

PD14526/LM/CP
Email: lucy.markham@montagu-evans.co.uk
honor.munro-hall@montagu-evans.co.uk

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70 St Mary Axe
London
EC3A 8BE
Tel: 020 7493 4002
www.montagu-evans.co.uk

Director of Planning
Planning Department
Southwark Council
160 Tooley Street
London
SE1 2TZ

Dear Sir/Madam

22 SHAD THAMES, LONDON SE1 2YU

APPLICATION FOR LISTED BUILDING CONSENT TO UPDATE THE DRAWINGS ATTACHED TO PARENT PLANNING PERMISSION REFERENCE 21/AP/3117 UNDER PLANNING (LISTED BUILDING AND CONSERVATION AREAS) ACT 1990, VIA PLANNING PORTAL: PP-12357726.

HERITAGE STATEMENT

On behalf of our client, Shad Thames Partnership LLP, we submit an application to amend the consented designs for internal refurbishment of the existing office building (planning reference: 21/ AP/ 3117).

The proposed changes relate largely to modification of the MEP strategy and the services installation at 22 Shad Thames. The changes have considered previous discussions with Southwark Council, including a site visit on 15th November 2023.

After further investigations on site, Shad Thames Partnership LLP wish to make changes to drawings submitted under the consented application for listed building consent for internal alterations to the building.

Application reference 21/AP/3117 did not include a condition on the drawings submitted. As a result, and in consultation with the LB Southwark, a section 19 application to vary the drawings attached to the consent is not considered an appropriate option. Therefore, a full LBC application is required to secure consent for the updates to the internal arrangements.

The description of development is as follows:

“Listed Building Consent to make amendments to internal alterations to the building consented under application reference 21/AP/3117, including minor changes to MEP and services design, the glazed internal partition in the ground floor reception, the layout of W/Cs and the detail of the balustrade to the Level 05 infill, .”

BACKGROUND

The application site comprises of an existing Class E, 4-storey office building on a quiet single carriageway street, Shad Thames. Properties of surrounding area includes a range of uses such as studios, retail units and other commercial uses. However, refurbished residential apartments make the majority of the property uses within the immediate area. The site is a Grade II listed building (listing number: 1475166) and falls within the St Saviours Dock Conservation Area.

Planning history

The extant application was submitted and granted approval on the 11th November 2021 under ref. 21/AP/3117 .

A site visit and pre-application meeting was held on the 15th November 2023 to discuss items relevant to planning application reference 23/AP/1814 and 23/AP/1815 which sought external amendments and was granted consent on 18th January 2024. The site visit also provided a useful opportunity to seek pre-application advice on the proposed materials for internal alterations included within this application. The pre-application response received from the Council is included as an Appendix (**Appendix 1.0**) to this letter.

THE AMENDMENTS

For preparation for and during the construction phase, further investigations into the site were conducted by the architects and the engineer design teams. The extent of the necessary revisions is set out below and within the enclosed Design and Access Statement.

Summary of the changes listed below:

- Installation of a service riser on specific floors to serve on-floor VRF units located on the south elevation.
- Extension of the trench heating and installation of a boiler cupboard in the north stair at ground floor level
- Omission of the trench heating on the upper floors
- Adjustment to the extents of the dividing wall within the on-floor plant rooms
- Relocation of a small number of the floor VRF units
- Relocation of the floor boxes on ground, level 04, and 05 to suit the final furniture layout
- Enlargement of the plant room at basement level
- Making good the west facade following removal of the redundant service connection points.
- Update to the location of the lights and sensors following design development at basement level
- Update to balustrade detail to Level 05 Infill
- Insertion of a transom in the internal glazed partition at ground floor level for the Tenancy Screen
- Level 04 and 05 Toilet Layout

MATERIALITY OF AMENDMENTS

The changes are considered to be material as they involve works which materially affect the content or impacts of the original application or works. The National Planning Practice Guidance (NPPG 2021), Paragraph 17 states that there is no statutory definition of 'minor-material' amendment and goes on to state that a minor-material amendment "is likely to include any amendment where its scale and/or nature results in a development which is not substantially different from the one which has been approved."

