

## Development, Enterprise and Environment

**Victoria Crosby**

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PO Box 64529  
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**Our ref:** GLA/4308/01/ADR

**Your ref:** 18/AP/4039

**Date:** 26 November 2019

Dear Victoria

**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, Southwark  
Local Planning Authority Reference: 18/AP/4039**

I refer to the copy of the above planning application, which was received from you on 28 January 2019. On 26 November 2019, the Mayor considered a report on this proposal, reference GLA/4308/01. 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 Mayor considers that the application does not fully comply with the London Plan and draft London Plan for the reasons set out in paragraph 86 of the above-mentioned report; however, the resolution of those issues could lead to the application becoming compliant with the London Plan and draft London Plan.

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 me 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, email [andrewhiley@tfl.gov.uk](mailto:andrewhiley@tfl.gov.uk), telephone 020 3054 7032.

Yours sincerely,

A handwritten signature in blue ink, reading 'John Finlayson', followed by a horizontal line.

**John Finlayson**

Head of Development Management

cc    Florence Eshalomi, London Assembly Constituency Member  
      Andrew Boff, Chair of London Assembly Planning Committee  
      National Planning Casework Unit, DCLG  
      Lucinda Turner, TfL  
      Sarah Considine, DP9 Ltd

**New City Court, Southwark**  
**in the London Borough of Southwark**  
**planning application no. 18/AP/4039**

**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**

Office led mixed use redevelopment of the site comprising the demolition of 1980s office buildings and the construction of a 37-storey building, 144 metres in height (AOD), together with the restoration of heritage assets on St Thomas Street and the provision of new public spaces and movement routes.

**The applicant**

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

**Strategic issues**

**Principle of development:** Office-led mixed use redevelopment within the CAZ and an Opportunity Area and Town Centre is strongly supported in principle. The proposal would provide a significant quantitative increase and qualitative enhancement to the existing office and commercial floorspace. The proposed affordable workspace is also strongly supported and should be secured (paragraphs 18 to 27).

**Urban design:** The development layout is strongly supported and the height and massing is acceptable in strategic planning terms, noting associated strategic views and heritage considerations. Overall, the scheme is of a high design and architectural quality (paragraphs 28 to 36).

**Heritage:** Whilst the application would result in a degree of harm to the setting of the Tower of London World Heritage Site (and various designated heritage assets within it); Southwark Cathedral (Grade I); Borough High Street Conservation Area; and, other designated heritage assets (including the setting of St Paul's Cathedral (Grade I) within LVMF view 3A.1 from Kenwood House), GLA officers consider that this harm would be less than substantial, and would be outweighed by the wider public benefits associated with the scheme (paragraphs 37 to 60).

**Climate change:** The application complies with the London Plan and draft London Plan (paragraphs 61 to 63)

**Transport:** Car parking and cycle parking is acceptable. Improved pedestrian access and a new station entrance is strongly supported and should be secured. Financial contributions are required towards St Thomas Street improvements, cycle hire docking stations and legible London signage. The servicing strategy is acceptable in principle; however, significant site constraints require the detailed design of servicing arrangements to be approved and secured including restrictions on the servicing vehicle numbers, hours of deliveries and vehicle size restrictions. The proposed consolidation strategy must also be secured. Other standard conditions are required in relation to London Underground infrastructure asset protection, construction logistics and travel planning (paras 64 to 82).

**Recommendation**

That Southwark Council be advised that whilst the proposal is strongly supported in principle, the application does not yet fully comply with the London Plan and draft London Plan for the reasons set out in paragraph 86 of this report. However, the possible remedies set out within this report could address those deficiencies.

## Context

1 On 28 January 2019, 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. 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.

2 The application is referable under the following categories of the Schedule to the Order 2008:

- *1B(c) "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - outside Central London and with a total floorspace of more than 15,000 square metres."*
- *Category 1C: "Development which comprises or includes the erection of a building of...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 GLA website [www.london.gov.uk](http://www.london.gov.uk).

## Site description

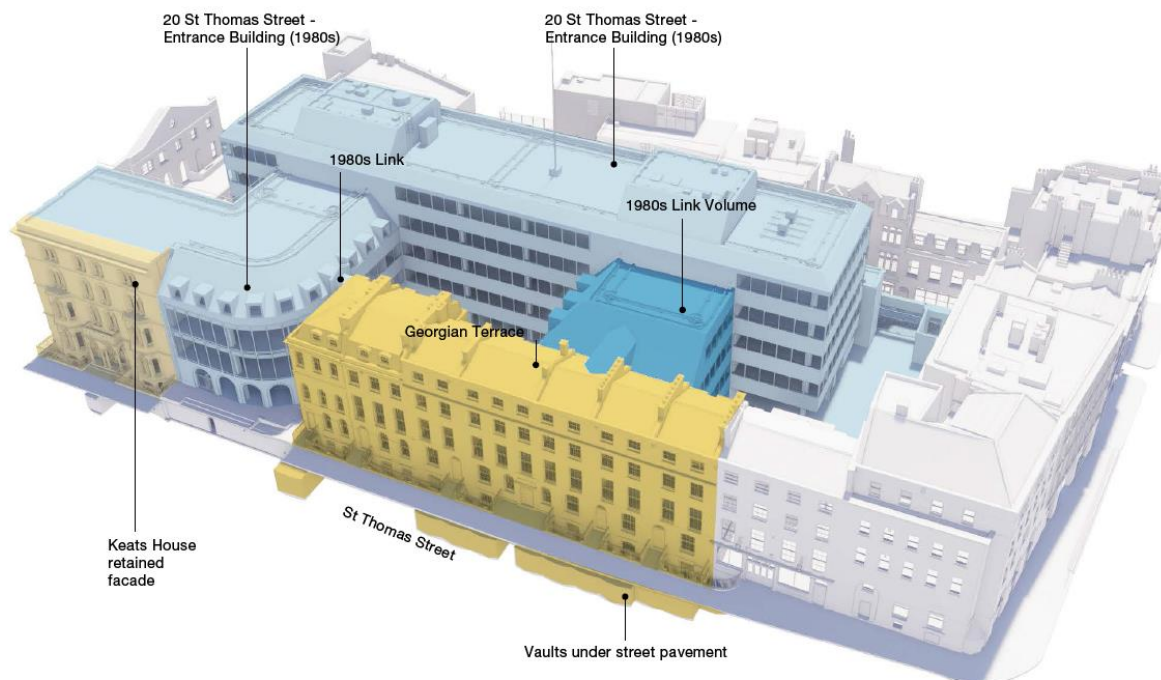
6 The 0.36 hectare site is located in the Central Activities Zone (CAZ) and falls within the Bankside, Borough and London Bridge Opportunity Area, as well as the London Bridge District Town Centre. The site is bounded by St Thomas Street and the Bunch of Grapes Public House to the north; Guy's Hospital 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. This includes:

- Numbers 4 to 8 and 12 to 16 St Thomas Street – an early 19<sup>th</sup> 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 19<sup>th</sup> Century building which effectively screens a 1980s office building to the rear which is linked to New City Court.

