



ONE BLACKFRIARS

P L A N N I N G S T A T E M E N T



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ST GEORGE SOUTH LONDON LTD

One Blackfriars Road, LB Southwark

Planning Statement

May 2012

CONTENTS

1.0 Executive Summary.....	2
2.0 Introduction.....	7
3.0 Site and Surrounding Area	8
4.0 Planning History	10
5.0 Proposed Development.....	14
6.0 Pre-Application Consultation	16
7.0 Planning Policy Overview.....	17
8.0 Planning Policy Assessment	23
9.0 Section 106 Agreement Heads of Terms	58
10.0 Conclusion.....	60

APPENDICES

A. APPENDIX A – PLANNING POLICY OVERVIEW	64
B. APPENDIX B – INDICATIVE S106 HEADS OF TERMS FINANCIAL CONTRIBUTIONS.....	92

1.0 Executive Summary

- 1.1 This Planning Statement is submitted in support of the application for full planning permission at the One Blackfriars Road Site, at the northern end of Blackfriars Road in the London Borough (LB) of Southwark.
- 1.1 This New Application, submitted on behalf of St George South London Ltd, seeks full planning permission for:

“The erection of three buildings (a tower of 50 storeys plus basement levels, of maximum height 170m above Ordnance Datum (AOD), a low-rise building of 6 storeys above ground level – ‘The Rennie Street Building’, a low rise building of 4 storeys above ground level – ‘The Podium Building’) providing a mixed use scheme totalling 74,925 sq m gross external area comprising: 11,267 sq m of Class C1 use (hotel); 52,674 sq m of Class C3 (residential use); 1,336 sq m of Class A uses (A1 to A5); 9,648 sq m of basement, ancillary plant, servicing and car parking; on land at 1 Blackfriars Road - land bounded by Blackfriars Road, Stamford Street, Rennie Street and Upper Ground, London, SE1”.

Background

- 1.2 On 25 March 2009 planning permission (LPA Ref. 06-AP-2117) was granted for the redevelopment of One Blackfriars comprising the erection of two buildings on a podium providing a mixed use scheme (hereafter referred to as the ‘Implemented Permission’). On 26 September 2011 LB Southwark granted a certificate of lawfulness of existing use or development. The effect of the certificate is to confirm that the Permission has been implemented and the development to which it relates is capable of being built out.
- 1.3 The Implemented Permission included a 170 metre (m) Above Ordnance Datum (AOD) 52 storey tower and a standalone 6 storey block (above ground level) with a site wide podium level. The development included a luxury 261 bedroom hotel (Class C1) and its associated facilities (hereafter referred to as the ‘Implemented 261 bedroom hotel’), 96 homes (Class C3) and ancillary retail/leisure uses (Class A1-5/D2).
- 1.4 St George South London Ltd (hereafter referred as ‘the Applicant’) acquired the Site in December 2011. This New Application would retain the external appearance, height and massing of the tower element of the Implemented Permission, rework the internal layout and uses and reconfigure the Podium and Rennie Street Buildings to create a high quality mixed use development known as One Blackfriars (hereafter referred to as ‘Proposed Development’).
- 1.5 In relation to the visual appearance of the two schemes, and in particular in relation to the visual appearance of the tower element of the two schemes, the differences between the Implemented Permission and the New Application would be minimal.
- 1.6 The New Application retains the original design by Ian Simpson Architects for the external appearance, height and massing of the 2009 Implemented Permission Tower and reworks the internal layout and land uses to provide an approximately 74,925 metres squared (sq m) Gross External Area (GEA) mixed use development. A summary of the principal differences between the New Application and Implemented Permission is set out below:
- Relocating the hotel from the lower floors of the Tower to the Rennie Street building;

1.0 Executive Summary

- Replacing the hotel within the tower with high quality residential;
- Removing the pay to visit Sky Deck visitor attraction from the Tower and replacing it with a 'Viewing Lounge' – a high quality managed space on the 32nd level which would be made available to the public by prior arrangement;
- Improvements to the public realm, to reflect the wholly residential use of the tower and reconfigured hotel and retail uses including the removal of the podium and the creation of a new public square at grade;
- Separation of the Tower, Rennie Street and Podium Buildings through removal of the raised podium;
- Provision of off-site residential affordable housing, resulting in a demonstrable uplift to quantum and mix of homes; or a financial payment in lieu should this prove not to be feasible;
- Amendments to servicing and parking to reflect the revised land use mix; and
- Revisions to the energy strategy to reflect the latest policy position of the London Plan and alteration to the mix of uses in the development.

Assessment against Planning policy and other material considerations

- 1.7 This Planning Statement has assessed the proposed development against the National Planning Policy Framework (NPPF – 2012), the statutory Development Plan (comprising the London Plan 2011, LB Southwark Core Strategy 2011 and Saved Policies of the Southwark Plan 2007), emerging policy and supplementary planning guidance.
- 1.8 It sets out how, in bringing forward this development, the Applicant has consulted with and taken account of comments from key authorities and stakeholders, to enable the delivery of an exemplary development that would accord with national, London wide and LB Southwark planning policy objectives and other material considerations.
- 1.9 The New Application will be determined in accordance with the development plan unless material considerations indicate otherwise. An important material consideration is the existence of the Implemented Permission. Where elements of the Implemented Permission remain unchanged in the New Application these are afforded significant weight in the assessment of the Proposed Development against planning policy.

Benefits of the Proposed Development

- 1.10 The Planning Statement and accompanying planning application documents demonstrate the wide-ranging benefits of the Proposed Development and that it substantially accords with both adopted and emerging planning policy. The key benefits of the Proposed Development are summarised below.

Principle of Development

- The Site is located in the London Bridge, Borough and Bankside (LBBB) Opportunity Area in the London Plan 2011 which is identified for the delivery of significant numbers of new homes (1,900) and jobs (25,000) in the period to 2031.

1.0 Executive Summary

- The Site is identified in LB Southwark’s draft BBLB SPD (2010) as a Development Site appropriate for mixed use development including a range of uses, the development of a tall building and significant public realm improvements.
- The Proposed Development would deliver: a high density mixed use development with a sustainable and viable mix of uses that complement and enhance the area’s existing offer and contribute to regional and local planning targets; deliver significant public realm improvements and exemplary design, whilst maximising the development potential of a central London site which has been vacant for over 10 years.
- The principle of the Proposed Development is fully in accordance with the regional and local objectives for the area, as well as meeting the NPPF’s core principles, at the heart of which is the presumption in favour of sustainable development.

Creation of High Quality Homes

- The Proposed Development would deliver 274 homes in a mix of sizes, all of which would be exemplary in their design and would deliver 14% of the local areas targets.
- The provision of the maximum reasonable quantum of affordable housing would be secured either through off-site provision in the vicinity or through financial contributions should this not prove possible in the required timescales.

Creation of New Jobs

- The Proposed Development would deliver 212 permanent jobs in a range of sectors on a Site which has been vacant for ten years.
- It would also deliver significant local employment opportunities both during the construction and operational phases of development through employment and training initiatives.

Creation of a Viable Hotel Offer

- The Proposed Development includes an upscale/lifestyle 152 bedroom hotel in the Rennie Street Building (hereafter referred to as the ‘Proposed 152 bedroom hotel’) which is commercially viable and would add to the vitality and vibrancy of the Blackfriars area.

Public Access to the Tower

- The sky deck major visitor attraction has been removed as it is not viable in current economic circumstances. A managed access Viewing Lounge on the 32nd level would be provided which would provide a unique facility with outstanding views of London for residents, hotel guests, the local community and the Council.

Improved Retail Offer

- The Proposed Development includes an increase in the level of A class retail uses from 911sq m to 1,336 sq m.
- Increased active uses at ground floor level including seating around the newly created public square would create a vibrant sense of place and shopping, dining and leisure opportunities for the existing and future community.

1.0 Executive Summary

Delivery of Exemplary, Sustainable Design

- The New Application retains the exemplary design and integrity of the Implemented Permission designed by Ian Simpson Architects whilst incorporating refinements at the lower levels.
- The Proposed Development would deliver a landmark building which would enhance the London skyline and positively contribute to the local townscape and sense of place.

Delivery of Significant Public Realm Improvements

- The Proposed Development would enable the delivery of a significantly enhanced public realm through the removal of the elevated podium plaza and creation of the new public square known as 'Blackfriars Place' at grade at the heart of the Proposed Development.
- This would create a new destination for residents, workers and visitors to the Blackfriars area. It would provide a place to linger and a place of calm set back from the busy neighbouring streets.
- Pedestrian legibility and thoroughfares through the Site would be significantly improved enhancing connectivity to the surrounding area.
- Additional significant public realm enhancements would be delivered along Rennie Street, Blackfriars Road, Upper Ground enlivening the area. In addition, the junction of Stamford Street and Blackfriars Road would be re-aligned and straightened, providing new public realm and seating and strengthening the street corner.

Delivery of Sustainable Development

- The Proposed Development has been designed to maximise the energy efficiency and sustainable benefits of the proposals including:
 - All homes would be Lifetime Homes Compliant and seek to achieve Code for Sustainable Homes Level 4;
 - The Applicant seeks to achieve BREEAM 'Excellent' for the Rennie Street Building and 'Very Good' for the Podium Building (subject to verification of calculation methodology);
 - Achieve an overall 25% reduction in CO₂ Emissions beyond Part L of Building Regulations 2010;
 - On-site renewable energy would be provided via photovoltaics and CHP which would be future-proofed to enable the Proposed Development to plug-in to a district-wide Heat and Energy Network should one be forthcoming.

Conclusions

- 1.11 In conclusion, the Proposed Development would deliver an exemplary, sustainable and economically viable development which would have many regenerative and economic benefits for the Site and immediately surrounding area in line with NPPF, London Plan and LB Southwark planning objectives.

1.0 Executive Summary

- 1.12 The Implemented Permission has stalled in the current economic climate. The proposed changes in this New Application result in a more viable development which better reflects current demand and provides the developer with confidence that the development can be taken forward following grant of planning permission.
- 1.13 If approved, the Applicant would complete the Proposed Development within 48 months from starting on site in 2013. The delivery of this development would act as a catalyst for the regeneration of the wider Bankside area where a number of major development sites are currently stalled. This is particularly significant in light of the core objective of the NPPF to secure the delivery of sustainable development.

2.0 Introduction

- 2.1 This Planning Statement is submitted in support of the application for full planning permission at the One Blackfriars Road Site, at the northern end of Blackfriars Road in the London Borough (LB) of Southwark. The site and surroundings are described in Section 3.0 of this Statement.
- 2.2 A full description of the Proposed Development is contained in Section 4.0 of this Statement.
- 2.3 A summary of pre-application consultation is contained in Section 5.0.
- 2.4 Section 6.0 provides an overview of the relevant national, regional and local planning policy.
- 2.5 Section 7 assesses the Proposed Development against planning policy. CBRE's conclusions are included in Section 8.
- 2.6 In accordance with the Town and Country Planning (Environmental Impact Assessment) (England & Wales) Regulations 1999, as amended, the application constitutes an 'EIA development'. Accordingly, this application submission is accompanied by an Environmental Statement (ES). Where appropriate, the Planning Statement cross refers to relevant sections of the ES.
- 2.7 The Planning Statement should also be read in conjunction with the following formal submission documents:
 - The covering letter;
 - The planning application form;
 - The land ownership and agricultural holdings certificate;
 - Design and Access Statement (incorporating Landscape Strategy); and
 - Detailed drawings and plans.
- 2.8 This Planning Statement should be read in conjunction with the following supporting documents:
 - Affordable Housing Statement;
 - Energy Strategy & Sustainability Statement;
 - Hotel Demand and Feasibility Study;
 - Regeneration Statement;
 - Sky Deck Feasibility Report;
 - Community Engagement Strategy; and
 - Transport Assessment and Travel Plan.

3.0 Site and Surrounding Area

- 3.1 The Site is approximately 0.67 ha and is located on the south bank of the River Thames, adjacent to the southern approach to Blackfriars Bridge in the LB Southwark.
- 3.2 The Site is bound to the north by Upper Ground, to the west by Rennie Street, to the south by Stamford Street and to the east by Blackfriars Road (See Site Location Plan submitted with this application).
- 3.3 The former buildings on the Site, Drury House and Stamford House, were demolished in 2003 and it is currently cleared (with only a number of old basement walls still remaining). The Site is currently surrounded by temporary hoarding. There are two sets of large advertisement boards located in the north-east and south-east parts of the Site.
- 3.4 The Site benefits from excellent public transport connections, with the highest Public Transport Accessibility Level (PTAL) of 6b (on a scale where 1a is poor and 6b is excellent).
- 3.5 Waterloo Station is within ten minutes walking distance and offers connections to National Rail and London Underground services. Southwark Station is less than 5 minutes walk (London Underground services) and London Bridge Station is less than 15 minutes walk (National Rail and London Underground services). A new ticket hall and entrance to Blackfriars Station on the South Bank (Thameslink 2000 project) on the opposite side of Blackfriars Road, provides National Rail and London Underground links to the rest of London and beyond.
- 3.6 The Site is well served by buses, with routes running along Blackfriars Road, Stamford Street and Upper Ground. Also, the Site is connected to the London Cycle Network by sign posted on-road cycle routes along Blackfriars Road and Upper Ground.
- 3.7 The Site is located in a strategically important part of central London. The north-south artery of Blackfriars Road extends from the River Thames to the major regeneration area of Elephant and Castle. Further north across Blackfriars Bridge, the road links to the Kings Cross/St Pancras transport interchange.
- 3.8 The Site is part of a wider area that lies within London Bridge, Borough and Bankside Opportunity Area (OA) as identified in the London Plan. There are a number of large scale development projects with planning permission in the OA and in the neighbouring London Borough of Lambeth. In the immediate vicinity 20 Blackfriars Road to the south, King's Reach Tower to the west and Sea Containers House to the north-west all have planning permissions for development. On the east side of Blackfriars Road, development proposals are currently being prepared for Ludgate House which is due to be submitted for planning later this year.
- 3.9 The surrounding area contains a mix of residential and commercial uses. The riverside walk to the north of the Site provides pedestrian links to numerous cultural attractions on the South Bank including the County Hall, the London Eye and the Southbank Centre to the west, and the Tate Modern, the Globe Theatre, Tower Bridge and Butler's Wharf to the east. The nearby Oxo Tower and Gabriel's Wharf offer retail outlets, cafes and restaurants.
- 3.10 The Site is not situated in a Conservation Area and there are no listed buildings on Site, however there are a number in the vicinity. Immediately adjacent to the south is the Grade II listed buildings of 1 Stamford Street and 3-7 Stamford Street (Mad

3.0 Site and Surrounding Area

Hatter Pub). In close proximity to the north east is Blackfriars Bridge and Abutment, which is also Grade II listed. Old Barge House Alley Conservation Area is located to the east straddling the Southwark/Lambeth borough boundary (a full list of nearby heritage assets is provided in the Volume II of the Environmental Statement which accompanies this application).

4.0 Planning History

- 4.1 The Site has a long planning history. This section first provides an overview of these applications before reviewing the Implemented Permission in detail.

APPLICATIONS SUBMITTED PRIOR TO IMPLEMENTED PERMISSION

LPA Planning Ref. 01-AP-0649 and 06-AP-0974

- 4.2 Planning permission was granted on 8 January 2002 for the redevelopment to provide a part 19 storey (90 m high AOD) building, and part 7 and part 5 storey building for 43,856 sq m of office use with a 2,418 sq m supermarket use on the ground floor together with the creation of a public open space on the north west corner of the Site and parking provision for 25 cars, 35 motorcycles and 200 bicycles in the basement. This permission was subject to 22 conditions and has not been implemented.
- 4.3 Planning permission was granted on 1 November 2006 (LPA Planning Ref. 06-AP-0974) for the same development but with modified conditions from those imposed on the 2002 planning permission (under Section 73 of the Town and Country Planning Act 1990). The revised conditions allowed implementation of the development before some details were submitted and approved. Subsequently the 2006 permission was implemented in November 2006 through the carrying out of foundation works on Site.
- 4.4 Prior to the grant of this permission, two applications were approved to discharge condition 5 and 6 attached to the 2002 permission addressing details of archaeological work and foundation design on 31 October 2006 (LPA Planning Ref. 06/AP/1787 and 06/AP/1988 respectively).
- 4.5 A further planning application discharging condition 5 and 6 attached to the 2006 permission addressing details of archaeological work and foundation design was approved on 9 November 2006 (LPA Planning Ref. 06/AP/2161).
- 4.6 The LB Southwark online database shows that no subsequent applications for the discharge of further conditions attached to either permission have been submitted.

LPA Planning Ref. 05-AP-1545

- 4.7 A planning application was submitted in 29 July 2005 for a 69 storey tower (maximum height 226 m AOD) with 218 homes and two 10 storey buildings providing 109 homes, hotel and retail uses, and a four level basement for parking, service areas, lifts, cycle and refuse storage, and associated public open space and landscaping.
- 4.8 The proposed tower and two podium buildings linked as one continuous U shaped block around the west, south and east sides of the Site. On 14 May 2007 this application was withdrawn.

4.0 Planning History

LPA PLANNING REF. 06-AP-2117 (HEREON REFERRED TO AS "THE IMPLEMENTED PERMISSION")

Initial Proposals

- 4.9 A planning application was submitted on 30 October 2006 (referred to as the 'Implemented Permission') comprising a single storey podium which extended across the whole Site and formed the base for a 6 storey residential block along the Rennie Street frontage and a mixed use tower of 180 m (AOD) accommodating a 261 bed hotel and associated facilities. A public plaza was proposed above the podium level at the base of the tower with shops and cafés. 4 basements were proposed to accommodate parking spaces for 79 cars, 24 motorcycles and 112 bicycles (an extra 36 bicycle spaces included at ground floor level).
- 4.10 The Southwark Planning Applications Committee resolved to grant permission for these proposals on 24 July 2007 subject to a S106 agreement and referral to both the London Mayor and Secretary of State (SoS).
- 4.11 Referral of the application was delayed to allow for further discussions with English Heritage regarding their concerns about the potential impact on strategic views. The dialogue with English Heritage resulted in changes to the design addressing their concerns. The amended proposal also incorporated changes requested at the July Committee.

Amendments and Secretary of State Decision

- 4.12 The amended proposal description is as follows:
- "Erection of two buildings on a podium (maximum height 170m Above Ordnance Datum Level / 51 storeys plus basement levels) providing a mixed use scheme totalling 76,060m² Gross External Area comprising 35,348m² of Class C1 (hotel) comprising 261 rooms, associated facilities including a business centre, spa, wellness centre/gym, restaurants and bars; 26,864m² of Class C3 (residential) use comprising 96 flats; 993m² of Class D2 use as a Sky Deck for observation and function areas; 911m² of Class A uses (372m² of Class A3 restaurant use, 46m² of retail, and 493m² of flexible Class A Use); 11935m² of ancillary plant, servicing and car parking".*
- 4.13 The initial proposals were amended in the following ways:
- the height of the tower was reduced 10m from 180m AOD to 170m AOD, with the reduction by one floor to 52 storeys;
 - the length of the building, north-south, was reduced by 1.85m at the longest point, and the width, east-west, was increased by 1.5m at the widest point;
 - the provision of publicly accessible WC facilities was included within the public plaza; and
 - there was a reduction in the number of car parking spaces from 79 to 62.
- 4.14 The shape of the tower was refined in order to accommodate the changes and the total floorspace was reduced by 953 sq m largely from the hotel and sky deck. The hotel retained the same number of rooms and the number and mix of homes and number of habitable rooms for private residential element remained the unchanged.

4.0 Planning History

- 4.15 The Southwark Planning Applications Committee resolved to grant permission for the amended proposal on 18 December 2007 subject to a S106 agreement and referral to the Mayor and call in by the SoS.
- 4.16 The SoS called in the application on 10 March 2008 and it was considered at Public Inquiry in September 2008 alongside another major application on the neighbouring 20 Blackfriars Road site. Following the Planning Inspector's recommendation for approval, the SoS granted permission for the application subject to a S106 Agreement on 25 March 2009. A draft Section 278 Agreement was also provided but was not signed.
- 4.17 A schedule of floorspace in the Implemented Permission is provided below:

Implemented Permission – Floorspace Schedule

USE	FLOORSPACE (SQ M)
Hotel	35,348
Market Residential	23,642
Affordable Residential	3,222
Retail	911
Sky Deck	993
Ancillary	11,944
TOTAL	76,060

Source: Southwark Officer's Report (24 July 2010) and Inspector's Report (9 December 2008)

Further Minor Amendments and Implementation

- 4.18 A Section 96A application was submitted on 26 June 2011 for non-material amendments (NMA) to the roof of the proposed Rennie Street building within the Implemented Permission. The proposed amendments created a setback. The NMA was agreed on 20 July 2011 (LPA Ref. 11/AP/2050).
- 4.19 A non-material amendment was agreed on 13 April 2011 (LPA Planning Ref. 11-AP-0620) for the variation of Conditions 4, 7, 8, 9, 10, 13 and 16 attached to the Implemented Permission, to allow implementation works to proceed before the details required by conditions needed to be submitted.
- 4.20 The permission was then implemented, which was confirmed through a certificate of lawfulness relating to construction of two rotary bored piles from basement level, issued on 26 September 2011 (LPA Planning Ref. 11-AP-2743).

Status of the Implemented Permission as Material Consideration

- 4.21 The New Application needs to be determined in accordance with the development plan unless material considerations indicate otherwise. An important material consideration is the existence of the Implemented Permission. The Council will need to weigh the merits of the New Application against the scheme which is the subject of the Implemented Permission.

4.0 Planning History

- 4.22 In relation to the visual appearance of the Implemented Permission and the Proposed Development, and in particular the visual appearance of the tower element, the differences will be minimal.

5.0 Proposed Development

5.1 This New Application seeks full planning permission for:

“The erection of three buildings (a tower of 50 storeys plus basement levels, of maximum height 170m above Ordnance Datum (AOD), a low-rise building of 6 storeys above ground level – ‘The Rennie Street Building’, a low rise building of 4 storeys above ground level – ‘The Podium Building’) providing a mixed use scheme totalling 74,925 sq m gross external area comprising: 11,267 sq m of Class C1 use (hotel); 52,674 sq m of Class C3 (residential use); 1,336 sq m of Class A uses (A1 to A5); 9,648 sq m of basement, ancillary plant, servicing and car parking; on land at 1 Blackfriars Road - land bounded by Blackfriars Road, Stamford Street, Rennie Street and Upper Ground, London, SE1”.