We therefore consider that the amendments are not substantially different from the approved scheme. The Council in our opinion, can be satisfied that the amendments sought are minorly material.

We note that amendments to applications for listed building consents are always material; it is not possible to make non-material amendments to listed building consents.

LEGISLATION AND PLANNING POLICY

STATUTORY FRAMEWORK

Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.

Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 contains the statutory duties that apply to the grant of works to a listed building, requiring the decision maker to pay special regard to the desirability of avoiding harm to the special architectural or historic interest of a listed building.

In this usage, 'preserve' means 'to do no harm'.

THE DEVELOPMENT PLAN

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with policies of the statutory Development Plan, unless material considerations indicate otherwise.

The statutory development plan for the Site comprises the:

- London Plan (July 2021);
- Southwark Plan 2022 (February 2022);

Further guidance has been provided through relevant SPDs including;

- Heritage SPD (October 2021)

OTHER MATERIAL CONSIDERATIONS

The revised National Planning Policy Framework (the "NPPF") was published on 20th July 2021 and supersedes previous national planning guidance contained in various Planning Policy Guidance and Planning Policy Statements. The Framework sets out the Government's approach to planning matters and is a material consideration in the determination of planning applications.

The National Planning Practice Guidance (2019), (the “NPPG”), published 21st July 2021 (and subsequent amendments) is also a material consideration and should be read in conjunction with the Framework.

The overarching approach of the NPPF is to promote sustainability which has three components, social, environmental and economic. The sections of particular relevance to the determination of this application are:

- Chapter 12 (Achieving well designed places); and
- Chapter 16 (Conserving and enhancing the historic environment).

ASSESSMENT OF AMENDMENTS

Ground Floor Changes

Trench Heating Extents

Lower Ground Floor

Upon inspection the screed at ground floor level was found to be shallower than originally expected. In order to accommodate this the MEP strategy for the perimeter trench heating unit has been adjusted. This alters the extents, width and location. The appearance remains unchanged from the consented trench heating unit.

The edges of the proposed new units will align with the back of the glazed façade fins. A single row of tiles along the façade edge will be lifted to enable these works. A small extension to the run is also proposed at both ends to improve access for ongoing maintenance and to provide a consistent level of heat across the façade.

To the north the connection will provide connection to a new boiler cupboard in the service core from which the heating unit will be served. The depth of the cupboard has been carefully aligned to an existing service bulk head at high level.

The proposed position was selected as it caused the least amount of disruption to the existing building fabric.

Upper Ground Floor

Under consented plans the service penetrations run through the slab from the basement plant areas. The proposals alter the position slightly in order to align with the existing tile arrangement. No extension is required for the trench heating extent at this level.

These changes are *de minimis*, would not be noticeable and would not harm the architectural or historic interest of the listed building and are therefore compliant with Policies P14 Design quality, P20 Conservation areas, P21 Conservation of the historic environment and natural heritage.

Plant Room Wall

The proposed changes seek to replace a block work nib wall within the on-floor plant rooms at ground floor level. The replacement will comprise a shaft wall which will provide greater stability, maintenance access and fire performance.

As this area is back of house, the impact is considered inconsequential, but will improve the buildability and robustness to the interface between this wall and the consented overhead services. Please refer to drawing enclosed within the submission pack.

Entrance Doors to the South Core

Previous drawings illustrating the existing swing on the main entrance door were incorrect. The actuator to this door present on the consented drawings is no longer required and as such this has been removed from the drawings.

Redundant Services

It is proposed to remove the existing tap, grille, pipe connections and alarm siren on the west elevation. The openings will be infilled with a concrete finish to match the existing façade- creating a consistent aesthetic on the west elevation, whilst simultaneously removing redundant services.

The proposed changes will improve the appearance of the listed building and it is therefore compliant with Policies P14 Design quality and P21 Conservation of the historic environment and natural heritage.

