticipated to include the following obligations:

1. Parties – Southwark Council and Black Pearl Limited
2. Boilerplate provisions, including indexation, payment of legal fees, etc
3. Financial contributions towards:
 - a. Archaeology
 - b. Carbon Green Fund Contribution
 - c. Children's Playspace Shortfall
 - d. Cycle Hire Docking Station
4. Affordable housing
 - a. 40.5% of all habitable rooms to be provided on-site as affordable housing
 - b. Tenure split: 26.4% social rent; 14.1% intermediate
 - c. Use and occupation restrictions
5. Affordable workspace

-
- a. 2,421sqm (GIA) affordable workspace on-site (the Knowledge Hub and the Incubator) to be provided for a 30 year term at peppercorn rent
 - b. Payment in lieu of further on-site provision to enable the Council to meet the needs of SME and start-up businesses across the Borough. Payment together with on-site provision to equate to 10% of total proposed employment floorspace
 - c. Use and occupation restrictions; eligibility requirements; heads of terms for affordable workspace lease; and management plan
 6. Community and education
 - a. Community and schools access to the Assembly Room and an area of the Exchange (minimum of 2,000 sq ft; location to be agreed) with management plan to secure access arrangements free of charge for at least 30 days/events during the year
 - b. Engagement with one or more schools within the Borough to provide careers advice, skills training, etc.
 7. Christ Church Garden
 - a. Improvement works to Christ Church Garden (including restoration works to the listed drinking fountain) or an equivalent payment to the Council for such works to be carried out
 - b. Delivery timing obligations to ensure works are completed ahead of practical completion of the development
 - c. Scope and specification of works to be agreed with the Council (in consultation with Christ Church and Bankside Open Spaces Trust) and fountain works subject to listed building consent
 8. Be seen energy monitoring

-
9. Employment and Skills
 - a. Construction Employment and Skills Plan – to include targets and payment in event of shortfall
 - b. End User Employment and Skills targets – to include targets and payment in event of shortfall
 10. Local procurement requirements
 11. Communal amenity space
 - a. Public access to the Rotunda, Hatters Yard and children’s playspace
 - b. Public routes through the site
 - c. Maintenance arrangements
 12. Transport and highways
 - a. Car club – one space in the basement car park
 - b. Off-site consolidation of deliveries and Delivery and Servicing Management Plan to include peak hour restrictions
 - c. Cycle docking station key fob free of charge for each dwelling for two years
 - d. S278/38 highways agreement to be entered into to secure highways improvements
 - e. Travel Plan(s)
- 10.3. In addition, the Proposed Development is anticipated to result in a CIL liability in-excess of £50 million. This remains subject to detailed assessment and will ultimately be determined by the Council’s CIL team.