5.2 This New Application retains the external appearance, height and massing of the tower element of the Implemented Permission, reworks the internal layout and uses and reconfigures the Podium and Rennie Street Buildings to create a high quality mixed use development.

5.3 In relation to the visual appearance of the two developments, and in particular in relation to the visual appearance of the tower element of the two schemes, the differences between the Implemented Permission and the New Application are minimal.

5.4 The New Application retains the original design by Ian Simpson Architects for the external appearance, height and massing of the 2009 Implemented Permission Tower and reworks the internal layout and land uses to provide 74,924 metres squared (sq m) Gross External Area (GEA) mixed use development. A summary of the principal differences between the New Application and Implemented Permission is set out below:

- Relocating the hotel from the lower floors of the Tower to the Rennie Street building;
- Replacing the hotel within the tower with high quality residential;
- Removing the pay to visit sky deck visitor attraction from the Tower and replacing it with a ‘Viewing Lounge’ – a high quality managed space on the 32nd level which would be made available to the public by prior arrangement;
- Improvements to the public realm, to reflect the wholly residential use of the tower and reconfigured hotel and retail uses; including the removal of the podium and the creation of a new public square at grade.
- Separation of the Tower, Rennie Street and Podium Buildings through removal of the raised podium.
- Provision of off-site residential affordable housing, resulting in a demonstrable uplift to quantum and mix of homes; or a financial payment in lieu should this prove not to be feasible.
- Amendments to servicing and parking to reflect the revised land use mix; and
- Revisions to the energy strategy to reflect the latest policy of the London Plan (2011) and alteration to the mix of uses in the Proposed Development.

5.0 Proposed Development

Mix and type of uses

- 5.5 The table below describes the principal components of the Proposed Development compared to the Implemented Permission. The Proposed Development would provide a total floorspace of 74,925 sq m (GEA).

Floorspace Breakdown Comparison (Sq m GEA)

LAND USE	IMPLEMENTED PERMISSION	PROPOSED DEVELOPMENT
Residential (Class C3) – including ancillary residential facilities and viewing lounge	26,864	52,674
Retail (Class A1-A5/D2)	911	1,336
Hotel (Class C1)	35,348	11,267
Sky Deck	993	-
Ancillary (incl.Plant and Basement)	11,944	9,648
TOTAL	76,060	74,925

- 5.6 The development which is the subject of the Implemented Permission has stalled. In the current economic climate, there are significant concerns over the viability of the Implemented Permission. The proposed changes result in a more viable development which better reflects current demand and provides the developer with confidence that the development can be taken forward immediately following the grant of planning permission.
- 5.7 The Proposed Development that planning permission is being sought for under this New Application is viable and deliverable in the current economic climate and, if approved, the Applicant would complete within 48 months from starting on site in 2013.
- 5.8 The delivery of the Proposed Development would act as a catalyst for the regeneration of the wider Bankside North area and Borough as a whole with a number of major development sites currently stalled. This is particularly significant in light of the core objective of the NPPF to secure the delivery of sustainable development. The regeneration and economic considerations are considered later in this report.

6.0 Pre-Application Consultation

- 6.1 The Applicant has undertaken a comprehensive pre-application consultation programme to engage with relevant local stakeholders and the wider local community.
- 6.2 As part of this, two public exhibitions were held on Monday 23rd January and Monday 27th February 2012 to present the proposals and to gather feedback from the local community and interested parties. Over 100 people attended.
- 6.3 In addition the Applicant has facilitated a series of meetings with relevant politicians, community groups and neighbouring landowners to consult on the proposals and to gather feedback.
- 6.4 The Applicant has engaged in formal pre-application discussions with the planning authorities and statutory consultees including:
 - LB Southwark
 - Greater London Authority (GLA)
 - Transport for London (TfL)
 - English Heritage
- 6.5 The feedback received has been useful in understanding the community, stakeholders' and authorities' aspirations for the Site's development. Many of the comments received have resulted in a series of changes to the Proposed Development including:
 - further improvements to the public realm;
 - pedestrian routes and connections to the surrounding area;
 - increased active frontages around the Site;
 - introduction of the Viewing Lounge within the Tower; and
 - further improvements to access and servicing of the Site.
- 6.6 The evolution of the design in response to this feedback is included at Section 3.7 of the Design and Access Statement.
- 6.7 Further details of all consultees are included within the Community Engagement Strategy that is submitted in support of the application.

7.0 Planning Policy Overview

INTRODUCTION

- 7.1 The Town and Country Planning Act 1990 (the “1990 Act”), the Planning and Compulsory Purchase Act 2004 (the “2004 Act”) and the Localism Act 2011 establish the legislative basis for town planning in England and Wales. Together these Acts establish a “plan led” system which requires local planning authorities to determine planning applications in accordance with the statutory development plan (the development plan) unless material considerations indicate otherwise (section 38(6) of the 2004 Act as amended by the Localism Act). In London the development plan comprises the borough plan and the London Plan.
- 7.2 This section includes a summary of; the key principles contained within the National Planning Policy Framework (NPPF), site specific allocations, relevant designations and associated development plan policy; and other relevant policy considerations specific applicable to the determination of these proposals. Commentary on the interpretation of the policies and material considerations and how they apply to these proposals is set out in the planning assessment chapter. A comprehensive overview of all relevant development plan and supplementary policy is set out in Appendix A.
- 7.3 The statutory development plan for the Site comprises:
- The London Plan 2011;
 - The London Borough of Southwark’s Local Development Framework (LDF) Core Strategy 2011; and
 - The London Borough of Southwark’s Unitary Development Plan 2007 (known as ‘The Southwark Plan’) saved policies.
- 7.4 Where there is a conflict between policies in the development plan, Section 38(5) of the 2004 Act provides that the most recently adopted policy takes precedence. As the London Plan was adopted more recently than either the LDF Core Strategy or Southwark Plan, where there is a difference in policy the London Plan takes precedence.
- 7.5 To support and explain the policies contained within the development plan, both the Mayor and LB Southwark have published non-statutory planning guidance which includes Supplementary Planning Guidance (SPG) and Supplementary Planning Documents (SPDs). SPG and SPDs must be consistent with national and regional planning guidance, as well as the policy in the adopted development plan which they are intended to supplement. They must not introduce new policies or seek to allocate land for development that is not related to a statutory policy provision.
- 7.6 Emerging policy is also addressed including:
- Early Minor Alterations to the London Plan (February 2012)
 - The Mayor’s Draft Housing SPG (2011)
 - The draft Bankside Borough and London Bridge SPD (2010)

7.0 Planning Policy Overview

NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

- 7.7 The National Planning Policy Framework (NPPF) was published on the 27th March 2012. It consolidates national planning guidance into a single document (and technical appendices) and replaces all Planning Policy Guidance Notes and Planning Policy Statements with the exception of PPS10.
- 7.8 At the heart of the NPPF is a presumption in favour of sustainable development. For plan-making, this means local planning authorities should positively seek opportunities to meet the development needs of their area, for decision-taking this means approving development proposals that accord with the development plan without delay. The NPPF encourages the re-use and redevelopment of previously developed land and the more efficient use of land through bringing back into residential use empty housing and buildings in line with local housing and empty homes strategies.
- 7.9 The NPPF identifies that the purpose of the planning system is to achieve sustainable development which comprises three strands - economic, social and environmental:
- an economic role – contributing to building a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
 - a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and
 - an environmental role – contributing to protecting and enhancing our natural, built and historic environment; including improving biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.
- 7.10 At paragraph 9, the NPPF identifies that pursuing sustainable development involves “seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life, including (but not limited to):
- making it easier for jobs to be created in cities, towns and villages;
 - moving from a net loss of bio-diversity to achieving net gains for nature;
 - replacing poor design with better design;
 - improving the conditions in which people live, work, travel and take leisure; and
 - widening the choice of high quality homes.”
- 7.11 Paragraph 14 identifies that at the heart of the NPPF is a presumption in favour of sustainable development. For decision-taking this means approving development proposals that accord with the development plan without delay.
- 7.12 A summary of key relevant NPPF policies is included in the Appendix A.

7.0 Planning Policy Overview

SITE SPECIFIC ALLOCATIONS AND RELEVANT DESIGNATIONS

Strategic Policy - The London Plan 2011

- 7.13 The Site falls within two important designations in the London Plan:
- Central Activities Zone (CAZ)
 - London Bridge, Borough and Bankside Opportunity Area (OA)
- 7.14 Strategic priorities for the Central Activities Zone (Policy 2.10) include enhancing its international, national and London-wide role, supporting its distinct offer and strategic uses; bringing forward development capacity and supporting infrastructure and services; and supporting and improving the retail offer.
- 7.15 Policy 2.11 promotes a mix of uses in the CAZ including residential and retail development. The Site falls within an area on the South Bank identified for mixed uses with strong arts, cultural or entertainment character in Map 2.3.
- 7.16 Development proposals in OAs should optimise densities, providing supporting infrastructure, contribute to housing and employment targets, realise the scope for intensification and support wider regeneration (Policy 2.13). The London Bridge, Borough and Bankside OA is specifically identified for the delivery of a minimum of 1,900 new homes and approximately 25,000 new jobs in the plan period to 2031.
- 7.17 Tall buildings are directed to the CAZ and Opportunity Areas in areas which benefit from good public transport access and whose character would not be adversely affected by such proposals (Policy 7.7). Within the CAZ, strategically important hotel provision should be focussed on its Opportunity Areas with good access to public transport (Policy 4.5).

Local Policy - LDF Core Strategy 2011 and Southwark Plan ('Saved Policies') 2011

- 7.18 Core Strategy Strategic Targets Policy 2 reflects the London Plan's aspirations for the CAZ and the London Bridge, Borough and Bankside OA as the focus for a significant number of new homes and jobs to be delivered through mixed use development. This policy sets an additional target for 665 affordable homes to be delivered in the OA (as part of the overall target for 1,900 new homes).
- 7.19 Strategic Targets Policy 2 also sets out a vision for the Bankside and Borough area specifically, which seeks new development to improve public spaces, accessibility and recognise and enhance the different character and roles of places in the area. The northern end of Blackfriars Road is specifically identified for a cluster of tall buildings providing offices, housing, hotels and shops. These buildings would be of exceptional design and would enhance the look of the area and provide new public spaces. Car parking would be limited to deter car use and help reduce traffic.
- 7.20 The Site also falls within five other relevant local policy designations:
- Bankside and Borough District Town Centre
 - Bankside, Borough and London Bridge Strategic Cultural Area
 - Archaeological Priority Zone
 - Air Quality Management Area

7.0 Planning Policy Overview

■ Thames Flood Zone

- 7.21 LB Southwark will support the provision of new food and non-food retail space in town centres and seek to ensure that new development comprises a scale and balance of different uses appropriate to the centre (Core Strategy Strategic Policy 3). Saved Southwark Plan Policy 1.7 states that most new developments for retail and other town centre uses (including leisure, entertainment, community and residential uses) will be directed to existing town centres.
- 7.22 Development of hotels will be promoted within the town centres, the Strategic Cultural Areas, and places with good access to public transport services, providing that these do not harm the local character (Core Strategy Strategic Policy 10).
- 7.23 Proposals on sites in APZs should provide an assessment of any archaeological remains which may be present (Core Strategy Strategic Policy 12 and saved Southwark Plan Policy 3.19). Development that would lead to a reduction in air quality will be resisted, particularly in the Air Quality Management Area (saved Policy 3.6).
- 7.24 Development will be allowed in the 'Thames Flood Zone' (identified in Figure 34 of the Core Strategy) where it is designed to be safe and resilient to flooding and meets the Exceptions Test (set out within PPS25) in accordance with Core Strategy Strategic Policy 13.

Supplementary Guidance - Draft Bankside, Borough & London Bridge SPD 2010

- 7.25 The draft SPD was published for two rounds of public consultation in February and September 2010. Production of the SPD was put on hold in early 2011 to allow the preparation of Bankside, Borough and London Bridge Neighbourhood Plan. However, work recommenced on the production on the SPD in early 2012. Although not formally adopted, the draft SPD is a material consideration in the determination of planning applications in the area.
- 7.26 The draft Bankside, Borough and London Bridge (BBLB) SPD sets out a strategic vision for the OA and includes a site specific allocation relating to the Site.
- 7.27 LB Southwark's vision is for Bankside, Borough and London Bridge to be a vibrant, mixed-use area that people want to visit, that supports the economic and business function of central London, promotes the success of local businesses and provides a high quality living environment for local people. In order to achieve this, LB Southwark will support the delivery of a significant number of new homes and jobs in accordance with London Plan targets.
- 7.28 In relation to Blackfriars Road North sub-area, the SPD states that (Section 3.2):

"Major mixed use development will line the northern half of Blackfriars Road, which will be a major focus for high quality offices and a complementary mix of uses bringing new life to the area. This will include hotels, new retail space and housing. Development will help bring new activity and life to Blackfriars Road, which will be complemented by major public realm improvements. There will be a cluster of tall buildings around the northern end of Blackfriars Road. These buildings will be of exceptional design and will enhance the look of the area and provide new public spaces. Access to and along the riverside and to and from the new Blackfriars Station will be improved"

7.0 Planning Policy Overview

- 7.29 Guidance on the Blackfriars Road North sub-area specifies that at the intersection of Blackfriars Road, Stamford Street and Southwark Street, development should be no taller than 165 metres, the height of the schemes already approved for this location.
- 7.30 A site specific allocation (Section 5.9) is included for the Site which describes it as a 'gateway to Southwark' and states that development could provide a significant contribution to providing high quality homes and offices, and improving the streetscape and vibrancy of Blackfriars Road.
- 7.31 The Site is promoted for a mix of uses including hotel, office (Class B), retail (Class A), leisure, entertainment and cultural (Class D) and residential uses, with active uses at lower levels. The allocation also seeks the provision of viewing platforms and a major leisure, arts, cultural or entertainment facility to provide public benefit and take advantage of its prominent location.
- 7.32 The Site is identified as having potential for a tall building. Proposals should be of the highest quality of design which appropriately responds to the sensitive riverside location and takes into account important views (such as the strategic view from St James Park to Horse Guards Road and local views along Blackfriars Road). The design should also define the corner of the Site, have a building line which provides enclosure to the street and accommodate substantial amounts of publicly accessible active uses.
- 7.33 Development should provide pleasant and welcoming public space on the Site which relate and link to nearby open spaces. Development should also help to improve the streetscape and pedestrian and cycling environment on Blackfriars Road and Stamford Street (including through provision of an improved road crossing).

OTHER RELEVANT POLICY CONSIDERATIONS

- 7.34 In addition to the site specific allocation and other designations, there are a number of other policy considerations associated with the Site's location.
- 7.35 The Site is visible in a number of strategic views in the London View Management Framework (2012) – although it is not within the Viewing Corridor or Background Consultation Area of any Protected Vistas. Of particular relevance, the Site falls within the Background Consultation Area of the Townscape View from Assessment Point 26.A: St James's Park to Horse Guards Road (as highlighted in the site specific guidance in the BBLB OA SPD).
- 7.36 Guidance on this view states that any building proposal that will be visible in the background should relate to one or the other of the existing groups either side of Duck Island and must be of exceptional design quality, in particular with regard to the roofline, materials, shape and silhouette. New buildings that appear above the central part of Duck Island would damage the viewer's ability to see these groups of buildings in conjunction with the landscaped foreground and should normally be refused.
- 7.37 A number of local views are also identified in the draft BBLB SPD. These are assessed in detail within Volume II of the Environmental Statement.
- 7.38 As outlined in the Site and Surroundings section, there are a number of Grade II listed buildings in the immediate vicinity of the Site. Also, Old Barge House Alley Conservation Area is located to the east of the Site straddling the Southwark/Lambeth borough boundary (full list of nearby heritage assets is provided

7.0 Planning Policy Overview

in the Volume II of the Environmental Statement which accompanies this application).

- 7.39 Local planning policy requires that new developments conserve or enhance Southwark's heritage assets, their setting and wider historical environment including, inter alia, APZs, listed buildings, conservation areas and world heritage sites (Core Strategy Strategic Policy 12, and saved Southwark Plan Policy 3.15 and 3.18).

8.0 Planning Policy Assessment

- 8.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications made in accordance with the development plan should be determined positively unless material considerations indicate otherwise.
- 8.2 A key material consideration in the determination of this new application is the Implemented Permission as set out in Sections 4 and 5. This section assesses the New Application against current planning policy but where relevant also takes into account the status of the Implemented Permission as a material consideration where elements of the Implemented Permissions have been replicated in the New Application.
- 8.3 This section of the Planning Statement deals with the key planning issues relating to the Proposed Development. The topics considered are:
- Principle of re-configured land uses:
 - Hotel
 - Residential
 - Retail
 - Public access to the Upper Levels of the Tower
 - Enhanced Public Realm
 - The Cumulative Regeneration and Economic Benefits
 - Residential Considerations:
 - Mix of homes
 - Affordable Housing
 - Residential Density
 - Residential Standards (Home Sizes, Daylight and Sunlight, Aspect, Lifetime Homes)
 - Residential Amenity
 - Children’s Playspace
 - Design – Building Layout, Scale, Massing and Appearance
 - Townscape, Conservation and Heritage Considerations
 - Access and Inclusivity
 - Waste Management
 - Transport and Servicing
 - Sustainability and Energy
 - Environmental Considerations
 - Planning Obligations

8.0 Planning Policy Assessment

PRINCIPLE OF RECONFIGURED LAND USES WITHIN THE DEVELOPMENT

- 8.4 The New Application proposes a high quality mixed use development including a 170m AOD tower and two low rise, 6 storey and 4 storey buildings comprising, hotel, residential and retail uses together with significant new public realm.
- 8.5 The New Application retains the original design by Ian Simpson Architects for the external appearance, height and massing of the 2009 Implemented Permission Tower and reworks the internal layout and land uses to provide an approximately 74,925 metres squared (sq m) Gross External Area (GEA) mixed use development. A summary of the principal differences between the New Application and Implemented Permission is set out below:
- Relocating the hotel from the lower floors of the Tower to the Rennie Street building.
 - Replacing the hotel within the tower with high quality private homes.
 - Separation of the Tower, Rennie Street and Podium Buildings through removal of the raised podium.
 - Improvements to the public realm, to reflect the wholly residential use of the tower and reconfigured hotel and retail uses; including the removal of the podium and the creation of a new Public Square (Blackfriars Place) at grade.
 - Removing the pay to visit sky deck visitor attraction from the Tower and replacing it with a managed 'viewing lounge' on the 32nd level.
 - Provision of off-site residential affordable housing, resulting in a demonstrable uplift to quantum and mix of homes; or a financial payment in lieu should this prove not to be feasible.
 - Amendments to servicing and parking strategy to reflect the revised land use mix; and
 - Revisions to the energy strategy to reflect the latest policy position of the London Plan and alteration to the mix of uses in the Proposed Development.
- 8.6 These changes would make the development viable and see the delivery of a stalled development on a prominent brownfield site which has been vacant for ten years.
- 8.7 This application proposes mixed use redevelopment of a prominent site within the London Bridge, Borough and Bankside Opportunity Area (LBBB OA) and the Central Activities Zone (CAZ). The NPPF (para 17), London Plan Policy 2.11, Core Strategy Strategic Policy 1 and Saved UDP Policy 3.11 promote mixed use redevelopment, in particular, in CAZ and OA locations. The Site is also specifically identified for mixed use redevelopment in Southwark's Draft Bankside, Borough and London Bridge (BBLB) SPD (2010). The principle of redevelopment for a mix of uses is in therefore in accordance with policy at all levels.
- 8.8 Paragraph 17 of the NPPF specifically identifies the core principles of the planning system underpinning both plan making and decision taking including to "proactively drive sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs". Paragraph 14 identifies a presumption in favour of sustainable development including that

8.0 Planning Policy Assessment

“development proposals that accord with the development plan should be approved without delay”.

- 8.9 OAs are priority areas for growth in new jobs and housing. The Site is specifically identified as a strategically important development site within the draft BBLB SPD.
- 8.10 The principle of the redevelopment of the Site for a high density mixed use development was established by the Implemented Permission and is supported by the London Plan, Southwark Plan, Core Strategy, and the draft Bankside, Borough and London Bridge SPD.
- 8.11 The Proposed Development would enable the delivery of a Site which has been vacant for ten years. The Proposed Development would provide 274 new homes, over 200 new permanent jobs in a range of sectors, new hotel and retail related facilities, a managed access Viewing Lounge on the 32nd level of the tower, significant public realm improvements and enable the delivery of off-site affordable housing.
- 8.12 The application proposals represent a viable and deliverable development. The Applicant’s objective is to commence development in 2013 and complete the development within a period of 48 months subject to receiving planning permission.
- 8.13 The Proposed Development would therefore deliver on NPPF, London Plan and LB Southwark’s policy objectives, providing a landmark, exemplary mixed use development, securing the delivery of new homes and jobs and contributing significantly to the regeneration of the area (see below).
- 8.14 The proposed mix of uses is appropriate to the Site and accords with national, regional and local planning policy. Each land use will now be addressed in turn.

Hotel

- 8.15 London Plan Policy 4.1 identifies the objective to deliver an additional 40,000 hotel bed spaces in the capital by 2031 and identifies OAs as a preferred location for hotel development (policy 4.5). Southwark Plan’s saved Policy 1.7 also identifies OAs and town centres as the preferred location for town centre uses including hotels.
- 8.16 In addition saved Policy 1.12 encourages hotel development in highly accessible areas where they will not result in an over dominance of visitor accommodation. Similarly, Core Strategy policy 10 promotes hotel development in Strategic Cultural Areas such as the LBBB OA where they do not harm local character.
- 8.17 Importantly, the Core Strategy Strategic Policy 2 identifies the Blackfriars North area as suitable for hotel development. In line with this, the site allocation in the draft LBBA SPD specifically identifies the Site for the delivery of a hotel as part of a of mixed use development. The delivery of a new hotel as part of the overall mix of uses is in accordance with policy.
- 8.18 A Hotel Demand and Feasibility Study (May 2012) produced by CBRE Hotels has been submitted as part of this planning application. It assesses the viability and feasibility of the Implemented Permission and New Application hotel offers.