7 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 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.

Figure 1 – Existing buildings on site (viewed from St Thomas Street)



8 The site has a Public Transport Access Level (PTAL) rating of 6b (on a scale of 0 to 6b, where 6b represents the highest level of access to public transport). It is in close proximity to London Bridge Station which provides tube and rail services, as well as a bus interchange. A London Underground station entrance is located immediately adjacent to the site on Borough High Street. Access to both rail and tube services is also provided to the north via Joiner Street. A range of bus routes are available on Borough High Street, Southwark High Street, Tooley Street and at London Bridge Station. 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). Southwark Council is the Highway Authority for Kings Head Yard and White Hart Yard.

#### Surrounding context

9 The immediate surrounding context of the site includes a number of designated heritage assets. To the east, the Guys Hospital Main Building, Chapel and Wings are Grade II\* Listed, with the courtyard also including the Grade II listed railings and Statue of Thomas Guy. Both the Kings Head Public House and the Bunch of Grapes Public House are Grade II listed. On the opposite side of St Thomas Street, the former Chapel (9A St Thomas Street) is Grade II\* listed, as is number 9 and Sheridan House (11 and 13 St Thomas Street). Number 15 St Thomas Street and the adjacent telephone kiosk are Grade II listed.

10 The wider heritage context includes the Grade I listed Southwark Cathedral to the west and the Grade I listed the George Inn to the south. Tower Bridge is Grade I listed to the north. Borough High Street includes a number of Grade II listed buildings (numbers 2, 4, 6, 8, 10, the Post Office building and numbers 28, 32, 34, 53, 53A, 54, 55) as well as the Grade II\* listed Southwark War Memorial and the Grade II\* listed Church of St George the Martyr. The Hop Exchange on Southwark Street is Grade II listed. London Bridge Station (platforms 9-16) and the railway viaduct arches along Crucifix Lane are Grade II listed. The Tower of London World Heritage Site (which includes various listed buildings – including the Grade I Tower itself) is to the north, on the other side of the River Thames, and falls within the Tower Conservation Area. The wider context includes the Bermondsey Street Conservation Area to the south east; the Thrale Street Conservation Area,

Liberty of the Mint Conservation Area and Union Street Conservation Area to the west; Tooley Street Conservation Area to the north-east; and Tower Bridge Conservation Area to the east.

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) and the Place office building (17 storeys). The Fielden House development (Shard Place) is currently under construction on Joiner Street to the north and nearing completion. This comprises a part 26 and part 16 storey residential and mixed use scheme. London Bridge Station has also recently been extensively redeveloped as part of the Thameslink programme.

## Emerging context

12 In terms of the emerging context, there are a number of development proposals on St Thomas Street to the east of the site which include live planning applications for tall buildings. This includes a 20-storey office-led mix use development at Vinegar Yard (LPA ref: 18/AP/4171; GLA ref: 4822) and a 39-storey building at Capital House comprising student accommodation and a museum (LPA ref: 18/AP/0900; GLA ref: 4483a). Becket House at 60-68 St Thomas Street is also the subject of a development proposal for a 25-storey office-led mixed use scheme which is at pre-application stage. The draft Southwark New Plan (2018) identifies the above sites as allocations for mixed use development (NSP52 and NSP53) and the adjacent King's College London and Guy's Hospital is also identified as a 'Health Cluster' (NSP51) which seeks to retain and enhance the existing health, research and education activities. However, the application site itself is not allocated for any particular land use in Southwark Council's Core Strategy or as part of the draft New Southwark Plan (2018).

## Details of the proposal

13 The application seeks full planning permission and listed building consent for the redevelopment of the site to include demolition of existing 1980s office buildings and the construction of a 37-storey tower (including ground and mezzanine floors) with a maximum height of 144 metres (AOD), together with the restoration and refurbishment of existing Grade II listed Georgian terrace and the redevelopment and reconstruction of Keats House as a standalone building with the retention of the existing building facade. The layout of the development at ground floor level is shown below in Figure 2.

Figure 2 – Proposed ground floor layout and public space



## Case history

14 GLA pre-application meetings were held to discuss the development proposal at City Hall on 30 August 2017 and 8 February 2018. The advice issued by GLA officers on 23 April 2018 stated that the principle of the development was supported subject to further details relating to flexible and affordable office provision. The height and scale of the proposals was broadly supported, subject to a more detailed assessment of the heritage impacts and further consideration of the wider public benefits that the scheme would provide. The proposed improvements to the pedestrian network and public realm, including the provision of new public open space within the site was strongly supported. The proposal to provide an additional entrance to London Bridge Underground Station on Borough High Street was strongly supported, subject to detailed design and further engagement with London Underground. Concerns regarding the proposed servicing strategy and potential conflicts with pedestrian safety were raised.

## Strategic planning issues and relevant policies and guidance

15 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 2016 London Plan (Consolidated with Alterations since 2011).

16 The following are also relevant material considerations:

- The National Planning Policy Framework (2019);
- National Planning Practice Guidance;
- the Draft London Plan – Consolidated Suggested Changes Version (July 2019). The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor and this was published on the GLA website on 21 October 2019. In line with paragraph 48 of the NPPF, the weight attached to the draft London Plan should reflect the stage of its preparation; the extent to which there are unresolved objections to relevant policies; and the degree of consistency of the relevant policies in the emerging Plan to the NPPF;
- Southwark Council – New Southwark Plan (Proposed submission version - February 2018);
- Draft Bankside, Borough and London Bridge SPD (2011); and,
- Tower of London World Heritage Site Management Plan.