Floor Box Location Adjustment

The location of the floor boxes have been adjusted to suit the final furniture layout. Small adjustments were made to future proof the area and minimize future interventions on the existing building. The proposed changes are not seen to have any impact on the building and are in line with that which was previously consented. The new locations were highlighted to officers on the Site visit held on the 15th November 2023. The new positions were agreed, with former floor box locations to be tiled over.

Ground Floor Reception Screen

A new transom is proposed to the ground floor reception screen. This will split the glass panel into two small pieces. The original design proposal is no longer feasible due to the weight of the single piece of glass and Site constraints.

The new transom will align with that on the main entrance minimising the visual impact to the building elevations and create a consistent language in the reception area, and would not harm the special interest of the listed building. This approach was agreed with officers on site.

Upper Floors

South wall of north stair extension

During works MEP pipework and services were found in the lift area. In order to accommodate the existing condition, the Proposed Development would include a wall build out by 200mm. This is demonstrated by drawings submitted within the application pack. The visual impact of these changes would none and it is considered that the effect would not materially alter the delivery of the original consent 21/AP/3117.

Heating Trench Extents

As with the lower floors heat trench extents on upper floors have also been adjusted in response to site investigations. The proposals now aim to omit this element of works from the proposals due to the spatial limitations present on site.

Plant Room Wall

Plant room walls on Level 01-04 also comprise a block work nib wall, like the ground floor. Proposals seek to replace these in shaft wall for stability, maintenance access and fire performance. As this area is back of house, the impact of this change is expected to be inconsequential but will improve buildability and robustness of the interface between this all and the consented overhead services.

Floor Box Location

The location of the floor boxes in the proposed drawings have been adjusted to suit the final furniture layout. The change will reduce the amount of overall floor boxes. The relocation of floor boxes is not seen to further impact the building.

Level 04 and 05 Toilet Layout

An existing wall projection has been discovered throughout the construction process. The toilet layout has been replanned to accommodate the existing conditions, flipping the internal layout of the toilet. The proposed changes have been carefully considered and aim to minimize the disruption to the existing fabric and impact on the floor plate and services layout.

Level 05 Infill Detail Adjustment

The infill detail included in the previously consented design is no longer certified to provide the required 60 minute fire rating required to new floors, as per the Building Regulation 2022 amendments. Use of concrete to create the new infill would not be structurally suitable and impact the fabric of the listed building.

The following changes have been proposed to adhere to building regulation standards:

- Fire rated boards and insulation have been added.
- Radius of the balustrade increased from 36mm to 45mm in order to comply with regulations
- .Additional steel member which would act as an independent structural support purely to the balustrade.

The proposals adapt the detail of both the build-up and balustrade, pushing the handrail out into the void that is to be supported by a weighted foot/ base. No permanent fixings are required to support the balustrade therefore no change is required to the listing building. The materiality of the balustrade will remain the same as the previously consented. Proposals are therefore compliant with Policies P14 Design quality and P21 Conservation of the historic environment and natural heritage, whilst adhering to new build elements and building control- offering a high level of safety.

Basement

Plant Room

A larger plant room is required at basement level to provide the necessary services and upgrades and future proof the office to current standards. Small changes to the dimensions of the plant room will have been designed to have no additional impact on the building fabric at basement level.

The plant room door has been changed from a single leaf door to a two-door leaf. Similarly, the door type to the proposed enlarged plant room also changed from a two-door leaf to an unequal two-door leaf. The door swing will also be flipped.

This will help to improve accessibility for wheelchair users whilst maintaining the same number of cycle spaces. The proposed amendments have been carefully considered by the Applicant and are considered to have a minor impact on the

existing fabric and non-material in nature. No harm to the special interest of the listed building would occur as a result of these changes and as such are compliant with P14 and P21 of the Local Plan.

CONCLUSION

We have considered the potential impacts of the amendments to the consented scheme as part of this application and have submitted supporting information which demonstrates that the changes would not give rise to negative impacts on significance of the listed building.

We therefore conclude that the alterations to the consented scheme are minor material in nature and that this application allows for Condition 1/ drawings of the consented scheme to be amended to reflect the proposed drawings submitted as part of this application.