The Implemented 261 Bedroom Hotel

- 8.19 The Implemented Permission included a luxury 261 bedroom hotel occupying levels 2 to 26 of the tower building. The hotel would have been aimed at the luxury end of the hotel market. Based on the usual profile of corporate travellers in the luxury

8.0 Planning Policy Assessment

market, such an operation would seek to cater for senior executives and high profile business representatives.

- 8.20 Hotel Room rates would be high, limiting the affordability of the Implemented 261 bedroom hotel and making it less likely to attract tourist and mid level business travellers who are likely to spend more time and money in the local area. It is envisaged that guests would only spend a small amount of time in the local area in Southwark, which would limit spending in the Site's vicinity and borough.
- 8.21 CBRE Hotels' research among hotel groups operating in this market shows that their preferred location is Mayfair and Knightsbridge and that other locations are considered to be secondary. Attracting luxury hotels outside these areas would be extremely challenging.
- 8.22 In addition, since the grant of the Implemented Permission a number of additional Luxury hotels have been opened in the locations identified above, further increasing the competition for this type of hotel and the difficulty in attracting a luxury hotel to this location.
- 8.23 The Study also finds that the impact of challenging market conditions is compounded by the extremely high construction and management costs of including the Implemented 261 bedroom hotel within the Tower. This is further exasperated by significant operational inefficiencies in the approved floorplans including hotel rooms that are too large and unfeasible ancillary facilities such as a ball room.
- 8.24 It is CBRE Hotel's opinion that the size of the Implemented 261 bedroom hotel is too large and that given the Site's location would be unlikely to generate demand to reach a viable share of the market and would be unable to support the expected high hotel tariff levels. This would impact on the viability of the Proposed Development. As such the number of potential operators for a luxury hotel in this location would be limited.
- 8.25 The CBRE Hotels Study concludes that the type of hotel, construction cost and operational inefficiencies mean that Implemented 261 bedroom hotel offer within the tower is not viable in the current economic climate.

The Proposed 152 Bedroom Hotel

- 8.26 The Applicant proposes an upscale/lifestyle 152 bedroom hotel to be built in the stand alone 6 storey Rennie Street building. It would include publically accessible active uses at ground floor level include restaurant and bar facilities and a Business Centre.
- 8.27 The CBRE Hotels' Study advises there is a much stronger market for upscale/lifestyle hotels in this location with significant interest from a number of hotel operators. The Applicant is currently in discussions with a number of interested parties.
- 8.28 The upscale/lifestyle genre distinguishes itself from the more traditional offering by providing more personalised experience in a contemporary and design orientated environment. Examples of established brands in this sector are W by Starwood and Andaz by Hyatt. Public areas, such as restaurants, bar and lobby are important focus points, intended to draw in guests and the public.
- 8.29 Room rates for the upscale/lifestyle hotel market are more affordable than the luxury market. The guest profile of this type of hotel can be classified as middle to senior manager, frequently travelling on business and leisure guests who are interested in

8.0 Planning Policy Assessment

art and cultural events and typically seeks new and authentic experiences. Southwark and the Southbank, have many attractions and offerings that are relevant to the target leisure guest. An upscale/lifestyle hotel in this location would provide a suitably complementary offer.

- 8.30 The Proposed 152 bedroom hotel positioned within the upscale sector would, receive greater interest from operators. The Proposed 152 bedroom hotel is likely to be more appealing to both the local corporate market as well as leisure visitors and its size should allow it to generate viable occupancy levels. Despite the current economic climate, interest in upscale/lifestyle hotels remains very strong with new investors and existing hotel operators keen to enter the sector. London upscale/lifestyle hotels frequently outperform competing corporate chains.
- 8.31 Upscale/lifestyle hotels provide a personalised, high quality accommodation and service for guests. Measures are undertaken by the operators in order to differentiate themselves from other hotels and to create a destination hotel. The Proposed 152 bedroom hotel would be sited in a unique location benefitting from the creation of Blackfriars Place as a destination and being located by the new landmark Tower which would assist in attracting operators and visitors.
- 8.32 From a construction and operational costs perspective the relocation of the hotel to the stand alone Rennie Street Building allows for greater operational efficiency with more efficient room sizes, appropriately sized ancillary facilities and reduced construction costs.
- 8.33 The Proposed 152 bedroom hotel provides a more deliverable offer in the current economic climate, and is designed as an upscale/lifestyle hotel that would be sought after by a range of market operators.
- 8.34 The scale and nature of the Proposed 152 bedroom hotel would generate sustainable hotel tariff levels that ensure the hotel is viable.
- 8.35 In addition to the 'fit' between an upscale/lifestyle hotel and the evolving arts and cultural nature of the South Bank area, the destination nature of restaurant and bar areas normally associated with such hotels, would further complement the setting of the residential and retail around Blackfriars Place.
- 8.36 In terms of certainty and delivery, the build costs associated with the relocation of the hotel into an attractive standalone building on Rennie Street and change from a luxury hotel offering to an upscale/lifestyle hotel would reduce construction costs, create a more viable and deliverable offer.
- 8.37 The Proposed 152 bedroom hotel would create approximately 122 full time jobs. Given the hotel's high quality offer, it would continue to generate a wide range of roles including hotel management, cleaners and porters, chefs and waiters.
- 8.38 The Applicant is working with LB Southwark to investigate the potential for ensuring that candidates for hotel jobs would be recruited locally where possible. This would be secured through a Training and Employment Plan which would be agreed with LB Southwark.
- 8.39 The Applicant has also agreed to support the establishment of a Hotels and Hospitality Sector Employer's Skills Forum with other employers, BIDS and local skills and employment agencies in the surrounding area. The Applicant would encourage the hotel operator to continue to engage in this.

8.0 Planning Policy Assessment

- 8.40 The Proposed 152 bedroom hotel would provide the opportunity for a range of employment benefits and high quality ancillary facilities that would benefit the local economy and population.
- 8.41 The Proposed 152 bedroom hotel within the New Application is considered to be viable and deliverable and is well suited to the Site's location. We therefore consider it is in conformity with national, regional and local planning policy.

Residential

- 8.42 A crucial component of the Proposed Development is the delivery of 274 high quality new market homes in the Tower, an increase from 96 in the Implemented Permission.
- 8.43 The proposals deliver on the core land use principles of the NPPF, promoting mixed use development and the delivery of new homes.
- 8.44 London Plan policies 2.10, 2.11 and 2.13 promote residential development within the CAZ and OAs. A specific target of the delivery of 1,900 new homes is identified for the LBBB OA. The London Plan is clear that these targets are a minimum which should be exceeded.
- 8.45 The Core Strategy identifies a target of the delivery of 24,450 new homes in the Borough between 2011 and 2026. Core Strategy Policy 5 promotes residential development in growth areas such as the LBBB OA. Saved Southwark Plan Policy 4.2 promotes residential development within mixed use development.
- 8.46 Residential uses are also required as part of the mix of uses specified in the draft BBLB SPD site allocation.
- 8.47 The increased number of homes optimises the use of a previously developed site in a highly accessible CAZ location in accordance with London Plan and LB Southwark policies and substantially boosts housing supply for Bankside area, providing 14% of the areas 1,900 target for the period to 2026.
- 8.48 The delivery of an increased number of homes on the Site would also facilitate the delivery of a significant level of affordable housing off-site either through securing a donor site or financial payment in lieu (this is addressed further in paragraphs 8.101 to 8.123 below).
- 8.49 The new homes would generate the need for approximately 28 estate management jobs on Site once operational as well as wider economic regeneration benefits which are discussed in the Cumulative Regeneration and Economic Benefits assessment later in this Section.
- 8.50 The proposed residential use is therefore fully in accordance with policy at all levels.

Retail

- 8.51 London Plan Policy 2.11 identifies retail as a suitable use within CAZ and OA locations. Saved Policy 1.9 of the Southwark Plan and the Core Strategy Policy 3 identify the Site as falling within the Bankside and Borough District Town Centre, food and non-food, retail and other town centre uses are supported in this location. The site specific allocation within the draft BBLB SPD identifies that retail uses should be provided as part of a sustainable mix of uses.

8.0 Planning Policy Assessment

- 8.52 The Proposed Development would deliver 1,336 sq m of retail floorspace comprising retail units at ground floor and ancillary areas at basement level.
- 8.53 This application seeks flexibility to use this floorspace for open A class, depending on occupier demand such that the Proposed Development would provide a sustainable mix of appropriate retail, service, food and drink uses.
- 8.54 The retail uses within the Proposed Development would provide for a significant level of active frontages facing onto the public realm and new central public open space, Blackfriars Place, together with frontages on Blackfriars Road, Rennie Street and Stamford Street.
- 8.55 This is in line with the draft site allocation which seeks to improve the streetscape of Blackfriars Road and Stamford Street. These active frontages would provide for an engaging and lively public realm including opportunities for tables and chairs outside restaurants, bars and cafes providing 'pleasant and welcoming open spaces' including encouraging people 'visit and linger' in the area as promoted by the policies of the draft BBLB SPD.
- 8.56 The retail uses would result in the provision of an additional 61 new jobs. The cumulative employment benefits of the Proposed Development are considered in the Cumulative Regeneration and Economic Benefits section below.

Public Access to the Upper Levels of the Tower

- 8.57 London Plan Policy 7.7 identifies the CAZ and OAs as suitable areas for the location of tall buildings and identifies that tall buildings should "incorporate publicly accessible areas on the upper floors, where appropriate". The Core Strategy identifies the LBBB OA as a possible location for tall buildings, as does the site specific allocation in the draft BBLB SPD including that development should "include the provision of viewing platforms and a major, arts, leisure, culture and entertainment facility to provide public benefit and to take advantage of its prominent location".

The 'Sky Deck' Major Visitor Attraction

- 8.58 The Implemented Permission included a pay for entry major visitor attraction known as 'The London Sky Deck' which was to provide a viewing and observation deck on the two top floors of the Tower. It was proposed this major visitor attraction was to be operated by the hotel operator located in the tower.
- 8.59 A Sky Deck Feasibility Report prepared by The Visitor Attraction Company (TVAC) is submitted in support of the New Application and assesses the feasibility of incorporating a Sky Deck major visitor attraction as part of the revised proposals.
- 8.60 The Visitor Attraction Company (TVAC) are renowned experts in the provision of advice on the feasibility of, operation and management of major visitor attractions in the UK and worldwide, including the London Eye and the Arcelor Mittal Orbit.
- 8.61 The report concludes that a major visitor attraction such as the Sky Deck would not be commercially feasible or viable as part of the revised proposals in the current economic climate for the following reasons:
- The TVAC reports considers that the Sky Deck would be a second tier attraction in a very competitive market which is already well served by internationally renowned destination attractions.

8.0 Planning Policy Assessment

- The Sky Deck would be competing for the same visitors as the London Eye and Shard which are in close proximity; both of which are far better suited for commercially operated major visitor attractions. The London Eye is a purpose built, long established visitor attraction with over 3 million visitors per year, providing changing views of the London sky line with significant supporting facilities (including 4D Cinema). The Shard, when open, will provide viewing platforms and substantial supporting facilities on the upper levels of the tower, over 20 storeys higher than the Proposed Development.
 - The market for viewing platforms has a limited capacity. Only a limited offer can be provided in the relatively small space of the LBBB OA and the creation of a third tall building visitor attraction within close proximity to others would lead to market oversupply;
 - There is a significant risk that the Sky Deck offer would fall behind its competitors in the market, which are capable of providing world class, destination visitor facilities, that the Sky Deck could not compete with. This would have implications on its marketability to visitors, its attractiveness to operators and on its viability in the long run.
 - As a consequence, it would be unsustainable from a financial perspective; the TVAC report demonstrates that from year two onwards the Sky Deck would likely need to be subsidised by around £400,000 per year if it was to be maintained to a high quality level, after generating a small profit in the first year; such a business model is not sustainable.
 - The Applicant is not a visitor attraction operator and does not have the expertise to manage such a facility. Given the challenging market conditions outlined above, it would be difficult to attract a high quality operator and extremely unlikely to find one willing to invest in the fit-out of the facility.
 - The quality of the experience and financial viability may be further impacted upon by design and management related issues including;
 - Limited floorspace for Sky Deck facilities within the tower - approximately 300 sq m of further space outside of the tower would need to be provided and rented to accommodate toilets, a shop and back of house needs.
 - Evacuation procedures in the case of an emergency.
 - The single outer skin of the building at Sky Deck level which may cause heat build up on summer days and condensation on damper and cooler days.
 - Potential impact of the Sky Deck on residents' amenity due to the relationship between the entrance lobby for visitors and entrance to the residential uses.
- 8.62 Delivery of the Sky Deck in the current economic climate would not be financially viable and based on the findings of the TVAC report, it would need to be subsidised on an annual basis after the first year.
- 8.63 It is clearly demonstrated in the TVAC report that it is not commercially or financially feasible at present to deliver the Sky Deck major visitor attraction as part of the

8.0 Planning Policy Assessment

Proposed Development. The Sky Deck major visitor attraction therefore does not form part of the New Application.

- 8.64 The Applicant has also investigated the scope for inclusion of other commercial uses on the top floors of the tower such as restaurant and bar facilities. However, detailed assessment has found that such facilities are not sustainable or viable due to design and financial issues.
- 8.65 The financial impact of these facilities on the viability of the Proposed Development has been shared with LB Southwark officers confidentially due the financially sensitive nature of the information.

The Viewing Lounge

- 8.66 In recognition of the Tower's prominent location and aspirations of LB Southwark and GLA, the Applicant has explored alternative realistic opportunities to incorporate engaging, publically accessible elements within the Tower that would provide a benefit to the local community and borough.
- 8.67 The New Application now includes a managed access Viewing Lounge on the 32nd level of the Tower. This facility would occupy 476 sq m GEA of floorspace in the northern prow of the building offering expansive views along the River Thames and cityscape to the north, east and west. Public access is gained from Upper Ground Level of Blackfriars Place. Further details of the layout and design of the Viewing Lounge are included within the Design and Access Statement.
- 8.68 It is envisaged the Viewing Lounge would be a shared communal facility that would be available to the following users, with the capacity to accommodate up to 35 people at any one time:
- Residents of the tower
 - Hotel guests
 - Local Community (residents who live in Chaucer and Cathedral Wards and their guests)
 - LB Southwark Council Official Events
 - Recognised local amenity groups
- 8.69 The Viewing Lounge would be available for the following functions:
- Events/Receptions
 - Presentations
 - Meetings
 - Viewings
- 8.70 The space would be available for hire at a reasonable cost, no greater than the need to cover the running costs. The Applicant is working with the LB Southwark to prepare a detailed Management Plan for the facility which would elaborate on these principles. This would be incorporated into the Section 106 Agreement should planning permission be granted to ensure the facility is retained in perpetuity.
- 8.71 The Viewing Lounge would provide a unique and exciting communal facility for residents and the local community, which takes advantage of the Tower's prominent

8.0 Planning Policy Assessment

location and offering fantastic views of London from a significant and meaningful height.

- 8.72 The status of the Viewing Lounge as a non-commercial operation means that its on-going future viability would be safeguarded and would not be at risk from market pressures that a commercial Visitor Attraction would be vulnerable to.
- 8.73 The Viewing Lounge provides a significant public benefit and visitor experience for members of the local community. The proposals therefore accord with London Plan and LB Southwark Policy.

Enhanced Public Realm

- 8.74 London Plan policies 7.5 and 7.6 require that new development provides a 'comprehensible' public realm and provides high quality spaces. The draft BBLB SPD specifically identifies Blackfriars North and the area immediately surrounding the Site providing poor connectivity and legibility. It places a particular emphasis on the scope and opportunity that redevelopment including the provision of tall buildings in the area, and specifically on the Site, offer for significant improvements to the public realm including:
- Providing and improving access to the riverside and attractions such as the Tate Modern and Bankside;
 - Improving the streetscape of Blackfriars Road and Stamford Street; and
 - Improving pedestrian movement within and across the area;
 - Encouraging people to visit and linger along key routes such as Blackfriars Road and Stamford Street.
 - Create more space for pedestrians and new points of activity and interest to encourage movement away from crowded areas.
- 8.75 The Site Allocation specifically requires that "development should provide new pedestrian links through the Site which relate and link to nearby open spaces, including those on the adjoining Kings Reach and 20 Blackfriars Road sites and help improve the pedestrian and cycling environment on Blackfriars Road and Stamford Street including through provision of improved road crossing".
- 8.76 The New Application includes significant public realm improvements, increasing the amount of public realm on site from 2,958 sq m in the Implemented Permission to 3,100 sq m in the Proposed Development. The following key improvements are addressed below:
- i. The creation of a new central public square known as 'Blackfriars Place';
 - ii. Significant improvements to the public realm and general environment of Rennie Street;
 - iii. The straightening of the junction of Stamford Street with Blackfriars Road to create an area of new public realm and provide well-defined edge to the corner; and
 - iv. Enhancements to Blackfriars Road and Upper Ground pedestrian routes including use of high quality granite and planting.

8.0 Planning Policy Assessment

i. Blackfriars Place

- 8.77 The Implemented Permission included a raised plaza at podium level. The main challenges stemmed from its limited accessibility and its separation from the public footway. Elevated one floor above the pavement level, it required lift access or a long flight of stairs for the public.
- 8.78 The New Application removes the elevated podium of the Implemented Permission and creates a new square which would be known as 'Blackfriars Place' at ground level.
- 8.79 Details of Blackfriars Place are included in the Landscape Strategy Section of the Design and Access Statement submitted in support of the application.
- 8.80 The removal of the podium level and the creation of a public space at grade is considered to be a highly beneficial change. Through the pre-application consultation process, a new route has been added through to Blackfriars Road and further improves connections, whilst also adding interest to the Blackfriars Road streetscene.
- 8.81 Blackfriars Place would significantly increase the permeability of the area, through the removal of stepped access and would provide new connections to the area's wider townscape creating new routes through the Site to Upper Ground, Blackfriars Road and south to Stamford Street and beyond.
- 8.82 As demonstrated in the Landscape section of the Design and Access Statement, Blackfriars Place has several key functions:
- It is a point of destination worthy of the tallest building in the Blackfriars area.
 - It provides several pedestrian routes connecting the Site to the wider area including Upper Ground, Stamford Street and beyond. Legible pedestrian routes would link Blackfriars Place to surrounding areas and routes along the riverside.
 - Blackfriars Place would be enhanced through extensive soft and hard landscaping incorporating greening of the area through tree and shrub planting and a new area of public seating.
 - The Applicant is in discussion with stakeholders to explore opportunities for the inclusion of public art. This would enhance the character of the area providing visual interest and a focal point within Blackfriars Place.
 - It would be a place where the public can linger and enjoy the calm away from the busy roads and take advantage of spill out space from neighbouring retail uses. At the heart of Blackfriars Place would be a central area which provides a more soft and intimate space including planted trees, soft landscaping and benches, which is surrounded by raised water features.
 - The outer edges of Blackfriars Place would be bounded by active frontages of the proposed ground floor retail and hotel uses within the Podium and Rennie Street buildings, including retail and food and drink uses with opportunities for outdoor seating creating a lively and engaging public space.
 - Opportunities are currently being explored for the development to contribute towards the 'legible London' initiative as part of the public realm strategy through wayfinding initiatives and signage.

8.0 Planning Policy Assessment

8.83 Blackfriars Place would provide a new place to dwell and enjoy as part of residents', workers' and visitors' experience of Bankside and the Southbank. The proposals include a significant increase in the level of active frontage within the Proposed Development and improve connectivity and legibility compared to the Implemented Permission, in accordance with the specific policy objectives in the draft BBLB SPD and London Plan.

ii. Rennie Street

8.84 The Implemented Permission included servicing along the majority of the ground floor level Rennie Street building façade and Upper Ground. On-site servicing for the Rennie Street Building has now been rationalised into one point on Rennie Street. This would enable the rest of the Rennie Street Building frontage to be activated through the retail, hotel lobby and hotel restaurant uses.

8.85 These active frontages on Rennie Street would add significant vitality to the street and correspond positively to the proposed active frontages of the neighbouring King's Reach Tower proposals which were granted planning permission last year.

8.86 To reinforce the changing nature of Rennie Street into a high quality and active environment, the Landscape Strategy includes the use of granite paving and roadway. The use of high quality shared materials in both would assist in enhancing the street whilst additional tree planting is included on the pavements outside Rennie Street to further soften the environment.

iii. Stamford Street

8.87 Proposals to improve the quality of public realm on Blackfriars Road between Blackfriars Bridge and St George's Circus have recently been considered by TfL, culminating in the production of the Blackfriars Road baseline conditions and concept report, which was published in February 2010.

8.88 The urban improvement scheme on Blackfriars Road aims to improve the public realm and facilities for both pedestrians and cyclists whilst maintaining its status as a strategic vehicular link for north-south movements within London and co-ordinating with existing stakeholder aspirations including future developments/ attractors and competing public transport modes.

8.89 The Proposed Development includes the re-alignment of the junction of Stamford Street and Blackfriars Road. The Stamford Street slip road would be removed and replaced with high quality landscaping and pavement spill out space from ground floor retail within the Podium Building.

8.90 The re-alignment of the Stamford Street junction provides a well-defined edge to Stamford Street on the corner of Blackfriars Road and much improved public realm from both the existing condition and Implemented Permission.

iv. Blackfriars Road and Upper Ground

8.91 Blackfriars Road and Upper Ground would include the residential and hotel vehicle drop-offs for the Proposed Development.

8.92 In further recognition of the Blackfriars Road Improvements Scheme, the Landscape Strategy proposes the use of high quality granite paving to create a coherent high quality finish with Blackfriars Place.

