



Your ref: APP/A5840/W/22/3290473

Our ref: NCC3-18APP4039

Transport for London
City Planning

5 Endeavour Square
Westfield Avenue
Stratford
London E20 1JN

Phone 020 7222 5600
www.tfl.gov.uk

16 March 2022

Enc.

Dear Sir/Madam,

Appeals by GPE (St Thomas Street) Limited

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

1. Transport for London (TfL) is the integrated transport authority responsible for meeting Mayor of London's strategy and commitments on transport in London. We run the day-to-day operation of much of the Capital's public transport network including London Underground (LU) services and manage London's main road network (TLRN).

2. Our interest in the planning applications subject to these appeals is as follows:

- Interface with LU infrastructure, most notably the London Bridge LU station entrance that is included in the applications, and potential impact on sub-surface railway assets.
- Impact on the TLRN, including upon pedestrians, cyclists, and bus operations, adjacent to the site, namely St Thomas Street and Borough High Street, for which TfL is the highway authority.
- Impact on TfL-controlled strategic transport capacity – buses, LU services, Santander Cycles cycle hire.
- Impact on projects which TfL is delivering in the area, notably that for St Thomas Street

- Compliance with, and delivery of London Plan and Mayor's Transport Strategy policies related to transport.

3. TfL's landholdings and property interests and infrastructure are shown on the appended plan TfLD1. This plan also shows the boundaries of the TLRN. We understand from the applicants planning agent DP9 that TfL property does not lie within the red line, but directly adjacent to it.

4. You will have been provided with GLA and TfL comments on the following planning applications:

18/AP/4039 – the 2018 planning application (APPEAL/22/0003, APP/A5840/W/22/3290473)

21/AP/1361 –the 2021 planning application (APPEAL/22/0004, APP/A5840/W/22/3290483)

5. These comments were submitted to Southwark Council as the Local Planning Authority and formed the basis of transport advice to the GLA and Mayor, reflected in the respective Mayor's decision letters. These documents are appended to this letter (TfLD2, TfLD3, TfLD4).

6. I am writing to summarise and reinforce TfL's position on the applications listed above, supplementing, and updating previous comments sent to the council at the relevant public consultation stage.

7. If permission is granted for either application with an obligation to deliver the new entrance and other works to London Bridge LU station, then there will need to be a development agreement between the appellant and ourselves. The appellant has been in contact with LU in this respect, to draft the heads of terms of the development agreement. An infrastructure protection agreement will also be required to safeguard operational assets.

8. A s278 agreement with TfL as highway authority will also be required for works to St Thomas Street and/or Borough High Street consequent upon the development. Therefore, TfL would wish to be party to a section 106 agreement to secure the obligations related to TfL assets and services.

9. Note these comments are limited to highways and transport as they relate to London Plan and Mayor's Transport Strategy policy, and in respect of our assets and landholdings, and form TfL's opinion only. We do not seek to address the overall planning balance.

10. We request to reserve a right to make further written submissions in case either or both applications change as part of the appeal process and if a response is required to the written submissions of other parties.

Policy context

11. The Mayor's Transport Strategy (MTS) 2018 and the adopted London Plan (2021) set out an overarching strategic policy that developments must contribute towards the delivery of high quality sustainable and accessible travel options for all Londoners. This includes reducing car-dominance, improving accessibility, improving safety (Vision Zero) and delivering Healthy Streets.

12. London Plan policy T1 states that development should ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

13. Policy T2 states that development proposals should demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators and reduce the dominance of vehicles on London's streets whether stationary or moving.

14. Policy T4 states that mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified with development proposals, and that they should not increase road danger.

15. Policy T7 states that development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible.

16. Paragraph 110 of the National Planning Policy Framework (NPPF) sets out a requirement for developments to facilitate access to high quality public transport and to address the needs of people with disabilities and reduced mobility in relation to all modes of transport.

17. Paragraph 111 states that development should be refused on highways grounds where there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

18. Paragraph 112 states that development should give priority to pedestrian and cycle movements, both within the scheme and neighbouring areas and facilitate access to high quality public transport.

19. Paragraph 112 also states that development should create places that are safe, secure, and attractive which minimise the scope for conflicts between pedestrians, cyclists, and vehicles, avoid unnecessary street clutter, and allow for the efficient delivery of goods.

