

**FORMER LONDON TELEVISION CENTRE
60-72 UPPER GROUND, LONDON, SE1 9LTT**

APP/N5660/V/22/3306162

INQUIRY PURSUANT TO SECTION 77 OF THE TOWN AND COUNTRY PLANNING ACT 1990

**OPENING SUBMISSIONS
ON BEHALF OF COIN STREET COMMUNITY BUILDERS**

1. London's South Bank lies in what Sir Denys Lasdun himself described as "a magical position".¹ That magic derives in part from the bend in the river, on the inside of which is the South Bank. The location gives it a special prominence, with visual connections to the City of London in the east and Westminster in the west, creating "one of the world's most recognisable urban vistas".²

2. Woven into the fabric of the South Bank's history are Coin Street Community Builders ("**Coin Street**"). Established in 1984, Coin Street owns a 13-acre site comprising the Oxo Tower Wharf, Gabriel's Wharf, Bernie Spain Gardens and a number of housing cooperatives (Redwood, Palm, Iroko, and Mulberry) as well as Doon Street (where it has sought, gained, and implemented planning permission for the Doon Street public swimming and indoor leisure centre and residential tower).

3. Coin Street is one of the custodians of the South Bank. It was Coin Street who, from 1984-1988, conceived and executed the riverside walkway from Prince's Wharf to Sea Containers House, which forms part of Queen's Walk, as well as the new riverside park at Bernie Spain Gardens. It is Coin Street who manage and maintain both, and who in 2019 achieved planning permission to improve and relandscape the riverside walkway and Gardens.

¹ PoE Clemens para. 5.4.5

² PoE Filskow para. 10.2.1

4. Coin Street has, for almost 40 years, put the South Bank community at the heart of every decision it has taken, providing inestimable community benefits, including the significant delivery of social housing, to help make the South Bank the vibrant place it is today.
5. As Coin Street well understands, the South Bank's special qualities derive, to a considerable degree, from its powerful cultural significance. Regenerated through the Festival of Britain, it is home to a cultural quarter that includes the Royal National Theatre, the Royal Festival Hall, and the Haywood Gallery. Along its front runs the iconic riverside promenade of Queen's Walk; enjoyed by many thousands of locals and tourists alike every day – many millions of visits every year.
6. The architectural context makes a major contribution to this significance. The South Bank is its own conservation area. The Grade II* National Theatre is one of the great icons of modernist monumental civic architecture, celebrated in 2007 as one of the seven wonders of London.³ Next door, the Grade II listed IBM Building was designed by Lasdun specifically to complement the National and uses a corresponding architectural language in a composition the significance of which includes the grouping of the two buildings together. To the south are the Waterloo and Roupell Street Conservation Areas and across the river are four adjacent conservation areas: Savoy, Strand, Temple, and Whitefriars, within the second of which the Grade I listed Georgian masterpiece - Somerset House – stands prominently on the north bank of the river. Further upstream, the site is visible in the London View Management Framework (“**LVMF**”) strategic view from Westminster Pier towards St Paul's Cathedral (View 8A.1), where it appears in front of St Paul's Cathedral. Downstream it forms an important component of the LVMF view from Blackfriars Bridge (View 14A.1).
7. It is here, in this most sensitive of locations, that the Applicant proposes to develop just under 1 million square feet of commercial space to meet a design brief requiring

³ NT CMP CD 9.06h p.1

the provision of “the maximum achievable amount of state-of-the art Grade A office (with ancillary retail/ leisure)” development.⁴

8. The scale and massing of the development have been roundly criticised. The Design Review Panel used the euphemism “very challenging”, before describing the development as “jarring” “overbearing”, “bulky”, and “overtly dominant in its context”, noting that the “proposed bulk and mass does not justify its impact”.⁵
9. Historic England endorsed these views.⁶
10. Leading architectural commentators writing in the national press have avoided euphemism. Simon Jenkins described it as the primeval chaos-monster known as a “behemoth”, whilst Rowan Moore said it is simply “a brute”.⁷
11. The benefits said to justify that development are unpersuasive. In accordance with the developer’s brief, the overwhelming majority of the proposal (approximately 850,000sqft) will be high grade office space. In addition to that are proposed some retail, food and beverage outlets (approximately 44,000sqft) and what is described as a “cultural and innovation hub”, which comprises the foyer to the building being used as a reception, gallery/ exhibition space, and public through route, with a relatively small “assembly room” located within it, a cooperative workspace on the first floor, and further windowless space designed to be used as studios in the basement.⁸ Once the voids and ‘back of house’ areas are taken into account, the useable area of the internal public realm much vaunted by the Applicant accounts for barely 8.5% of the site area.⁹
12. The external public realm is little better. To the rear, the frontage onto Upper Ground is inactive (save for servicing) and has been pushed forwards towards Coin Street’s

