

GREATER **LONDON** AUTHORITY

Good Growth

Victoria Crosby
London Borough of Southwark
By Email

Our ref: 2021/0545/S1

Your ref: 21/AP/1361

Date: 14 June 2021

Dear Victoria Crosby

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

New City Court, 4-26 St Thomas Street, London SE1 9RS

Local Planning Authority reference: 21/AP/1361

I refer to the copy of the above planning application, which was received from you on 06 May 2021. On 14 June 2021, Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and Skills, acting under delegated authority, considered a report on this proposal, reference 2021/0545/S1. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application does not yet comply with the London Plan for the reasons set out in paragraph 136 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

The application represents EIA development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations. The environmental information made available to date has been taken into consideration in formulating these comments.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the Council under Article 6 to refuse the application; or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Andrew Hiley, [REDACTED]

Yours sincerely

A handwritten signature in black ink, reading "John Finlayson" with a long horizontal flourish at the end.

John Finlayson
Head of Development Management

cc Marina Ahmad, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG
TfL
David Shiels, Agent, DP9

New City Court, 4-26 St Thomas Street

Local Planning Authority: Southwark

Local planning authority reference: 21/AP/1361

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Redevelopment to include demolition of the 1980s office buildings and erection of a 26-storey building (plus mezzanine and two basement levels), restoration and refurbishment of the listed terrace (nos. 4-16 St Thomas Street), and redevelopment of Keats House with removal, relocation and reinstatement of the historic façade on a proposed building, to provide office floorspace, flexible office/retail floorspace, restaurant/café floorspace and a public rooftop garden, associated public realm and highways improvements, provision for a new access to the Borough High Street entrance to the Underground Station, and ancillary or associated works.

The applicant

The applicant is **Great Portland Estates** and the architect is **AHMM**.

Strategic issues summary

Land use principles: The proposed office-led mixed-use redevelopment within the CAZ and an Opportunity Area, comprising a significant quantitative increase and qualitative enhancement to the existing office floorspace, as well as a significant provision of affordable workspace, is supported in land use terms. The Council should consider securing the floorspace for this specific use and should adequately secure the provision of affordable workspace.

Urban design: The application site falls within an area that is identified as suitable for tall buildings in the adopted and emerging Local Plans, in accordance with policy D9(B3). Concerns are raised with regards to visual impacts and the applicant is particularly encouraged to reduce the proposed width. An update will be provided to the Mayor at his decision-making stage also with regards to functional, environmental and cumulative impacts.

Heritage: Less than substantial harm to a number of heritage assets, including the Tower of London, Southwark Cathedral, St Paul's Cathedral, Guy's Hospital and the Borough High Street Conservation Area, has been identified. However, further consideration will be given at the Mayor's decision-making stage to the harm caused by the proposals to the numerous heritage assets surrounding the site and to the public benefits provided by the scheme, following a review of the detailed assessment of heritage impacts made by the Council and by Historic England.

Transport: Should the following mitigation be secured, the development would on balance be in accordance with London Plan policy in terms of strategic transport: £22,000 Legible London signage contribution; New LU ticket hall entrance; £400,000 Cycle hire expansion contribution; Significant Healthy Streets contribution; Servicing restrictions and management including during construction, backed by a financial bond; and Travel plan measures to encourage active travel and off-peak use of public transport, backed by a financial bond.

Environment: Further information is needed with regards to energy, whole life cycle carbon and circular economy.

Recommendation

That Southwark Council be advised that the application does not fully comply with the London Plan for the reasons set out in paragraph 136. Where the associated concerns within this report are addressed, the application may become acceptable in strategic planning terms.

Context

1. On 6 May 2021, the Mayor of London received documents from Southwark Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses and the associated Listed Building Consent application (LPA reference: 21/AP/1364). Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The planning application is referable under the following categories of the Schedule to the Order 2008:
 - 1Bb, Non-residential developments in Central London excluding City of London and floorspace more than 20000 square metres;
 - 1Cc, The building is more than 30 metres high and is outside the City of London.
3. Once Southwark Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.
5. The Mayor of London's statement on this case will be made available on the City Hall website: www.london.gov.uk.

Site description

6. The 0.36 hectare site is located in the Central Activities Zone (CAZ) and falls within the Bankside, Borough and London Bridge Opportunity Area, as well as the London Bridge District Town Centre.
7. The site is bounded by St Thomas Street and the Bunch of Grapes Public House to the north; Guy's Hospital Main Building and Chapel to the east; King's Head Yard to the south; and commercial and mixed use properties on Borough High Street to the west. The existing site includes a number of separate but linked buildings of different ages, which are in office use, as shown in Figure 1 below.
8. This includes:
 - Numbers 4 to 8 and 12 to 16 St Thomas Street – an early 19th century Grade II Listed Georgian terrace;
 - New City Court (20 St Thomas Street) – an early 1980s office development with a curved glazed four-storey building on St Thomas Street, which is linked to a larger five-storey linear building to the rear which extends up to Kings Yard (and includes an arched Victorian facade); and,

- Keats House (24 to 26 St Thomas Street) – this comprises the retained facade of an early 19th Century building, which effectively screens a 1980s office building to the rear which is linked to New City Court.