8.0 Planning Policy Assessment

- 8.93 The boundary between public and private parts of the development would be seamless and a coherent approach to landscape would invite the public into the development.
- 8.94 In conclusion, the Proposed Development would secure the delivery of a new high quality public place and public realm which would significantly enhance the vitality and vibrancy of the area through the inclusion of a new place to visit, enjoy and dwell, through the incorporation of public seating, landscaping, public art and active and engaging uses such as cafes, restaurants, shops and bars at ground floor level. The proposals would also improve accessibility and legibility of the area through the provision of new pedestrian routes through the Site.

CUMULATIVE REGENERATION AND ECONOMIC BENEFITS

- 8.95 The Regeneration Statement submitted as part of this New Application identifies the key cumulative regenerative and economic impacts that the Proposed Development would deliver. These are summarised below.

Delivery of a viable and sustainable development

- The proposals would ensure delivery of development on a site that has been vacant since 2003 to provide high quality buildings of exemplary design containing an appropriate mix of uses including residential, retail (A1, A2, A3, A4, A5 class uses), hotel and an enhanced public realm. The Proposed Development would be delivered as soon as practicable by the Applicant. Subject to receiving planning permission, it is the Applicant's objective to commence construction on site in early 2013 with completion within four years by 2017.

Housing benefits

- The NPPF, Mayor's Housing Strategy, the London Plan and LB Southwark's Core Strategy all emphasise the importance of delivery of new homes. The development would deliver a mix of 274 new, high quality homes which contributes significantly to London and local targets (14% of BBLB OA's target to 2026).
- The Proposed Development seeks to maximise affordable housing benefits for the local community and borough as a whole through securing the maximum reasonable level of off-site affordable housing (determined by a financial 'toolkit' approach).
- The provision of 274 new homes on site would generate a New Homes Bonus of approximately £2.4 million. New Homes Bonus would also be payable on the delivery of off-site affordable housing.

Employment and Economic Development Benefits

- The Proposed Development would result in a range of direct employment opportunities through the hotel, retail and associated residential uses totalling 212 jobs in the operational phase;
- An estimated 456 FTE jobs (net) during the operational phase, taking on-site activities and spending of new residents and hotel guests into account, and 616 on-site construction jobs per year (net) during the construction phase,

8.0 Planning Policy Assessment

representing Gross Value Added of £6.6m per annum during the operational phase and £11.9m during the construction phase

- The Applicant has a demonstrable track record of facilitating local employment and training opportunities in their developments.
- The Section 106 planning obligations for the Site would include additional financial and non-financial contribution towards local employment and training schemes.

Other benefits to the wider community

- The changes to the Proposed Development would provide an significantly improved public realm with enhanced pedestrian linkages through the Site and active frontages at ground floor level within the public realm;
- Rennie Street would benefit from significant enhancement through the introduction of retail uses providing vitality to the area, active frontages would also be provided within the Proposed Development.
- New pedestrian routes through the Site would be provided therefore improving legibility and access to surrounding areas such as Bankside, Borough and Southbank.

Principle of Development Conclusions

- 8.96 The Proposed Development would secure delivery of a high quality mixed use development within a 48 month period from commencement on site in 2013 should planning permission be granted.
- 8.97 The proposals would bring back into viable and sustainable use, a site which has been vacant since 2003. The delivery of this development would act as an important catalyst for investment in and development of the area and result in regenerative benefits for the Site and immediately surrounding area.
- 8.98 For the reasons outlined above, the Proposed Development is considered to accord with national, London Plan and Southwark Policy.

RESIDENTIAL CONSIDERATIONS

Mix of Homes

- 8.99 The development would include 274 private homes within the Tower. The table below identifies the proposed mix of homes.
- 8.100 The Proposed Development exceeds LB Southwark's policy target that 60% homes should have 2 or more bedrooms and 10% 3 or more bedroom. The provision of 4.7% studio homes is below the policy maximum of 5%. All studios would be generously sized and significantly exceed minimum size standards.

8.0 Planning Policy Assessment

HOME TYPOLOGY	MARKET HOMES (%)	NUMBER OF MARKET HOMES
Studio	4.7%	13
1 Bed (Manhattan)	28.5%	78
2 Bed	43.8%	120
3 Bed	20.4%	56
4 Bed	2.2%	6
5+ Bed	0.4%	1
Total:	100%	274

Affordable Housing

- 8.101 London Plan Policy 3.11 establishes a London-wide Investment target for 13,200 additional affordable homes per year over the term of the Plan. Within this target, the Mayor would seek to ensure 60 % is social housing and 40% is intermediate housing. The London Plan identifies that boroughs should set overall targets in their LDFs. Accordingly, Core Strategy policy 6 identifies the requirement for as much affordable housing on developments of 10 or more homes as is financially viable identifying 35% as a minimum target.
- 8.102 The NPPF states that affordable housing should be provided on site, *“unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities”* (Para. 50, Page 13).
- 8.103 The Early Minor Alterations to the London Plan (Feb 2012) similarly state that, *“Affordable Housing should normally be provided on-site. In exceptional circumstances where it can be demonstrated that this is not appropriate in terms of the policies in this Plan, it may be provided off-site. A cash in lieu contribution should only be accepted where this would have demonstrable benefits in furthering the affordable housing and other policies in this Plan and should be ring-fenced and, if appropriate, pooled to secure additional affordable housing either on identified sites elsewhere or as part of an agreed programme for provision of affordable housing”* (Policy 3.12).
- 8.104 LB Southwark’s adopted (2008) and draft (2011) SPD on Affordable Housing identifies a sequential approach to affordable housing delivery in new development to ensure that the maximum reasonable level of affordable housing is achieved. The sequential approach is as follows:
- The delivery of affordable homes on site, in the first instance;
 - In exceptional circumstances, the council may allow the affordable housing to be provided off-site. The expectation is for the affordable housing to be provided on another site or sites in the local area.
 - Finally, where it is not possible to find an off-site location, in exceptional circumstances the Council may allow a contribution in lieu.

8.0 Planning Policy Assessment

- Where either an off-site or in lieu contribution is allowed, at least as much affordable housing must be provided as would have been provided if the minimum 35% affordable housing policy requirement were achieved on-site.

8.105 The proposed approach to affordable housing in relation to the New Application is assessed below.

On Site Provision

8.106 The Affordable Housing Statement and Toolkit submitted in support of this application demonstrate that it is not practical or financially viable to provide affordable housing on the Site.

Shared Ownership

8.107 The inclusion of shared ownership housing on-site is not viable due to the likely level of income required to purchase Shared Ownership properties being significantly above the maximum level specified in LB Southwark's draft SPD (even allowing for an additional 10% uplift in maximum incomes) due to high local property prices.

Social Rent

8.108 The provision of social rent homes within the Tower would significantly affect the financial viability of the Proposed Development – it would require the provision of a separate access core and entrance which would reduce the overall level of residential floorspace within the proposed development.

8.109 The provision of social rent homes within the Tower would also impact upon the overall achievable residential values reducing the level of funding available towards affordable housing provision.

8.110 The provision of social rent homes within the Tower would not meet the priority housing needs of the Borough – to deliver a higher proportion of social rented homes in new development.

8.111 Affordable homes (both shared ownership and social rent) would be unable to bear the level of service charge required for this type of development.

Alternative Design Solutions Considered

8.112 The Applicant commissioned the architects to produce plans assessing the impact of including affordable housing with the Rennie Street building. Savills and CBRE subsequently assessed viability and planning implications of doing so.

8.113 Providing 29 affordable homes (the equivalent to just under 10% of the total homes) within the Rennie Street building would reduce the size of the proposed new hotel to 70 bedrooms thereby impacting upon the quality and viability of the offer. In addition, the reduction in hotel size and quality would result in a reduction of approximately 95 gross operational jobs. CBRE Hotels consider that the reduction of the hotel offer by such a level would seriously threaten its viability and deliverability.

8.114 The option of providing affordable housing in the Podium Building was also considered. However, this was discounted as complex reworking would be required which would result in substandard accommodation including poor outlook and sunlight/daylight levels to the proposed development.

8.0 Planning Policy Assessment

8.115 A Financial Viability Appraisal of the Proposed Development has been prepared by Savills Affordable Housing consultants. This demonstrates that it is not financially viable to accommodate affordable housing on site. The Appraisal has been submitted separately as a confidential document due to the financial information contained within it being commercially sensitive.

8.116 In conclusion, it has been demonstrated that it is not viable or feasible to provide affordable housing on-site.

Off-site provision

8.117 Having assessed the viability of providing on-site affordable housing, in line with the NPPF (Para 50), London Plan Policy 3.12 and LB Southwark's draft and adopted affordable housing guidance, the Applicant is committed to a full exploration to secure affordable housing off-site within the locality.

8.118 A detailed investigation of a number of potential sites in the locality would determine whether it is feasible to provide affordable housing off-site, within a reasonable timeframe such that it does not delay the delivery of the Proposed Development, and to determine what can be delivered on each site.

8.119 This is the subject of ongoing investigation and discussion with LB Southwark. The final arrangements for affordable housing delivery, would be secured as part of the Section 106 Agreement for the Site.

8.120 The off-site provision secured would meet the mix of tenures and homes set out in LB Southwark Core Strategy Policy 7 and draft SPD or as subsequently agreed with LB Southwark as part of the planning process.

8.121 Provision of affordable housing off-site would enable more appropriately located sites and schemes to be secured for a greater number of affordable homes than could be achieved on-site, in particular family housing (in accordance with London Plan Policy 3.8 (including draft Early Minor Alterations) and Core Strategy Strategic Policy 7). The Applicant is currently reviewing sites in terms of their potential to accommodate the off-site affordable housing.

8.122 The Applicant would continue to work with LB Southwark post-submission of the planning application to investigate potential donor sites for securing affordable housing provision.

8.123 The approach to affordable housing is therefore in accordance with the NPPF, the London Plan and LBS adopted and emerging policy.

Residential Density

8.124 The London Plan provides a density guideline of 650 -1 100 habitable rooms for a highly accessible CAZ location such as the Site. The Core Strategy (Strategic Policy 6) and the draft BBLB SPD identify that within the Opportunities Areas the maximum densities set out above may be exceeded when developments are of an exemplary standard of design.

8.125 The Proposed Development results in a residential density of 1,864 habitable rooms per hectare if calculated using the 'Greenwich Method' which expresses the density in terms of the residential floorspace as a proportion of the total floor space in the development. When calculated in line with the methodology set out in Southwark's Residential Design Standards SPD the resultant residential density is 2,518 hr/ha.

8.0 Planning Policy Assessment

8.126 The Site’s location within the LBBB Opportunity Area is a key consideration, in addition to the exemplary design standards in accordance with Section 2.2 of the Residential Design Standards SPD that would be achieved in the Proposed Development which is evidenced in the Design and Access Statement.

8.127 On this basis the residential density is considered entirely appropriate and reflective of optimum development capacity of the Site.

Residential Quality

8.128 A detailed analysis of the homes within the Proposed Development against the Residential Standards included within LB Southwark’s Residential Standards SPD and The Mayor’s Draft Housing SPG is included in Section 4 of the Design and Access Statement. This analysis demonstrates that homes would fully comply (and in areas, significantly exceed) residential standards creating an exemplary living environment. The key findings of this assessment are summarised below.

Sizes of Homes

8.129 The Proposed Development would provide significantly oversized homes compared to the minimum dwelling sizes set out in the London Plan (which are also reflected in the LB Southwark Residential Design Standards SPD). This is summarised in the table below which demonstrates that on average the proposed new homes are provided with an exceptional standard of internal amenity significantly exceeding minimum policy requirements.

DWELLING TYPE	HOME SIZE RANGE SQ M		LONDON PLAN STANDARD SQ.M	DIFFERENTIAL SQ M		AVERAGE DIFFERENTIAL SQ M
	MIN	MAX		MIN	MAX	
Studio	40.5	50.6	37	3.5	13.6	9.2
Manhattan (1 bed)	50.7	78.6	50	0.7	28.6	12.2
2 bed	87.4	144.1	61-70	17.4	83.1	46.1
3 bed	148.2	234.9	86-95	53.2	148.9	91.5
4 bed	308.6	308.6	90-99	209.6	218.6	209.6
Penthouse	386.4	591.2	90-99	287.4	501.2	391.6

8.130 All new homes would meet Lifetime Home standards. Initial Lifetime Home Assessment demonstrates that the homes would be able to achieve ‘Gold’ accreditation.

Daylight and Sunlight

8.131 All homes would benefit from excellent daylight and sunlight due to the layout and form of development as set out in Chapter 13 of the ES.

8.132 All homes would also benefit from a high quality aspect benefitting from stunning panoramic views across London and the Thames. Due to the arrangement of the proposed floorplates there are no homes with an ‘only north facing’ aspect. Due to

8.0 Planning Policy Assessment

the circular floorplates and the glazed frontage, new homes on the northern apex of the building would either have a north eastern or north western facing aspect.

Noise

8.133 Chapter 11 of the ES deals with Noise and Vibration issues and explores the exposure of the Site to noise. Baseline noise surveys were undertaken at the Site and recommendations made on the approach to materials within the Proposed Development to ensure that the development itself could not create noise impacts as well suitably insulating the proposed development from potential external noise sources.

Residential Amenity

8.134 LB Southwark's Residential Design Standards SPD 2011 states that all new residential development must provide an adequate amount of useable outdoor amenity space – the nature and scale of which should be appropriate to the location of the development, its function and the character of the area.

8.135 It also states that; where it is not possible to provide an adequate amount of outdoor amenity space in accordance with the required standards of the SPD, and the saved Southwark Plan Policy 4.2, the Applicant must justify why this cannot be achieved through the Design and Access Statement. Where developments are within immediate proximity of a substantial area of public open space, accessibility to the open space, combined with better outlook, may justify less amenity space as part of the development. It identifies that in such circumstances, a planning contribution may be required instead to provide off-site public amenity space.

8.136 The SPD seeks 10 sq m of private amenity space for each 3+ bedroom home and as much as possible for smaller homes towards a target of 10 sq m with the shortfall to provided through provision of private communal space.

8.137 Mayoral standards set out in the Mayor's draft Housing SPG (December 2011) require that a minimum of 5 sq m of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sq m should be provided for each additional occupant. In exceptional circumstances, where site constraints make it impossible to provide private open space for all dwellings, a proportion of dwellings may instead be provided with additional internal living space equivalent to the area of the private open space requirement.

8.138 Within the Tower, private winter gardens would be provided for all homes of 2+ bedrooms which meet the GLA draft Housing SPG minimum requirements for balcony sizes. This represents two thirds of all homes. All 3+ bedroom homes have a minimum of 10 sq m of private amenity space in accordance with LB Southwark's Residential Standards SPD.

8.139 Studio and Manhattan homes would be provided with additional internal living space in lieu of winter gardens. On average these homes are approximately 9 sq m and 12 sq m larger than the London Plan standards respectively. It is considered that these homes would benefit more from this additional internal space compared to the inclusion of winter gardens. The majority of homes would benefit from panoramic views across London and the Thames, which would further enhance the quality of the residential offer and accommodation provided.

8.0 Planning Policy Assessment

8.140 The Proposed Development also includes 219 sq m of private communal outdoor amenity space at first floor level of the Podium Building. In addition, the 476 sq m GEA managed Viewing Lounge would be provided at 32nd floor level which would be available to residents as an amenity facility. Furthermore 3,073 sq m of ancillary amenity facilities would be provided which would be accessible to all residents, including:

- a residents' gym and spa;
- a private cinema screening room;
- a 'residential lounge'; and
- a games room and other facilities

8.141 The Proposed Development would also include over 3,100 sq m of high quality public realm at grade incorporating Blackfriars Place which would provide a significant additional amenity to residents of the Tower with opportunities to sit in a place of calm away from the neighbouring busy streets.

8.142 Taking into account the exemplary standards that would be achieved by the homes, the additional residential facilities within the Proposed Development and the significant benefits brought by the improvements to Public Realm at ground level, it is considered that the proposed residential amenity would meet the objectives of London Plan and Southwark Policy, given the Site's location, size and nature of the residential tower.

Children's Play Space

8.143 LB Southwark's Residential Design Standards SPD identifies that, in most developments there should be a mix of both private and communal amenity space, including for family housing in order to provide a safe outdoor area for children to play in. It can take the form of private gardens, balconies, terraces and roof gardens.

8.144 The Mayor's Draft SPG on Shaping Neighbourhoods: Children and Young People's Play and Informal Recreation (2012) identifies the importance of 'playable' spaces in accommodating children and encouraging 'shared' public spaces that meet the needs of adults and children at the same time. It encourages the provision of multifunctional spaces that can provide 'incidental' play spaces and opportunities for informal play. This can be achieved through the creative use of the public realm to provide enjoyment and discovery for children and young people for example through the creation of landscaping and high quality public art.

8.145 As identified in the Mayor's Draft SPG on Shaping Neighbourhoods, private amenity space such as the proposed winter gardens and shared amenity space can provide 'playable space' and opportunities for informal play by children who would occupy the proposed new homes.

8.146 Based on the methodology set out in the GLA's adopted SPG on the provision of play and informal recreation space, the Proposed Development would result in a child yield of 33.7 children requiring the provision of 337.9 sq m of child play space.

8.147 The Landscape Strategy within the Design and Access Statement identifies over 464 sq m of informal playspace within the Private Communal Garden and Blackfriars Place.

8.0 Planning Policy Assessment

8.148 As with the Implemented Permission, given the constraints of the Site's size, it is not possible to accommodate all required formal children's playspace within the Proposed Development. The Section 106 agreement would therefore include a contribution towards the provision of children's play space locally.

DESIGN, MASSING, BUILDING LAYOUT AND APPEARANCE

8.149 The New Application retains the original design by Ian Simpson Architects for the external appearance, height and massing of the 2009 Implemented Permission Tower and reworks the internal layout and land uses to provide 74,925 metres squared (sq m) Gross External Area (GEA) mixed use development.

8.150 The New Application includes revisions to the lower buildings, including the removal of the Podium and separation of the Rennie Street and Podium Buildings.

8.151 Set out below is a commentary on each of these elements and, where relevant, physical changes to the design since the Implemented Permission. There are three key built components to the Proposed Development:

- i. The Tower
- ii. The Rennie Street Building
- iii. The Podium Building

The Tower

8.152 The design, external appearance and building envelope of the Tower have not changed from the Implemented Permission.

8.153 The number of floors within the tower has been reduced from 52 in the Implemented Permission to 50 within this New Application. This is a result in the changes to floor to ceiling heights resulting from the change of uses within the Tower.

8.154 Changes to the ground floor and how the tower 'meets the ground' have been facilitated by the removal of the podium.

The Rennie Street Building

8.155 The Rennie Street building's massing and building envelope would remain the same as the Implemented Planning Permission.

8.156 The building would accommodate an upscale/lifestyle 152 bedroom hotel and ancillary uses and therefore there have been minor amendments proposed to the elevational treatment of the building to reflect its revised use and its relationship to Rennie Street and Blackfriars Place.

The Podium Building

8.157 The Podium Building would now be an independent building separate from the other buildings on site, linked by a sub-level residents' connection to the Tower.

8.158 The Building would retain the same footprint as the Implemented Permission. The height of the building has increased from three storeys to the equivalent of four storeys as identified in the Design and Access Statement.

8.159 The podium would now incorporate retail at ground floor on all sides. The upper levels would accommodate a gym, spa and private communal garden for the use of

8.0 Planning Policy Assessment

the residents of the Tower. Plant space is incorporated at roof level but screened from view from above and the side.

Exemplary Design

- 8.160 The NPPF identifies that the Government attaches “great importance to the design of the built environment” and that good design is a key aspect of sustainable development and should contribute positively to making places better for people (paragraph 56)
- 8.161 The Design and Access Statement that accompanies the application provides a full explanation and assessment of the Proposed Development design and its evolution.
- 8.162 The Proposed Development has sought to achieve the highest standards of design and inclusivity in terms of layout and individuals buildings.
- 8.163 The Proposed Development has also been designed with consideration of London Plan (2011) policies 7.1, 7.4 and in particular 7.7, which relates to design issues associated with tall buildings.
- 8.164 Cumulatively, the three key built elements of the Proposed Development outlined above retain the exemplary design quality and integrity of the Ian Simpson designed implemented permission.
- 8.165 The lower level design changes improve upon the ground floor experience of the Proposed Development, and create a new destination that successfully integrates into the wider urban fabric.
- 8.166 The design amendments respond positively to the reconfiguration of land uses within the Proposed Development that are required to ensure the development is deliverable and viable in the current economic climate and in areas, improve upon the implemented permission.
- 8.167 In addition, as a new application for the Site, the Proposed Development is required to be considered against all the requirements of saved Policy 3.20 of the Southwark Plan which requires all tall buildings to:
- i. Make a positive contribution to the landscape;
 - ii. Be located at a point of landmark significance;
 - iii. Are of the highest architectural standard;
 - iv. Relate well to its surroundings, particularly street level; and
 - v. Contribute positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.
- 8.168 The Proposed Development is considered against the criteria of Policy 3.20 below.
- i) Make a positive contribution to the landscape;**
- 8.169 The landscape and public realm strategy is an important part of the tall building proposal. It would create a setting for the tower, allowing it to ‘land’ appropriately.
- 8.170 As established in the Design and Access Statement and earlier in this section, the public realm strategy for the Proposed Development would provide an appropriate setting for the Tower. The creation of Blackfriars Place would significantly enhance the Site’s contribution to the landscape of the wider area, providing greater permeability, cohesion with neighbouring sites and provided a multi-functional

8.0 Planning Policy Assessment

central space which would act as destination for residents, workers and visitors to the wider area.

ii) Be located at a point of landmark significance;

8.171 The definition of a point of landmark significance was the subject of extensive discussion at the Public Inquiry in relation to the Implemented Permission. It was concluded that this is an appropriate location for a tall building at the confluence of these importance routes, as well as the bridgehead and the river crossing in this location.

8.172 This is recognised in the site specific allocation for the Site included within the draft BBLB SPD which identifies the Site as an appropriate location for a tall building.

