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James Shipton
Great Portland Estates (St Thomas Street)
33 Cavendish Square
London
WA1G 0PW

13 November 2018

Our reference: DCC/0917

London Borough of Southwark: New City Court

Dear James Shipton,

Thank you for presenting to Design Council's Design Review Panel on 29 October 2018. We welcome the opportunity for a follow-up pre-planning review of this scheme following the previous review on 16 May 2018 (letter dated 1 June 2018).

Summary

The panel discussion focused on strategic aspects of the design proposal, namely the role and impact of a tall building in this location, which the London Borough of Southwark has statutory authority over. The review focused less on detailed design aspects, such as typical floor and basement layouts.

We appreciate that a tall building on this site will have very significant impacts. We note that there was some concern regarding the building height which therefore led to recommendations to lower the building. However, in principle we are also not opposed to height in this location. In order to justify a building of this height in this low-rise conservation area, a much more ambitious and highly innovative design is required for this significant scheme. We think more work, studies and evidence is needed prior to the planning submission to underpin the rationale for this tall building proposal on this site.

At this stage, we strongly recommend that the current design will need to perform better in three key areas, supported by exemplary building design and construction:

- Environmental sustainability
- The identity, character and heritage of Southwark
- The health and wellbeing of people on and around the site

The panel are not yet convinced that the current proposal is justified in these three respects. We think that if these criteria can be successfully met and evidenced, the proposed building height may be justified.

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A proposal of this scale proceeds best with a positive and collaborative relationship with the local planning authority. We are concerned that the project team are pursuing an imminent planning application for a significant tall building scheme while there is significant misalignment of views with the project team and London Borough of Southwark and Historic England on key issues.

Environmental sustainability

While the architecture of the building promises to be of quality, we are concerned that the environmental engineering and solutions are not of a standard warranted by a proposal of this scale and sensitivity.

Approach to standards

We recommend that wherever possible, this building uses technologies and methods that anticipate future environmental standards. These include a whole life-cycle and circular economy approach.

We consider the projected energy use of tall building to not align with the ambition present elsewhere in this proposal. Such a building should aspire to enshrine the energy use standards of the future to adequately address its environmental impact. By 2030 this building should aim to be zero carbon, and using only non-fossil fuel energy. We would like to see a greater deployment of proven technologies, such as battery storage.

Construction and material choice

Such a large development on a constrained site would cause significant disruption to neighbours during construction. We recommend that the approach to construction is developed prior to the planning submission and that there is a commitment to reducing disruption in the planning application. Pre-fabricated materials, for example, could help to reduce this impact as well as reducing the carbon footprint of the building.

We believe that the embodied carbon footprint of this development should be addressed in greater detail as the design team have more control over such decisions at this stage of the design and planning process.

Impact on identity, character and heritage of Southwark

As a counter to the dramatic alteration of scale that this building will cause we believe that the proposal must actively enhance and contribute to the urban realm in this part of Southwark. The creation of a new eastern entrance and exit for the Underground Station is a welcome example of this.

Landscape design and character of public realm

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We support the evolution of the landscape design across the scheme. The public courtyard at ground floor level and upper floor garden space that can be enjoyed by employees and visitors has progressed well since the previous review. We support the key moves such as the re-positioning of the lift and refinement of the internal ground floor space which reflect the design team's emerging thinking on how to build on the industrial past of the area.

While there are positive steps in making the ground floor generally accessible, more will need to be done to make the scheme feel truly inclusive and useable to local residents. It is important that the courtyard feels and functions all year round as a public amenity to help ensure the economic and social vitality in this part of Southwark. We suggest that the design team continue to refine the character of the building and courtyard so that it truly reflects and enhances the identity and heritage of this part of Southwark.

We are concerned that the courtyard can feel cramped given the projected 3000+ employees in the scheme, in addition to a large number of commuters accessing the Northern and Jubilee Lines, especially at rush hour. In terms of movement and accessibility, there also appears to be a pinch-point to the north west of the scheme between the courtyard and new yard. The visualisations presented at review may not be a fair representation of how the space will look and feel, but it is important that this proposal delivers exemplary, high-quality and useable public spaces for the reasons mentioned above.

Tall buildings and key local and distant views

We reiterate our advice from May 2018 that the Local Planning Authority should operate a fully up to date policy on scale of development. As in May 2018, we do not believe a tall building on this site can be seen part of a 'London Bridge cluster' of tall buildings. We strongly recommend that if approved, this proposal should form the western stop of the line of tall buildings that is in progress along St Thomas Street, so as not to set a precedent for further tall buildings adjacent.

We are concerned at the extent to which key views, particularly from Kenwood House to St Pauls and from the courtyard of Southwark Cathedral, will be affected by this proposal. Reducing the height would clearly be one of the ways to address this specific impact.

Impact on health and wellbeing

Microclimate

Despite a reduction in wind impacts, we are concerned that there will still be a negative microclimate at the northwest corner of the building (at the pinch-point between the courtyard and new yard mentioned elsewhere in this letter). We recommend this is investigated fully as this is a crucial pedestrian route onto St Thomas Street and into the building itself. This space could also be affected by occasional north winds, exacerbated

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by the design of the northern façade. We recommend this façade is tested further and vegetation is not relied upon to prevent negative microclimates in this specific area.

Overheating and thermal comfort

We consider the façade treatment across the scheme to require further design work and environmental assessment. The fully glazed façade could lead to overheating within the building. It could also perpetuate the use of blinds to reduce the impact of glare and solar gain. We recommend the façade treatment is assessed for comfort, particularly in southern workspaces, and is refined further to ensure the building provides a comfortable working environment.

Overshadowing

An overshadowing study was not presented at the review but is integral to an assessment of the role and impacts of a tall building on the immediate and wider area. We are aware that this study is yet to be completed and recommend that, once completed, the study informs the strategic and detailed design aspects of the scheme.

We hope you have found the review process and the content of this letter useful. Should you have any other queries please do not hesitate to contact us.

Yours sincerely,



Theo Harrison
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Review process

Following a site visit, (and) discussions with the design team and local authority and a pre-application review, the scheme was reviewed on 29 October 2018 by Sunand Prasad (chair), Julie Fletcher, Matthew Lloyd, Charles Wagner, Kay Richardson, Jonathan Ward. These comments supersede any views we may have expressed previously.

Confidentiality

Since the scheme is not yet the subject of a planning application, the advice contained in this letter is offered in confidence, on condition that we are kept informed of the progress of the project, including when it becomes the subject of a planning application. We reserve the right to make our views known should the views contained in this letter be made public in whole or in part (either accurately or inaccurately). If you do not require our views to be kept confidential, please write to dc.cabe@designcouncil.org.uk.

cc (by email only)

Attendees



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Robert Romanis	AHMM
Simon Allford	AHMM
Sara Martins	AHMM
Hugh Morgan	DP9
Sarah Considine	DP9
James Shipton	GPE
Jennifer Mui	MRG
Jose Rosa	MRG
Michael Tsoukaris	London Borough of Southwark
Victoria Crosby	London Borough of Southwark
Sarah Freeman	Historic England

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