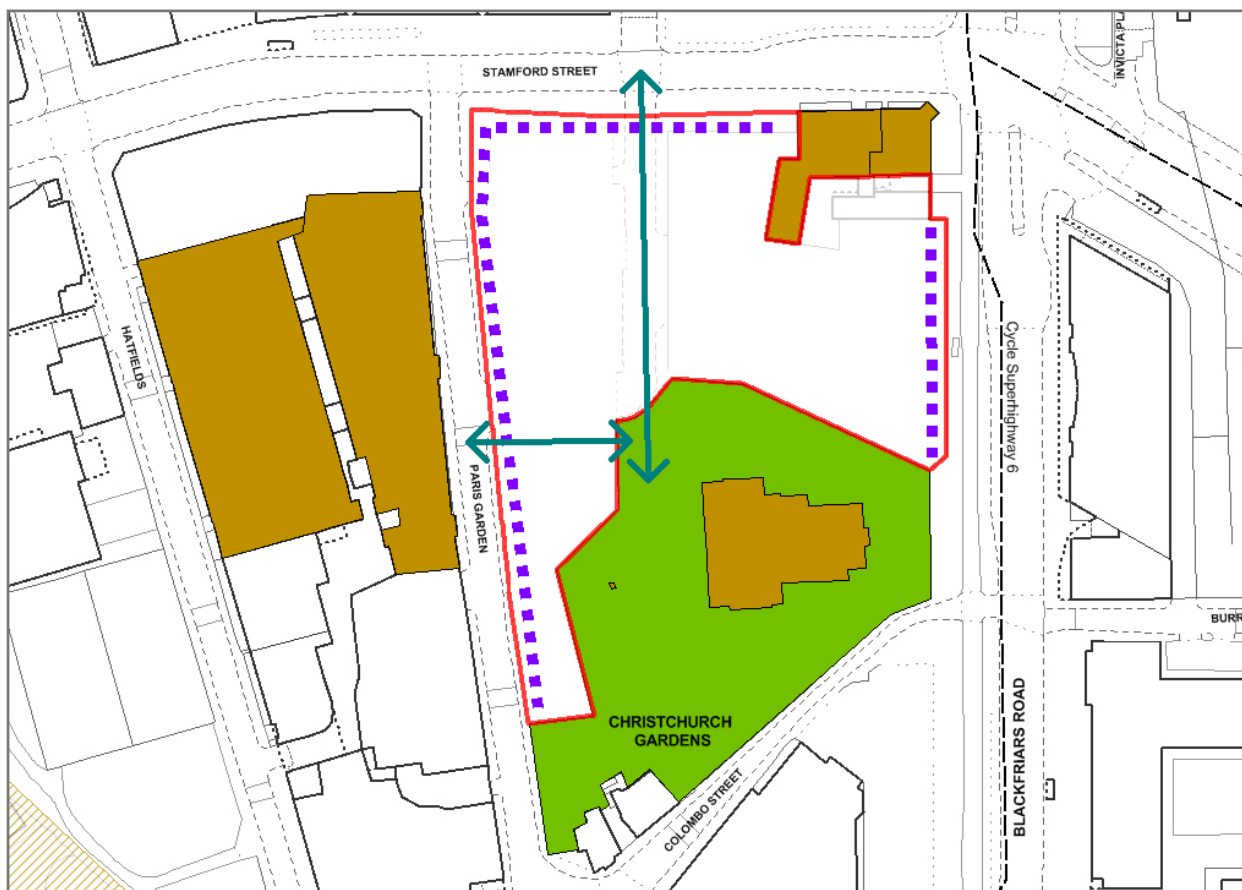
11. CONCLUSIONS AND PLANNING BALANCE

- 11.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the Development Plan unless other material considerations indicate otherwise.
- 11.2. As set out in this Planning Statement, the Proposed Development has been carefully designed to respond to its site context and the local environment, delivering transformative generational qualities. Whilst some adverse effects have been identified in relation to built-heritage (on-site), archaeology alongside daylight, sunlight and overshadowing within the Environmental Statement, it is considered that the Proposed Development as a whole performs positively and the benefits that the scheme would (as described in sections 9 and 10 above) substantially and demonstrably outweigh these potential negative impacts.
- 11.3. In addition, whilst harm has been identified to two of the assessed heritage assets, the level of harm is considered to be less than substantial. Despite great weight being attached to this harm in the planning balance, it is clearly outweighed by the heritage benefits the Proposed Development would secure (which arguably should also be given great weight) together with the wider public benefits.
- 11.4. Overall it is considered that the Proposed Development positively accords with the requirements and aspirations of the Development Plan when taken as a whole, together with supplementary guidance and supporting documents and so planning permission and listed building consent should be granted.
- 11.5. The Proposed Development would deliver a high-quality mixed-use development, which would make a significant contribution towards Southwark's vision for Blackfriars Road and create a new architectural landmark for the borough and an exciting destination to live, work and visit. Collectively,

it would reinforce the status of London as a global commercial centre and World City to which Southwark makes a significant contribution towards. but perhaps even more importantly the Proposed Development would bring enhanced public realm, greening, routes through, a new playground and an exciting mix of tenants and uses that would revitalise the Site and provide substantial tangible benefits, not only for local residents, but also more widely across the borough.