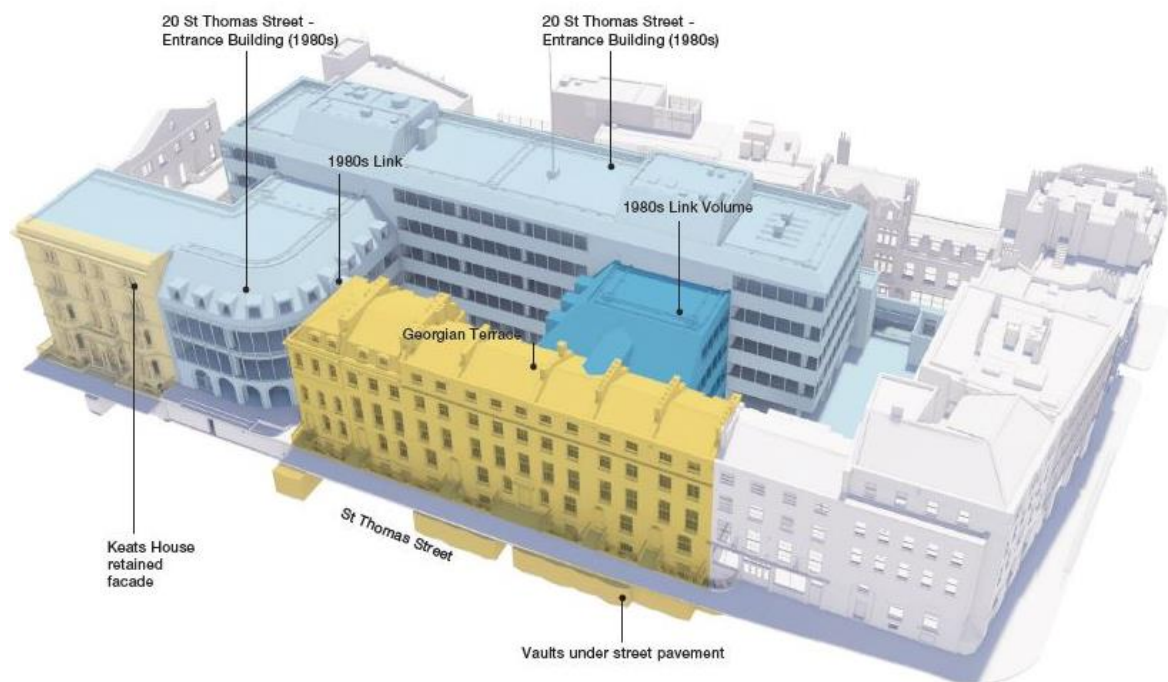


Figure 1: Site as existing.

9. The application site boundary includes the Grade II listed Georgian Terrace and attached railings (numbers 4-8 and 12-16 St Thomas Street). It is also located within the Borough High Street Conservation Area. Keats House is not listed, nor is the two-storey arched Victorian facade along King's Head Yard. The surrounding context of the site includes numerous designated and undesignated heritage assets.
10. The site is located within two Protected Vistas orientated towards St Paul's Cathedral from Parliament Hill (LVMF 2A.1) and Kenwood (LVMF 3A.1), as defined in the London View Management Framework (LVMF) falling within the background wider setting consultation area.
11. A substantial amount of office and mixed-use development has been undertaken within the surrounding London Bridge Quarter. This includes the Shard (310 metres), the Place office building (17 storeys) and Shard Place (99m), which is in the final stages of construction.
12. The site is adjacent to the London Bridge station complex, so is in one of the best-connected locations in London in terms of public transport. Consequently, the PTAL rating is the highest possible, at 6b. A London Underground station entrance is located immediately adjacent to the site on Borough High Street.
13. Transport for London (TfL) is the Highway Authority for St Thomas Street and Borough High Street, which form part of the Transport for London Road Network (TLRN).
14. Cycleway 4 to Canada Water ends at Tower Bridge Road. Quietway 14 is around 200m to the south. Borough High Street, despite not being a signed cycle route, is popular with cyclists, and London Bridge provides direct access to and from north of

the river. The site is within the Santander Cycle Hire area, though demand is high, given the proximity to London Bridge station and Borough Market.

15. TfL has introduced numerous London Streetspace Plan (LSP) measures in the area, notably wider footways on St Thomas Street southern footway and on Borough High Street. St Thomas Street is now one-way only, westbound.

Details of this proposal

16. The application seeks full planning permission and listed building consent for the redevelopment of the site for:

- Demolition of the existing 1980s buildings, alterations of listed Georgian terrace buildings along St Thomas Street, and reconstruction of Keats House with retention of existing façade;
- Construction of 26-storey building (plus mezzanine and two basement levels) extending to 108 m (AOD), providing 49,329 sqm (GIA) of office floorspace (including 5,017 sqm of affordable workspace);
- Introduction of 340 sqm (GIA) of flexible office/retail floorspace (Class E) at ground floor level and 421 sqm (GIA) of food/drink floorspace (Class E) at roof level;
- Delivery of publicly accessible rooftop garden;
- Delivery of fully accessible public realm, providing enhanced connectivity through new public routes and a new covered public arcade;
- Creation of a new entrance to London Bridge Underground Station; and
- Improved onsite servicing strategy.

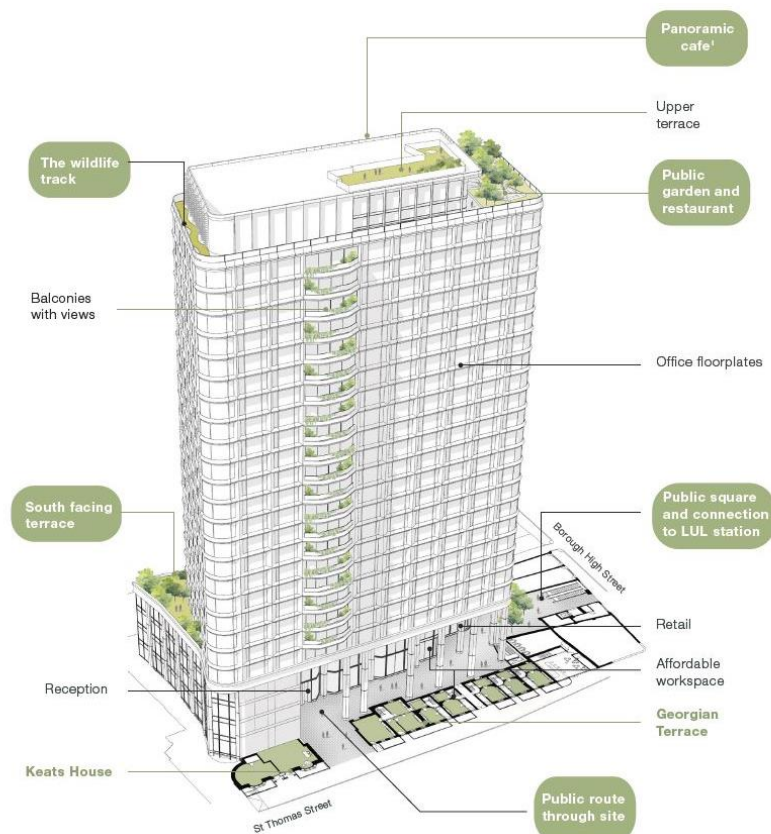


Figure 2: New building as proposed.