Direct access to London Bridge London Underground station

20. In both planning applications the applicant proposes to provide a new entrance into the existing entrance building to London Bridge LU station on Borough High Street. TfL owns the freehold of the station building and the tunnels and other infrastructure below, that at ticket hall level and the offices above as shown in TfLD1.

21. The proposal is to remove the south-east-facing façade at the ground floor level of the station building, so that the development can be accessed, step-free, directly from the escalators and lift linking to the Borough High Street ticket hall/gateline area (see photograph TfLP1 appended). Between the two buildings a public square, a new area of public realm, is proposed to be delivered as part of the development.

22. We are supportive of this subject to all costs being covered by the appellant and an agreement on commercial terms. As explained above, a development agreement with TfL will be required to deliver this entrance.

23. The new additional entrance will have the following public and development benefits:

- The new public realm/ground floor entrances in the development will be directly visible from the top of the escalators.
- The station entrance will be directly visible from the new public realm/ground floor entrances in the development.
- There will be a seamless, level transition from the top of the escalators to the public realm, and more direct, step-free access from the platforms to the entrance of the new development.
- The direct access will also reduce pedestrian movement on Borough High Street adjacent to the current station entrance (which will remain) and along St Thomas Street – these are areas of extremely high footfall where footways have been temporarily widened as part of the London Streetscape programme initiated during the pandemic to facilitate social distancing (see photograph TfLP2 for current narrow footway adjacent to the LU entrance).
- Improved accessibility of a lift (step free) entrance of the LU network from a number of locations around New City Court and to the east, with reduced journey times.
- The travelling public will have more pleasant journeys to and from London Bridge station to the east of Borough High Street.
- The journey time between the station and the development and St Thomas Street more generally is reduced

- Is required to meet an acceptable Pedestrian Comfort Level (PCL) on footways surrounding the site, as concluded in the respective transport assessments.

24. Given these benefits, we consider the new entrance to be in line with the three requirements for planning obligations, in particular necessary for the development to mitigate its impact on the surrounding footways (London Plan policy T2 and T4), so it should be required to be delivered prior to first occupation of the development, should you be minded to approve either of the applications. A development agreement will be required to be entered into with TfL, prior to commencement.

Impact on the TLRN - 2018 scheme

25. The 2018 application proposes servicing from two directions. Light goods vehicles (LGVs) would use a vehicle lift accessed from White Hart Yard and Borough High Street. Heavy goods vehicles (HGVs), unable to access White Hart Yard, would utilise a loading bay on St Thomas Street, with goods trolleyed across and along the footway.

26. As the highway authority for Borough High Street and St Thomas Street, and in terms of Healthy Streets and Vision Zero policies, we have serious concerns over both these arrangements.

27. White Hart Yard is very narrow, and the access off Borough High Street is through a gap in the façade of the terrace, see photographs TfLP3 and TfLP4. The buildings severely reduce the visibility splays for exiting vehicles, requiring drivers to 'nudge' their vehicles out onto the footway before they can see.

28. This stretch of Borough High Street is very busy with pedestrians and cyclists, hence the introduction of the London Streetspace scheme of widening the footway (see photographs TfLP5 and TfLP6) made under a Temporary (Covid) Traffic Regulation Order. TfL intends to reinforce this footway widening using an Experimental Traffic Regulation Order in the very near future, with barriers replaced by tarmac. The eventual goal is to secure via a Permanent Traffic Order.

29. It is acknowledged that some vehicles already use this access, but the development will introduce an additional 28 vehicle movements per day (with consolidation) which will increase the risk of collisions. The pedestrian amenity and safety of White Hart Yard itself will be reduced, and this is a pedestrian route to the Guys Hospital complex, via Beak Alley.