APPENDIX ONE

NSP22: Land between Paris Gardens, Colombo Street, Blackfriars Road and Stamford Street

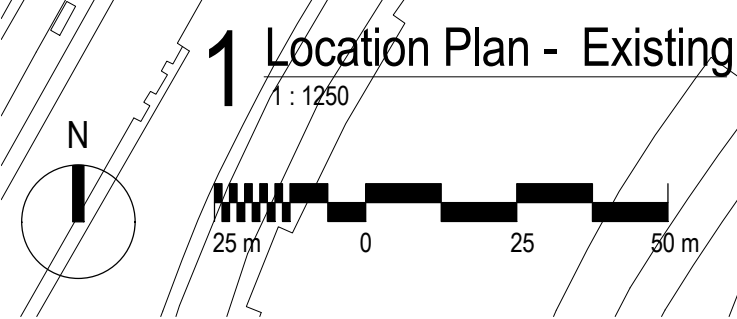
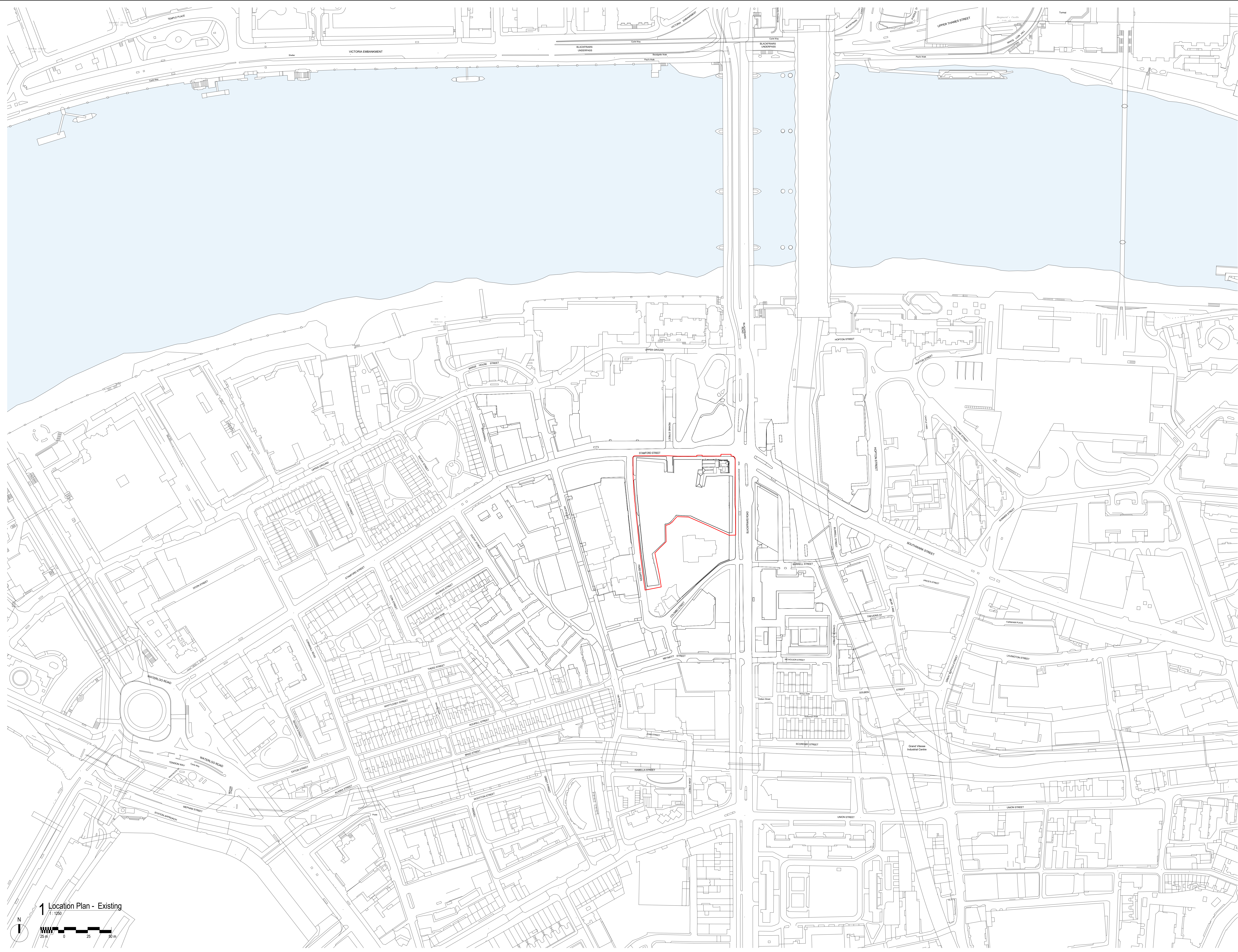