Case history

17. A similar proposal (Council Ref: 18/AP/4039 and 18/AP/4040) was submitted to the Council in December 2018 and referred to the Mayor for Stage 1 in January 2019 (GLA Ref: GLA/4308/01). The scheme included a narrower and taller building (144m AOD), with 1,300 sqm of public open space and an elevated public botanical gardens on levels 5 and 6 of the building.
18. A generally positive Stage 1 response was issued in November 2019 and the application is awaiting determination.
19. At Stage 1, the principle of the development was supported and the design of the scheme was considered to be of high quality.
20. In terms of heritage impacts, the scheme was acknowledged to cause less than substantial harm to a wide range of heritage assets (including the WHS Tower of London, the Grade I listed Southwark Cathedral, and Borough High Street CA), however, this harm was on balance considered to be outweighed by the wider public benefits that the scheme would provide.
21. The proposals raised concerns in relation to servicing, however, due to constraints of the site, it was accepted that the proposed servicing strategy would be based on a combination of off-street and on-street servicing via St Thomas Street and White Hart Yard.
22. The key differences between the two schemes include: different height, massing and architectural approach of the proposed office building; layout and extent of the proposed public realm; proposed servicing strategy; and location and extent of the public garden.

Strategic planning issues and relevant policies and guidance

23. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Southwark Core Strategy (2011), Saved policies from the Southwark Plan (2007) and the London Plan (2021).
24. The following are relevant material considerations:
 - The National Planning Policy Framework and National Planning Practice Guidance;
 - Draft New Southwark Plan, submitted for examination in January 2020;
 - Draft Bankside, Borough and London Bridge SPD (2010); and,
 - Tower of London World Heritage Site Management Plan;
13. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:
 - Land use principle *London Plan; Central Activities Zone SPG; Night Time Economy SPG;*
 - Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Achieving an Inclusive Environment SPG;*

- Historic environment and strategic views *London Plan; London View Management Framework (LVMF) SPG*
- Environment *London Plan; Sustainable Design and Construction SPG; the London Environment Strategy (2018);*
- Transport *London Plan; and, the Mayor's Transport Strategy (2018).*

Land use principles

14. As set out above, the site is in office use and is located in the Central Activities Zone (CAZ) and falls within the Bankside, Borough and London Bridge Opportunity Area, as well as the London Bridge District Town Centre. The proposed uses are outlined below:

Use	Existing	Proposed	Net change
Office, including affordable workspace (5,017sqm) <i>Class E(g)(i)</i>	12,763	49,329	+ 36,566
Flexible office/retail <i>Class E(a)/E(g)(i)</i>	0	340	+ 340
Food and Drink <i>Class E(a/b)</i>	0	421	+ 421
Rooftop Garden Access (<i>Sui generis</i>)	0	208	+208

15. The need to support and enhance the competitiveness of central London's agglomerations of nationally and internationally significant office functions within the CAZ to meet demand is established as a strategic priority in London Plan Policies SD4 and SD5.
16. To support this objective, London Plan Policy E1 provides strong support for the principle of office-led mixed-use development within the CAZ and the renewal and modernisation of the existing office stock through intensification and redevelopment. This seeks to increase the overall quantum of office floorspace provision, but also its quality and flexibility, to ensure the provision of a range of types and sizes of office floorspace at different rental levels.
17. The existing 1980s office buildings are relatively dated and the various buildings on the site have been constructed and linked in a relatively incremental and ad hoc manner, resulting in the inefficient use of the site in view of its location within the CAZ and adjacent to London Bridge Station.
18. The proposed development would deliver a substantial quantitative and qualitative improvement to the office stock available in this location of the CAZ and this is strongly supported in land use terms, in accordance with London Plan Policies SD4, SD5 and E1. The Council should consider securing the office floorspace for this specific use via condition.
19. Furthermore, London Plan Policy SD1 sets out the Mayor's objective to ensure that opportunity areas fully realise their potential for growth, regeneration and intensification and optimise employment and housing capacity. The Bankside, Borough and London Bridge Opportunity Area is identified as having an indicative

capacity for 5,500 new jobs and a minimum of 4,000 new homes in the London Plan.

20. The applicant has estimated that the proposed office floorspace would generate approximately 2,890 net additional jobs in operation. As such, the scheme would make a significant contribution towards achieving the benchmark jobs target for the opportunity area, which is in line with Policy SD1.
21. Policy E2 of the London Plan states that larger office proposals should consider the scope for provision of some flexible workspace suitable for micro, small and medium sized enterprises.
22. Accordingly, the application includes the provision of a range of flexible office floorplates, including large open plan office floorspace within the tower, which can be easily sub-divided.
23. Policy E3 of the London Plan encourages the use of planning obligations to secure affordable workspace in specific circumstances and locations. Draft New Southwark Plan Policy P30(2.1) requires developments proposing 500sqm or more employment floorspace to deliver at least 10% of the proposed gross employment floorspace as affordable workspace on site at discount market rents.
24. The proposals would provide 5,000 sqm of affordable workspace, which would be in line with London Plan Policy E3 and emerging New Southwark Plan Policy P30(2.1) and should be adequately secured in the S106 agreement.
25. Lastly, it is noted that the proposal would include 761 sqm of commercial uses, which would contribute to the activation of the ground floor and of the roof terrace and are therefore supported.
26. In conclusion, the proposed office-led mixed-use redevelopment within the CAZ and an Opportunity Area, comprising a significant quantitative increase and qualitative enhancement to the existing office floorspace, as well as a significant provision of affordable workspace, is strongly supported in land use terms.

Urban design

27. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

Public realm and ground floor layout

28. Currently, there is no public access through the site, and generally poor pedestrian permeability from Borough High Street through to St Thomas Street - with the footway on Borough High Street and junction corner at St Thomas Street heavily congested during busy periods.
29. The proposal would include a 'covered gallery' (circa 500sqm) within the proposed building to provide a link to the proposed new entrance to London Bridge Underground Station. This entrance would be created by opening up the existing rear wall of the existing ticket hall, which would create a new alternative pedestrian route through to St Thomas Street from Borough High Street. As such, the proposal

would relieve pressure on the existing footway on the junction corner outside the existing Barclays Bank, which is strongly supported.