30. The proposed arrangement for HGVs using an on-street servicing bay on St Thomas Street is also considered contrary to Policy T2 (Healthy Streets) and London Plan policy T7 (Delivery and Servicing) for the following reasons:

- Trolleying goods along (the bay may not be directly outside the service entrance) and across the footway will reduce pedestrian amenity and space, and create obstacles for visually and mobility impaired pedestrians.
- The loading bay cannot be dedicated to one user, so may not be available at the time required. This scenario would result in unlawful waiting and potentially blocking on St Thomas Street and/or additional HGV movements in an area of London that has a very restricted road network for HGV 'U' turns and high cycle and pedestrian movement.
- The loading bay will be on the south side of St Thomas Street, which will reduce footway space and width; this is a location of temporary footway widening for social distancing as part of the London Streetspace plan, due to current narrow footway and high footfall. (see photograph TfLP7),
- The 2021 scheme shows that off-street servicing is possible for this site
- The taxi rank will need to be relocated, putting further pressure on the kerbside in St Thomas Street.

31. Furthermore, as with Borough High Street, we are soon to reinforce this temporary London Streetspace scheme along the southern footway of St Thomas Street via an Experimental Traffic Regulation Order, allowing removal of the barriers and replacement with tarmac. The addition of a loading bay where the 2018 application (and potential relocation of the taxi rank) envisages will reduce footway width in a crucial location and undermine this.

32. TfL also has a longer term proposal to deliver a 'Healthy Streets'-based scheme in St Thomas Street (subject to funding and consultation) that will introduce one-way working and a contraflow cycle track to allow two-way cycling; currently cyclists can only travel one-way (westbound). We should know more about the status of this project when there is a long term funding settlement from the government in place.

33. Delivery of this long-term scheme would improve cycle access to and from the development. The cycle track would be on the south side of St Thomas Street, i.e. adjacent to the development, and a loading bay to support the latter and associated relocation of the taxi rank could preclude this project due to lack of width.

34. Alternatively, if space was made available by reducing footway width - contrary to the aims of the Healthy Streets scheme and the existing Streetspace scheme - then goods would have to be trolleyed across the cycle track as well as footway, creating an additional safety and amenity hazard.

35. At the time of the 2018 application, the appellant undertook further studies, at the request of TfL and the council, to see if off-street servicing could be achieved, and how service vehicle numbers could be reduced through consolidation. At the time, following conclusion of the studies and negotiations with the GLA, and reflected in the Stage 1 report for that application, TfL reluctantly agreed that there was not a viable alternative to on-street servicing. However, the submission of the 2021 planning application with entirely off-street servicing demonstrates that there is a viable scheme for the redevelopment of this site, one that accords better with Healthy Streets, Vision Zero and London Plan (and local) servicing policy, and this is explored further below.

Impact on the TLRN - 2021 scheme

36. The concerns about on-street servicing were communicated to the appellant both before and after the 2018 application, and an alternative off-street arrangement urged, for example at a TfL pre-application meeting on 29 August 2018 (TfLD5). As mentioned above, the appellant undertook further work on an off-street servicing arrangement but concluded negatively.

37. We were therefore pleased and surprised that the 2021 application included an off-street service area accessed via a new crossover on St Thomas Street. Although any new crossover on the TLRN is not ideal, it can be designed as 'fit for purpose' via a s278 agreement with TfL (unlike the existing White Hart Yard access which cannot be improved other than by demolition of buildings owned and occupied by third parties) and would allow for the development being entirely serviced off-street.

38. It would still however be important to impose restrictions on allowable times of access and numbers of daily service vehicle movements to reflect the high level of pedestrian movement on this footway and in the vicinity more generally. This is common with other large developments in busy areas, for example the approved Elephant and Castle shopping centre redevelopment (planning application reference 16/AP/4458)

Conclusion on servicing

39. For the reasons outlined in the previous section, we respectfully request that you **refuse the 2018 application** as we consider it is contrary to London Plan policies T1, T2, T4 and T7 and the NPPF, and that the 2021 proposal better accords with these policies. We would **not object to the 2021 application appeal being allowed**, subject to mitigation outlined in table TfLM1 appended to this letter.

Other transport matters relating to both 2018 and 2021 schemes

Trip generation

40. The site is very well served in capacity and connectivity terms by public transport and as such is suitable for high trip generating uses. It is considered that the additional trips can, in capacity terms, subject to the above referenced LU station improvements and those to the TLRN, be accommodated on the public transport network and as such both applications comply with London Plan policy T4 and the NPPF in this respect. There will be additional demand for Santander Cycles cycle hire, which will require mitigation, and this is discussed further below.