8.173 In this context the Proposed Development including a tall building is appropriate for the Site. This is reinforced by the external appearance, design, scale and massing of the Tower remain the same as the Implemented Permission which is a material consideration.

iii) Is of the highest architectural standard

8.174 There was considerable discussion at the Public Inquiry on the architectural qualities of the Implemented Permission. As demonstrated in the Design and Access Statement and ES Vol II Townscape Visual Impact Assessment (TCVIA), the fundamental characteristics and integrity of the design of the implemented permission have been retained with the Tower element of the New Application retaining exactly the same external design and appearance as the implemented permission including:

- The double skin-façade;
- The complex curved glass 'skin' and its sculptural form;
- The materiality of the internal facade and the use of colour;
- The taper of the buildings top and its single skin transparency.

8.175 There have been changes proposed to the internal configuration and the ground floor of the Tower. However, these have been demonstrated not to affect the quality of the design. The removal of the Podium would allow the Tower to hit the ground as a freestanding building that responds to the site topography and contribute to the public realm.

8.176 Since the Implemented Permission was granted, the LVMF has been revised setting out the strategic views that apply to the Proposed Development. In addition the council has published its draft BBLB SPD which sets out the local views that should be considered in this context. The appearance of the Proposed Development in these views has been assessed in the ES Vol II TCVIA and is summarised later this chapter.

8.177 The changes to the low rise Podium and Rennie Street buildings would retain the overall high quality design of the implemented permission and improve specific elements of the buildings as outlined earlier in this section. These revisions have been enabled by bringing the public realm to ground level.

8.178 The changes to the Podium building at the corner of Stamford Street and Blackfriars Road would give it a stronger presence and greater purpose. It now reads as an element in itself but one that would still relate sensitively to the Grade II Listed Mad Hatter Pub across Stamford Street.

8.0 Planning Policy Assessment

8.179 The external corners of the Site are significant and double-height frontages of the Rennie Street building would assist to address the corners more deliberately and activate the corners on more than a single level. This is particularly important given the scale.

8.180 In summary, the retention of Implemented Permission's Tower design and the revisions to the low rise Podium and Rennie Street buildings would ensure the Proposed Development is of the highest architectural quality.

iv) Relate well to its surroundings, particularly street level;

8.181 The Implemented Permission focussed on the main frontages of Stamford Street and Blackfriars Road. The Proposed Development has sought to maximise the active frontages on all buildings. This has led to the level of active frontage increasing from 35% in the Implemented Permission to 80% in the New Application with service access being minimised and consolidated onto one location on Rennie Street.

8.182 The most important part of the contribution to the street scene would be Blackfriars Place created at the heart of the Site. The design for this space would include a well defined street edge on Stamford Street, Upper Ground and Blackfriars Road. Retail units, hotel and entrances would be used to create active frontages on all sides of the space. The Landscaping strategy for this space has been used to define the functions of the space and encourage its use with cafe spill out zones, pedestrian routes and a tranquil central space all clearly demarcated.

8.183 The green landscape of the central area of Blackfriars Place would give the public realm a softness to the space and tranquil feel and encourage its use. The consistent use of granite for paving throughout the Site would ensure a high quality finish is provided for both public and private owned areas.

v) Contribute positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.

8.184 Consideration of the Proposed Development against this Policy criteria is addressed below.

8.185 In conclusion, it is considered that the Proposed Development has been designed to an exemplary standard which meets the design objectives of national, regional and local planning policy.

TOWNSCAPE, CONSERVATION AND HERITAGE CONSIDERATIONS

Strategic and Local Views

8.186 Policies 7.10 and 7.11 of the London Plan set out the Mayor's approach to protecting the character of World Heritage Sites and other 'strategically important landmarks' as well as London's wider character. Since the Implemented Permission was granted by the Secretary of State following recommendation from the Inspector's Public Inquiry report, a new LVMF SPG was published in July 2010 and further changes to this have been set out in a further consultation draft of the LVMF published in July 2011. A revised version of the LVMF incorporating these changes was published in March 2012.

8.0 Planning Policy Assessment

- 8.187 The revised LVMF (2012) has additional visual management guidance set out in paragraph 431 in relation to views from Assessment Point 26A.1 St James's Park Bridge. The additional guidance states "buildings that appear above the central part of Duck Island would damage the viewer's ability to see these groups of buildings in conjunction with the landscaped foreground and should be refused".
- 8.188 This change in guidance since the grant of the Implemented Permission is a material consideration that needs to be taken into account and weighed against the Implemented Permission and other material considerations.
- 8.189 In addition, since the grant of the Implemented Planning Permission, LB Southwark has published a draft BBLB SPD which identifies a series of Local Views that are relevant to the Proposed Development.
- 8.190 A detailed Townscape, Conservation and Visual Impact Assessment (TCVIA) has been undertaken as part of the Environmental Statement by Robert Tavernor Consultancy who undertook the Townscape analysis for the Implemented Permission.
- 8.191 In the Visual Assessment the suitability of the design of the Proposed Development in its spatial location has been assessed using 41 different viewing positions which assess both Strategic and Local Views. These views seek the Proposed Development to be assessed and its impact on the local townscape to be tested. The Visual Assessment demonstrates that the Proposed Development, where visible, would have an insignificant likely impact on regional views and an insignificant to minor beneficial impact on sub-regional views. The likely impact on district views would be insignificant to moderate beneficial, and on local views would be insignificant to substantial beneficial.
- 8.192 The TCVIA concludes that the Proposed Development would enhance and promote sustainable development by establishing a major new development that has been conceived as an integral part of the townscape of the locality. The Proposed Development would be a mixed use development with a distinctive character and sense of place.
- 8.193 Importantly, the TCVIA concludes that the Proposed Development would not harm strategic or local views. In relation to the Tower, the TCVIA states:

"The outward appearance of the Tower element of the Proposed Development is the same as the Implemented Permission, and the design character and quality of the its exterior is therefore unchanged and the impacts on the character and the quality of the townscape and setting of designated heritage assets are also unchanged. The change of internal use to the Tower has enabled changes to the lower elements of the Implemented Permission – Blackfriars Place, which has brought the public realm to ground and the Rennie Street Building and Podium Building – which will improve their relationship to the local context and to the built heritage within it. The local and wider townscape would be greatly enhanced by the Proposed Development".

LVMF Townscape View from Assessment Point 26.A: St James's Park to Horse Guards Road

- 8.194 Specifically in relation to the Strategic View from St James's Park Bridge (Assessment Point 26.A), the TCVIA comments that in terms of the general approach to this view,

8.0 Planning Policy Assessment

the height and materials of the Implemented Permission were carefully designed so as not to damage the viewer's appreciation of the buildings and landscape the subject of the view. It finds the Proposed Development has been designed to appear exactly the same as the Implemented Permission in this view.

- 8.195 The Implemented Permission was approved by the Secretary of State who concluded that it would accord with the LVMF SPG (2007) and "would not have a harmful effect on the view" (para. 16, 25 March 2009). Subsequently, the LVMF SPG has been republished (March 2012) with revised Visual Management Guidance for this View 26A.1. The Proposed Development, whilst of the same appearance in this view as the Implemented Permission, will not fully accord with the current (2012) LVMF SPG Guidance.
- 8.196 The TCVIA states that the Proposed Development will accord with a significant part of the current (2012) LVMF SPG Guidance: it will be of "exceptional design quality, in particular with regard to [its] roof line, material, shape and silhouette" and it will "not dominate, overpower or compete with either of the existing two groups of built form or the landscape elements between and either side of them" (Ref 1-2, P.223). However, it will also appear above the central part of Duck Island in this view and the LVMF SPG (2012) states that such a proposal "should be refused". This is obviously a change in circumstances since the Secretary of State's decision relating to the Implemented Permission in March 2009.
- 8.197 In deciding how to approach this part of the LVMF SPG (2012), it will be appropriate for the Planning Authorities to determine the weight to be given to the Implemented Permission as a material consideration. The Implemented Permission is a material consideration because, if planning permission was refused for the New Application on the basis of the revised guidance, the Implemented Permission is a development which is capable of being built out at any time in the future. As such, it is considered that the weight which should be given to the Implemented Permission is very significant.
- 8.198 Since the Proposed Development and the Implemented Permission would appear the same in this view, it is concluded that the impact would be no different between the two proposals. In view of the weight which should be given to the Implemented Permission, it is considered that the Implemented Permission as a material consideration significantly outweighs the change to the LVMF Visual Management Guidance.
- 8.199 The TCVIA concludes that the impact of the Proposed Development is the same as the impact which was assessed in relation to the Implemented Permission and is therefore 'Moderate Beneficial'.

Conservation Areas and Heritage Considerations

- 8.200 The Site is adjacent to a number of Conservation Areas and listed buildings including the Grade II listed Mad Hatter hotel at 3-7 Stamford Street and adjacent 1 Stamford Street. An assessment of the impact of the Proposed Development on the significance of designated heritage assets including the setting of listed buildings, world heritage sites, and the character and appearance of conservation areas, both in Southwark and in other boroughs has been assessed in the TCVIA and considered in the design process.
- 8.201 The TCVIA concludes that the Proposed Development would not have a harmful impact on any designated heritage assets.

8.0 Planning Policy Assessment

8.202 The Proposed Development therefore accords with national, regional and local planning policy relating to the protection of Conservation Areas and Heritage Assets.

Access and Inclusivity

8.203 The Design and Access Statement explains how the Proposed Development has been designed to enable 10% of the proposed homes to meet wheelchair accessibility standards (i.e. designed to be fully adaptable), whilst all homes have been designed to accord with Lifetimes Homes criteria. 10% of hotel rooms would also be designed as wheelchair accessible.

8.204 The Design and Access Statement identifies which homes within the Proposed Development are capable of being wheelchair accessible and illustrative floor plans are provided to demonstrate that these homes are capable of meeting the necessary standards. The removal of the steps to a raised podium plaza in the Implemented Permission and bringing public realm to grade has greatly enhanced the accessibility and inclusivity of the Site. The Design and Access Statement also confirms that the public realm at grade has been designed to meet the relevant standards.

8.205 The Proposed Development would therefore meet the accessibility standards required for new developments set out in Part M of the Building Regulations, the Equality Act (2010), London Plan and LB Southwark standards.

WASTE MANAGEMENT

8.206 Waste and recycling storage facilities are provided for each of the separate uses as set out in the Site Wide Waste Management Plan contained within the Design and Access Statement and Chapter 7 of the Environmental Statement in line with national best practice guidance, the London Plan and LB Southwark standards.

TRANSPORT, SERVICING, HIGHWAY IMPROVEMENTS

8.207 This planning application is supported by a Transport Assessment and framework Travel Plan. Key elements of the proposals are outlined below.

Car Parking

8.208 A total of 194 car parking spaces would be provided for residents using a valet and stacker car parking system operated from the basement of the Site. The car park would be accessed from two car lifts off Rennie Street.

8.209 This equates to a car parking ratio of approximately 0.7 spaces per home. No general car parking is provided for the commercial uses within the Site, with the exception of disabled parking bays.

8.210 The Proposed Development has been demonstrated to generate a significant reduction in vehicle trips relative to the Implemented Permission.

8.211 The TA demonstrates that whilst the proposed parking ratio of approximately 0.7 spaces per home exceeds the LB Southwark Policy car parking ratios of 0.4 per home in the CAZ and car free development in CPZs, it meets London Plan objectives of providing car parking at a ratio of significantly less than one space per home and would not have a detrimental impact on the surrounding highway network.

8.0 Planning Policy Assessment

- 8.212 Car parking usage surveys included within the TRAVL database and a study recently produced by WSP on behalf of the Berkeley Group entitled 'Does Car Ownership Increase Car Use?' (2011) suggests that most London residents, who have access to good public transport or live within accessible locations will walk, cycle or use public transport for their peak period journeys such as commuting to work.
- 8.213 Car parking usage surveys included in the TA demonstrate that those people in the market to purchase high-end residential apartments such as those provided by the Proposed Development often have a requirement for a parking space. However, this is primarily to store a car rather than use it on a daily basis for travelling to work.
- 8.214 In order to mitigate against any unexpected increase in car driver trips, the Applicant would also provide a full Travel Plan to maximise the opportunities for sustainable travel (including provision of significant cycle parking).
- 8.215 A Car Park Management Plan is included in Appendix C of the Transport Assessment which sets out how the valet and stacker car parking will be operated and managed. This Plan has been produced to ensure queue times for access to the car park on neighbouring streets is minimised and also prevent overflow of vehicles within the dedicated residential and hotel drop-offs on Blackfriars Road and Upper Ground respectively.
- 8.216 In addition, the Applicant proposes that residents are prevented from receiving parking permits for the Controlled Parking Zone scheme which is in operation in the surrounding area.
- 8.217 Therefore it is considered that, on balance, the proposed parking ratio is acceptable.

Disabled Parking

- 8.218 The valet car parking system proposed for the residential element of the Proposed Development would accommodate the needs of most disabled residents through the allocation of a space for each wheelchair accessible home.
- 8.219 Three additional conventional 'self park' Blue Badge car parking spaces would be provided at basement for uses by residents and employees (2 for residents and 1 for patrons of the Proposed 152 bedroom hotel).
- 8.220 The proposed level of Disabled Parking is compliant with London Plan and LB Southwark standards.

Electric Vehicle Charging

- 8.221 Electric charging spaces would be provided in accordance with the London Plan standards; a minimum of 20% of spaces within the basement would provide access to electric charging facilities and a further passive provision of 20% for future conversion.

Servicing

- 8.222 The majority of servicing and activities associated with the hotel, retail and residential uses would be accommodated on-site from within the residential and hotel drop off areas. The use of these off-street servicing areas would be complemented by the introduction of two 12 metre loading bays on Rennie Street which would accommodate the low levels of HGV traffic and refuse collection activities generated by the Proposed Development.

8.0 Planning Policy Assessment

8.223 The number of servicing trips for the Proposed Development is forecast to be over 50% lower than the Implemented Permission. The TA demonstrates that all servicing activities can be accommodated without materially affecting the operation of the surrounding highway network or on-site drop-offs at the front of the Rennie Street Building and Tower.

8.224 A Delivery and Service Management Plan is included in Appendix D of the Transport Assessment submitted in support of the New Application which sets out how deliveries and servicing will be managed to ensure there is no negative impact on the surrounding streets and road network.

Motorcycle Parking

8.225 Motorcycle parking would be provided within the basement at 4% of the total parking provision, equating to six spaces.

Cycle parking

8.226 Cycle parking would be provided in accordance with the standards specified within Table 6.3 of the London Plan and Southwark Plan minimum cycle parking standards.

8.227 A minimum of 339 cycle parking spaces would be provided for residents and their visitors. A valet cycle parking system would be provided for residents.

8.228 Cycle parking would also be provided in accordance with standards set out in the London Plan. 12 employee cycle parking spaces (six Sheffield Stands) would be provided for the hotel use which would support approximately 125 full time staff.

8.229 A total of 20 Sheffield Stands (providing 40 cycle spaces) would also be provided within the public realm on Rennie Street and Stamford Street for use by the general public and visitors to the Proposed Development.

Surrounding Highway Improvements

8.230 Proposals to improve the quality of public realm on Blackfriars Road between Blackfriars Bridge and St Georges Circus have recently been considered by TfL, resulting in the production of the Blackfriars Road baseline conditions and concept report, which was published in February 2010.

8.231 The urban improvement scheme on Blackfriars Road aims to improve the public realm and facilities for both pedestrians and cyclists whilst maintaining its status as a strategic vehicular link for north-south movements and co-ordinating with existing stakeholder aspirations including future developments and competing public transport modes.

8.232 As the Proposed Development is located within the Northern Section of Blackfriars Road, pre-application consultation with TfL and LBS has identified an opportunity to facilitate the delivery of a section of the Blackfriars Urban Realm Improvement scheme adjacent to the Site.

8.233 The extent of the Blackfriars Urban Realm Improvement scheme which could be implemented by the Proposed Development would include:

- Removal of the slip road from Stamford Street onto Blackfriars Road and the creation of additional public realm on the street corner.

8.0 Planning Policy Assessment

- Improvements to the section of Blackfriars Road at the Site frontage from the junction with Stamford Street up to and including the toucan crossing immediately to the north of Upper Ground;
- Improvements to the signalised junction of Stamford Street/ Blackfriars Road/ Southwark Street up to the improved pedestrian crossings on each arm;
- Kerb-works on Stamford Street from the signalised junction with Blackfriars Road up to the junction with Rennie Street; and
- Re-location of the RV1 bus stop from the Site frontage on Blackfriars Road onto Upper Ground or Stamford Street, to the west of Rennie Street.

8.234 The delivery of these improvements would significantly enhance the public realm and highways in the surrounding area for vehicles, cars and pedestrians.

Transport Conclusions

8.235 In conclusion, the TA demonstrates that the Proposed Development meets the transport aspirations of the national, regional and local planning policy in respect of sustainable modes of transport.

8.236 The trips generated by each mode of transport can be accommodated on the surrounding transport infrastructure and represents a significant reduction relative to the level of the impact previously accepted by LB Southwark and TfL for the Implemented Permission.

SUSTAINABILITY AND ENERGY

8.237 This planning application is accompanied by a Sustainability Statement and Energy Strategy.

Sustainability Strategy

8.238 The Sustainability Statement demonstrates that high standards of environmental sustainability would be achieved for the Proposed Development. This would be achieved by the commitment to energy efficiency, water conservation, recycling, and providing cycle storage facilities.

8.239 The strategy highlights how the development achieves the sustainability objectives of national, regional and local sustainability policies. The features of the Proposed Development would include:

- The Applicant seeks to achieve Code for Sustainable Homes Code Level 4.
- BREEAM 2011 rating of 'Excellent' is targeted for the Rennie Street Building (hotel) and 'Very Good' for the Podium Building (retail & residential facilities);
- The energy strategy is designed to achieve exemplar regulated CO₂ reductions, with an expected site-wide improvement of ~25% over Part L 2010 of the Building Regulations;
- On-site low and zero carbon energy generation is proposed by the implementation of a PV array CHP engines;
- Water efficient devices would be installed to reduce water consumption in line with the London Plan and Code for Sustainable Homes / BREEAM targets;

8.0 Planning Policy Assessment

- Rainwater run-off attenuation would be provided by attenuation tanks and bio-diverse roofs;
- Sustainably sourced, recycled or re-used building materials would be specified where possible;
- A Site Waste Management Plan would ensure the construction waste on site would be monitored, sorted and recycled;
- The residential waste strategy is designed to encourage a high rate of recycling in line with national, regional and local policy;
- Secure, sheltered cycle storage would be installed to encourage the use of bicycles amongst the residents and the staff of the commercial facilities. This would be located in the basement;
- Contractors would sign up to the Considerate Constructors Scheme and exceed the best practice score (>36).

8.240 As part of BREEAM 2011, the Ene 01 calculator which evaluates the energy performance of the Proposed Development, is based on a number of factors with the intention of seeking to restrict buildings with low fabric efficiency from achieving the required 6 credits (for BREEAM Excellent) through the inclusion of renewable energy sources. It has been found that the process of calculation is currently unfairly penalising the use of Combined Heat and Power (CHP) as the electrical generation from the CHP is not currently accounted for.

8.241 At present, the Ene 01 calculator is not yielding the 6 points required for BREEAM 'Excellent', however the Applicant is seeking amendment to the calculator by the BRE in light of the unfair penalty levied against strategies that include CHP.

8.242 The BREEAM 'Very Good' rating for the Podium Building (retail & residential facilities) has been chosen in recognition that these are speculative spaces that would require fit-out by others. Furthermore, in space terms, the Podium Building comprises a small proportion (~2%) of the overall Proposed Development. As such, a 'Very Good' rating has been chosen, with the aspiration that future tenants could fit-out their respective spaces to 'Excellent' where feasible.

Energy Strategy

8.243 In accordance with the London Plan objectives the Mayor's energy hierarchy (Policy 5.2) has been followed:

- Be Lean: a range of energy saving measures have been applied to establish the building energy demands and carbon emissions;
- Be Clean: site wide Combined Heat and Power would provide for the Proposed Development's heating, cooling demands and energy requirements. Provision would be made for a future connection to a district heating network.
- Be Green: renewable technologies would be incorporated in the form of Photovoltaic panels within the roof of the Rennie Street Building. Other renewable technologies have been assessed and have been considered inappropriate for the Proposed Development.

8.0 Planning Policy Assessment

- 8.244 In summary, the Proposed Development is seeking compliance with Part L 2010 requirements for regulated CO₂ emissions through passive design and energy efficiency measures. This would be achieved through finalising materials used for the façade in terms of glazing ratio and thermal performance. Furthermore, the systems installed would be energy efficient for example 100% low-energy lighting.
- 8.245 Testing of the relative benefits of different façade design options occurred throughout the design process. This allowed the optimum solution to be found for the Proposed Development.
- 8.246 The Tower would benefit from energy sharing as heat pumps would be connected to a condenser water loop allowing heat rejected from one apartment to be used in another. Hot water would be derived from high efficiency condensing gas boilers, feeding all elements of the Proposed Development in an energy network configuration. This arrangement allows for the future connection to decentralised energy networks at such a time as these become available.
- 8.247 In addition to the “be lean” measures summarised above, the Proposed Development would utilise a Combined Heat and Power (CHP) engine. Two units would be sized to deliver 100% of the Proposed Development’s hot water demand. The CHP system is forecast to offset a further ~20% regulated CO₂ emissions beyond Part L 2010.
- 8.248 An appraisal of renewable technologies has been carried out for the Proposed Development. Of the technologies appraised, Photovoltaic panels have been highlighted as the most appropriate method. The assessment suggests that in order to save ~1% of regulated CO₂ emissions beyond Part L 2010, an array of 200 sq m would be required.
- 8.249 The total CO₂ emissions reduction beyond Building Regulations Part L 2010 is therefore 25% which is in compliance with the overall policy target.
- 8.250 The energy centre and district heating network would be designed to enable connection to a local decentralised energy network (provided by others), at the time of construction or at a future date.
- 8.251 In conclusion, the Energy and Sustainability aspects of the Proposed Development have been demonstrated to substantially comply with the objectives of the national, regional and local planning policy.

ENVIRONMENTAL CONSIDERATIONS

- 8.252 This New Application is accompanied by a full Environmental Statement (ES) assessing the potential environmental impact of the proposals both individually and cumulatively.
- 8.253 A formal Scoping Report, outlining the proposed assessment approach for all aspects of the EIA was submitted to the LB Southwark on the 9th December 2011. A Scoping Opinion was received on 27th January 2012. The scope of the ES follows the guidance outlined in the received scoping opinion.
- 8.254 The design of the Proposed Development has incorporated issues raised within the scoping opinion received and has evolved through continuous consultation with a number of stakeholders. This consultation process has informed the assessment of those issues of greatest significance.