APPLICATION DOCUMENTS

To assist in the determination of this application, the following application documents accompany this application for planning permission and listed building consent:

- Application form for Listed Building Consent, prepared by Montagu Evans LLP;
- Covering Letter including Heritage Statement (i.e. this letter), prepared by Montagu Evans LLP;
- Design and Access Statement, prepared by Squire and Partners;
- Proposed drawings prepared by Squire and Partners; and
- Drawing schedule prepared by Montagu Evans LLP.

ADMINISTRATIVE MATTERS

The application has been submitted via the Planning Portal under reference PP-12357726. The application fee will be paid separately by the Applicant.

We trust the information submitted is in order and allows you to validate and determine this application, however should you require any further details please do not hesitate to contact Lucy Markham (07818 012 536 / lucy.markham@montagu-evans.co.uk) / Honor Munro-Hall (07823 800 731/ honor.munro-hall@montagu-evans.co.uk) in the first instance.

Yours sincerely,



MONTAGU EVANS LLP

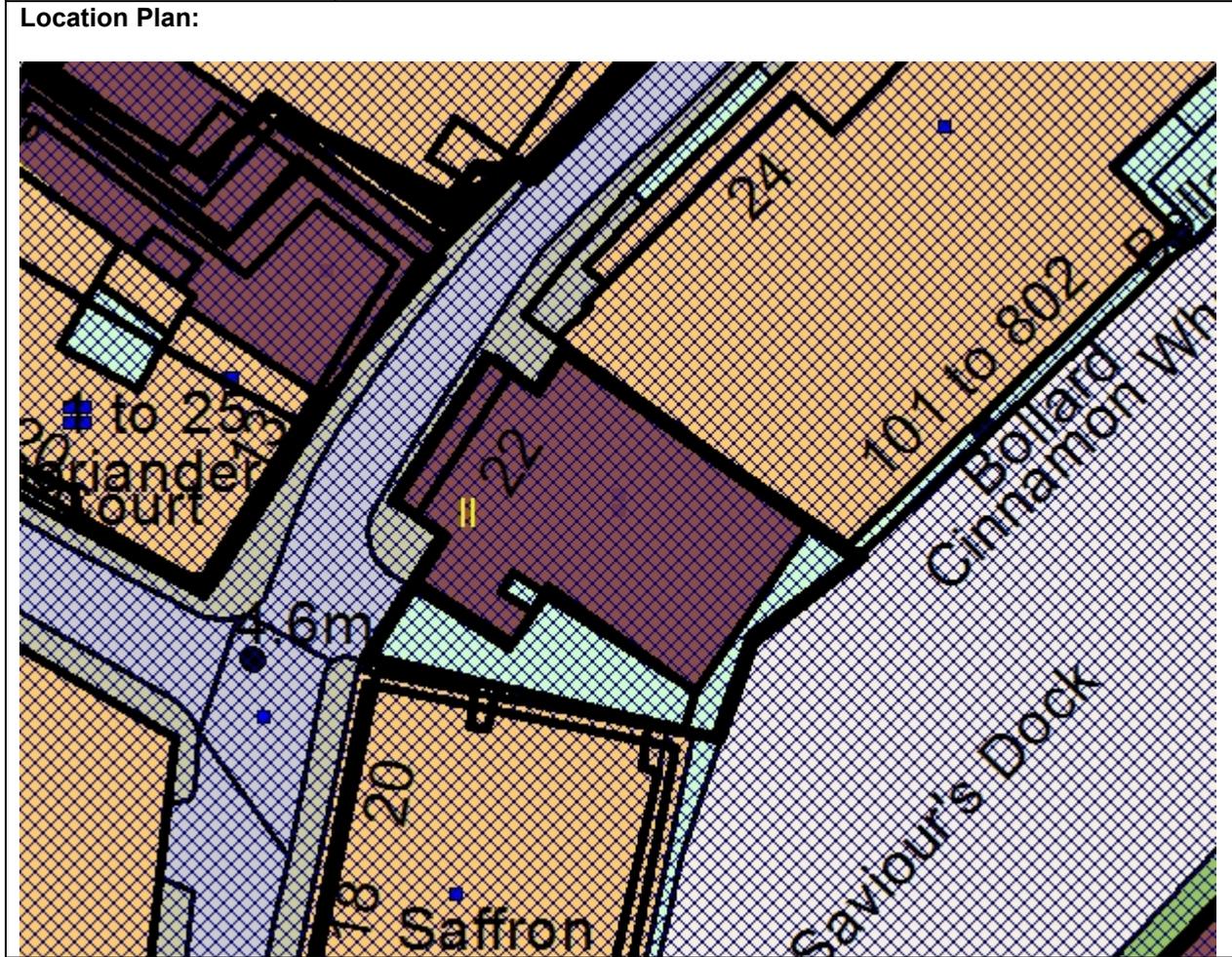
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APPENDIX 1.0