Car parking

41. London Plan policy T6 requires that developments in locations such as this should be car-free with the exception of Blue Badge (BB) provision, so both applications accord with this. We consider any on-site BB car parking should be provided with electric vehicle charging and would encourage the provision of such facilities for any on street BB parking.

Cycle parking

42. The cycle parking for both applications accord with London Plan standards.

Pedestrian environment

43. Both proposals include the provision of a public square at the centre of the site, linked to the LU station as covered above. This would provide a new route through the site and is welcomed in terms of improving permeability and reducing footway crowding on the TLRN, as reflected in the pedestrian comfort assessment summarised in the respective transport assessments. If not to be adopted as public highway, 24/7 public access and suitable maintenance and management arrangements should be secured in any consent to ensure the full benefit of this space, in line with the Public London Charter.

Mitigation

44. In the event that you allow either or both of the appeal/s, we request the mitigation in the appended table TfLM1 is secured, in accordance with London Plan policies T4 (mitigating transport impacts) and T9 (Funding transport infrastructure through planning). Please note that we have not seen any detailed draft conditions or planning obligations, other than in the respective planning statements, and the 'draft Heads of Terms' (DP9 September 2021), the status of which is unclear. We reserve the right to comment further once these are produced, including, if possible, by way of attendance by a TfL officer at the conditions and obligations session of the inquiry.

45. Note TfL is **not** seeking any contributions towards mitigating the impact of the development upon bus service capacity and infrastructure or that of LU trains, passenger provision and other infrastructure except for the new station entrance.

Summary

46. As summarised in this representation, the proposed redevelopment of New City Court, when coupled with the requested mitigation above, would deliver substantial transport benefits as mitigation of the development. These include a new step-free entrance to the London Bridge LU station building on Borough High Street, Healthy Streets improvements to St Thomas Street and Borough High Street, additional Santander Cycles cycle hire capacity and a new public square and walking route, supporting strategic and national policy objectives to increase public transport accessibility and active travel.

47. The site is very well served by sustainable transport and is well suited to high density and taller development in this regard and the additional trips would not lead to an adverse impact on the strategic transport network, subject to the aforementioned mitigations.

48. However, due to inadequate servicing arrangements, we respectfully request that you refuse the 2018 application, due to conflicts with London Plan policies T1, T2, T4 and T7, Healthy Streets, Vision Zero and the NPPF.

49. Subject to the satisfactory completion of the s106 agreement and taking account of the site and development constraints, the 2021 application conforms with the relevant London Plan and MTS policies and aims.

50. I hope you find this further information useful and please do not hesitate to contact me if you need any further clarifications.