8.0 Planning Policy Assessment

8.255 A summary of the pertinent conclusions not already discussed are set out below.

Water Resources and Flood Risk

8.256 Chapter 14 of the ES concludes that no significant impacts on water resources during the construction phases are expected provided a series of mitigation measures are followed. However, the impact of increased demand and waste water generation is anticipated to be of minor adverse.

8.257 A Flood Risk Assessment (FRA) for the Proposed Development has been undertaken, which details the full mitigation proposals to manage flood risks. Flood resilient construction measures have been included on the basement and ground floor levels to reduce the impact of a flood event on the building. The FRA includes assessment of the surface water drainage issues and conceptual drainage design. The FRA details the measures, attenuation tanks and the incorporation of green roofs, to reduce surface water flows in order to meet relevant planning policy. The Proposed Development would have a minor beneficial impact on flood risk.

Ground Conditions

8.258 Chapter 15 of the ES identifies the potential for contamination on the Site and concluded that further intrusive investigation work would need to be undertaken and a range of mitigation measures employed throughout the construction period. The operational phase would have negligible impacts on ground conditions.

Noise and Vibration

8.259 Chapter 11 of the ES concludes that during the construction phase, vibration from construction works would have negligible to minor adverse impacts whilst construction traffic and noise would have a negligible impact. Best practice measures would be followed to mitigate against impacts by reducing the duration and magnitude of noise on sensitive receptors.

8.260 In the operational phase, traffic is considered to be of negligible significance whilst plant would be designed to have a rating 10 dBA below the background noise level. Negligible impacts are expected on this basis.

Air Quality

8.261 Chapter 10 of the ES concludes that the proposed development would have minor adverse to negligible impacts in the construction phase due to the potential for construction dust. However, these would be of temporary duration and local extent. Mitigation measures would be implemented to minimise any adverse impacts on air quality in line with the relevant guidance.

8.262 The potential sources of impacts to air quality from the Proposed Development would be from road traffic and heating and plant power emissions. The increased vehicles on the surrounding road network, travelling to and from the Site, would have a negligible impact. It was not considered necessary to mitigate atmospheric emissions associated with traffic flows with the completed and operational development it is expected to have a negligible impact to local air quality at nearby sensitive receptors.

8.263 The heating and power plant on site would have a minor adverse impact on the local surrounding air quality in the long term, however it is predicted that during

8.0 Planning Policy Assessment

peak operation this plant will cause a major adverse impact without mitigation. It is proposed that a series of mitigation measures will be incorporated when selecting the proposed heating plant during the detailed design phase and the maintenance of the plant over the lifetime of the Proposed Development. Such measures include:

- Appropriate design of the flues to ensure adequate dispersion of pollutants and selection of equipment regarded as Best Available Technology (aspiring to meet the emissions criteria required under the BREEAM / Code for Sustainable Homes methodologies);
- Incorporation of low-NOx optimisation of the Combined Heat and Power (CHP) engines and gas boilers, including use of a digital combustion control system and specially modified heads;
- Inclusion of a flue gas dilution system or NOx abatement system to remove up to 60% of the NOx emissions.
- Regular inspection of the machinery, operation to the manufacturer's instructions, and ensuring that equipment is well maintained during operation

Wind

- 8.264 Chapter 12 of the ES concludes that the residual impacts, with the inclusion of the landscape plan and the canopy on the east elevation of the Tower, were at worst, negligible, which means that the measured wind microclimate would be suitable for the desired pedestrian use of the Site. This applied to Rennie Street, Stamford Street, Upper Ground, Blackfriars Road as well as the routes through the Site.
- 8.265 There were other areas where the wind microclimate was calmer than desired and the significance of the wind microclimate in these areas was beneficial. With the mitigation measures implemented the wind microclimate in the central public square was suitable for sitting in the summer which would imply a negligible effect.
- 8.266 Mitigation measures have been developed and tested for the cumulative scenario which is considered the worst case configuration. The mitigation applied to the Proposed Development would incorporate landscaping, including a single tree in the vicinity of the entrance to the Tower on Upper Ground, along with a canopy on the eastern façade of the Tower above an entrance on Blackfriars Road.
- 8.267 With the mitigation measures included in the Proposed Development, all locations would result in conditions which are suitable for their intended use.

Ecology

- 8.268 Chapter 17 of the ES identifies that there are potential habitats within the Site provided by existing vegetation, trees and structures. It concluded that the Proposed Development has the potential for short term minor impacts through habitat loss specifically through the removal of existing vegetation and timings of the construction work. A series of environmental enhancements are proposed including bat and black redstart boxes, the inclusion of brown roofs to encourage nesting birds and tree planting.

Aviation

- 8.269 Chapter 18 of the ES concludes that the Proposed Development would have no impact on aviation safety and security matters.

8.0 Planning Policy Assessment

TV and Radio Interference

8.270 Chapter 19 of the ES concludes that there would be no potential impacts on TV and radio reception as a result of the Proposed Development that cannot be mitigated against.

Environmental Conclusions

8.271 Overall the Proposed Development would provide a beneficial impact to the local area compared to the position if the Site was left in a “do nothing” scenario. The EIA process means that mitigation has been built into the design to ensure minimal adverse impacts.

8.272 The Proposed Development therefore accords with the principles of national, regional and local planning policy.

9.0 Section 106 agreement HEADS OF TERMS

- 9.1 In addition to the provision of the planning and regeneration benefits directly generated by the proposed development, the Applicant is working with LB Southwark to agree an appropriate package of Section 106 contributions.

Financial Contributions

- 9.2 It is anticipated that the Heads of Terms for the Section 106 Agreement could include financial contributions to a number of areas. Included at Appendix B of this Planning Statement is a schedule of potential areas of contribution and indicative levels of contribution. The areas of contribution and financial amounts are indicative and may be subject change as a result of further discussions between the Applicant and the relevant authorities.
- 9.3 The potential areas and indicative levels of financial contribution have been informed by various factors including:
- LB Southwark's S106 Toolkit (2012) and LB Southwark's Section 106 planning obligations SPD (2007)
 - The S106 Contributions of the Implemented Permission
 - Anticipated TfL and LB Southwark highways improvements and potential Section 278 requirements for the site
 - Mayoral CIL
 - Current viability assessment
- 9.4 Current assessments estimate S106 financial contributions could be in the region of £8.6million. The final level of financial contributions would be agreed prior to determination of the planning application.

Non-Financial Contributions

- 9.5 Non-financial contributions could include the following:
- Employment and training
 - i. Construction Jobs
 - ii. Workplace Co-ordination
 - iii. Construction apprenticeships
 - iv. Local Employment Initiatives Post Construction
 - Viewing Lounge Management Plan
 - Car Club
 - Parking Permit Restrictions
 - Travel Plan
 - Highways Works And Highway Agreements
 - Public Realm Improvements
 - Pedestrian Route And Maintenance
 - Street Works
 - Phasing Programme For The Highways Works

9.0 Section 106 agreement HEADS OF TERMS

- Other Areas To Be Agreed With Officers As Necessary

- 9.6 These financial and non-financial contributions would be discussed with officers during the consideration of the New Application and are subject to change. The final S106 Heads of Terms and amounts of contribution would be agreed prior to the determination of the application.

10.0 Conclusion

- 10.1 This Planning Statement has assessed the Proposed Development against the National Planning Policy Framework (NPPF – 2012), the statutory development plan (comprising the London Plan 2011, LB Southwark Core Strategy 2011 and ‘Saved Policies’ of the Southwark Plan 2007), emerging policy and supplementary planning guidance.
- 10.2 It sets out how, in bringing forward the Proposed Development, the Applicant has consulted with and taken account of comments from key authorities and stakeholders, to enable the delivery of an exemplary development that would substantially accord with national, London and LB Southwark planning policy objectives and other material considerations.
- 10.3 The New Application needs to be determined in accordance with the development plan unless material considerations indicate otherwise. An important material consideration is the existence of the Implemented Permission. Where elements of the Implemented Permission remain unchanged in the New Application these are afforded significant weight in the assessment of the Proposed Development against planning policy.

Benefits of the Proposed Development

- 10.4 The Planning Statement and accompanying planning application documents demonstrate the wide-ranging benefits of the Proposed Development and that it substantially accords with both adopted and emerging planning policy. The key benefits of the Proposed Development are summarised below.

Principle of Development

- The Site is located in the London Bridge, Borough and Bankside (LBBS) Opportunity Area in the London Plan 2011 which is identified for the delivery of significant numbers of new homes (1,900) and jobs (25,000) in the period to 2031.
- The Site is identified in LB Southwark’s draft BBLB SPD (2010) as a Development Site appropriate for mixed use development including a range of uses, the development of a tall building and significant public realm improvements.
- The Proposed Development would deliver: a high density mixed use development with a sustainable and viable mix of uses that complement and enhance the area’s existing offer and contribute to regional and local planning targets; deliver significant public realm improvements and exemplary design, whilst maximising the development potential of a central London site which has been vacant for over 10 years.
- The principle of the Proposed Development is fully in accordance with the regional and local objectives for the area, as well as meeting the NPPF’s core principles, at the heart of which is the presumption in favour of sustainable development.

Creation of High Quality Homes

- The Proposed Development would deliver 274 homes in a mix of sizes, all of which would be exemplary in their design and would deliver 14% of the local areas targets.

10.0 Conclusion

- The provision of the maximum reasonable quantum of affordable housing would be secured either through off-site provision in the vicinity or through financial contributions should this not prove possible in the required timescales.

Creation of New Jobs

- The Proposed Development would deliver 212 permanent jobs in a range of sectors on a Site which has been vacant for ten years.
- It would also deliver significant local employment opportunities both during the construction and operational phases of development through employment and training initiatives.

Creation of a Viable Hotel Offer

- The Proposed Development includes an upscale/lifestyle 152 bedroom hotel in the Rennie Street Building which is commercially viable and would add to the vitality and vibrancy of the Blackfriars area.

Public Access to the Tower

- The sky deck major visitor attraction has been removed as it is not viable in current economic circumstances. A managed access Viewing Lounge on the 32nd level would be provided which would provide a unique facility with outstanding views of London for residents, hotel guests, the local community and the Council.

Improved Retail Offer

- The Proposed Development includes an increase in the level of A class retail uses from 911sq m to 1,336 sq m.
- Increased active uses at ground floor level including seating around the newly created public square would create a vibrant sense of place and shopping, dining and leisure opportunities for the existing and future community.

Delivery of Exemplary, Sustainable Design

- The New Application retains the exemplary design and integrity of the Implemented Permission designed by Ian Simpson Architects whilst incorporating refinements at the lower levels.
- The Proposed Development would deliver a landmark building which would enhance the London skyline and positively contribute to the local townscape and sense of place.

Delivery of Significant Public Realm Improvements

- The Proposed Development would enable the delivery of a significantly enhanced public realm through the removal of the elevated podium plaza and creation of the new public square known as 'Blackfriars Place' at grade at the heart of the development.
- This would create a new destination for residents, workers and visitors to the Blackfriars area. It would provide a place to linger and a place of calm set back from the busy neighbouring streets.

10.0 Conclusion

- Pedestrian legibility and thoroughfares through the Site would be significantly improved enhancing connectivity to the surrounding area.
- Additional significant public realm enhancements would be delivered along Rennie Street, Blackfriars Road, Upper Ground enlivening the area. In addition, the junction of Stamford Street and Blackfriars Road would be re-aligned and straightened, providing new public realm and seating and strengthening the street corner.

Delivery of Sustainable Development

- The Proposed Development has been designed to maximise the energy efficiency and sustainable benefits of the proposals including:
 - All homes would be Lifetime Homes Compliant and seek to achieve Code for Sustainable Homes Level 4;
 - The Applicant seeks to achieve BREEAM 'Excellent' for the Rennie Street Building and 'Very Good' for the Podium Building (subject to verification of calculation methodology);
 - Achieve an overall 25% reduction in CO₂ Emissions beyond Part L of Building Regulations 2010;
 - On-site renewable energy would be provided via photovoltaics and CHP which would be future-proofed to enable the Proposed Development to plug-in to a district-wide Heat and Energy Network should one be forthcoming.

Conclusions

- 10.5 In conclusion, the Proposed Development would deliver an exemplary, sustainable and economically viable development which would have many regenerative and economic benefits for the Site and immediately surrounding area in line with NPPF, London Plan and LB Southwark planning objectives.
- 10.6 The Implemented Permission has stalled in the current economic climate. The proposed changes in this New Application result in a more viable development which better reflects current demand and enables the Applicant to proceed and bring forward the Proposed Development following grant of planning permission.
- 10.7 If approved, the Applicant would complete the Proposed Development within 48 months from starting on site in 2013. The delivery of the Proposed Development would act as a catalyst for the regeneration of the wider Bankside area where a number of major development sites are currently stalled. This is particularly significant in light of the core objective of the NPPF to secure the delivery of sustainable development.

APPENDICES

APPENDIX A – PLANNING POLICY OVERVIEW

- 1.1 The Town and Country Planning Act 1990 (the “1990 Act”), the Planning and Compulsory Purchase Act 2004 (the “2004 Act”) and the Localism Act 2011 establish the legislative basis for town planning in England and Wales. Together these acts establish a “plan led” system which requires local planning authorities to determine planning applications in accordance with the statutory development plan (the development plan) unless material considerations indicate otherwise (section 38(6) of the 2004 Act as amended by the Localism Act). In London the development plan comprises the borough plan and the London Plan.
- 1.2 This section identifies the principal policies applicable to the determination of these proposals. Commentary on the interpretation of the policies and material considerations and how they apply to these proposals is set out in the planning assessment chapter.
- 1.3 The statutory development plan for the Site comprises:
 - The London Plan 2011;
 - The London Borough of Southwark’s Local Development Framework (LDF) Core Strategy 2011; and
 - The London Borough of Southwark’s Unitary Development Plan 2007 (known as ‘The Southwark Plan’) saved policies.
- 1.4 Where there is a conflict between policies in the development plan, Section 38(5) of the 2004 Act provides that the most recently adopted policy takes precedence. As the London Plan was adopted more recently than either the LDF Core Strategy or Southwark Plan, where there is a difference in policy the London Plan takes precedence.
- 1.5 To support and expand upon the policies contained within the development plan, both the Mayor and Southwark have published non-statutory planning guidance which includes Supplementary Planning Guidance (SPG) and Supplementary Planning Documents (SPDs). SPG and SPDs must be consistent with national and regional planning guidance, as well as the policy in the adopted development plan which they are intended to supplement. They must not introduce new policies or seek to allocate land for development that is not related to a statutory policy provision.
- 1.6 Emerging policy is also addressed including:
 - Early Minor Alterations to the London Plan (2012)
 - The Mayor’s Draft Housing SPG (2011)
 - The Draft BBLB SPD (2010)
- 1.7 The sections of relevance to this New Application are outlined below.

THE NATIONAL PLANNING POLICY FRAMEWORK (NPPF) MARCH 2012

- 1.8 The National Planning Policy Framework (NPPF) was published on the 27th March 2012, it consolidates national planning guidance into a single document (and

APPENDIX A – PLANNING POLICY OVERVIEW

technical appendices) and replaces all Planning Policy Guidance Notes and Planning Policy Statements with the exception of PPS10.

Sustainable Development

1.9 The NPPF identifies that the purpose of the planning system is to achieve sustainable development which comprises three strands - economic, social and environmental:

- an economic role – contributing to building a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; including improving biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

1.10 At paragraph 9 it identifies that pursuing sustainable development involves “seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life, including (but not limited to):

- *making it easier for jobs to be created in cities, towns and villages;*
- *moving from a net loss of bio-diversity to achieving net gains for nature;*
- *replacing poor design with better design;*
- *improving the conditions in which people live, work, travel and take leisure;*
- *and*
- *widening the choice of high quality homes.”*

1.11 Paragraph 14 identifies that at the heart of the NPPF is a presumption in favour of sustainable development. For plan-making, this means local planning authorities should positively seek opportunities to meet the development needs of their area, for decision-taking this means approving development proposals that accord with the development plan without delay.

Core Planning Principles

1.12 The NPPF sets out 12 land-use principles that should underpin both plan-making and decision-taking, including, inter alia, that planning should:

- be a creative exercise in finding ways to enhance and improve the places in which people live their lives;

APPENDIX A – PLANNING POLICY OVERVIEW

- proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. This includes that “every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth”.
- always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- take account of the different roles and character of different areas, promoting the vitality of our main urban areas;
- support the transition to a low carbon future in a changing climate, taking
- full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy);
- contribute to conserving and enhancing the natural environment and
- reducing pollution;
- encourage the effective use of land by reusing land that has been
- previously developed (brownfield land), provided that it is not of high environmental value;
- promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas;
- conserve heritage assets in a manner appropriate to their significance;
- actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

Economy

- 1.13 The NPPF reinforces the Government’s commitment to securing economic growth in order to create jobs and prosperity (paragraph 18) and specifies “significant weight should be placed on the need to support economic growth through the planning system”.
- 1.14 Paragraph 21 states that planning policies should recognise and seek to address potential barriers to investment, including a poor environment or lack of infrastructure, services or housing including identifying “priority areas for economic regeneration, infrastructure provision and environmental enhancement”. In drawing up Local Plans, local planning authorities should also ensure policies are flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.
- 1.15 Paragraph 22 states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment

APPENDIX A – PLANNING POLICY OVERVIEW

use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

Town Centres

- 1.16 Paragraph 23 identifies town centres as the heart of communities and therefore policies must support their viability and vitality. A network and hierarchy of centres that are resilient to anticipated future economic changes is necessary.
- 1.17 The sequential test should be applied for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan.

Sustainable Transport

- 1.18 Paragraph 30 supports development that facilitates the use of sustainable modes of transport.
- 1.19 Paragraph 32 requires all developments that generate a significant amount of movement to be supported by a Transport Statement or Transport Assessment. It is noted that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.
- 1.20 At Paragraph 35 the NPPF identifies that developments should be located and designed, where practical to:
 - Accommodate the efficient delivery of goods and supplies;
 - Give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;
 - Create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;
 - Incorporate facilities for charging plug in and other ultra low emission vehicles; and
 - Consider the needs of people with disabilities by all modes of transport.
- 1.21 At paragraph 37 it encourages planning policies to aim for a balance of uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure and other activities.
- 1.22 Paragraph 39 notes that when setting local parking standards for residential and non-residential development, local planning authorities should take into account:
 - The accessibility of the development;
 - They type, mix and use of development;
 - The availability of and opportunities for public transport;
 - Local car ownership levels; and
 - An overall need to reduce the use of high-emission vehicles.

APPENDIX A – PLANNING POLICY OVERVIEW

Housing

- 1.23 The NPPF at paragraph 47 states that, to boost significantly the supply of housing, local planning authorities should:
- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out within the NPPF, including identifying key sites which are critical to the delivery.
 - Identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market for land.
 - LPAs are also required to identify a supply of specific developable sites or broad locations for growth for years 6 to 10 and where possible years 11 to 15.
 - Illustrate the expected rate of housing delivery through housing trajectories for the plan period including how they will maintain a delivery of a five year supply for market and affordable housing.
 - Set out their own approach to housing density to reflect local circumstances.
- 1.24 Paragraph 49 goes on to state that relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites. It also states that that housing applications should be considered in the context of the presumption in favour of sustainable development.
- 1.25 At Paragraph 50 the NPPF identifies the objective for LPAs to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities including, inter alia;
- plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);
 - identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand
 - where they have identified that affordable housing is needed to “set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time”.
- 1.26 Paragraph 159 sets out Local planning authorities should have a clear understanding of housing needs in their area and should prepare a full Strategic Housing Market Assessment (SHMA) to identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period. This must:

APPENDIX A – PLANNING POLICY OVERVIEW

- Meet household and population projections
 - Address the needs for all types of housing including affordable and the needs of different groups in the community (such as, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and
 - Cater for housing demand and the scale of housing necessary to meet this demand.
- 1.27 LPAs must also prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.
- 1.28 Paragraph 173 identifies that plans should be deliverable stating that “to ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable”.

Design

- 1.29 The NPPF identifies that the Government attaches “great importance to the design of the built environment” and that good design is a key aspect of sustainable development and should contribute positively to making places better for people (paragraph 56).
- 1.30 Paragraph 58 establishes that developments, inter alia:
- Function well and add to the overall quality of the area over the lifetime of the development;
 - Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
 - Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;
 - Respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;
 - Create safe and accessible environments where crime and disorder, and the fear of crime do not undermine the quality of life or community cohesion; and
 - Are visually attractive as a result of good architecture and appropriate landscaping.
- 1.31 Paragraph 60 stipulates that planning policies and decisions should not attempt to impose architectural styles of particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain

APPENDIX A – PLANNING POLICY OVERVIEW

development forms or styles. It is however, proper to seek to promote or reinforce local distinctiveness.

- 1.32 Planning policies and decision are required to address the connections between people and places and the integration of new development into the natural, built and historic environment (paragraph 61).
- 1.33 The NPPF specifies at paragraph 63 that “in determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area”.
- 1.34 Paragraph 66 states that applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably.

Climate Change

- 1.35 The NPPF identifies that Local Planning Authorities should adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations (paragraph 94).
- 1.36 Paragraph 96 establishes that local planning authorities should expect new development to comply with Local Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant that this is not feasible or viable, and to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- 1.37 Paragraph 99 expects new development to be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures”.

Flood Risk

- 1.38 Paragraph 100 directs inappropriate development in areas at risk of flooding away from areas at highest risk, however, where development is necessary it should be made safe without increasing flood risk elsewhere.
- 1.39 Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:
 - applying the Sequential Test;
 - if necessary, applying the Exception Test;
 - safeguarding land from development that is required for current and future flood management;
 - using opportunities offered by new development to reduce the causes and impacts of flooding; and
 - where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking

APPENDIX A – PLANNING POLICY OVERVIEW

- opportunities to facilitate the relocation of development, including housing, to more sustainable locations.
- 1.40 Paragraph 102 identifies that if, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied. In order for the exception test to be passed:
- it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk and
 - a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
- 1.41 At paragraph 103 the NPPF states that when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment following the Sequential Test, and if required the Exception Test, it can be demonstrated that:
- within the site, the most vulnerable development should be located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and
 - development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems.