17 The relevant issues and corresponding strategic policies and guidance are as follows:

- |  |  |
|--|--|
| • Land use principle                       | <i>London Plan; Central Activities Zone SPG; Night Time Economy SPG;</i>                             |
| • Urban design                             | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG;</i>                               |
| • Historic environment and strategic views | <i>London Plan; London View Management Framework (LVMF) SPG</i>                                      |
| • Inclusive access                         | <i>London Plan; Accessible London: Achieving an Inclusive Environment SPG;</i>                       |
| • Climate change, flood risk and drainage  | <i>London Plan; Sustainable Design and Construction SPG; the London Environment Strategy (2018);</i> |
| • Transport                                | <i>London Plan; and, the Mayor's Transport Strategy (2018).</i>                                      |

## Principle of development

18 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. A comparison between the existing and proposed floorspace by land use is set out below:

Table 2 – existing and proposed land uses

Use	Existing	Proposed	Net change
Office (Class B1a)	12,763	46,374	+ 33,611
Retail (Class A1)	0	765	+ 765
Restaurant/cafe (Class A3)	0	1,139	+ 1,139
Gym (Class D2)	0	615	+ 615
Public Garden (Class D2)	0	825	+ 825
Hub Space (Class B1/D2)	0	719	+ 719
<b>Total</b>	<b>12,763</b>	<b>50,437</b>	<b>+ 37,674</b>

### CAZ strategic office functions

19 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 2.10 and 2.11 and Policies SD4 and SD5 of the draft London Plan. To support this objective, London Plan Policy 4.2 and Policy E1 of the draft London Plan provide 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. The draft London Plan anticipates demand for office floorspace is expected to be greatest within the CAZ and Isle of Dogs, comprising 59% of overall projected demand.

### Opportunity Area context

20 London Plan Policy 2.13 and draft London Plan Policy SD1 set 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 25,000 jobs and 1,9000 homes in the London Plan and 5,500 new jobs and a minimum of 4,000 new homes in the draft London Plan. The applicant has estimated that the proposed office and commercial floorspace would generate approximately 3,000 jobs across the entire site (2,000 net new jobs). As such, the scheme would make a significant contribution towards achieving the benchmark job targets for the opportunity area, which is strongly supported.

### Proposed office use

21 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. 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 2.10, 2.11 and 4.2 and Policies SD4, SD5 and E1 of the draft London Plan.



### SME and affordable workspace

22 Policy E2 of the draft London Plan provides that larger office proposals should consider the scope for provision of some flexible workspace suitable for micro, small and medium sized enterprises. In addition, Policy E3 of the draft London Plan encourages the use of planning obligations to secure affordable workspace in specific circumstances and locations. 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 and workspace units within the retained Georgian terrace and Keats House which would be suitable for micro, small and medium sized enterprises. In total, these two retained buildings would include a total of 1,468 sq.m. of flexible floorspace which would be suitable for SMEs. All of the office accommodation within the Georgian terrace would be affordable workspace and provided at rent levels below market rent (1,067 sqm.). This is strongly supported. Further clarification on management and rent levels should be provided by the applicant. Subject to these matters being appropriately addressed and the affordable workspace being secured by planning obligation, the application accords with Policies E2 and E3 of the draft London Plan.

### The 'hub' space

23 Level 22 and 23 of the building would comprise a 'hub space' in flexible Class B1 and D2 use and would include a 250 fixed seat auditorium which could be used for exhibitions, events and conferences, with views across London. This would contribute towards the wider economic and employment offer within the CAZ and is supported in accordance with London Plan Policy 2.10, draft London Plan Policy SD4 and the CAZ SPG.

### Retail, restaurant/cafe and leisure uses

24 In total, the application proposes 2,519 sq.m. of retail, restaurant/cafe and gym uses. This is supported in view the site's location within a District Town Centre, the aspiration for active frontages and the overall increase in employment uses proposed and accords with London Plan Policies 2.15 and 4.7 and Policies SD6 to SD8 of the draft London Plan. A range of small retail units would be provided within the Georgian terrace and Keats House and at the base of the tower, which would help to activate the proposed new public routes. Two of the retail units within the Georgian terrace are proposed as affordable retail units (181 sq.m.). This is supported and should be secured by obligation, in accordance with London Plan Policy 4.9 and Policy E9 of the draft London Plan Policy E9.

### Publicly accessible space within the building

25 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 7.7 and Policy D8 of the draft London Plan. Such spaces should normally be located at the top of the building to provide wider views across London. In this instance, the applicant is proposing an elevated public botanical garden (716 sq.m.) on Levels 5 and 6 of the building. This would be served by dedicated lift accessed from the ground floor of the tower facing onto the square and new station entrance. The elevated garden would be a glazed internal double height space approximately 7 metres in height served by a cafe/restaurant and outdoor terrace and would afford north, west and east facing views over the immediate surrounding area. Whilst the location of the public viewing garden departs from the general height principle set out above, GLA officers consider that an appropriate degree of flexibility should be apply in this instance, given the overall quality and well-considered nature of the proposals, as set out in more detail under urban design. As such, subject to free of charge public access being secured by Section 106 agreement, the policy requirements set out above are met.

## Public open space

26 The proposals include two new public squares and improved public access through the site, as described in more detail below under urban design. In total, over 1,300 sq.m. of additional outdoor public open space would be created at ground floor level. This is strongly supported.

## Principle of development – conclusion

27 In summary, the principle of the proposed office-led mixed use redevelopment within the CAZ and an Opportunity Area and Town Centre, comprising a significant quantitative increase and qualitative enhancement to the existing office and commercial floorspace, and including affordable workspace and retail uses, as well as an elevated public viewing area and garden, is strongly supported.

## **Urban design**

### Design, layout, public realm and landscaping

28 London Plan Policies 7.1 to 7.5 and Policies D1-D3, D7 of the draft London Plan apply to the design and layout of development and set out a range of urban design principles relating to the quality of public realm, the provision of convenient, welcoming and legible movement routes, the importance of designing out crime by, in particular, maximising the provision of active frontages and increasing local permeability. 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 application proposes a new internal public courtyard at the base of the tower. This would be approximately 25 metres by 30 metres in size and would be fronted by the Old Kings Head Public House to the south; a new entrance to London Bridge Underground Station to the west; a range of active small scale retail units to the north; and the entrance to the viewing garden to the east. In addition, a new small entrance plaza would be created off St Thomas Street which would lead directly through to a double height entrance and reception/lobby area serving the office building. These two new squares would be linked by a new ‘yard’ pedestrian route, with a secondary circulation route provided alongside the eastern flank of the building. The new station entrance would be created by opening up the existing rear wall of the existing ticket hall. This would provide direct access to the tube station from the office but would also create a new alternative pedestrian route to the square and through to St Thomas Street from Borough High Street. As such, the various measures described above would significantly enhance the overall permeability of the site and relieve pressure on the existing footway on the junction corner outside the existing Barclays Bank. This is strongly supported.