Written Pre-Application Response- 23AP1815 and 23AP1814 (15th November 2023)

DEVELOPMENT MANAGEMENT – PREAPPLICATION RESPONSE – COVER SHEET

Reference Number:	23/EQ/0209
Site Address:	Conran Building, 22 Shad Thames, London, Southwark, SE1 2YU



KEY DATES

Application Start Date:	15.12.2023	Application Expiry Date:	26.01.2024
Earliest Decision Date:		Committee Date:	Not applicable

DEVELOPMENT MANAGEMENT – PREAPPLICATION RESPONSE

APPLICATION DETAILS

Application Type:	Pre Application Enquiry
Proposal:	Pre Application enquiry (meeting and written advice): Works proposed relate to small amendments to the consented designs for the internal refurbishment of the existing office building, which for the most part relate to modifications of the MEP strategy and services installation.
Ward(s):	North Bermondsey
From:	Director of Planning and Growth
Case Officer and Team:	Eleanor Heagney, Design & Conservation Team

ASSESSMENT OF PROPOSAL

1. Summary

No objections are raised to the proposed amendments. An application for listed building consent should be prepared and submitted.

2. Site

The Conran Building, 22 Shad Thames is a six storey (plus basement) commercial building which was designed by Hopkins Architects and built by McAlpine and Sons in close collaboration with the designer and manufacturer, David Mellor, who was the client. The building was completed in 1991 and is characterised by its modern, high-tech architectural style. The building comprises a main central volume providing open-plan offices set within an expressed concrete frame with fully glazed front and rear elevations, and is flanked on either side by recessed service towers, which are dressed mainly in metal cladding, including flanged steel plates and decorative leading panels. The structure features slender fair-faced concrete columns, with those to the front elevation forming pilotti at street level with the tall ground floor set back by a half-bay to form a covered walkway over the pavement. The final floor is recessed and forms part of a rooftop penthouse that previously provided an ancillary residential duplex, but has become incorporated into the general office layout. The basement is unlit, providing storage and off-street car parking, which is accessed by a steep vehicle ramp immediately to the south of the building.

The building has a refined, quasi-industrial aesthetic that is both well composed and well-detailed, with a modular character and appearance that is engaging. Externally, the building has undergone little change of significance since its original construction. The building was listed at Grade II status in 2021 during a programme of refurbishment. The listing description provides a comprehensive assessment of the building's significance, which relate to its architectural and historic interest. It also lies

within the Tower Bridge Conservation Area, where its modest scale, high quality of architecture and contrasting appearance make a positive contribution to the townscape.

3. Proposed development

Pre-application advice is sought for amendments to Listed Building Consent ref. 21/AP/3117, the development description for which read as:

“Listed Building Consent for internal alterations to the building, including the replacement of partitions and doors, new floor finishes, partial infill of atrium, upgrading of services and lighting and other associated works.”

The proposed amendments relate to:

- Replacement granite tiles to the ground floor reception area
- Replacement tiles to the back of house area and north staircase
- Alternative arrangement to the glazed internal wall in ground floor reception.