⁴ PoE Filskow para. 2.1

⁵ CD 3.08 paras. 11.1-11.5 and 13.7-13.9

⁶ CD 11.08 para. 30

⁷ CD 5.03 pp. 40-41

⁸ PoE Filskow para. 7.1.5

⁹ RRPoE Reynolds para. 1.4.3

Iroko House social housing co-operative. The new pedestrian link routes to the east and west are narrow, with pinch points and without views from Upper Ground through to the Thames. Even on the river side of the development, the frontage fails to integrate well with the public realm and open space on Queen's Walk and Bernie Spain gardens managed, maintained, and proposed for improvement by Coin Street. The frontage provides what appear to be a series of restaurant seating areas beneath the shade cast by the development's overhangs. The best of the open amenity space in the development (including the expansive 'podium garden') will be private; available to those whose offices are in the proposed building, but not to members of the public.

13. Notably absent from the development is any housing whatsoever, let alone much needed affordable housing. Despite the clear requirement in the Local Plan allocation for the site (Site 9) for a mix of uses including office and residential components, this proposal will not contribute one dwelling towards meeting the acute need for market and affordable housing in London generally, and Lambeth in particular. No housing on this brownfield site at all.
14. Rather, the proposed development is an office development, in form and function. It brings with it very serious consequences. Not only will the poor design in terms of scale, form, and real public provision result in harm to the character and appearance of the South Bank, with the new building physically dominating the locality, dwarfing its neighbours and casting the well-used public path along Queen's Walk into shade, but it will also (as all parties agree) have major adverse effects on the living conditions of residents in the Iroko social housing cooperative.¹⁰
15. As Historic England have themselves made clear, the development will harm the significance of a great many designated heritage assets. It will cause high levels of less than substantial harm to St Paul's Cathedral (Grade I Listed), the Royal National Theatre (Grade II* Listed), and the South Bank Conservation Area; medium levels of less than substantial harm to the IBM Building (Grade II Listed) and the Roupell Street

¹⁰ PoE Webb para. 1.18

Conservation Area; and low levels of less than substantial harm to Somerset House (Grade I Listed), as well as the Old Barge House, Strand, Temples, and Whitefriars Conservation Areas. This includes harm to two LVMF strategic views; LVMF view 14A.1 from Blackfriars Bridge, where the development will almost completely obscure the National Theatre and create a jarring uplift in river frontage building height; and LVMF view 8A.1, where the proposal will appear on both sides of St Paul's cathedral, creating a canyoning effect and completely obscuring what is presently visible of the northern tower.

16. Put simply, the proposed development will result in serious heritage harm to designated assets of the highest possible significance. That harm must be given considerable importance and weight. It creates a strong presumption against the grant of planning permission.

17. Overall, then, this is development which does not accord with the development plan:

- a. It fails to provide the mix of uses required in the Site 9 allocation in the Local Plan;
- b. The design of the tall building(s) proposed is poor. It harms local character and amenity in a way that fails to accord with the requirements of policies D3-6, D8, D9, and D11 of the London Plan and Q2-Q9 and Q24-26 of the Local Plan; and
- c. The harm caused to the historic environment is contrary to policies HC1 and HC3-4 of the London Plan and Q20-22 of the Local Plan.

18. Section 38(6) of the Planning and Compulsory Purchase Act 2004 also, therefore, creates a presumption against the grant of planning permission.

19. That presumption is not outweighed by other material considerations. On the contrary, the proposal does not satisfy the requirements of national policy in relation to delivering a sufficient supply of homes (Part 5), promoting healthy and safe

communities (Part 8); achieving high quality, beautiful and well-designed places (Part 12); and conserving and enhancing the historic environment (Part 16).

20. This is not sustainable development. It is overdevelopment resulting in unacceptable harm which clearly outweighs the benefits of the proposal.

21. Essentially for these reasons, Coin Street will ask that planning permission be refused.

Charles Streeten
Francis Taylor Building

6 December 2022