30 The overall design, layout and landscaping of the proposed public spaces within the site would be of a high quality and visualisations and landscape strategy submitted by the applicant alongside the application demonstrate that the scheme would provide a series of attractive, welcoming and legible public spaces which would respond positively to the intimate and enclosed character of the conservation area, whilst responding to the need to provide enhanced permeability. The provision of active frontages has been maximised, with small scale retail and cafe units provided where possible around the base of the tower. Whilst the rear of the Grade II listed Bunch of Grapes Public House would remain in situ as a blank brick wall, this would be appropriately mitigated by the provision of a green wall, seating and tree planting. Implications in terms of servicing and delivery are set out below.

### Public viewing garden

31 The placement of the viewing garden at a relatively low level in the building (at levels 5 and 6) ensures it would be visually prominent from the local public realm, and would also allow the facility to enhance the character, vibrancy and passive surveillance of the neighbouring public space during the day and night. Whilst the garden would be an internal, glazed and primarily north-facing public space, the applicant's landscape strategy demonstrates that a selection of non-native tropical plants would be able to thrive in this type of space - offering the potential to create a verdant botanical garden, with dense planting and foliage. The space would be approximately 7.5 to 8 metres in height and could accommodate relatively mature trees in planters. This approach is strongly supported.

### Height, massing and architectural quality

32 London Plan Policy 7.7 and Policy D8 of the draft London Plan state that tall buildings should be part of a plan-led and design-led approach, incorporating the highest standard of architecture and materials. Tall buildings should not have an unacceptably harmful impact on their surroundings in terms of their visual, functional, environmental and cumulative impacts. The proposed tall building would form part of an emerging cluster of tall buildings around London Bridge Station. This would include the Shard and Shard Place, with other tall buildings also proposed along St Thomas Street (East) as referred to within the site description above. In view of the excellent public transport access level and the existing and emerging context of tall buildings in the vicinity of the London Bridge transport hub, the principle of the development of a tall building within this part of the CAZ and Bankside, Borough and London Bridge Opportunity Area is acceptable in principle, subject to high quality design; an appropriate response to associated heritage, townscape and environmental considerations; and, highways and servicing implications being considered acceptable. These matters are considered in various sections below.

33 The architectural quality of the building would be of a high standard and the massing and design has evolved following a detailed pre-application process of engagement and design review involving Southwark Council, the GLA, Historic England and CABE. The massing, design and materiality of the tower has been generally well-considered in relation to its immediate and wider context. The north facing facade of the building is curved to reduce the massing of the building at lower levels and to some extent its impact on the immediate public realm and surrounding heritage and townscape. The narrower east and west facing elevations of the building would feature an attractive exposed steel frame which would help to express the verticality and more slender massing of the building in these side on views, with the diagonal and horizontal steelwork structure drawing positively on the industrial character of the bridges and warehouse buildings in this location. The design of the south facing elevation of the building includes a recessed and staggered profile to ensure this longer facade is appropriately detailed and expressed, given its visual prominence. Overall, GLA officers are of the view that the design and architectural quality of the building is of high quality.

### Microclimate impacts

34 The impact of the building on wind and pedestrian comfort levels within the proposed new public spaces has been assessed and modelling findings have fed into the design of the building - including the curved profile of its northern elevation. This seeks to reduce the massing of the building at ground floor level and the potential for downward or accelerated wind, with further mitigation proposed through tree planting and building materials. For the avoidance of doubt, noting that the curved facade faces north, GLA officers do not anticipate any associated solar glare issues on St Thomas Street. Further to this, detailed modelling has been undertaken to assess the potential for solar glare impact on the surrounding area more generally. The findings of this modelling should be assessed by Southwark Council, and should planning

permission be granted, conditions should be included in any decision notice to ensure that wind and solar glare issues are appropriately mitigated.

#### Fire safety

35 In line with Policy D11 of the draft London Plan and prior to commencement of the development, a fire statement should be prepared by a third party suitably qualified assessor demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.

#### Inclusive design

36 London Plan Policy 7.2 and draft London Plan Policy D3 require that all new development achieves the highest standards of accessibility and inclusive design. Level access would be provided to all of the proposed office and retail floorspace with lift access provided within all of the buildings, including the older buildings being restored. There would be level changes across the site on its completion and these would be suitably addressed by providing gentle slopes at acceptable gradients to ensure wheelchair access and to enable those with mobility issues to move through the site in a safe and convenient manner. As such, the application complies with the London Plan, draft London Plan in respect of inclusive design.

### **Strategic Views**

#### Protected Vistas

37 The applicant's Townscape and Visual Impact Assessment (TVIA) demonstrates that the proposed building would be visible in two Protected Vistas orientated towards St Paul's Cathedral from Parliament Hill (LVMF 2A.1) and Kenwood (LVMF 3A.1). In line with London Plan Policies 7.11 and 7.12 and Policies HC3 and H4 of the draft London Plan, new development should make a positive contribution to and not harm the characteristics and composition of strategic views and should preserve or enhance viewer's ability to recognise and appreciate this Strategically Important Landmark – which in this case is St Paul's Cathedral.

#### LVMF view 2A.1 - Parliament Hill

38 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. Guys Hospital tower lies immediately to the right of the western towers and is taller than the height of the Cathedral dome and spire. The TVIA demonstrates that the proposed building would be not be viewed behind either the dome or the towers in this particular view and would be situated to the right of Guys Hospital tower and at a similar height, 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.

#### LVMF view 3A.1 - Kenwood

39 At present, the view of St Paul's from this location is affected by buildings in the background, most notably Guys Hospital tower which lies directly behind the right side of the dome, but also Shard Place to the left of the dome - which both affect the ability to perceive the silhouette of the dome. The western towers are discernable 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. The TVIA shows that the

proposed tall building would sit immediately behind one of the western towers, thereby further reducing the ability to appreciate this element. It would also lie immediately adjacent to Guys Hospital tower and to the right of the dome, it would also effectively increase the width and scale of continuous building facade in the background of the dome. 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 cumulatively harm the composition of the view (albeit, the degree of additional material harm would be to some extent limited by the layering of existing buildings in this view). Considering this view in isolation, GLA officers conclude that the proposal would marginally diminish the viewer's ability to recognise and appreciate St Paul's Cathedral in this view. Further to this, GLA officers also conclude that the proposal would result in some less than substantial harm to the setting of St Paul's Cathedral (Grade I) from this strategic viewpoint. However, having regard to the public benefits of this proposed development (as set out within paragraphs 57 and 60 of this report) and the associated consideration within the heritage section below, GLA officers are satisfied that both the impact on LVMF view 3A.1; and, the associated less than substantial harm to the setting of St Paul's (Grade I), would be appropriately outweighed.