- | | |
|----------------------------------|--|
| Site Boundary | Improved connectivity for pedestrians and cyclists |
| Conservation Area | Open Spaces |
| Grade I Listed Building | Buildings of architectural and historic merit |
| Grade II Listed Building | Buildings of townscape merit |
| Grade II*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

Site Area	• 7,218m ²	
Existing uses (GEA)	• Office (E)(g)(i) - 24,749m² • Ground floor retail (E(b)) - 669m²	
Indicative residential capacity	• 288 homes	
Site requirements	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 • Provide ground floor active frontages with ground floor retail, community or leisure uses (as defined in the glossary) on Paris Garden, Blackfriars Road and Stamford Street; and • Improve connectivity to provide a new green link from Rennie Street to Paris Gardens. Redevelopment of the site should: • Provide new homes (C3). Planning application 16/AP/5239 is relevant to this site.	
Design and accessibility guidance	Redevelopment must be sensitive to existing trees of significance. Redevelopment must provide a new link from Rennie Street to Paris Garden and links to the Cycle Super Highway. 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. Development proposals must recognise the sites close proximity to the borough boundary and must consider the setting of heritage assets in Lambeth, in addition to the provisions of policies and site allocations within reasonable proximity as set out in the Lambeth Local Plan.	
The site location		
	Approach to tall buildings	Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.
	Impacts Listed Buildings or undesignated heritage assets	The site includes listed buildings and their attached railings at 1 and 3-7 Stamford Street, the listing relates to a group of commercial buildings dating from c1875, which now house The Mad Hatter Hotel. The site is within the setting of listed buildings on Paris Garden.
	Impacts a Conservation Area	No

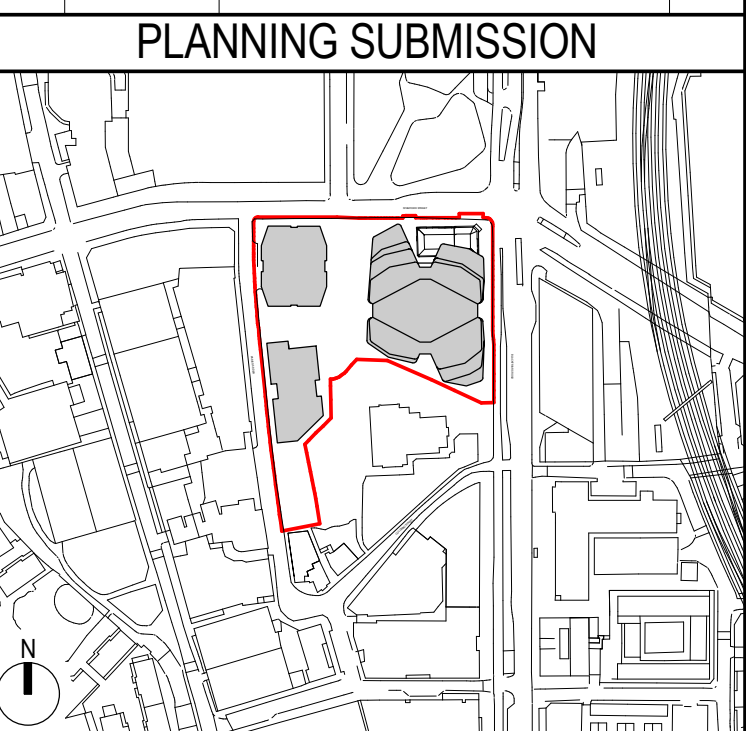
Impacts a distinctive Borough View or London View Management Framework View (LVMF)	No
Impacts an Archaeological Priority Area	Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads The site has potential to contain important multi-phase archaeological deposits. An archaeological assessment is required for this site.
Impacts a Scheduled Ancient Monument	No
Is in close proximity to the River Thames	No
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	The site is in proximity to the designated Christchurch Gardens (Borough Open Land and Site of Importance for Nature Conservation).