It should be noted that since no approved plans condition was imposed on the decision notice for 21/AP/3117, a new application for listed building consent would be required (rather than a Section 19 application) for any amendments to this scheme.

4. Relevant planning history

Planning history of relevance includes:

21/AP/2366 (planning) and 21/AP/2367 (listed building consent) for: *Alterations at roof level including installation of 3 no. new condensers within a new acoustic enclosure, replacement of existing metal balustrading and installation of additional metal balustrading, enlarging the existing grilles on the east elevation, installation of a new front door and access control panel, installation of 5 no. new CCTV cameras at ground floor level, installation of new basement entrance doors, louvres and a metal clad entrance lobby at basement level.* These applications were recently subject to minor material amendments under LBS refs. 23/AP/1814 and 23/AP/1815.

21/AP/2368 (planning) and 21/AP/2369 (listed building consent) for: *Infill extension of the north core stair to Level 05 of the existing building.*

21/AP/3117 (listed building consent) for: *Internal alterations to the building, including the replacement of partitions and doors, new floor finishes, partial infill of atrium, upgrading of services and lighting and other associated works*

21/AP/3122 (planning) and 21/AP/3123 (listed building consent) for: *Installation of a new glazed double entrance door to the western elevation of the existing building*

5. Relevant considerations

A site visit was conducted on 15.11.2023, where various samples of the proposed replacement tiles were inspected and the glazed partition to the reception was

discussed. A number of other matters relating to LBS refs. 23/AP/1814 and 23/AP/1815 were also discussed during the course of this meeting.

a) Principle of development

The proposals relate to minor amendments to the scheme approved under 21/AP/3117 which relate to the internal refurbishment of the building. There is no change to the use of the site implied by the proposed works. No objections are therefore raised regarding the principle of the proposed works, provided that the works would preserve the special historic and architectural interest of the Grade II listed structure and respect the established character of the Tower Bridge Conservation Area and complies with relevant local and national planning policies.

b) Affect on the historic and architectural significance of the house

The NPPF requires Local Planning Authorities to consider whether a proposal would result in harm to the significance of a heritage asset and to decide whether that harm would be 'substantial' or 'less than substantial'. Paragraph 208. of the NPPF also require Local Planning Authorities to weigh any such harm against the public benefits of the development proposed, including securing the optimal viable use of the heritage asset. Any harm should require clear and convincing justification and can arise from the loss of historic fabric or features of significance as well as impact on the setting of a heritage asset. In accordance with paragraph 206 of the NPPF any harm, including 'substantial' or 'less than substantial', should be avoided in the case of Grade II listed assets and should be wholly exceptional in the case of Grade II* and Grade I listed assets. Policy P19 (Listed buildings and structures) of the Southwark Plan (2022) requires that any development proposals relating to listed buildings or their settings will conserve or enhance the special significance of the listed asset. The abovementioned policies are also reinforced by the London Plan (2021) Policy HC1 (Heritage conservation and growth), which requires that development proposals affecting heritage assets should conserve the significance of the heritage asset by being sympathetic to the assets' significance and appreciation within their surroundings.

Granite tiles

Under the parent consent, it was proposed that any replacement tiles to the ground floor reception area would be replaced with granite tiles sourced to match the existing. In the interim period it has become evident that it is no longer possible to source tiles from the original quarry, and as such, reinstatement with exactly matching granite tiles would not be possible. An alternative option – Bianco Sardo, which has been sourced from Sardinia was inspected on site and compared to the existing retained granite tiles on site. The differences in appearance between the existing granite tiles and Bianco Sardo are only visible on very close inspection. Overall, the Bianco Sardo tiles are a good match that would preserve the aesthetic of the flooring at ground floor reception. The visual appearance of these tiles would not constitute harm to the significance of the listed building. There are no objections to amending 21/AP/3117 to include the Bianco Sardo tiles as replacement tiles where necessary for the ground floor reception.