#### London Panoramas

40 The tall building would be visible within the following London Panoramas:

- LVMF 1A.2 – Alexandra Palace
- LVMF 4A.1 – Primrose Hill
- LVMF 5A.2 – Greenwich Park
- LVMF 6A.1 – Blackheath Point

41 Having reviewed the impact of the scheme as set out in the applicant's TVIA, 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 landmark (St Paul's), in accordance with London Plan Policy 7.12 and Policy HC4 of the draft London Plan

#### River prospects

42 The application would impact the following LVMF River Prospects:

- LVMF 12B.1 – Southwark Bridge: downstream
- LVMF 10A.1 – Tower Bridge: upstream
- LVMF 17B1 – Golden Jubilee/Hungerford Footbridges: downstream

43 The TVIA shows that the building would be highly prominent in LVMF 12B.1 with the building sited to the right of the Shard. GLA officers consider that its addition would enhance the overall juxtaposition of buildings and landmarks in this view, in accordance with London Plan Policy 7.12 and Policy HC4 of the draft London Plan. In LVMF 17B1, the building would obscure the base of the Shard which is a visually prominent landmark in this river prospect; however, both buildings would be obscured from view by permitted schemes on the South Bank. As such, the impact of the scheme in this respect is acceptable. In LVMF 10A.1, the proposed building would be viewed as part of the existing cluster of tall and large modern office buildings near the Shard and would enhance the form and character of this river prospect.

## Heritage

44 London Plan Policy 7.8. and Policy HC1 of the draft London Plan 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. 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. 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.

45 London Plan Policy 7.7 and Policy D8 of the draft London Plan state that tall buildings in sensitive locations such as this should avoid harm to the significance of London’s heritage assets and their settings and should be given particular consideration. Proposals resulting in harm will require clear and convincing justification, demonstrating that there are clear public benefits that outweigh that harm.

### Tower of London World Heritage Site

46 London Plan Policy 7.10 and Policy HC2 of the draft London Plan require that developments affecting the setting of World Heritage Sites should conserve, promote and enhance and not compromise or adversely effect their Outstanding Universal Value and the ability for this to be appreciated. The Outstanding Universal Value of a World Heritage Site includes the authenticity, integrity and significance of its attributes and its management and protection. Paragraph 184 of the NPPF recognizes that World Heritage Sites are internationally recognised to be of Outstanding Universal Value and, as such, are afforded the highest significance of all designated heritage assets. As well as being a World Heritage Site, the Tower of London includes a number of Grade I, II and II\* listed buildings and falls within the Tower Conservation Area.

47 The TVIA demonstrates that the proposed tall building would impact the Tower of London World Heritage Site. The proposed development would be visible from within the Inner Ward, with the upper section of the building protruding above the roofline of the Grade I listed 16<sup>th</sup> Century timber framed Queens House building. The building would appear to the left of the Grade I listed Beauchamp Tower at broadly the same height as the turret of the tower and would therefore alter its setting, albeit this would be reduced by foliage in the foreground of the view during summer months. Currently, the Shard has a relatively dominating visual impact on this view, with Shard Place and Guys Hospital tower also visible above the roofline. Notwithstanding this, the proposed tall building would cause additional cumulative harm to the setting of the Grade I Queen’s House and Beauchamp Tower and, by extension, would adversely effect the Outstanding Universal Value of the World Heritage Site and the Tower Conservation Area. GLA officers consider the level of harm to be less than substantial.

## Southwark Cathedral

48 Views 56.1 to 56.6 of the TVIA assess the impact of the scheme in a sequence of kinetic views of Grade I listed Southwark Cathedral as one moves around Montague Close. The significance of Southwark Cathedral is derived from its historic status as one of London's most recognisable medieval buildings dating back to the 14<sup>th</sup> Century. The visual prominence and setting of the Cathedral contributes to its significance, in particular, views of the Cathedral looking south from Montague Close as these enable viewers to appreciate the roof, bell tower and silhouette of the Cathedral. The TVIA demonstrates that the proposed tall building would be situated behind the silhouette of the Cathedral bell tower and roof line of the Cathedral in a number of these kinetic views from Montague Close. In terms of the existing context, some of the tall and large buildings at the Shard Quarter are visible within the backdrop of the Cathedral, when viewed from the west; however, from the south, the Cathedral roof and bell tower is currently appreciated against a backdrop of clear sky free from buildings. As such, GLA officers consider that the proposed building would significantly alter the existing setting of the Grade I listed building and that these impacts would comprise less than substantial harm to the setting of Southwark Cathedral.

## Other designated heritage assets

49 The Grade II listed Georgian Terrace (numbers 4-8 and 12-16 St Thomas Street) would be sensitively restored as part of the proposed scheme. These buildings have been altered significantly internally and externally as part of the office developments during the 1980s. A front would be provided on both sides of the terrace with the inclusion of small retail units fronting the square and the new yard route leading to the plaza entrance on St Thomas Street. The proposed materials and architectural detailing of the retail frontages would be of a high standard. A narrow passageway through the Georgian terrace would be re-introduced to provide additional permeability through to St Thomas Street. On balance, whilst the architecture and historic character and setting of the terrace would be significantly altered as a result of the proposal, GLA officers consider that the restoration of the the Grade II listed terrace would comprise a notable public heritage benefit associated with the scheme.

50 Views 50-54 of the TVIA illustrate the visual impact of the proposals on the front of the Grade II listed Georgian terrace and the Grade II listed Bunch of Grapes public house from different directions along St Thomas Street. This demonstrates that the proposed height and massing of the building and its close proximity to the terrace would have a significant visual impact on these Grade II listed buildings from this location. Overall, whilst noting the beneficial impacts set out above, GLA officers consider that the impact on the setting of the Grade II listed terrace and the Bunch of Grapes public house would constitute less than substantial harm.

51 The setting of the Grade II listed Old King's Head Public House would be altered. Currently, the pub is tightly enclosed within a narrow alleyway, which is characteristic of the historic street pattern which contributes to the significance of this part of the Borough High Street Conservation Area. However, the narrowness and generally unattractive nature of the route and the building's close proximity to the adjacent service yard and refuse area means that its existing setting negatively impacts the ability to fully appreciate the architectural and historic character and significance of the building. As such, GLA officers consider that the proposal to provide a new public square directly outside this Grade II listed building, comprising high quality materials, seating and tree planting, would be a significant change to its setting. High quality block paving, level changes and planting would delineate the historic route of the Kings Head Yard which is supported. On balance, GLA officers consider these changes to be positive and would not give rise to harm. Overall, despite the height of the proposed building, GLA officers consider the layout and public realm proposals around its base would contribute towards creating an intimate human scale character within the proposed new square and yards which would respond positively to the prevailing historic character of this part of the Borough High Street Conservation Area.