APPENDIX TWO



- General Notes
1. Do not scale drawings. Dimensions govern.
 2. All dimensions are in millimetres unless noted otherwise.
 3. All levels are in metres unless noted otherwise.
 4. All dimensions shall be verified on site before proceeding with the work.
 5. Any discrepancies on these drawings shall be brought to the immediate attention of Foster + Partners.
 6. All area measurements noted on this drawing are approximate and provided for indicative purposes only. Should the Client or any other party require precise measurements they are to engage specialist advice for this purpose.
 7. All elements and levels taken from dimensional survey information provided by Client.
 8. All furniture layouts are indicative.
 9. All planters and landscape details are indicative.
 10. Balustrades shown are indicative only with detailed design subject to condition.

00 23/06/2023 Planning Submission F+P
Rev. Date Reason For Issue CHK



Full Planning
Application
Boundary

Foster + Partners

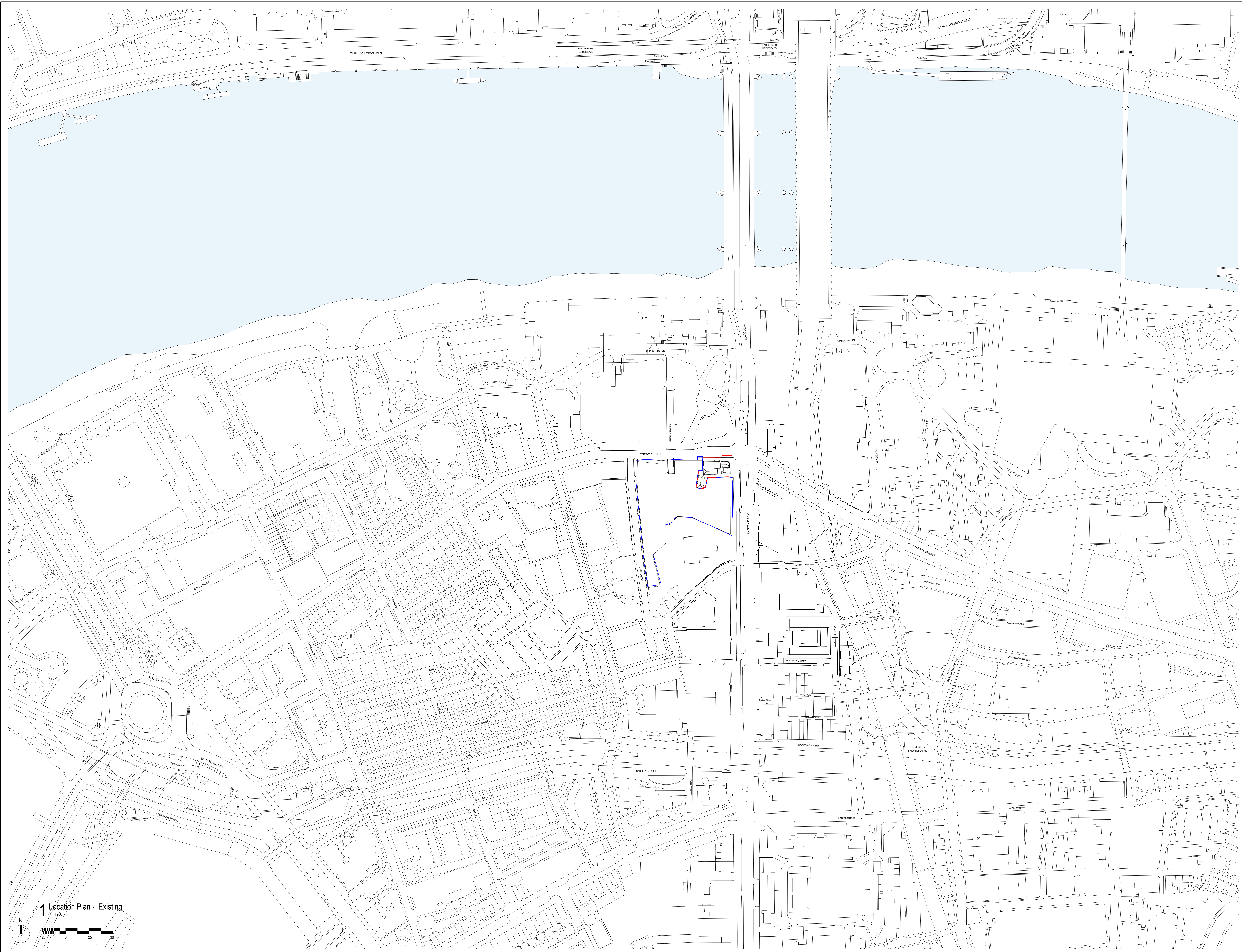
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Client
Black Pearl Limited