30. In addition, it is welcome that the proposal would also provide some external public space adjacent to King's Head Yard and the tube station entrance, as well as a new north-south route connecting to Beak Alley, which would be located next to the servicing route.
31. The proposed covered gallery would be completely open and exposed to the elements. It would benefit from a generous height and natural light and it would also display the restored rear elevations of the Grade II listed Georgian terraces, which is supported. The chamfered parabola footprint of the covered gallery towards the tube station appears to respond well to the character and opportunities of the site. Although the L-shaped form of the space would not allow a clear visibility of the end of the arcade from either side, the proposed space would offer a high-quality route.
32. It is noted that great attention has been given to wind mitigation measures, which appear well integrated into the overall architecture and would not diminish the quality or functionality of the new public routes and spaces. As it is acknowledged that a tall building could have an adverse impact on the microclimate around King's Head Yard, the Council should ensure that the proposed mitigation would be sufficient and the microclimatic conditions of the new public realm would be welcoming.
33. As the site and surroundings present a hard, urban environment, the proposals should ensure that generous planting to match the scale of the development is provided. Whilst it is noted that the ground floor is constrained, a reduction in the proposed footprint (as recommended below) would provide opportunities to increase the proposed planting.
34. Subject to adequate microclimatic conditions and appropriate landscaping and greening, the new routes through and around the site, the 'covered gallery', the external space next to King's Head Yard, and the new access to London Bridge Underground Station would all be significant design benefits of the proposed scheme. Given the already constrained and busy nature of the area, with a significant deficit of good public realm, these proposals could make a significant difference to pedestrian experience in this very busy area.
35. Nevertheless, notwithstanding these benefits (and the chamfers in the plan and the structural grid that echoes the dimensions of historic plots), it should be noted that the large footprint sits awkwardly with the prevailing grain and proportions of the building along St Thomas Street, Borough High Street and Southwark Street. This may be also exacerbated by the fact that the building is situated behind existing buildings on the most prominent sides (Borough High Street and St Thomas Street) and does not appear to meet the ground. As further discussed below, the applicant is advised to reduce the width of the proposal, which would improve the ground floor layout of the building and its visual impacts.

Tall building

36. London Plan Policy D9(B3) states that "tall buildings should only be developed in locations that are identified as suitable in Development Plans".
37. The Saved Southwark Plan policies state that "planning permission may be granted for buildings that are significantly taller than their surroundings or have a significant impact on the skyline, 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 there are excellent links between the building(s) and public transport services.” It also goes on to set out a list of requirements that any tall building should meet.

38. The emerging New Southwark Plan Policy P16 takes a similar approach and states that: “Areas where we expect tall buildings are on Figure 4. These are typically within our Major Town Centres, Opportunity Area Cores, Action Area Cores and the Central Activities Zone”. The figure identifies the whole CAZ and includes the application site.
39. Given that the adopted and emerging Southwark Local Plans broadly identify the application site as part of an area that is suitable for tall buildings, the proposals would comply with London Plan Policy D9(B3).
40. As per policy D9(C), the development should satisfactorily address visual, functional, environmental and cumulative impacts.
41. In terms of visual impacts, the significant width proposed (over 60m) does not feel proportionate or comfortable in this low-rise historic context with many designated heritage assets and its combination with the proposed height (over 100m) causes concern. There is a sudden and dramatic change in scale between the site and its surroundings, which is unlikely to be softened by future development.
42. It is acknowledged that attempts have been made to minimise and mitigate the width of the building through the façade’s design. Aspects of the building, such as the core and communal spaces on each floor, have been articulated in an attempt to present the building as a number of slender elements, as opposed to a single mass. Whilst this has been successful to a degree, further work is needed and a reduction in the proposed width and footprint is strongly advised, even though this would necessarily lead to a reduction in floorspace.
43. Whilst it is noted that the proposed tall building would form part of an emerging cluster of tall buildings around London Bridge Station, the proposed materiality (GRC as opposed to lighter weight materials) and massing would contrast and conflict with the character of this emerging cluster, emphasising the proposals as a separate individual building.
44. Whilst it is acknowledged that the proposed façade treatment aimed to reduce the heritage impact of the proposals (as well as improve energy efficiency) in the attempt of providing a more neutral backdrop to heritage assets (as opposed to providing a ‘landmark’ building), this design choice overall does not seem to be successful.
45. It is also noted that some harm would be caused to the LVMF view 3A.1 – Kenwood and to heritage assets, as discussed below in the ‘Strategic Views’ section and the ‘Heritage’ section.
46. With regards to functional, environmental (including also glare and light pollution) and cumulative impacts, the applicant’s technical information on these aspects will be assessed in detail by the Council, including whether mitigation measures are necessary to make the application acceptable. An update will be provided to the Mayor at his decision-making stage, although at this stage, it is noted that the building’s E-W orientation and considerable width would cause significant overshadowing on St Thomas Street.

Public viewing garden

47. Prominent tall buildings, such as that proposed here, should incorporate free to enter publicly accessible areas within their design, in accordance with London Plan Policy D9 of the London Plan. Such spaces should normally be located at the top of the building to provide wider views across London.
48. The applicant is accordingly proposing a new public terrace of 780 sqm at the level 24, with a mix of woodland character areas and a sheltered space for education. The proposed space is an imaginative concept and could be a real benefit to the local public realm, depending on intuitive and equitable access from street. The proposed would comply with the requirements of the policy, subject to access being adequately secured in the S106.

Fire safety

49. In accordance with the London Plan Policy D12 on fire safety, the applicant must submit a fire statement, produced by a third party suitable qualified assessor. The applicant has accordingly submitted a fire statement, however, it is currently unclear if the statement's authors are suitably qualified. In addition, the strategy should clearly address the requirements of Policy D12(B,1-6) and it is noted that information about the building's construction methods, products and materials used should be as specific as possible.
50. It is also essential that the statement contains a declaration of compliance that the fire safety of the proposed development and the fire safety information satisfy the requirements of Policies D12(A) and D5(B5), as the responsibility lies with the qualified assessors.
51. Further information is available [here](#)¹.
52. A revised statement must therefore be submitted to address these issues. Compliance with the revised fire statement should then be secured through planning condition.

Inclusive design

53. Policy D5 of the London Plan seeks to ensure that new developments achieve the highest standards of accessible and inclusive design (not just the minimum), ensuring they: are designed taking into account London's diverse population; provide spaces that are designed to facilitate social interaction and inclusion; can be entered and used safely, easily and with dignity by all; are convenient and welcoming (with no disabling barriers); and, provide independent access without additional undue effort, separation or special treatment.
54. Accordingly, the submitted Design and Access statement confirms that the proposed building is designed to promote inclusive access throughout the scheme (with the exemption of the listed buildings, which is accepted). However, it should be clarified if other options have been explored to provide access to King's Head Yard, as this appears to pose a barrier to the increased permeability of the site.