52 Having considered Views 47, 49, 50 and 51 of the applicant's TVIA, GLA officers are of the view that the height and visual impact of the proposed building and its close proximity would cause less than substantial harm to the adjacent Grade II\* Listed Guys Hospital Main Building, Chapel and Wings.

53 Views 39-44 and 53-54 of the TVIA illustrate the visual impact of the Grade II listed properties on Borough High Street and Southwark Street which are set out in paragraph 10. Within the majority of these existing views the Shard is visually prominent providing a glazed modern backdrop to the setting of the Borough High Street Conservation Area and Grade listed buildings. Whilst the Shard is noticeably taller than the proposed development, it is further away and its massing diminishes with its height. In contrast, the proposed building would be situated much closer to the High Street and therefore have a greater visual impact on the setting of the Borough High Street Conservation Area. GLA officers consider that the level of harm would be less than substantial.

54 The George Inn to the south is appreciated from within the adjacent yard, facing in the opposite direction. As such, the setting and significance of this is Grade I listed building would not be harmed by the proposed development. View 13 of the TVIA demonstrates that the proposals would moderately alter the setting of the Grade I listed Tower Bridge; however, given the distance and the existing built up context of the surrounding buildings in the background of the view, GLA officers consider the impact would be moderate and would not give rise to any harm.

#### Non-designated heritage assets on-site

55 Whilst Keats House is not listed, its original late 19th Century Italianate-style red brick and stone facade is considered to be a non-designated heritage asset, given its distinctive architectural and historic character and appearance. London Plan Policy 7.8 and Policy HC1 also apply to non-designated heritage assets. The NPPF requires the effect of an application on the significance of a non-designated heritage asset to be taken into account and a balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset in question. As part of the application, Keats House would be reconstructed as a stand-alone building. This entails dismantling of the original facade to enable the construction of the development and then restoration and rebuilding of the Keats House facade as part on a new building in a similar location to the existing one. These works would sustain and enhance the significance of this heritage asset, in line with the London Plan, draft London Plan and NPPF and would should be secured by planning obligation.

56 The site also contains a late 19th century arched decorative facade which is immediately adjacent to King's Head Yard and was retained as part of the construction of the 1980s glazed office extension which sits behind the facade. This is not listed and would be demolished as part of the proposed development. Whilst also a non-designated heritage asset, GLA officers consider the loss of this facade to be acceptable, taking into account the scale of the harm and its overall significance, balanced against the public benefits associated with its removal (refer below).

#### Heritage conclusion and planning balance

57 In summary, GLA officers consider that the proposed tall building would harm the setting and significance of the following heritage assets:

- the Tower of London World Heritage Site, including Grade I Queen's House and Beauchamp Tower
- Grade I listed Southwark Cathedral
- Grade II\* Listed Guys Hospital Main Building, Chapel and Wings



- Grade II listed Georgian terrace - numbers 4-8 and 12-16 St Thomas Street
- Grade II listed Bunch of Grapes public house
- Grade II and II\* listed buildings along Borough High Street
- Borough High Street Conservation Area
- St Paul's Cathedral (limited to its setting as a strategic landmark within LVMF view 3A.1 – from Kenwood)

58 GLA officers consider that the impact to the setting and significance of these designated heritage assets constitutes 'less than substantial harm' as defined by the NPPF. As such, in accordance with the NPPF, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. GLA officers consider that the application would provide the following heritage related public benefits:

- the removal of unattractive 1980s office buildings which detract from the character and appearance of the Borough High Street Conservation Area and the setting of the heritage assets on site;
- the internal and external restoration of the Grade II listed Georgian terrace (numbers 4-8 and 12-16 St Thomas Street);
- the restoration and reconstruction of Keats House as a stand-alone building (a non-designated heritage asset); and
- enhancement to the setting of the Grade II listed Old King's Head Public House through the provision of a high quality public space to the north.

59 GLA officers consider the non-heritage related public benefits to be substantial and would include:

- 1,300 sq.m. of net additional public open space comprising a new courtyard square, new plaza square on St Thomas Street and new yard routes around the base of the tower to the north and east;
- the creation of a new entrance to London Bridge Underground Station on Borough High Street;
- enhanced pedestrian permeability through the site and between Borough High Street and St Thomas Street;
- an elevated publicly accessible botanical viewing garden over levels 5 and 6 of the building; and
- the delivery of over 50,000 sq.m. of commercial floorspace as part of a high quality office-led mixed use scheme within the CAZ adjacent to London Bridge Station, which would strengthen the existing office cluster in this location and would contain 1,067 sq.m. of affordable workspace suitable for SMEs, 181 sq.m. of affordable retail floorspace and a new 250 seat 'hub' venue suitable for conferences and exhibitions. In total, the scheme would deliver approximately 3,000 jobs across the site (2,000 net new jobs).

60 On balance, taking into account the harm set out above and the public benefits associated with the application, GLA officers consider that the level of harm would be outweighed by the public benefits proposed. As such, the application is acceptable in this regard and complies with London Plan Policy 7.7 and Policy D8 of the draft London Plan.

## **Climate change**

61 Based on the energy assessment submitted, an on-site reduction in CO<sub>2</sub> emissions of 41% beyond 2013 Building Regulations compliant development is expected, of which energy efficiency measures would account for a 38% reduction in CO<sub>2</sub> emissions on the new build element of the scheme and 29% on the refurbished buildings. This complies with the CO<sub>2</sub> reduction targets set for non-residential uses in the London Plan and draft London Plan and would be achieved through a range of passive design features, air source heat pumps and photovoltaic panels. Further information has been provided by the applicant to verify the carbon savings and confirm the performance of the heat pumps and the potential to connect to the local district heat network. As such the application complies with London Plan and draft London Plan.

## **Flood risk and sustainable drainage**

62 The site is situated in Flood Risk Zone 3 in an area protected by Thames Tidal defenses, as such the risk of tidal and fluvial flooding is considered to be low. The risk of surface water flooding is identified as low to medium. The drainage strategy for the site comprises a blue roof with capacity to hold up to 50 cubic metres of water, as well as surface water attenuation storage below permeable paving in the public realm with capacity to hold up to 150 cubic metres of water. Rainwater and greywater recycling would be employed to irrigate the planting within the public viewing garden, which is welcomed. Overall, the use of Sustainable urban Drainage (SuDs) measures within the site has been maximised in line with the drainage hierarchy. As such, the application accords with London Plan Policies 5.12 to 5.13 and Policies SI.12 to SI.13 of the draft London Plan.