Environment

- 1.42 At paragraph 109 the NPPF identifies that the planning system should contribute to and enhance the natural and local environment by, inter alia:
- Minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity;
 - Preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water, or noise pollution or land instability; and
 - Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land where appropriate.
- 1.43 Paragraph 111 identifies that planning decisions should encourage the effective use of land by re-suing previously developed (brownfield) land, provided it is not of high environmental value.
- 1.44 Paragraph 120 states that to prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of

APPENDIX A – PLANNING POLICY OVERVIEW

- the area or proposed development to adverse effects from pollution, should be taken into account.
- 1.45 Paragraph 121 identified that planning decisions are required to ensure that the site is suitable for new use taking account of ground conditions and instability, including from former activities such as mining, pollution arising from previous uses and any proposals for mitigation including that adequate site investigation information prepared by a qualified person is presented.
- 1.46 At paragraph 123 the NPPF identifies that planning policies and decisions should, inter alia:
- avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development;
 - mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions.
- 1.47 Paragraph 124 identifies that planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.
- 1.48 Paragraph 125 identifies that by encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

Heritage

- 1.49 Paragraph 128 requires the applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.
- 1.50 Paragraph 131 requires local planning authorities to take into account the following when determining planning applications:
- 1.51 The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- 1.52 The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- 1.53 The desirability of new development making a positive contribution to local character and distinctiveness.

THE LONDON PLAN 2011

- 1.54 The London Plan was published in July 2011 and formally replaces The London Plan (Consolidated with Alterations since 2004) 2010. The Mayor published draft Early Minor Alterations to the London Plan in February 2012, primarily to address changes to Government policy and other policy subsequent to the publication of the

APPENDIX A – PLANNING POLICY OVERVIEW

current London Plan in July 2011. These Early Minor Alterations are referred to where relevant in this section.

- 1.55 The London Plan’s fundamental objective is to accommodate London’s population and economic growth through sustainable development. The Mayor’s vision is for London to:

“excel among global cities, expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21st century, particularly that of climate change.”

- 1.56 The objectives are to ensure London is a city that; meets the challenges of economic and population growth; is internationally competitive and successful; is diverse strong, secure and has accessible neighbourhoods; delights the senses; is a world leader in improving the environment; and where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities.

London’s places

- 1.57 The Site falls within the designated Central Activities Zone (CAZ).
- 1.58 Strategic priorities for the Central Activities Zone (Policy 2.10) include enhancing its international, national and London-wide role, supporting its distinct offer and strategic uses; bringing forward development capacity and supporting infrastructure and services; and supporting and improving the retail offer.
- 1.59 Policy 2.11 promotes a mix of uses in the CAZ including residential and retail development. The site falls within an area identified for mixed uses with strong arts, cultural or entertainment character in Map 2.3.
- 1.60 The Site falls within the London Bridge, Borough and Bankside Opportunity Area (OA). Development proposals in OAs should optimise densities, providing supporting infrastructure, contribute to housing and employment targets, realise the scope for intensification and support wider regeneration (Policy 2.13). The London Bridge, Borough and Bankside OA is identified for a minimum of 1,900 new homes and approximately 25,000 new jobs in the plan period to 2031.
- 1.61 The Mayor will promote delivery of green infrastructure, including Green Corridors and Green chains and the innovative use of street trees (Policy 2.18).

London’s People

- 1.62 The strategic annual housing target is 32,210 additional homes (Policy 3.3). Boroughs should seek to exceed their targets, which are minima, and should identify and seek to enable development capacity to be brought forward including in Opportunity Areas. Southwark’s annual housing target is 2,005 additional homes (Table 3.1).
- 1.63 Policy 3.4 seeks that housing capacity is optimised taking account of local character, transport capacity and the density matrix. Density ranges are set out in Table 3.2. Paragraph 3.28 sets out that it is not appropriate to apply Table 3.2

APPENDIX A – PLANNING POLICY OVERVIEW

mechanistically. The form of housing should be determined primarily by an assessment of housing requirements and not be assumptions as to the built form of the development.

- 1.64 Policy 3.5 seeks that developments are of the highest standard in relation to their context and the wider environment. Housing design should enhance the quality of local places and take account of ‘arrival’ and the ‘home’ as a place of retreat. Minimum space standards are set out in Table 3.3.
- 1.65 Housing development should make provision for children’s and young people’s recreation space (Policy 3.6). Proposals for large residential developments including complementary non-residential uses are encouraged in areas of high public transport accessibility (Policy 3.7). Policy 3.8 promotes housing choice including in mix of home sizes and tenures, including provision of affordable family housing. This Policy also requires that all new housing is built to ‘The Lifetime Homes’ standards and ten per cent of new housing is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users.
- 1.66 Policy 3.9 seeks a more balanced mix of tenures in all parts of London. Draft Early Minor Alterations to the London Plan include ‘affordable rented’ housing alongside social rented and intermediate housing in the definition of affordable housing (Policy 3.10).
- 1.67 Policy 3.11 establishes a London-wide investment target for 13,200 additional affordable homes per year over the term of the Plan. Within this target, the Mayor will seek to ensure 60 % is social housing and 40% is intermediate housing. Boroughs are to set overall targets in their LDFs.
- 1.68 Policy 3.12 provides guidance on negotiating the maximum reasonable amount of affordable housing on individual schemes having regard to:
- current and future requirements for affordable housing at local and regional levels identified;
 - affordable housing targets;
 - the need to encourage rather than restrain residential development;
 - the need to promote mixed and balanced communities;
 - the size and type of affordable housing needed in particular locations; and
 - the specific circumstances of individual sites including development viability, the availability of public subsidy, the implications of phased development including provisions for reappraising the viability of schemes prior to implementation (‘contingent obligations’), and other scheme requirements.
- 1.69 Draft Early Minor Alterations to the London Plan include the requirement for particular regard to guidance provided by the Mayor through the London Housing Strategy, supplementary guidance and the London Plan Annual Monitoring Report and the priority to be accorded to provision of affordable family housing, in addition to those considerations in Policy 3.12 outlined above.

APPENDIX A – PLANNING POLICY OVERVIEW

- 1.70 Draft Early Minor Alterations to the London Plan also amend Policy 3.12 to state that, 'Affordable housing should normally be provided on-site. In exceptional cases where it can be demonstrated that this is not appropriate in terms of the policies in this Plan, it may be provided off-site. A cash in lieu contribution should only be accepted where this would have demonstrable benefits in furthering the affordable housing and other policies in this Plan and should be ring-fenced and, if appropriate, pooled to secure additional affordable housing either on identified sites elsewhere or as part of an agreed programme for provision of affordable housing.'
- 1.71 Policy 3.16 seeks that developments support the provision of additional social infrastructure.

London's economy

- 1.72 The Mayor will support central London's economy (Policy 4.1). London's visitor economy will be supported and its growth stimulated: 40,000 net additional hotel bedrooms are to be delivered by 2031, of which at least 10 per cent should be wheelchair accessible (Policy 4.5). Within the CAZ strategically important hotel provision should be focussed on its Opportunity Areas with good access to public transport (Policy 4.5).

London's response to climate change

- 1.73 Policy 5.2 sets out the Mayor's energy hierarchy to: be lean, use less energy; be clean, supply energy efficiently; and be green, use renewable energy. Targets are proposed for minimum improvements over the Target Emission Rate: 25 per cent (Code for Sustainable Homes level 4) on 2010 Building Regulations (residential and non-domestic buildings between 2010-2013). Where targets cannot be met on site any shortfall can be provided offsite or through payment in lieu.
- 1.74 Sustainable design and construction standards include minimising carbon dioxide emissions, avoiding pollution, minimising waste and maximising recycling and avoiding impacts from natural hazards (Policy 5.3).
- 1.75 The Mayor's objective is that 25% of energy supply should be decentralised by 2025 (Policy 5.5). Boroughs are encouraged to undertake energy masterplanning and development of networks for development to connect to.
- 1.76 Policy 5.6 sets out the approach to decentralised energy in development proposals, prioritising connection to existing systems, followed by site wide CHP and communal heating and cooling.
- 1.77 Policy 5.7 seeks that a proportion of energy is generated from renewable sources. Paragraph 5.42 sets out a presumption that all major development proposals will seek to reduce carbon dioxide emissions by at least 20 per cent through the use of on-site renewable energy generation wherever feasible.
- 1.78 Major developments should reduce potential overheating (Policy 5.9).
- 1.79 Policy 5.10 promotes urban greening with a target increase in green space in the CAZ of 5% by 2030.

APPENDIX A – PLANNING POLICY OVERVIEW

- 1.80 Developments should include green roofs and walls where feasible (Policy 5.11).
- 1.81 Development should comply with PPS25 (superseded by technical guidance accompanying the NPPF) on flood risk and management (Policy 5.12) and utilise sustainable urban drainage unless it is not practical to do so (Policy 5.13).
- 1.82 Developments should seek to minimise waste and exceed targets of recycling and reuse of waste in construction, excavation and demolition to meet the Mayor’s objective for waste self-sufficiency (Policy 5.16 and Policy 5.18). Suitable waste and recycling storage facilities are required in all new developments (Policy 5.17).
- 1.83 Remediation of contaminated land is supported and appropriate measures should be taken to ensure that development on previously contaminated land does not activate or spread contamination (Policy 5.21).

Transport

- 1.84 The Mayor will encourage closer integration of planning and development and will encourage development that reduces the need to travel and encouraging walking by improving the urban realm (Policy 6.1).
- 1.85 Development proposals should ensure that impacts on transport capacity are assessed (Policy 6.3).
- 1.86 Policy 6.5 sets out the Mayor’s priority on securing funding for Crossrail through planning obligations.
- 1.87 Developments should provide secure cycle facilities (Policy 6.9). Maximum parking standards are set out in table 6.3. The Draft Early Minor Alterations to the London Plan proposes amendments to these standards.
- 1.88 Policy 6.13 states that an appropriate balance must be struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use. Maximum parking standards are set out in table 6.2. All developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit.
- 1.89 New developments should ensure that 1 in 5 spaces (active and passive) provide an electrical charging point to encourage the uptake of electric vehicles (Policy 6.13).

London’s living places and spaces

- 1.90 Development should be of the highest standards of accessible and inclusive design (Policy 7.2) and consistent with the principles of ‘secured by design’ (Policy 7.3).
- 1.91 Development should have regard to the form, function or structure of an area (Policy 7.4). In areas of poor character it should build on positive elements that can contribute to establishing character.
- 1.92 Development should make the public realm comprehensible with gateways and focal points (Policy 7.5).
- 1.93 Architecture should contribute to a coherent public realm, streetscape and wider cityscape. Buildings should be of the highest architectural quality, appropriately

APPENDIX A – PLANNING POLICY OVERVIEW

- enclose the public realm and provide high quality spaces. Buildings should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate (Policy 7.6).
- 1.94 Tall buildings should be part of a strategic approach to an area (Policy 7.7). Applications should include urban design analysis. Tall buildings should generally be in the CAZ and Opportunity Areas and have good public transport access; be in areas whose character would not be adversely affected; relate well to surrounding buildings; form distinctive landmarks; incorporate the highest standards of architecture and materials; have ground floor activities that provide a positive relationship to surrounding streets; where appropriate have accessible upper floors and contribute to regeneration. Tall buildings should not adversely affect their surroundings or strategic views.
- 1.95 New development in the setting of heritage assets, and conservation areas should be sympathetic to their form, scale, materials and architectural detail. It should make provision for the protection of archaeological resources (Policy 7.8).
- 1.96 Development within designated strategic views will be assessed for its impact on the foreground, middle ground or background (Policy 7.11). Development should not harm, and where possible should make a positive contribution to strategic views (Policy 7.12).
- 1.97 Developments should promote sustainable design and construction methods to reduce emissions (Policy 7.14) and should aim to be ‘air quality neutral’ and not lead to further deterioration of existing poor air quality. Offsetting should be used to ameliorate negative impacts associated with development proposals.
- 1.98 Existing and potential adverse noise impacts should be minimised in development proposals, separating new noise sensitive development from major noise sources and promoting new technologies and improved practices to reduce noise at source (Policy 7.15).
- 1.99 A proactive approach should be taken to the protection, promotion and management of biodiversity in support of the Mayor’s Biodiversity Strategy (Policy 7.19).

Implementation, Monitoring and Review

- 1.100 Affordable housing, supporting the funding for Crossrail (where appropriate) and other public transport improvements are strategic priorities for planning obligations (Policy 8.2).

SOUTHWARK LDF CORE STRATEGY 2011

- 1.101 The London Borough of Southwark’s Core Strategy was adopted in April 2011. The Core Strategy sets out Southwark’s spatial strategy and strategic policies with an implementation plan until 2026 to deliver sustainable development. The policies relevant to the Site and the Proposed Development are summarised below.

APPENDIX A – PLANNING POLICY OVERVIEW

Strategic and Site Specific Policy

- 1.102 Southwark is committed to working with partners, local communities and developers to ensure that developments achieve growth targets of; 80,000 sq m new shopping and leisure floorspace; 24,450 net new homes between 2011 and 2026; 8,558 new affordable homes between 2011 and 2026; 32,000 net new jobs; and 425,000 to 530,000 sq m additional business floorspace between 2011 and 2026 (Strategic Targets Policy 1).
- 1.103 The Site falls within the Bankside, Borough and London Bridge Opportunity Area (BBLB OA). The OA is identified to accommodate 1,900 net new homes (including 665 affordable homes) and 25,000 net new jobs between 2009 and 2026. The Opportunity Area will continue to be a location for mix of uses providing high quality office accommodation alongside world-class retail, tourism, culture and entertainment facilities and public spaces (Strategic Targets Policy 2).
- 1.104 Strategic Targets Policy 2 sets out a vision for the Bankside and Borough area which seeks new development to improve public spaces, accessibility and recognise and enhance the different character and roles of places in the area. The northern end of Blackfriars Road is specifically identified for a cluster of tall buildings providing offices, housing, hotels and shops. These buildings will be of exceptional design and will enhance the look of the area and provide new public spaces. Car parking will be limited to deter car use and help reduce traffic.
- 1.105 The Site falls within the CAZ. Development in the CAZ should support the continued success of London as a world-class city as well as protecting and meeting the more local needs of the residential neighbourhoods. Appropriate uses will include new homes, office space, shopping and cultural facilities, as well as improved streets, spaces and community facilities (Strategic Targets Policy 2).

General Development Principles

- 1.106 The Council will allow more intense development for a mix of uses which makes the most of the Site's potential and maintains open space in the growth areas (Strategic Policy 1).

Transport and Parking

- 1.107 The Council's overarching objective is to encourage walking, cycling and the use of public transport rather than travel by car. To achieve this, large developments will be directed to very accessible locations and requiring a transport assessment with applications to show that schemes minimise their impacts, minimise car parking and maximise cycle parking (Strategic Policy 2).

Shopping, Leisure and Entertainment

- 1.108 The Site falls within the Bankside and Borough District Town Centre. Southwark will support the provision of new food and non-food shopping space in this town centre and seek to ensure that new development comprises a scale and balance of different uses appropriate to the centre (Strategic Policy 3).

APPENDIX A – PLANNING POLICY OVERVIEW

Community Facilities

- 1.109 Developments should provide flexible community spaces that can be shared by many groups, where there is a local need and an identified occupier for the space. New development is also required to provide for new school places and increases in local health facilities (Strategic Policy 4).

Residential

- 1.110 Development should provide high quality new homes in attractive environments, particularly in growth areas (Strategic Policy 5).
- 1.111 Residential density will be expected to fall within the range of 650 to 1,100 habitable rooms per hectare in the CAZ, taking into account matters which include the quantity and impact of any non-residential uses. Within Opportunity Areas, such as the BBLB OA, the maximum density in this range may be exceeded when developments are of an exemplary standard of design (Strategic Policy 5).
- 1.112 Strategic Policy 6 requires that development provides as much affordable housing as is reasonably possible, to meet the borough targets of a minimum of 8,558 net affordable homes between 2011 and 2026. Southwark will seek a minimum of 35% affordable homes on developments with 10 or more homes.
- 1.113 Development of 10 or more homes should have (Strategic Policy 7);
- at least 60% 2 or more bedrooms;
 - at least 10% 3,4 or 5 bedrooms; and
 - a maximum of 5% as studios and only for private housing.

Hotel

- 1.114 The Site falls within a Strategic Cultural Area. Development of hotels will be promoted within the town centres, the Strategic Cultural Areas, and places with good access to public transport services, providing that these do not harm the local character (Strategic Policy 10).
- 1.115 Supporting paragraph 5.81 states that the BBLB OA has seen strong growth in hotels and apart-hotels, with much of this focused in the Bankside and Borough Areas. The Council will seek to ensure growth needs are balanced against fostering a stable residential community to avoid an over concentration of hotels (criteria to assess the impact of hotel development is to be included in the forthcoming Development Management DPD).

Employment

- 1.116 Existing business floorspace will be protected and the provision of around 25,000 - 30,000 sq m of additional business floorspace will be promoted to help meet general demand for office space in locations including, inter alia, the CAZ, town centres and Strategic Cultural Areas (Strategic Policy 10).
- 1.117 New jobs and training opportunities for local people will be encouraged as part of new developments (Strategic Policy 10).

APPENDIX A – PLANNING POLICY OVERVIEW

Open Space

- 1.118 New developments are required to provide space for children’s play, gardens and other green areas, and help to improve the quality of and access to open spaces, particularly in areas deficient in open space (Strategic Policy 11).

Design and Tall Buildings

- 1.119 Strategic Policy 12 states that development should achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in.
- 1.120 The northern end of Blackfriars Road (which the Site falls within) is a ‘location where tall buildings are possible’, as identified in Figure 33. Strategic Policy 12 requires that all tall building have an exemplary standard of design. The height and design proposed should also conserve and enhance both the historic environment and local and strategic views.

Archaeology and Heritage Assets

- 1.121 The Site falls within an Archaeological Priority Zone (APZ), is in close proximity to a number of listed buildings (as detailed in the Site and Surroundings section) and Old Barge House Alley Conservation Area is located to the east of the Site straddling the Southwark/Lambeth borough boundary. Strategic Policy 12 requires that new developments conserve or enhance Southwark’s heritage assets, their setting and wider historical environment including, inter alia, APZs, listed buildings, conservation areas and world heritage sites. Proposals on sites in APZs should provide an assessment of any archaeological remains which may be present.

Energy and Sustainability

- 1.122 Strategic Policy 13 sets out Southwark’s strategic approach for achieving high environmental standards. New developments will be expected to be designed and built to minimise greenhouse gas emissions across its lifetime, including:
- Meeting targets for at least Code for Sustainable Homes 4 and BREEAM “excellent” for non-residential development;
 - Major developments to set up and/or connect to local energy generation networks where possible;
 - Use low and zero carbon sources of energy to achieve a 44% saving in carbon dioxide emissions above the building regulations;
 - Achieve a reduction in carbon dioxide of 20% from using on-site or local low and zero carbon sources of energy; and
 - Reduce surface water run-off by more than 50% and achieve a potable water use target of 105 litres per person per day.

APPENDIX A – PLANNING POLICY OVERVIEW

Environment

- 1.123 Developments are expected to demonstrate minimisation of waste and water usage, and measures for reducing air, land, water, noise and light pollution and avoiding amenity and environmental problems (Strategic Policy 13).
- 1.124 The Site falls within the ‘Thames Flood Zone’ as identified in Figure 34. Development will be allowed in this Zone where it is designed to be safe and resilient to flooding and meets the Exceptions Test (set out within PPS25) in accordance with Strategic Policy 13.
- 1.125 Development should avoid harming protected and priority plants and animals and help improve and create habitat (Strategic Policy 11).

Planning Obligations

- 1.126 Strategic Policy 14 states that the Council will use planning obligations to reduce or mitigate the impact of developments.

SOUTHWARK PLAN 2011 – ‘SAVED POLICIES’

- 1.127 LBS adopted its UDP (known as the ‘Southwark Plan’) in July 2007, which sets out the Council’s vision for the borough. The Planning and Compulsory Purchase Act 2004 replaced UDPs with LDFs. A requirement was placed on local planning authorities to adopt LDFs within three years of either the commencement of the Act or the adoption of the UDP if after this date. After this time existing UDP policies would cease to have effect.
- 1.128 Some of the policies in the UDP have been ‘saved’, by means of a Secretary of State Direction in July 2010. The policies not saved expired at this time. LBS have since adopted their LDF Core Strategy (April 2011) which superseded a number of these ‘saved’ UDP policies.
- 1.129 Only ‘saved’ policies not superseded by the Core Strategy are referred to in this planning statement.

General Development Principles

- 1.130 Developments should maximise the efficient use of land whilst; protecting amenity of neighbouring occupiers; ensuring adequate amenity for future occupiers; including a design which positively responds to local context; ensuring the proposal does not unreasonably compromise the potential and uses of neighbouring sites; making adequate provision for servicing, access and circulation; and ensuring the scale of development is appropriate to the accessibility to public transport and other infrastructure (saved Policy 3.11).

Transport and Parking

- 1.131 The location of development throughout the borough must be appropriate to the size and trip generating characteristics of the development. Major Developments generating a significant number of trips should be located near transport nodes (saved Policy 5.1).

APPENDIX A – PLANNING POLICY OVERVIEW

- 1.132 Development should demonstrate that; there is no adverse impact on transport networks; adequate provision has been made for servicing, circulation and access to, from and through the site; consideration has been given to impacts of development on the Bus Priority Network and the Transport for London Road Network (saved Policy 5.2).
- 1.133 Development should make adequate provision for pedestrians and cyclists, through well designed access arrangements, direct, safe and secure walking and cycling routes and cycle parking which meets minimum standards (saved Policy 5.3).
- 1.134 All developments requiring car parking should minimise the number of spaces provided and will be expected to include justification for the amount of car parking sought taking into account; the site’s PTAL; impact on overspill parking; and the demand for parking within Controlled Parking Zones (saved Policy 5.6). Adequate parking for disabled people and the mobility impaired will also be required (saved Policy 5.7) alongside adequate taxi and coach parking facilities where developments attract large numbers of visitors such as hotel uses (saved Policy 5.8).