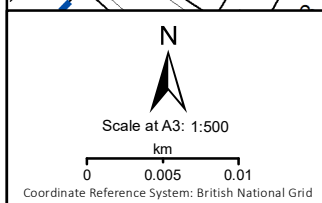
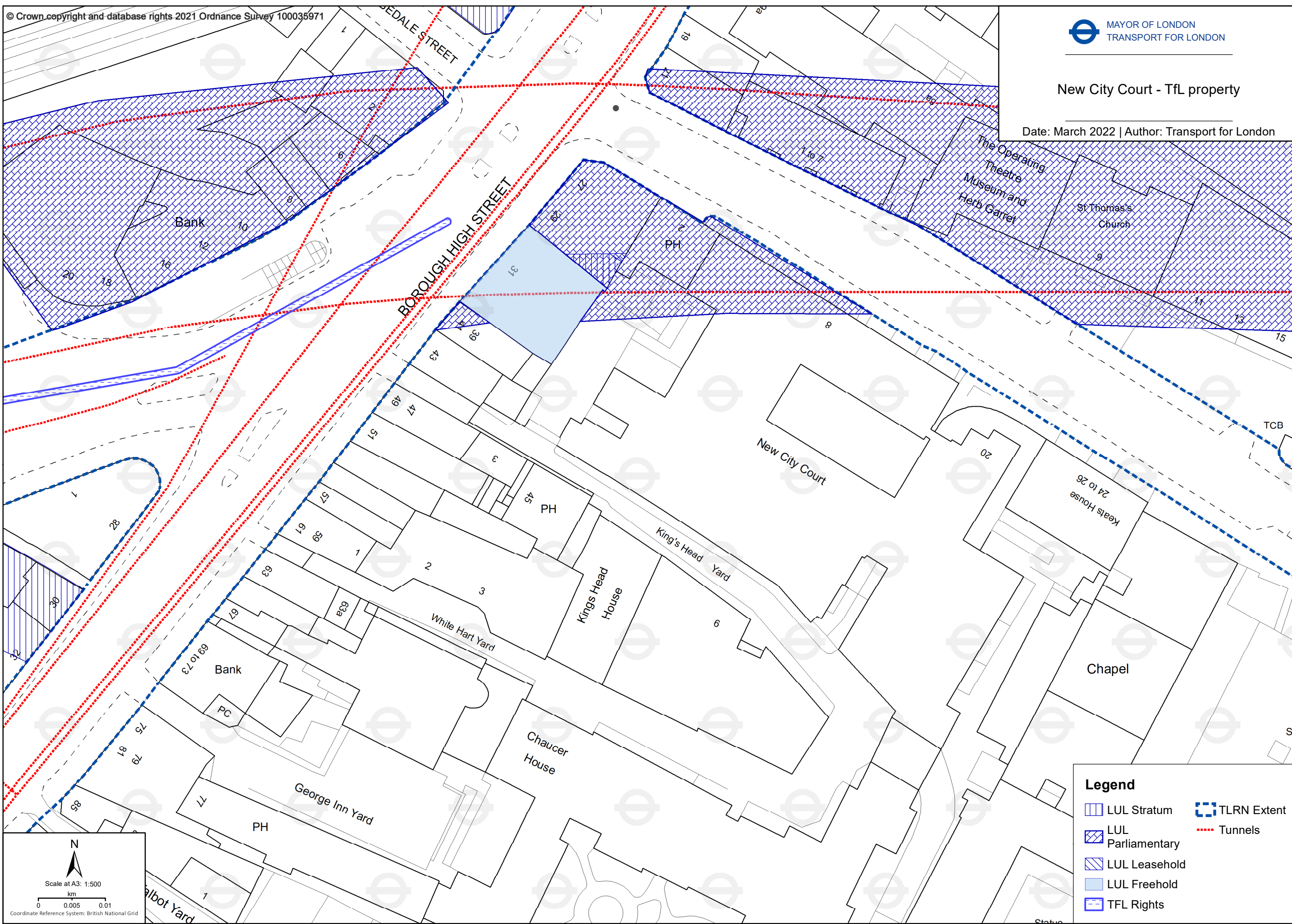
Yours sincerely



Danny Calver
Planning Manager
Email: danny.calver@tfl.gov.uk

New City Court - TfL property

Date: March 2022 | Author: Transport for London



Development, Enterprise and Environment

Victoria Crosby

Development Management (5th floor - hub 2)
PO Box 64529
LONDON SE1P 5LX

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, 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.