¹ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/draft-fire-safety-guidance-pre-consultation-information-only>

Public toilets

55. Policy S6 of the London Plan supports the provision of public toilets and states that large-scale developments that are open to the public and large areas of public realm should provide and secure the future management of free publicly-accessible toilets suitable for a range of users and free 'Changing Places' toilets, to be available during opening hours or 24 hours a day where accessed from areas of public realm.
56. Considering the significant provision of public realm at ground floor level, the applicant should demonstrate that the proposals would meet these policy requirements.
57. In addition, this provision of public toilets should also be made at roof level, where the public terrace is proposed. It is noted that a disabled toilet is provided there, however, the applicant should explore how to provide a 'Changing Places' toilet too.
58. The Council should then suitably secure these provisions via S106.

Digital connectivity

59. London Plan Policy SI6 states that development proposals should ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users. The Council should therefore ensure that this is provided and secured.

Strategic Views

60. Table 7.1 of London Plan Policy HC3 identifies a list of strategic views that include significant buildings or urban landscapes, which help to define London at a strategic level. London Plan Policy HC4 seeks to protect these strategic views and states that proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements.
61. The proposed building would appear in a number of strategic views defined within the London View Management Framework SPG:
- Protected Vista within London Panorama: Kenwood (3A.1);
 - Protected Vista within London Panorama: Parliament Hill (2A.1);
 - London Panorama: Alexandra Palace (1A.1 and 1A.2);
 - London Panorama: Parliament Hill (2B.1);
 - London Panorama: Primrose Hill (4A.1);
 - London Panorama: Blackheath Point (6A.1);
 - River Prospect: Tower Bridge (10A.1);
 - River Prospect: Southwark Bridge (12B.1);
 - River Prospect: Waterloo Bridge (15B.2); and
 - River Prospect: Golden Jubilee/Hungerford Footbridges (17B.2).

Protected Vistas – LVMF view 2A.1 – Parliament Hill

62. The proposals would be visible in the Wider Setting Consultation Area, in the background of the vista, behind the strategic landmark of St Paul's Cathedral. In terms of the baseline conditions, the LVMF SPG recognises that existing buildings in the background of views 2A.1 diminish the viewer's ability to recognise and appreciate St Paul's from this location. The Shard is visible behind the dome of St

Paul's and Shard Place is situated behind one of the western towers. Guy's Hospital tower lies immediately to the right of the western towers and is taller than the height of the Cathedral dome and spire.

63. The submitted view demonstrates that the proposed building would be not be viewed behind either the dome or the towers and would be situated to the right of Guy's Hospital tower, partially obscuring the hospital building from view. As such, GLA officers consider that the application would not harm the composition of the view or the ability to appreciate the landmark from Parliament Hill.

Protected Vistas – LVMF view 3A.1 – Kenwood

64. The proposals would be visible in the Wider Setting Consultation Area, in the background of the vista, behind the strategic landmark of St Paul's Cathedral. At present, the view of St Paul's from Kenwood is affected by buildings in the background, most notably Guy's Hospital tower and Shard Place, which both affect the ability to perceive the silhouette of St Paul's dome. The western towers are discernible from this existing view, albeit the presence of the Avondale Estate Towers in the distant background impacts the ability to decipher the outline of these important features of the building.
65. The submitted view shows that the proposed tall building, given its width, would sit immediately behind one of the western towers and would come close to the second, thereby further reducing the ability to appreciate these elements. It would also lie immediately adjacent to Guy's Hospital tower and be of a competing height with St Paul's dome (excluding its spire), effectively increasing the width and scale of continuous building facade in the background of the dome.
66. As a result, GLA officers consider that the application would further diminish the ability to appreciate the strategic landmark of St Paul's and would therefore harm the composition of the view (albeit, the degree of additional material harm would be partly limited by the layering of existing buildings in this view). The heritage harm to St Paul's Cathedral (Grade I) is further discussed in the 'Heritage section' below.

London Panoramas

67. Having reviewed the impact of the scheme as set out in the applicant's submitted views for London Panoramas 1A.1, 1A.2, 2B.1, 4A.1 and 6A.1, GLA officers consider the proposed tall building would positively contribute to the prevailing pattern of tall buildings and existing clusters in these panoramas and would not harm the setting of the strategically important landmarks.

River prospects

68. Having reviewed the impact of the scheme as set out in the applicant's submitted views 10A.1, 15B.2 and 17B.2, GLA officers consider the proposed tall building would be largely obscured from views and would therefore have a negligible impact on the River Prospects.
69. With regards to the River Prospect 12B.1, however, the proposed building would be highly prominent, sited to the right of the Shard, Southwark Cathedral (Grade I) and of Guy's Hospital tower. Nevertheless, given the mixed character of buildings appearing in this view and the comparable proportions of the proposal to those within the cluster of tall buildings at London Bridge, it is considered that this addition would have a neutral impact on this view.

70. The proposals would therefore preserve an appropriate relationship between Southwark Cathedral and the developing cluster of tall buildings at London Bridge in line with the LVMF SPG.

Strategic views conclusion

71. The proposals would generally preserve strategic views, however, harm to the Protected Vista 3A.1 from Kenwood was identified and the proposals would not fully comply with London Plan Policy HC4. As mentioned above, policy conflicts and the overall planning balance will be considered at the Mayor's decision-making stage.

Heritage

72. London Plan Policy HC1 states that development should conserve heritage assets and avoid harm. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses". In relation to conservation areas, special attention should be paid to the desirability of preserving or enhancing the character of conservation areas when making planning decisions.
73. The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.
74. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse planning permission, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
75. London Plan Policy D9 states that tall buildings, located in sensitive locations such as this, should avoid harm to the significance of London's heritage assets and their settings. It also states that proposals resulting in harm will require clear and convincing justification, demonstrating that there are clear public benefits that outweigh that harm.
76. With respect to heritage assets, London Plan Policy HC1 requires that developments affecting the setting of heritage assets - including conservation areas, listed buildings, scheduled monuments and World Heritage Sites (WHS) - should conserve their significance. London Plan Policy HC2 states that development should not cause adverse impacts on WHS or their settings, and, in particular, should not compromise the ability to appreciate Outstanding Universal Value (OUV), integrity, authenticity or significance.
77. The application site falls within the Borough High Street Conservation Area and contains the Grade II listed 4-8 and 12-16 St Thomas Street, as well as Keats House, which is an unlisted building, which is identified as a positive contributor to the character and appearance of the Conservation Area. The site is also adjacent to

the Grade II listed Old King's Head Public House and the Bunch of Grapes Public House.