Project
**18 Blackfriars Road,
London SE1 9JU**

Title
**Location Plan
Existing**

Project No 3201	Sheet First Issue Date 23/06/2023	Scale at ISO A0 1:1250
Drawing Number BLAC-FAP-ZZ-ZZ-DR-PL-010001	Revision 00	

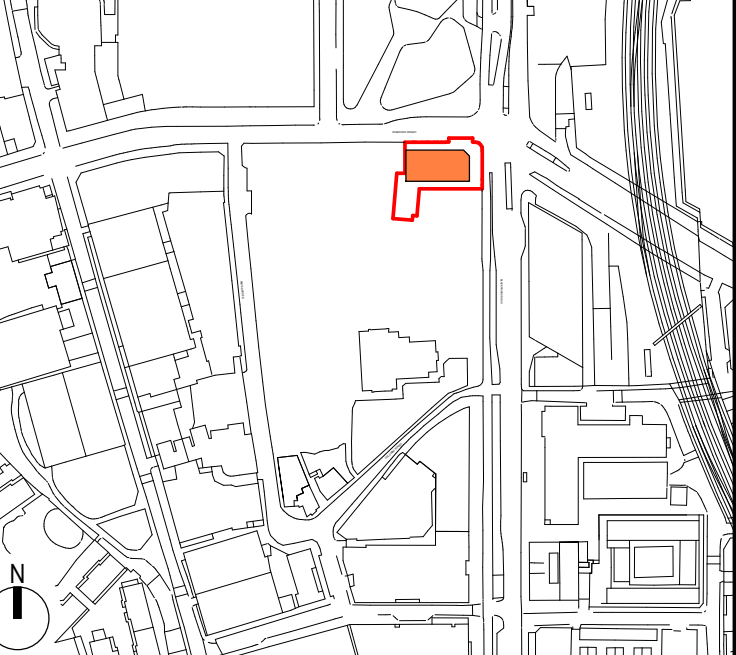


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00	23/06/2023	Planning Submission	F+P
Rev.	Date	Reason For Issue	Chk



- Listed Building Consent
Application Boundary
 Other Land Owned by the
Applicant