Site description

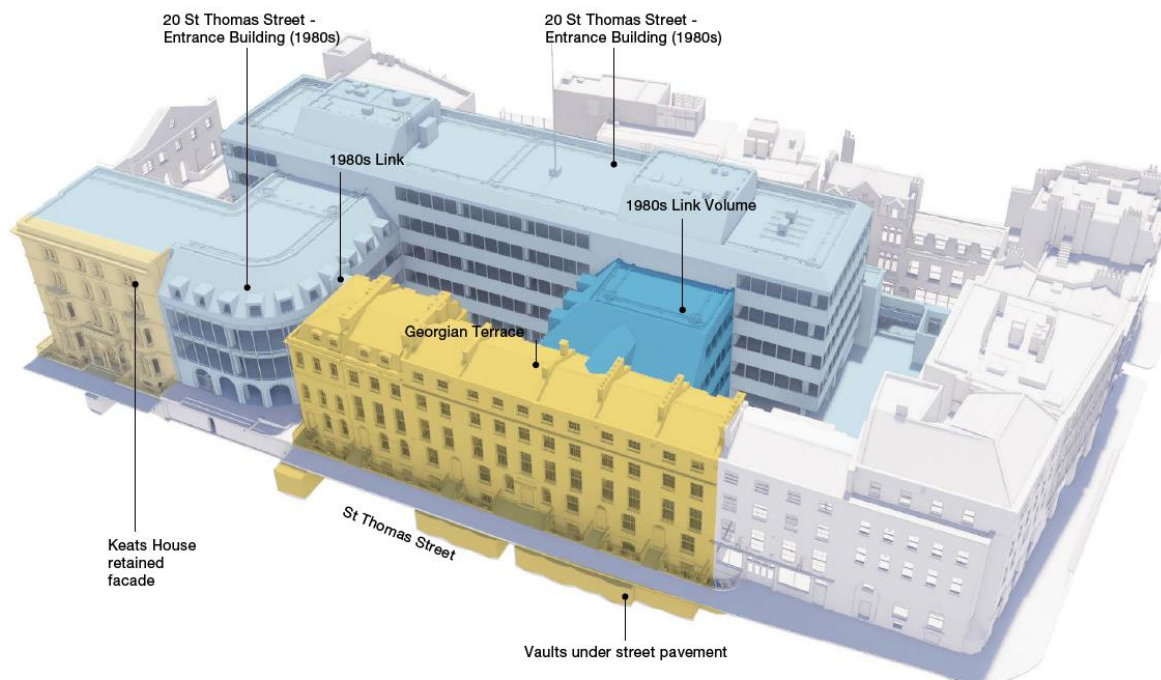
6 The 0.36 hectare site is located in the Central Activities Zone (CAZ) and falls within the Bankside, Borough and London Bridge Opportunity Area, as well as the London Bridge District Town Centre. The site is bounded by St Thomas Street and the Bunch of Grapes Public House to the north; Guy's Hospital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