Shopping, Leisure and Entertainment

- 1.135 The Site falls within the Bankside and Borough District Town Centre. Saved Policy 1.7 states that most new developments for retail and other town centre uses (including leisure, entertainment, community and residential uses) should be located in existing town centres subject to, inter alia, the proposal:
 - being a scale and nature appropriate to the character and function of the centre;
 - not harming the vitality and viability of the centre and amenities of surrounding occupiers;
 - including an appropriate mix of uses and providing amenities for users of the site where appropriate;
 - being located on a site highly accessible by sustainable modes of transport where uses will attract a lot of people, and not causing adverse effects on the environment, traffic circulation or air quality due to additional servicing traffic; and
 - addressing the street, providing an active frontage on pedestrian routes and not eroding the visual continuity of a shopping frontage.

Residential

- 1.136 Saved Policy 4.2 promotes residential development, including within mixed-use schemes, provided that good quality living conditions are achieved and the scheme includes high standards of; accessibility (all dwellings to be built to Lifetime Homes standards); privacy and outlook; daylight and sunlight; ventilation; outdoor/green space; safety and security; and protection from pollution including noise and light pollution.
- 1.137 Major new build residential development should provide a mix of dwelling types and three or more bed homes should have direct access to private outdoor space.

APPENDIX A – PLANNING POLICY OVERVIEW

At least 10% of homes should be suitable for wheelchair users, except when this is not possible because of site constraints (saved Policy 4.3).

Hotel

- 1.138 Proposals for hotels will be encouraged in areas with high public transport accessibility where they would not create an over dominance of visitor accommodation in the locality (saved Policy 1.12)

Employment

- 1.139 Outside Preferred Office Locations on sites which have an established B Class Use and fall within, inter alia, the CAZ or Strategic Cultural Area, development which proposes a net loss of Class B floorspace may be permitted where;
- Unsuccessful marketing of the property for continued Class B uses or mixed use including Class B uses can be demonstrated for a period of 24 months; or
 - The physical or environmental constraints of the site mean it is unsuitable for continued Class B uses or mixed use including Class B uses; or
 - The site is located in a town centre and is suitable for Class A or other town centre uses (see saved Policy 1.7 above).

Built Environment, Design and Tall Buildings

- 1.140 Developments should achieve a high quality of architectural and urban design, with new buildings creating a design solution specific to the site's shape, size, location, and development opportunities (saved Policy 3.12).
- 1.141 The design of developments should; include buildings of a height, scale and massing appropriate to the local context; have regard to existing urban grain, development patterns and density; make a positive contribution to the character of the area and have active frontages; have an appropriate site layout; include a high quality streetscape with; incorporate landscape design that enhances the area and biodiversity; and have suitable access for disabled people (saved Policy 3.13).
- 1.142 Development in both the private and public realm, should be designed to improve community safety and crime prevention (saved Policy 3.14).
- 1.143 Developments should preserve or enhance the historic environment (saved Policy 3.15) including the setting of listed buildings (saved Policy 3.18).
- 1.144 Buildings that are significantly taller than their surroundings or have a significant impact on the skyline may be acceptable on sites which have excellent accessibility to public transport facilities and are located in the Central Activities Zone (particularly in Opportunity Areas) outside landmark viewing corridors. Proposals for tall buildings should ensure that they (saved Policy 3.20):
- make a positive contribution to the landscape;
 - are located at a point of landmark significance;
 - are of the highest architectural standard;

APPENDIX A – PLANNING POLICY OVERVIEW

- relate well to its surroundings, particularly at street level; and
 - contribute positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.
- 1.145 Development should also not adversely impact on important local views (saved Policy 3.22).
- 1.146 The Site falls within an APZ and therefore development proposals should be accompanied by an archaeological assessment and evaluation (saved Policy 3.19).

Energy and Sustainability

- 1.147 Developments must be designed to maximise energy efficiency and to minimise and reduce energy consumption and carbon dioxide (CO2) emissions in accordance with the Mayor’s energy hierarchy (saved Policy 3.4).

Environment

- 1.148 Development which would have an adverse material impact on the environment and cause a loss of amenity, including disturbance from noise, to occupiers of the surrounding area will be resisted (saved Policy 3.1 and 3.2).
- 1.149 The Site is within an Air Quality Management Area. Development that would lead to a reduction in air quality will be resisted (saved Policy 3.6).
- 1.150 Developments are required to ensure adequate and accessible provision of recycling, composting and residual waste disposal facilities. The design of waste and recycling facilities must be easily and safely accessible, improving local amenity. (saved Policy 3.7).
- 1.151 Developments should incorporate measures to reduce the demand for water and recycle grey water and rainwater so this does not lead to a reduction in water quality. Proposals should incorporate sustainable methods of drainage where practical and not result in increased surface run-off which may lead to greater flood risk and pollution (saved Policy 3.9).
- 1.152 Developments should include features which enhance biodiversity (saved Policy 3.28).

Planning Obligations

- 1.153 The Council will seek to enter into planning obligations to mitigate the impact of the development, contribute towards infrastructure, environment or site management to support the development and secure an appropriate mix of uses (saved Policy 2.5).
- 1.154 Developments creating over 1,000 sq m of new employment generating floorspace are required to provide planning obligations towards training and employment opportunities, childcare facilities and public realm improvements for people with disabilities (saved Policy 1.1).

SUPPLEMENTARY PLANNING GUIDANCE (SPG) AND DOCUMENTS (SPD)

APPENDIX A – PLANNING POLICY OVERVIEW

- 1.155 To support and expand upon the policies contained within the development plan, both the Mayor and LB Southwark have published non-statutory planning guidance which includes Supplementary Planning Guidance (SPG) and Supplementary Planning Documents (SPDs). SPG and SPDs must be consistent with national and regional planning guidance, as well as the policy in the adopted development plan which they are intended to supplement. They must not introduce new policies or seek to allocate land for development that is not related to a statutory policy provision.

London View Management Framework SPG (March 2012)

- 1.156 London Plan Policies 7.11 and 7.12 refers to the London View Management Framework. The Revised London View Management Framework Supplementary Planning Guidance (SPG), published in March 2012, designates, protects and manages twenty-seven views of London and some of its major landmarks.
- 1.157 Of particular relevance to the Proposed Development, the Site falls within the background of the Townscape View from Assessment Point 26.A: St James’s Park to Horse Guards Road. Guidance states that any building proposal that will be visible in the background should relate to one or the other of the existing groups either side of Duck Island and must be of exceptional design quality, in particular with regard to their roofline, materials, shape and silhouette. New buildings that appear above the central part of Duck Island would damage the viewer’s ability to see these groups of buildings in conjunction with the landscaped foreground and should normally be refused.

The Mayor’s Draft Housing Supplementary Planning Guidance (December 2011)

- 1.158 The draft Housing Supplementary Planning Guidance (SPG) published for consultation in December 2011, will replace the adopted Housing SPG (2005) which is based on policies in the superseded London Plan. The draft SPG includes “baseline” standards which will be used to assess relevant aspects of development proposals and “good practice” standards which set out aspirational guidelines for exemplary housing quality and design. Relevant standards are considered and referred to where appropriate within the supporting documentation submitted with this application.

Other Relevant Mayoral SPGs

- 1.159 The Mayor has adopted a number of other relevant SPGs which provide detailed guidance referred to in other supporting documents accompanying the New Application but not specifically assessed in this Planning Statement These include:
- Sustainable Design and Construction SPG (2006);
 - Accessible London: Achieving an Inclusive Environment SPG (2004); and
 - The Mayor’s Energy Strategy: Green Light to Clean Power (2004).

LB Southwark’s Draft Bankside, Borough & London Bridge SPD (February 2010)

APPENDIX A – PLANNING POLICY OVERVIEW

- 1.160 The Bankside, Borough and London Bridge SPD was published by LBS in February 2010. The draft SPD sets out a detailed planning framework for the area. Consultation on the draft SPD took place in February and March 2010 with a further round taking place in September 2010. In February 2011, Southwark’s cabinet resolved to put work on the preparation of the SPD on hold on the grounds that the Bankside, Borough and London Bridge area, at that time, was being considered by the Government for Neighbourhood Planning Vanguard status.
- 1.161 In April 2011, the Government confirmed the area’s status as a neighbourhood planning frontrunner. A neighbourhood plan for the Bankside, London Bridge and Borough area is currently being prepared. The draft SPD will be used to inform the policies of the emerging Neighbourhood Plan. However, LB Southwark have confirmed that the preparation of the Neighbourhood Plan will not remove the need to have a clear planning framework for the whole opportunity area in the form of an SPD/OAPF and it is expected that work will resume on the preparation of this document during 2012.
- 1.162 The draft SPD remains a material consideration in the determination of planning applications for the area. A summary of the relevant planning policy considerations contained within the draft SPD are set out below.
- 1.163 The SPD identifies that Bankside, Borough and London Bridge have opportunities for further 10 to 15 years including that the biggest opportunities are around London Bridge station and the northern end of Blackfriars Road.
- 1.164 The vision for the area is for Bankside, Borough and London Bridge to be a vibrant, mixed-use area that people want to come to, that supports the economic and business function of central London and promotes the success of local businesses and provides a high quality living environment for local people. Key targets include the delivery of over 1,900 new homes, 400-500sq.m of additional business floor space and around 25,000 new jobs. Other key elements of the vision include, inter alia:
- The delivery of new high quality sustainable neighbourhoods with a range of housing, shops and facilities to meet the needs of local people;
 - Local people will share in the benefits of regeneration and investment in the area, such as through employment and training schemes. This will include new and improved community and youth facilities;
 - New development will help improve the look, feel and safety of streets and public spaces. Improvements will help people move more easily through the area by walking and cycling; and
 - There will be a good quality network of public spaces and links between them will be improved. New trees and landscaping improvements will make places feel greener.
- 1.165 In relation to Blackfriars Road North, the SPD states that:
- “Major mixed use development will line the northern half of Blackfriars Road, which will be a major focus for high quality offices and a complementary mix of uses bringing new life to the area. This will include hotels, new retail space and housing.*

APPENDIX A – PLANNING POLICY OVERVIEW

Development will help bring new activity and life to Blackfriars Road, which will be complemented by major public realm improvements. There will be a cluster of tall buildings around the northern end of Blackfriars Road. These buildings will be of exceptional design and will enhance the look of the area and provide new public spaces. Access to and along the riverside and to and from the new Blackfriars Station will be improved”

- 1.166 The draft SPD identifies the Site as suitable for the provision of active frontages, specifying that active frontages can include A and D class uses.

Retail

- 1.167 The draft SPD identifies the opportunity to improve the mix of retail as part of new developments and that new development should, inter alia;

- Provide at least 50% of the length of each active/retail frontage in the as class A1;
- Provide a range of retail unit sizes including small affordable retail units suitable for local and independent retailers; and
- Developers should work with the local community and retail businesses to secure uses that provide services to local residents.

Food and Drink

- 1.168 The SPD notes that A3 and A4 uses can help to create vibrant mixed use areas. It also notes that new developments should:

- demonstrate how they will manage potential amenity and nuisance impacts;
- be designed to allow the possibility of outdoor seating and dining where this would not cause amenity impacts or obstructions to public spaces; and
- Proposals for more than 1,000 sq m of A3, A4 or A5 uses should include a visitor management strategy that explains how the design and operation of the facility will avoid crowding of streets, noise and anti-social behaviour.

Hotel

- 1.169 The SPD identifies that in recent years there has been a concentration of hotels in the Opportunity Area, noting that hotels can bring benefits to the local economy but that it is important to ensure that hotels do not impact negatively on the character and amenity of areas.

- 1.170 London Bridge and Blackfriars are identified as the most appropriate locations for new hotel development due to the high level of transport accessibility and the expectation for major new mixed use development in the area. Proposals for new hotel bed spaces will only be supported where they:

- Do not result in a loss of B Class floorspace;
- Will not lead to adverse impacts on the amenity of residential areas from noise, traffic and anti-social behaviour. Proposals for hotel development

APPENDIX A – PLANNING POLICY OVERVIEW

should include a visitor management strategy that explains how amenity impacts will be avoided; and

- Provide public access to ancillary facilities such as restaurants, health clubs and meeting rooms.

Housing

1.171 The SPD notes the Core Strategy requirements for new residential developments of 10 or more dwellings in the opportunity area including that:

- At least 35% of homes should be affordable housing;
- At least 60% of homes should have two or more bedrooms;
- Within the areas at London Bridge and the north of Blackfriars Road at least 10% of dwellings should have three or more bedrooms;
- A maximum of 5% as studios and only for private housing; and
- At least 10% of homes should be wheelchair accessible to create an inclusive environment.

1.172 It requires new development to meet the following minimum overall floor sizes: studios – 36sq.m; 1 bed – 50sq.m; 2 bed – 70sq.m 3 bed – 86sq.m and 4+ bed – 95sq.m.

1.173 The SPG notes that developments will generally need to be within the range of 650 to 1100 habitable rooms per hectare. Higher densities will be allowed when developments are of an exemplary standard of design, provide excellent living accommodation and make a considerable contribution to infrastructure and environmental improvements over those required by the standard S106 tariffs (see section 6).

Design

1.174 The SPD identifies the areas around the north end of Blackfriars Road and London Bridge Station area is a suitable location for tall buildings and that tall buildings can offer unique opportunities and benefits to the area including providing landmark buildings, acting as a stimulus for regeneration and boosting the local economy.

1.175 Proposals for public realm as part of new development in the Opportunity Area should be designed having regard to the following principles:

- Create more space for pedestrians and new points of activity and interest to encourage movement away from crowded areas;
- Reduce barriers to movement and create a well-connected and legible area that is easy and safe to use. This includes improved crossings of busy roads;
- Roll out the Legible London signage project across the opportunity area;
- Improving links to and between the City, Waterloo, Elephant and Castle, the Riverside and Canary Wharf;

APPENDIX A – PLANNING POLICY OVERVIEW

- Provide a network of good quality green spaces that give respite from busy areas. Improve the quality of spaces so that they function better;
 - Bring nature into the city through tree planting and the creation of green links and improving habitat; and
 - Design public and communal spaces to be child friendly with opportunities for informal play and interaction.
- 1.176 The SPD contains specific guidance on the ‘Blackfriars North Area’, which includes the Site and surrounding area, in terms of design and public realm. New development will be expected to:
- Present a high quality frontage to the River Thames and protect and enhance the River environment;
 - Create definition and a sense of enclosure to streets, in particular Blackfriars Road and Stamford Street;
 - Reinforce the formal axis between the River Thames and St George’s Circus. Define the public realm with active frontages;
 - Respect and improve the scale and setting of historic buildings and buildings of townscape value. Development along Blackfriars Road should avoid appearing as a wall of development within local views of the area; and
 - Some of the considerations for tall buildings at Blackfriars Road North are:
 - Strategic view from St James’s Park to Horse Guards Road;
 - Setting, character and views of historic and local context, including listed buildings and structures, conservation areas and local landmarks. This consideration should also extend to the wider context of the neighbouring Waterloo and South Bank area; and
 - Blackfriars Road represents an important vista within the character area. The tight enclosure of medium storey buildings along both sides of the street provides for a series of long and short views.
- 1.177 A public realm strategy is identified for the Blackfriars North area including that new development is expected to:
- Provide active frontages to encourage people to visit and linger along key routes including Blackfriars Road and Stamford Street;
 - Enliven the Riverfront Walk with active frontages;
 - Improve the streetscape of Blackfriars Road and Stamford Street including tree planting and seating;
 - Improving access to and along the Riverside between Blackfriars Bridge and Oxo Tower;
 - Improving crossing points along Blackfriars Road and Stamford Street; and
 - Improve pedestrian movement between the level of the riverside walk and pedestrian pathways along bridges to help promote cross river movement.

APPENDIX A – PLANNING POLICY OVERVIEW

Site Specific Allocation

- 1.178 The SPD includes a site specific allocation relating to the Site. It identifies that redevelopment could make a significant contribution to improving the streetscape and vibrancy of Blackfriars Road and providing high quality housing and offices. The Site is identified as suitable for a tall building.
- 1.179 In addition it identifies that the design of development will be important including location within the Thames Policy Area and the impact of development within the view from St. James’s Park to Horseguards.
- 1.180 In terms of land use, it identifies that:
- the development should provide an appropriate mix of hotel, office (B class), retail (A class), leisure, entertainment and cultural (D class) uses with active uses at several of the lower levels;
 - Include the provision of viewing platforms and a major leisure, arts, cultural or entertainment facility to provide public benefit and take advantage of the prominent location;
 - Residential uses should also be provided; and
 - Development should provide new pedestrian links through the site which relate and link to nearby open spaces, including those on the adjoining Kings Reach and 20 Blackfriars Road sites and help improve the pedestrian and cycling environment on Blackfriars Road and Stamford Street including through provision of improved road crossing.
- 1.181 In terms of design, the SPD identifies that:
- Development will need to be sensitive to its riverside location and take into account important views;
 - Development should provide definition to the corner;
 - The building line along Blackfriars Road should provide strong enclosure to the street and a continuation of the established building line of the street;
 - Along Stamford Street the building line should help enclose the street;
 - Residential accommodation will be expected to be of the highest standard and provide a good internal living environment;
 - The form of the building must be appropriate to accommodate substantial amounts of publicly accessible active uses;
 - Development should provide pleasant and welcoming public space on the site which relate and link to nearby open spaces, including those on the adjoining Kings Reach and 20 Blackfriars Road sites; and
 - Development should help improve the streetscape of Blackfriars Road and Stamford Street. Active frontages should be provided along all street elevations and onto public spaces.

Other Relevant Southwark SPDs

APPENDIX A – PLANNING POLICY OVERVIEW

- 1.182 LB Southwark has adopted a number of other relevant SPDs which provide detailed guidance referred to in other supporting documents accompanying the New Application but not specifically assessed in this Planning Statement. These include:
- Residential design standards (2011);
 - Affordable housing (2008);
 - Section 106 planning obligations (2007);
 - Sustainability assessment (2009);
 - Sustainable design and construction (2009); and
 - Sustainable Transport (2010).
- 1.183 LBS published the Affordable Housing SPD in June 2011, public consultation ended in September 2011. LBS have not provided any timescales for a further round of consultation or publication of this document.

APPENDIX B – INDICATIVE S106 HEADS OF TERMS FINANCIAL CONTRIBUTIONS

Please note - These figures are estimates. Final amounts will be confirmed through discussions with the relevant planning authorities and viability assessment

SUMMARY OF INDICATIVE S106 CONTRIBUTIONS	
S106 (TOOLKIT BASED)	£1,714,977
S106 (NON TOOLKIT BASED)	£905,000
MAYORAL CIL ESTIMATE	£2,475,375
S278 ESTIMATE	£3,500,000
TOTAL	£8,595,352

8

ITEM NO.	PLANNING OBLIGATION		NEW APPLICATION OFFER	NEW APPLICATION OFFER COMMENTS
	S106 AREAS OF CONTRIBUTION	LB SOUTHWARK S106 TOOLKIT CALCULATION ASSUMPTIONS		
1	EDUCATION	£11,156 per school place	£319,282	Based on Toolkit Formula.
2	EMPLOYMENT IN THE DEVELOPMENT	To provide training and support into employment through a WPC for one person costs £2667	£46,583	Based on Toolkit Formula.
3	EMPLOYMENT DURING CONSTRUCTION	Contribution to workplace co-ordinator programme, including training and network support £76,463 per annum	£327,295	Based on Toolkit Formula.
4	EMPLOYMENT DURING CONSTRUCTION MANAGEMENT FEE	Contribution to the management and co-ordination of the construction workplace co-ordinator programme	£26,537	Based on Toolkit Formula.
5	PUBLIC OPEN SPACE	£142 per person for open space in areas of park deficiency	£119,100	Based on Toolkit Formula.
6	CHILDREN'S PLAYSPACE	£80 per child for childrens play equipment	£36,787	Based on Toolkit Formula.
7	SPORTS DEVELOPMENT	£349 per person for sports development	£231,642	Based on Toolkit Formula
8	TRANSPORT STRATEGIC	£223 per person	£218,394	Based on Toolkit Formula
9	HEALTH	£961 per unit	£300,820	Based on Toolkit Formula
15	ADMIN CHARGE	2% of the first £3 million of monetary contributions to be provided thereunder and 1% of monetary contributions to be provided thereafter	£44,861	Based on Toolkit Formula
16	COMMUNITY FACILITIES	£73 per person	£43,676	Based on Toolkit Formula

APPENDIX B – INDICATIVE S106 HEADS OF TERMS FINANCIAL CONTRIBUTIONS

17	CAR CLUB PAYMENT	N/A	£5,000	Based on Implemented Permission S106.
18	TOURISM AND VISITOR MANAGEMENT	N/A	£100,000	Based on Implemented Permission S106.
19	PUBLIC ART	N/A	£300,000	Based on Implemented Permission S106.
21	COMMUNITY PROJECTS	N/A	£500,000	St George offer to Local Community Projects.
22	SUB-TOTAL		£2,619,977	
	ESTIMATED S278 COSTS (Improvements to Blackfriars Road and Stamford Street)			
23		N/A	£2,500,000	Based on cost of re-aligning Stamford Street junction with Blackfriars Road, other improvements to Blackfriars Road and Stamford Street. Final Figures TBC.
	ESTIMATED S278 COSTS (Improvements to Rennie Street and Upper Ground)			
24	For Southwark Highway Improvement Works on Rennie Street and Upper Ground (Schedule 19 of Implemented S106)	N/A	£1,000,000	Based on delivery of Southwark Highway Improvements on Rennie Street and Upper Ground. Final Figures TBC.
	MAYORAL CIL			
25	Estimated at 70,725 sq m x £35 per sq m (Detailed Assessment TBC)	N/A	£2,475,375	Detailed CIL Calculation to be confirmed.
	TOTAL		£8,595,352	