78. In addition, within 1km radius from the site, there are 14 Conservation Areas across the London Borough of Southwark, the London Borough of Tower Hamlets and the City of London. In the surroundings of the site, there is also the Grade II* listed Guy's Hospital, the Grade I listed Southwark Cathedral, the Tower of London WHS and a very large number of other listed buildings and scheduled ancient monuments, which the applicant has largely organised in 37 groups. It is furthermore noted that in the surroundings of the site there are several locally listed buildings, which the applicant organised in 4 groups.
79. The submitted Townscape, Visual Impact and Built Heritage Assessment (TVIBHA) sets out to consider the impact of the proposal these designated heritage assets. However, the document does not appear to include the Zone of Visual Influence Study (to which it refers) and this should be provided, with clear mapping of the location of heritage assets on it.

Tower of London World Heritage Site

80. The Outstanding Universal Value is rooted in the rare survival of an 11th century fortress symbolising the military might of William the Conqueror and the seat of Royal power through the middle ages. The Tower complex also includes a number of individual palace buildings of very high significance that are considered by UNESCO as being attributes of the Outstanding Universal Value of the of the World Heritage Site. As well as being a World Heritage Site, the Tower of London is a scheduled ancient monument and includes a number of Grade I, II and II* listed buildings.
81. The submitted view (n.21) shows that the revised tall building would be marginally visible from the Inner Ward, with a small portion of the upper section of the building protruding above the roofline of 4-5 Tower Green, infilling the gap between two chimney stacks. Currently, the Shard has a relatively dominating visual impact on this view, with Shard Place and Guy's Hospital tower also visible above the roofline of Queen's House. Notwithstanding this, the proposed tall building would cause a degree of additional harm to the setting of the Grade I listing including "Inner Curtain Wall, with Mural Towers, The Queen's House, Nos 1, 2, 4, 5 and 7 Tower Green and the New Armouries" as well as to the Tower of London World Heritage Site itself, by further distracting from the visual experience of these assets. This harm would be less than substantial.

Southwark Cathedral (Grade I)

82. The significance of Southwark Cathedral is derived from its historic status as one of London's most important medieval buildings dating back to the 13th Century, although it has been the subject of later interventions. The setting of the Cathedral contributes to its significance, in particular, immediate views of the Cathedral looking south from Montague Close, which enable viewers to appreciate the architectural and landmark qualities of the Cathedral and its importance to this historic part of Southwark.
83. The submitted views (n. 49-53) taken from outside the courtyard entrance of the Cathedral show that the proposed tall building would appear behind the silhouette of the listed Cathedral, distracting from the visual experience of this asset and

thereby causing a degree of harm to the understanding and appreciation of the Cathedral's significance.

84. Whilst it is acknowledged that the existing context of the Cathedral already includes some tall and large buildings, it is noted that the proposed tall building would cause some additional harm to the setting of this asset, affecting views of the Cathedral where elements of it can be currently appreciated against a backdrop of clear sky and which would now be disturbed by the prominent appearance of the proposals.
85. As such, GLA officers consider that the proposed building would cause a degree of harm to the significance of the Grade I listed Southwark Cathedral, which would be less than substantial.

Guy's Hospital Main Building, Chapel and Wings (Grade II*)

86. The significance of this hospital is a fine example of a Georgian hospital complex, founded in 1725, and a particularly rare and important survival of an institution reflective of the emergence of institutional health provision in 18th century London. It has group value with several grade II listed structures associated with the hospital itself.
87. As shown in some submitted views (n. 39, 41-42), the height and close proximity of the proposals to the listed hospital would cause harm to the setting of this asset, by introducing a very prominent and tall building on its backdrop, which would significantly distract from the visual experience of this asset and would therefore cause additional harm to the understanding and appreciation of the hospital's significance.
88. In addition, it is noted that Historic England, in the previous submission, raised that additional harm could be caused by the proposed development by the blocking of natural light on the interior of the Hospital chapel. Following the detailed assessment by the Council and Historic England on this aspect of the proposals, an update will be provided to the Mayor at his decision-making stage about the level of harm that would be caused to this heritage asset.

Borough High Street Conservation Area and Keats House

89. The Borough High Street Conservation Area has a very high degree of historic significance as the main arterial route out of the City of London of Roman origin and the well-preserved fine and distinctive urban grain is a key component of its character and significance.
90. As mentioned in the 'Urban design' section above, the large footprint sits awkwardly with the prevailing grain and proportions of the building along St Thomas Street, Borough High Street and Southwark Street. The proposed width and height would result in a sharp contrast with the fine grain of the historic buildings of the Conservation Area and would therefore cause harm to its heritage significance, which would be less than substantial (particularly evident in views n.35 and 36).
91. In addition, the demolition and reconstruction of Keats House, which is identified as a positive contributor to the character and appearance of the Conservation Area, could potentially cause additional harm and the Council should carefully assess and secure the details of this operation.

Georgian Terrace on St Thomas Street (Grade II)

92. The Grade II listed Georgian Terrace (numbers 4-8 and 12-16 St Thomas Street) has been altered significantly internally and externally as part of the office developments during the 1980s and the proposals would aim to: reverse inappropriate changes to the listed terrace, through the reinstatement of plan form, decorative detail and appropriate material; recreate a passageway from St Thomas Street; and provide the listed terrace with a suitable long term use. These aspirations are welcome, however, the Council should verify the extent of heritage benefits that the proposals would provide in this regard.
93. In addition, it is noted that the historic character and setting of the terrace would be significantly altered as a result of the proposal, as the proposed tall building would be a very prominent presence that would distract from the visual appearance of these assets and would therefore cause harm to the understanding and appreciation of their significance (as evidenced by views n. 42, 43 and 45).
94. Following the detailed assessment of the Listed Building Consent application by the Council and any additional comments made by Historic England, an update will be provided to the Mayor at his decision-making stage about the level of benefits and harm that would be caused by the proposals to these designated assets.

St Paul's Cathedral (Grade I)

95. Considering the significance of the protected vista of St Paul's Cathedral in the London Panorama from Kenwood Gazebo (LVMF 3A.1) and the fact that the proposals, as discussed above in the 'Strategic Views section', would reduce the observers' ability to appreciate the landmark status of the Cathedral, the proposals would cause a degree of harm to the significance of St Paul's Cathedral.
96. It is noted that the setting of St Paul's Cathedral is also protected by a number of local views and, following the Council's detailed assessment, an update about the level of harm caused to this asset will be provided to the Mayor at this decision-making stage.