Back of house and staircase tiles

Damage has occurred to the existing tiling to the back of house and staircase areas of the building. Under the parent consent it was noted that materials in these areas should be made good to match the existing. It has proved somewhat difficult to find a like-for-like match to the existing grey tiles in this area. A number of samples were inspected on site and it was agreed that sample no. 7 was the best match, albeit not a perfect match. It is noted that the existing tiles, being to a back of house area, are not of particular historic significance in themselves. However, in the interest of aesthetic coherency, it is suggested that the retained tiles of good quality at the lower levels are lifted and cleaned in order to be re-used elsewhere. On site it was suggested that a break line should be proposed at the stairwell lobby / door so that tiles of a coherent appearance are used in contained areas. Replacement tiles would be concentrated to the more secondary areas (e.g. basement or stairwell) This would prevent any unattractive areas of contrast between the retained and new tiles, which are not a perfect match as set out above. This approach is welcome and should be set out in any forthcoming listed building consent.

Glazed internal wall to reception area

Under the parent application consent was granted for a full-height glazed screen and door to provide a partition to the ground floor reception. The proposed glazing would be very tall and the applicants have been advised that a fully glazed screen on the dimensions approved under 21/AP/3117 would be too large and heavy to feasibly install on site. A number of options were considered, including the introduction of a transom to divide the screen in two, or the introduction of larger base and top fixings. It was considered that the introduction of larger base and top fixings may create a heavier aesthetic that would contradict the purpose of introducing a glazed screen at this location. The option to introduce a transom that would align with the lintel of the proposed door is considered to have a less harmful visual impact and would preserve the lightweight aesthetic of the proposed screen. This is the preferred option – internal elevations and detail section drawings of the proposed screen showing the transom should be included for consideration under any forthcoming listed building consent application.

c) Assessment of amenity

Policy P56 of the Southwark Plan seeks to protect the amenity of existing and future occupiers or users in the borough. Amenity considerations which must be taken into account include:

- The privacy and outlook of occupiers of both existing and proposed homes
- Actual or sense of overlooking or enclosure
- Impacts of smell, noise, vibration, lighting or other nuisances
- Daylight, sunlight, and impacts from wind and on microclimate
- Residential layout, context and design

The proposed alterations relate to internal works only. No new architectural massing or bulk, windows, balconies or roof terraces are proposed. It is therefore very unlikely that any adverse amenity impacts would arise from the proposed works.

d) Fire safety regulations

Policy D12 (A) of the London Plan (2021)

Policy D12 (A) of the London Plan (2021) requires that all development must submit a planning fire safety strategy. The fire safety strategy should address criteria outlined in Policy D12 (A).

Paragraph 3.12.9 of Policy D12 explains that Fire Statements should be produced by someone who is “third-party independent and suitably-qualified”. The council considers this to be a qualified engineer with relevant experience in fire safety, such as a chartered engineer registered with the Engineering Council by the Institution of Fire Engineers, or a suitably qualified and competent professional with the demonstrable experience to address the complexity of the design being proposed. This should be evidenced in the fire statement. The council accepts Fire Statements in good faith on that basis. The duty to identify fire risks and hazards in premises and to take appropriate action lies solely with the developer.

e) All other relevant material planning considerations

None identified.

6. Conclusion

No objections to the proposed works are raised at this stage. Listed building consent is required – an application should be prepared and submitted to the LPA for consideration. Please refer to the checklist below in the preparation of any such listed building consent application.

7. Submitting a Planning Application

Information as shown below will be required for the formal submission of an application for full planning permission and / or listed building consent:

- A completed application form
- A site location plan to identify the land to which the application relates drawn to an identified scale (1:1250) showing the direction of North
- A copy of plans and drawings or information necessary to describe the subject of the application including:
 - Block plan of the site
 - Existing and proposed floor plans
 - Existing and proposed site sections, to include finished floor and site levels
 - Existing and proposed roof plans
 - Existing and proposed sections
 - Materials schedule
 - Design and Access Statement
 - Heritage Statement
 - Planning Fire Safety Statement / Reasonable Exemption Statement
 - The applicable fee

Disclaimer

APPENDIX 1: PLANNING APPLICATION SITE HISTORY

See above