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Client
Black Pearl Limited

Project
18 Blackfriars Road,
London SE1 9JU

Title
Listed Building Application
Location Plan
Existing

Project No 3201	Sheet First Issue Date 23/06/2023	Scale at ISO A0 1:1250
Drawing Number BLMH-FAP-ZZ-ZZ-DR-PL-016000		Revision 00

APPENDIX THREE

List of Planning Application Documents for Full Planning Permission and Listed Building Consent:

- Cover Letter, prepared by DP9;
- Application Forms and Certificates, prepared by DP9;
- CIL Additional Questions Form, prepared by DP9;
- Planning Statement;
- Site Location Plan (Full Planning Permission Boundary), prepared by Foster +Partners;
- Site Location Plan (Listed Building Consent Boundary), prepared by Foster +Partners;
- Existing Plans, Sections and Elevations, prepared by Foster +Partners;
- Demolition Plans, Sections and Elevations, prepared by Foster +Partners;
- Proposed Plans, Sections and Elevations, prepared by Foster +Partners;
- Design and Access Statement (including Landscape Masterplan and Strategy), prepared by Foster +Partners and West 8;
- Housing Delivery Schedule, prepared by Foster + Partners;
- Statement of Community Involvement, prepared by Kanda Consulting;
- Affordable Housing Statement, prepared by Quod;
- Retail Statement, prepared by Quod;
- Economic Benefits Statement, prepared by Quod;
- Health Impact Assessment, prepared by Quod;
- Whole Life Carbon Assessment, prepared by Arup;
- Circular Economy Statement, prepared by Arup;
- Sustainability Statement, prepared by Arup;
- Energy Statement, prepared by Arup;
- Overheating Assessment, prepared by Arup;
- Transport Assessment, prepared by Arup;
- Draft Travel Plan, prepared by Arup;

- Outline Servicing Management Plan, prepared by Arup;
- Operational Waste Management Plan, prepared by Arup;
- Fire Statement (and Planning Gateway One Form), prepared by Arup;
- Ventilation and Extraction Statement, prepared by Arup;
- Basement Impact Assessment, prepared by Arup;
- Geotechnical Desk Study, prepared by Arup;
- Flood Risk Assessment, prepared by Arup;
- Drainage Strategy, prepared by Arup;
- Electronic Interference Statement, prepared by Arup;
- Noise and Vibration Statement, prepared by Arup;
- Daylight, Sunlight and Overshadowing Report, prepared by GIA;
- Daylight and Sunlight and Photovoltaics (Impact on Neighbouring Properties) Report, prepared by GIA;
- Outline Construction Environmental Management Plan, prepared by Real PM;
- Aviation Safeguarding (Radar and Air Traffic) Assessment, prepared by KLG Consulting;
- Accessibility Statement, prepared by David Bonnett Associates;
- Arboricultural Impact Assessment, prepared by Tree Radar UK;
- Heritage Statement, prepared by Donald Insall Associates;
- Draft Operational Management Plan, prepared by Helix;
- Environmental Statement:
 - ES Non-Technical Summary, prepared by Trium Environmental;
 - ES Volume 1: prepared by Trium Environmental;
 - ES Volume 2: prepared by Donald Insall Associates and Tavernor Consultancy;
 - ES Volume 3 (including):
 - Introduction (Annexes 1 – 3), prepared by Trium Environmental;

-
- Ground Contamination Desk Study and Preliminary Risk Assessment, prepared by Arup;
 - Archaeological Desk-Based Assessment, prepared by MOLA;
 - Archaeological Monitoring Report, prepared by MOLA;
 - Evaluation Reports, prepared by MOLA;
 - Biodiversity Net Gain Report, prepared by Assystem;
 - Black Redstart Survey Report, prepared by Assystem;
 - London Travel Demand Survey, prepared by Air Quality Consulting;
 - Climate Change Note, prepared by Trium Environmental;
 - Transport Assessment, prepared by Arup;
 - Preliminary Air Quality Assessment, prepared by Air Quality Consulting;
and
 - Air Quality Positive Statement, prepared by Air Quality Consulting.