Old King's Head Public House (Grade II)

97. Currently, the pub is tightly enclosed within a narrow alleyway, which is characteristic of the historic street pattern that contributes to the significance of this asset, as well as this part of the Borough High Street Conservation Area.
98. Whilst the proposal to remove the retained Victorian façade along King's Head Yard and to create some open public space is welcome in design terms (as discussed above), it is considered that it would have a negative impact on the setting of this asset and its significance, as it would affect the long-established backland character of the area. This harm would be less than substantial.

Summary

99. Whilst it is welcome that the current scheme has sought to explore an alternative configuration to mitigate the harm caused by the previously submitted scheme through a reduction in height of the building (from 144m to 108m), it is noted that its increase in width partly undermines this attempt.
100. It is also noted that a scheme of 108m would still have significant impacts on the surroundings. At this stage, it is acknowledged that Historic England raised an

objection to the scheme and that further detailed comments will be provided upon discussion at the next Historic England London Advisory Committee (on 1 July).

101. A summary of some key heritage impacts has been provided above, however, further consideration will be given at the Mayor's decision-making stage to the level of harm caused by the proposals to the numerous heritage assets surrounding the site and to the public benefits provided by the scheme, following a review of the detailed assessment of heritage impacts made by the Council and by Historic England.

Transport

Cycle and car parking

102. London Plan compliant long stay cycle parking and associated shower and locker provisions would be provided at ground level and Basement Level 1. Policy compliant short stay Sheffield stand parking would also be provided at ground level and a mixture of double stacking racks, Sheffield stands and folding bike lockers would be provided at Basement Level 1 in secure access zones.
103. Access to the basement for cyclists with bikes would be provided from King's Head Yard via a combined cycle stair ramp with a conveyor system to assist. This would be wide enough to allow two people to pass on the stair. A dedicated shuttle lift would allow cyclists to return to reception once bikes have been stored. There would also be a lift for cyclists unable to use the stairs. Although shallow ramps are preferable to access cycle stores, given the site constraints, the proposed arrangements are acceptable. Access off King's Head Yard would also provide safe space for any queuing that may occur at the highest peak arrival times.
104. The development is proposed to be car-free except for two accessible parking bays in the servicing area for the use of blue badge holders, which is an acceptable level of provision, noting that the adjacent London Bridge station is fully accessible for all modes. At least one of these spaces should have electric vehicle charging, although given the low number of spaces, active charging provision for both spaces would be supported.

Healthy Streets

105. The proposed development would provide a pedestrian route between St Thomas Street and King's Head Yard, a movement that can't be made now. Coupled with the opening up of the eastern flank wall of the Borough High Street London Underground (LU) ticket hall, discussed further below, this would provide an alternative route for pedestrians from Borough High Street and the LU station entrance to St Thomas Street, which would relieve pressure on the narrow footways of St Thomas Street and Borough High Street at their junction. The temporary LSP scheme is a response to this very issue, and further crowding can be expected post-pandemic.
106. In order to promote this new route, a contribution to Legible London should be secured, to allow new signs to be provided within the site, and a local sign map refresh. £22,000 would provide two new signs and four existing sign map refreshes.
107. The development would also provide the opportunity to contribute to the proposed Healthy Streets improvements to St Thomas Street and Borough High Street

frontage, which could include permanent footway widening, footway and carriageway resurfacing, tree planting and provision of a segregated cycle track to allow two-way cycle access, which is currently not possible. This two-way access would enhance cycle connectivity to and from the development, and the permanent footway widening would mitigate the increase in pedestrian demand from the development.

108. TfL is currently developing the St Thomas Street Healthy Streets scheme, so an appropriate contribution to this would be expected in the s106 agreement, either via a substantial financial contribution or via 'in kind' delivery through a s278 agreement with TfL. Similar requests have been made in respect of other development proposals along St Thomas Street.
109. The scope and value of the Healthy Street contribution should be subject to further discussion with TfL and the Council.

Public transport impacts

110. The scale and nature of the proposed development would inevitably increase peak demand on the public transport network. London Bridge National Rail station has recently been transformed in terms of capacity and facilities, and Thameslink project has recently been completed, which transforms on-train capacity and connectivity across a wide part of the south east. National Rail services are, in normal times, crowded in peak periods, but the number of trains and range of destinations mean that the additional development trips should be able to be absorbed. This should however be confirmed by Network Rail.
111. LU train services are also, in normal times, very busy at peak times, particularly the Jubilee line eastbound and Northern line northbound in the AM peak and vice versa in the PM peak. As with any National Rail terminus LU station, boarders dominate in the AM peak, and alighters in the PM peak. An office development here will improve churn as, relatively more people will alight trains in the AM peak, freeing up space for boarders (vice versa in the PM peak).
112. The LU station has two entrances, the main one within the National Rail station and on Tooley Street, and a second one on Borough High Street. The developer proposes to open the eastern flank wall of the Borough High Street LU ticket hall to provide direct access to the site from the ticket hall. This is supported, subject to full developer funding, engineering feasibility and appropriate commercial terms. A further benefit of the new entrance is to alleviate footway crowding on the busy footways of Borough High Street and St Thomas Street, so this is considered essential mitigation. As such, the new entrance should be required to be open prior to first occupation of the development.
113. Bus services at London Bridge tend to be more crowded outbound in the AM peak and vice versa in the PM peak. As such, and given the dominant rail mode share, there is unlikely to be an unacceptable impact on bus service capacity.

Cycle Hire

114. This and other proposed developments in the vicinity of London Bridge will inevitably increase demand for cycle hire in an area that already exhibits high demand, due to the National Rail station and Borough Market. As such, it would be expected that an appropriate financial contribution would be secured within the s106 agreement to provide additional docking points locally, proportionate to the

relative size of the development (i.e. approximately one third of the proposed cumulative new jobs in the London Bridge area). This is likely to equate to a new mid-sized (30 point) docking station at the western end of St Thomas Street or nearby, for further discussion between TfL and the Council. A £400,000 contribution would cover the capital and additional operating cost of this new docking station.