## **Urban greening**

63 A comprehensive approach is proposed in terms of urban greening, with 15 new street trees proposed within the new areas of public realm as well as additional urban greening provided through green walls and within the internal botanical public viewing garden. This would provide substantial net improvement on the existing situation, which is comprised entirely of buildings and hard landscaping. Overall, GLA officers are satisfied that the potential for urban greening has been maximised taking into account the layout and use of buildings and public open spaces. As such the application accords with London Plan Policy 5.10 and 7.21 and Policies G5 and G7 of the draft London Plan.

## **Transport**

### Car parking

64 The development would be car-free with the exception of two disabled persons parking bays at basement level for the use of Blue Badge holders. This complies with the draft London Plan, which is welcomed. The basement car parking would be accessed via White Hart Yard with a vehicle lift provided at the base of the tower. Management of the disabled car parking and the car-free nature of the development should be secured by condition.

### Cycle parking

65 Draft London Plan compliant long stay cycle parking and associated shower and locker facilities will be provided at ground level and Basement Level 1 of the proposed tower. This would comprise a mix of double stacked cycle racks, Sheffield stands and folding bike lockers in secure and accessible zones which is supported. Access to the basement for cyclists with bikes will be provided from King's Head Yard via a combined cycle stair ramp with a conveyor belt

system to assist. This will be wide enough to allow two people to pass on the stairs. A dedicated shuttle lift will allow cyclists to return to reception once bikes have been stored. Both the cycle parking facilities and the proposed means of access described above should be secured by condition. Policy compliant levels of short stay parking will also be provided at ground level comprising Sheffield stands; however, the locations of the stands will need to be agreed at the detailed design stage, in order to minimise potential conflict with pedestrian movement.

### Walking, cycling and Healthy Streets

66 As set out under urban design, the proposed development will provide a new pedestrian route between St Thomas Street and King's Head Yard which does not currently exist. In addition, the scheme would provide a new entrance to London Bridge Underground station on Borough High Street by opening up the eastern flank wall of the existing ticket hall. This would provide a further alternative pedestrian route between Borough High Street and St Thomas Street, which would relieve pressure on the narrow footways of St Thomas Street and Borough High Street at their junction, which are congested during peak hours. Within the site, the applicant is proposing a total of 1,300 sq.m. of net additional public open space which would include a two small urban squares and yard routes which would be pedestrianised spaces.

67 These measures would not only help mitigate the development in terms of increased pedestrian and cycle movements but would also represent an overall benefit in terms of Healthy Streets, helping to overcome some of the deficiencies of the proposals, as discussed below. To promote the proposed new route through to St Thomas Street, a contribution to Legible London should be sought, to allow a new sign/s to be provided within the site, and a local sign map refresh. The development would also provide the opportunity to deliver part of the proposed improvements to St Thomas Street, which could include footway widening, tree planting and segregated cycle track. TfL is currently developing this scheme, so a financial contribution to this would be expected in the s106 agreement, either via a financial contribution or via works in kind through a s278 agreement with TfL.

### Public transport impacts

68 The development would provide for approximately 3,000 employees (2,000 net new jobs) which will 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 can be crowded in peak times, but the number of trains and range of destinations mean that the additional development trips should be able to be absorbed, this should be confirmed by Network Rail.

69 London Underground tube services are also very busy at peak times, particularly the Jubilee Line eastbound and Northern Line northbound. London Bridge Underground station currently has two entrances, the main one within the National Rail station and on Tooley Street, and a second one on Borough High Street. The applicant's proposal to open up a new direct entrance from the site to London Bridge Underground station entrance on Borough High Street would help to spread the load of the new development trips between the two ticket halls, reducing impacts on the more crowded main ticket hall. This is supported, subject to full developer funding, engineering feasibility and appropriate commercial terms being agreed. There is unlikely to be an unacceptable impact on bus service capacity.

### Cycle hire

70 This and other proposed developments in the vicinity of London Bridge will increase demand for cycle hire in an area that already exhibits high demand due to the National Rail station and Borough Market. As such, an appropriate financial contribution should be secured

within any Section 106 agreement to provide additional docking points locally, proportionate to the relative size of the development.

### Servicing and deliveries

71 A key issue for this site is the limited opportunities for servicing. The existing site (which contains much smaller office buildings compared to that now proposed) is serviced via White Hart Yard and King's Head 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 facade on Borough High Street. The junctions on Borough High Street also experience high volumes of pedestrian movement, which presents potential safety concerns. Given these site access constraints, this issue has been subject to detailed discussion between the applicant, the Council and TfL and GLA officers.

72 The applicant's proposed servicing strategy for the building is based on a combination of off-street and on-street servicing via St Thomas Street and White Hart Yard. The applicant intends to use White Hart Yard as an access route for light goods vehicle deliveries only. In addition to this, the applicant is proposing to make use of a loading bay on St Thomas Street and would provide access for larger goods vehicles. This would require the relocation of the existing loading bay and a taxi rank. On-street deliveries would be taken to a goods lift adjacent to Keats House, which would take deliveries down to basement level 2. In relation to St Thomas Street, the key concerns relate to the need to trolley goods across a busy footway, and any potential increase in larger goods vehicle movements.

73 London Plan Policy 6.14 and Policy T7 of the draft London Plan require innovative solutions in terms of servicing and deliveries to minimise congestion and reduce road danger, noise and emissions from freight vehicles. The draft London Plan states that new development should ensure safe and efficient deliveries and servicing by ensuring provision of adequate space for these activities, with deliveries made off-street, where possible, with on-street loading bays only used where this is not possible. The draft London Plan also encourages deliveries to be undertaken outside peak hours and in the evening or night time where appropriate and the use of consolidation techniques.

74 Under normal circumstances, an office development of this size would be expected to be serviced entirely off-street. However, in this instance, GLA and TfL officers accept that there are exceptional circumstances and site constraints which mean that it is not desirable to provide an entirely off street deliveries and servicing strategy for the site in this instance. These constraints relate to heritage assets to be retained and the potential impacts on pedestrian and cyclist permeability through the site and the presence of London Underground infrastructure.