Servicing

115. A key issue for this site is the limited opportunities for servicing. The current much smaller office is serviced via White Hart Yard. However, this road is very narrow with no segregated footway, and the entrance off Borough High Street is very restricted in height, width and visibility, as it effectively runs through the building frontage on Borough High Street. TfL and the Council have in the past been very concerned with any intensification of vehicle movements in White Hart Yard, particularly in terms of pedestrian safety on Borough High Street.
116. On-street loading, generally not supported either by TfL or the Council for new developments, is also particularly constrained on St Thomas Street by the temporary LSP scheme and, in the future, by the provision of a segregated cycle track. Therefore, the provision of on-site servicing in a basement accessed from St Thomas is supported. The detailed design of the access will need to be agreed with TfL as part of the s278 agreement.
117. The applicant has also committed to reducing service vehicle numbers significantly, through proposed consolidation techniques. These limits on service vehicle movements will need to be binding in any planning permission. Timing restrictions will also be expected, in the weekday AM and PM peaks and possibly weekday lunchtimes, as service vehicles would be crossing the busy St Thomas Street footway and, potentially, a segregated cycle track, as well as passing the extremely busy pedestrian crossing between the station/Shard and Guy's Hospital complex.
118. A proportion of deliveries by cargo bike should also be required, for example office food deliveries. Personal deliveries at work should be banned via tenancy agreements. These restrictions and monitoring regime should be enshrined in any planning permission and secured through a delivery and servicing plan (DSP), to be submitted for approval by TfL and the Council prior to commencement. The Council has in the past also secured a financial bond for additional remedial measures, should service vehicle numbers exceed the DSP, which is supported in this case.

Construction

119. Construction is likely to be challenging, given the constrained site, busy surrounding roads and the high numbers of vulnerable users. It will be essential that a detailed construction logistics plan (CLP) is developed in close partnership with, and formally submitted for approval by TfL and the Council, prior to commencement. The requirement for this should be secured in any planning permission. If any part of the TLRN is proposed to be used for construction purposes, early engagement with TfL would be essential.
120. The site also lies partly over and directly adjacent to LU infrastructure, so any permission should include a standard condition requiring LU approval of construction methodology. A separate development agreement is required with LU to deliver the new station entrance, and this should include asset protection also and should be reflected in the s106 agreement.

Travel Plan

121. A full travel plan should be required to be submitted for approval by the Council in consultation with TfL. The travel plan should contain stretching mode share targets and practical, funded measures to encourage healthy travel by foot and bike, such as pool bikes and business accounts for Santander cycle hire. The Council has a policy of securing free Cycle Hire memberships for eligible occupiers for around 10% of the occupants, which is supported. Occupiers should also sign up to flexible working hours, to encourage peak spreading of trips. The Council has in the past secured a financial bond for additional active travel measures, should travel plan targets not be met, which is supported in this case.

Mitigation and conclusions

122. As outlined above, it would be expected that the development provides the following mitigation:
- £22,000 Legible London signage contribution;
 - New LU ticket hall entrance;
 - £400,000 Cycle hire expansion contribution;
 - Significant Healthy Streets contribution;
 - Servicing restrictions and management including during construction, backed by a financial bond;
 - Travel plan measures to encourage active travel and off-peak use of public transport, backed by a financial bond;
 - Mayoral CIL payment.
123. Provided this mitigation is secured, the development would on balance be in accordance with London Plan policy in terms of strategic transport.

Environment

Energy strategy

124. The energy proposals for the site are generally compliant with the London Plan energy policies, however, some further information is needed to respond to the detailed technical comments that have been sent to the applicant and the Council under separate cover. These include the request for more information on the heat pump specification and carbon offset agreement.
125. The applicant should also review the 'Be seen' energy monitoring guidance to ensure that they are fully aware of the relevant requirements to comply with the 'be seen' policy (available [here](https://consult.london.gov.uk/be-seen-energy-monitoring)²).

Whole Life Carbon

126. In line with London Plan Policy SI2, the applicant has submitted a WLCCA assessment. However, some clarifications are required to address the detailed technical comments that have been sent to the applicant and the Council under separate cover.
127. Applicants must also be conditioned to submit a post-construction assessment to report on the development's actual WLC emissions.

² <https://consult.london.gov.uk/be-seen-energy-monitoring>

Circular Economy

128. London Plan Policy SI7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, whilst London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process.
129. A Circular Economy Statement has accordingly been submitted, however, this should be revised to address the detailed comments that have been sent under separate cover to the Council and applicant.

Urban greening

130. Policy G5 of the London Plan requires major development proposals to contribute to the greening of London. Applications should provide the calculation of the new Urban Greening Factor (UGF) and aim to achieve the recommended target.
131. The applicant has calculated the UGF of the proposed scheme to be 0.41, which would exceed the requirement of London Plan Policy G5 of 0.3 for predominately commercial developments and is therefore strongly supported. The greening measures should be secured by the Council via condition.

Air quality

132. London Plan Policy SI1 requires development proposals to meet a number of requirements to tackle poor air quality, protect health and meet legal obligations. Detailed technical comments have been sent under separate cover to the Council and applicant.

Local planning authority's position

133. Southwark Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

Legal considerations

134. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

135. There are no financial considerations at this stage.

Conclusion

136. London Plan policies on office developments, affordable workspace, design, heritage, transport and environment are relevant to this application. Whilst the proposed land uses are supported, the application does not fully comply with the other policies, as summarised below:

- **Land use principles:** The proposed office-led mixed-use redevelopment within the CAZ and an Opportunity Area, comprising a significant quantitative increase and qualitative enhancement to the existing office floorspace, as well as a significant provision of affordable workspace, is supported in land use terms. The Council should consider securing the floorspace for this specific use and should adequately secure the provision of affordable workspace.
- **Urban design:** The application site falls within an area that is identified as suitable for tall buildings in the adopted and emerging Local Plans, in accordance with policy D9(B3). Concerns are raised with regards to visual impacts and the applicant is particularly encouraged to reduce the proposed width. An update will be provided to the Mayor at his decision-making stage also with regards to functional, environmental and cumulative impacts, further to the Council's detailed assessments. Further information is also needed in relation to fire safety, inclusive design, public toilets and digital connectivity.
- **Heritage:** Less than substantial harm to a number of heritage assets, including the Tower of London, Southwark Cathedral, St Paul's Cathedral, Guy's Hospital and the Borough High Street Conservation Area, has been identified. However, further consideration will be given at the Mayor's decision-making stage to the harm caused by the proposals to the numerous heritage assets surrounding the site and to the public benefits provided by the scheme, following a review of the detailed assessment of heritage impacts made by the Council and by Historic England.
- **Transport:** Should the following mitigation be secured, the development would on balance be in accordance with London Plan policy in terms of strategic transport: £22,000 Legible London signage contribution; New LU ticket hall entrance; £400,000 Cycle hire expansion contribution; Significant Healthy Streets contribution; Servicing restrictions and management including during construction, backed by a financial bond; and Travel plan measures to encourage active travel and off-peak use of public transport, backed by a financial bond.
- **Environment:** Further information is needed with regards to energy, whole life cycle carbon and circular economy.

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