75 As requested, the applicant has undertaken studies to demonstrate how the site could theoretically be serviced entirely on-site. This strategy would require Keats House to be moved to the left within the proposed plans to accommodate a ramped access route for heavy goods vehicles from St Thomas Street. This move would have a number of negative consequences for the proposed scheme in terms of heritage; public space provision; pedestrian movement and permeability through the site; and, urban greening. The size of the entrance plaza facing St Thomas Street would be significantly reduced and the secondary yard route to the east of the building effectively removed. The proportion of inactive frontages would be increased and the overall quantum of public realm reduced by 24%. Vehicles would also need to cut across the footway on St Thomas Street which would raise concerns in terms of safety and pedestrian movement. A number of the public benefits of the scheme relating to the restoration of Keats House and provision of high quality public space would also be undermined. As such, on balance, GLA officers do not consider this approach to be an appropriate servicing strategy for the scheme.

76 Following further discussion and negotiations, the applicant has undertaken a number of delivery consolidation studies and committed to significantly reducing the overall number of deliveries and their expected delivery times through proposed delivery consolidation techniques. The revised consolidation and delivery strategy now assumes a 70% reduction in service vehicles per day using both St Thomas Street and White Hart Yard, compared to the original strategy set out in the application submitted in December 2018 and estimates that the total expected number of deliveries per day could be reduced by 88 HGV and LGV movements to the site. In addition, the applicant has stated that there would be no deliveries during peak pedestrian periods during the morning, lunchtime and evening peak hours. This approach is welcomed.

77 Overall, the proposed consolidation strategy would significantly limit the number of service vehicle movements to the site and will need to be binding in any planning permission. Given the significance of the potential impacts on both Borough High Street and St Thomas Street and the need for mitigation through the design, management and control of servicing arrangements, the servicing strategy should be secured by Section 106 agreement. This should include timing restrictions during the weekday AM and PM peaks, at lunchtimes and on Saturday daytimes should be secured. Vehicle size restrictions should also be required, for example, restrictions on articulated HGV vehicles during day times and provision for these deliveries only overnight. A proportion of deliveries by cargo bike should also be required, for example office food deliveries. Personal deliveries at work should be banned. These restrictions should be set out clearly in a delivery and servicing plan (DSP), in line with TfL guidance, which should be submitted for approval.

78 The proposed location and design for the loading bay on St Thomas Street would need to be compatible with TfL's proposals to improve St Thomas Street, which could include a segregated cycle track. This scheme will prioritise active travel and could include a one way eastbound-only carriageway and a segregated cycle track adjacent to the southern footway. As such, further discussion is required to confirm the location and design of the proposed loading bay on St Thomas Street, in the context of TfL's proposals for this street and taking into account the Mayor's healthy streets and vision zero objectives set out in the draft London Plan. Accordingly, further details should be submitted and approved by condition prior to commencement of the development. A road safety audit should be submitted and approved to support the proposed servicing arrangements via White Hart Yard.

#### Construction logistics

79 The construction of the scheme is likely to be challenging, given the site access constraints and busy surrounding roads and the high numbers of vulnerable users. As a minimum, all haulage contractors should be FORS (or equivalent) registered and use the highest rated Direct Vision Standard lorries as possible. It will be essential that a detailed construction logistics plan (CLP) is developed from the outline CLP in the planning application, in line with TfL guidance. This should be approved via pre-commencement condition.

#### London Underground infrastructure asset protection

80 The site also lies partly over and directly adjacent to London Underground infrastructure, so any planning permission should include a standard condition to require the submission of a detailed scheme covering the engineering and construction of the development and the protection of infrastructure assets. This should also be approved via pre-commencement condition.

### New station entrance

81 A separate development agreement will be required with London Underground to deliver the new station entrance. This will need to include asset protection measures and these works should be secured in any Section 106 agreement.

### Travel Plan

82 A full travel plan, developed from the outline travel plan in the planning application and in line with TfL guidance, should be secured by condition or obligation. The travel plan in particular should contain practical, funded measures to encourage healthy travel by foot and bike, such as pool bikes and business accounts for Santander cycle hire, and should encourage flexible working to spread peak period arrivals and departures as much as possible.

## **Local planning authority's position**

83 Southwark Council is currently assessing the application. A committee date is to be confirmed.

## **Legal considerations**

84 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 present stage for the Mayor to indicate his intentions regarding a possible

## **Financial considerations**

85 There are no financial considerations at this stage.

## **Conclusion**

86 London Plan and draft London Plan policies on offices, the CAZ, Opportunity Areas, town centres, urban design, tall buildings, inclusive design, strategic views, heritage assets, world heritage sites, climate change, sustainable urban drainage, urban greening and transport are relevant to this application. Whilst the proposal is strongly supported in principle, the application does not yet fully comply with the London Plan and draft London Plan as set out below:

- **Principle of development:** The principle of the proposed office-led mixed use redevelopment within the CAZ and an Opportunity Area and Town Centre is strongly supported in principle. The proposal would provide a significant quantitative increase and qualitative enhancement to the existing office and commercial floorspace, including affordable workspace and affordable small retail units and a hub auditorium/conference facility. Further clarification is required in relation to the affordable workspace in terms of rent levels and management. The affordable workspace should be secured by planning obligation. The additional public space and publicly accessible viewing garden is supported.

- **Urban design:** The development layout is strongly supported and the height and massing is acceptable in strategic planning terms, noting associated strategic views and heritage considerations. Overall, the scheme is of a high design and architectural quality.
- **Heritage:** Whilst the application would result in a degree of harm to the setting of the Tower of London World Heritage Site (and various designated heritage assets within it); Southwark Cathedral (Grade I); Borough High Street Conservation Area; and, other designated heritage assets (including the setting of St Paul's Cathedral (Grade I) within LVMF view 3A.1 from Kenwood House), GLA officers consider that this harm would be less than substantial, and would be outweighed by the wider public benefits associated with the scheme.
- **Climate change:** The application complies with the climate change policies in the London Plan and draft London Plan.
- **Transport:** The proposed cycle parking and car parking is acceptable and complies with the draft London Plan policy, subject to agreeing the locations of the short stay cycle parking. The new station entrance and improved pedestrian access between Borough High Street and St Thomas Street is strongly supported and should be secured by Section 106 agreement. Financial contributions are required towards TfL's improvement scheme for St Thomas Street, cycle hire docking stations and legible London signage. The servicing strategy is acceptable in principle; however, significant site constraints require the detailed design of servicing arrangements to be approved and secured including restrictions on the servicing vehicle numbers, hours of deliveries and vehicle size restrictions. The proposed consolidation strategy must also be secured. A road safety audit is required to support the servicing arrangements via White Hart Yard. Conditions are required in relation to London Underground infrastructure asset protection and construction logistics as well as a travel plan.

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