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
Total	12,763	50,437	+ 37,674

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 16th 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 14th 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 CO₂ emissions of 41% beyond 2013 Building Regulations compliant development is expected, of which energy efficiency measures would account for a 38% reduction in CO₂ emissions on the new build element of the scheme and 29% on the refurbished buildings. This complies with the CO₂ 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.

for further information, contact GLA Planning Unit (Development Management Team):

Juliemma McLoughlin, Chief Planner

020 7983 4271 email: juliemma.mcloughlin@london.gov.uk

John Finlayson, Head of Development Management

020 7084 2632 email: john.finlayson@london.gov.uk

Allison Flight, Deputy Head of Development Management

020 7084 2820 email: alison.flight@london.gov.uk

Graham Clements, Team Leader – Development Management

020 7983 4265 email: graham.clements@london.gov.uk

Andrew Russell, Principal Strategic Planner (case officer)

020 7983 5785 email: andrew.russell@london.gov.uk

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, email andrewhiley@tfl.gov.uk, telephone 07545 200056.

Yours sincerely

A handwritten signature in black ink, reading 'John Finlayson' with a long horizontal flourish extending to the right.

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.

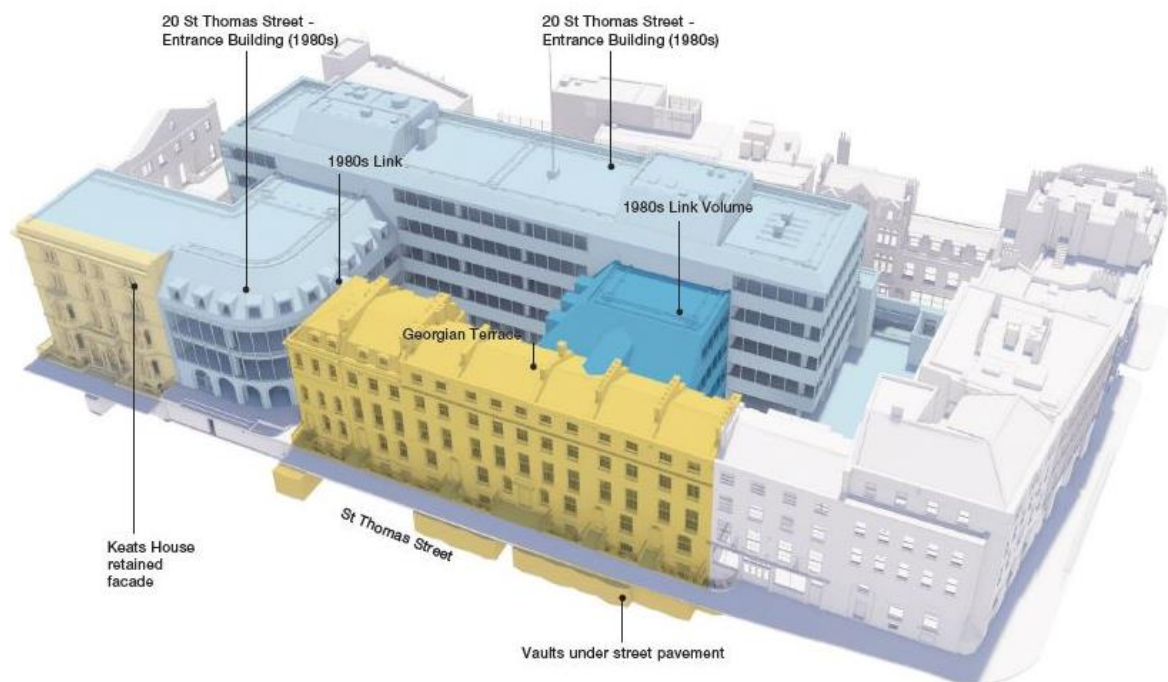


Figure 1: Site as existing.

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.

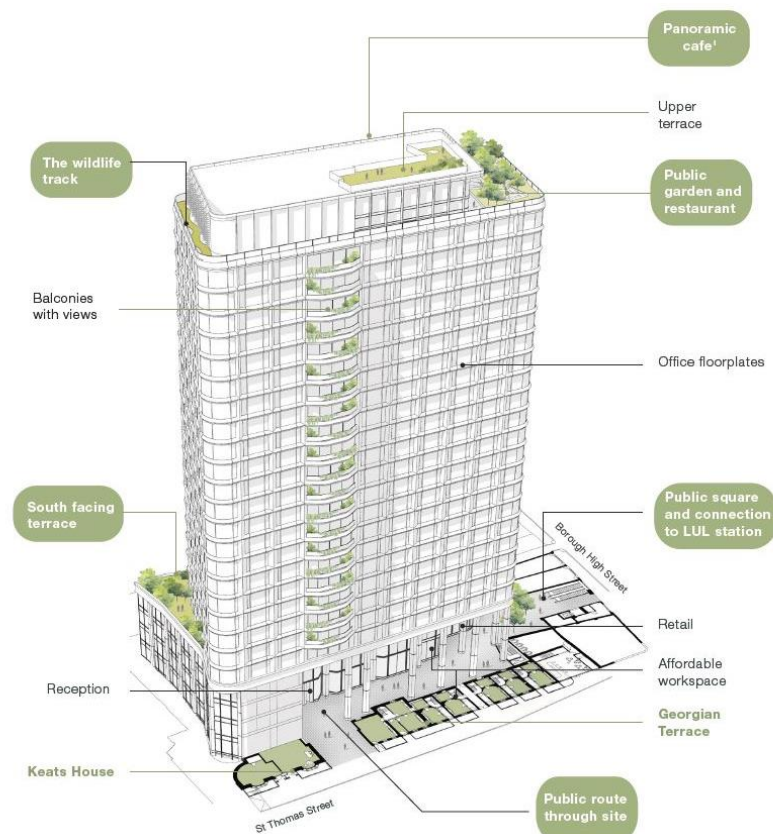


Figure 2: New building as proposed.

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.

For further information, contact GLA Planning Unit (Development Management Team):

Valeria Cabrera, Strategic Planner (case officer)

email: valeria.cabrera@london.gov.uk

Graham Clements, Team Leader – Development Management

email: graham.clements@london.gov.uk

Allison Flight, Deputy Head of Development Management

email: alison.flight@london.gov.uk

John Finlayson, Head of Development Management

email: john.finlayson@london.gov.uk

Lucinda Turner, Assistant Director of Planning

email: lucinda.turner@london.gov.uk

From: Hiley Andrew
Sent: 17 June 2021 15:55
To: 'Crosby, Victoria' <Victoria.Crosby@southwark.gov.uk>
Cc: Crane Anne <AnneCrane@tfl.gov.uk>; 'Valeria Cabrera' <Valeria.Cabrera@london.gov.uk>
Subject: Re 21/AP/1361 New City Court, 4-26 St Thomas Street, London

Hi Victoria

Further to my email below, I understand the Stage 1 report and letter for this planning application were issued earlier this week, so please find below TfL comments.

As you are aware, there was extensive negotiations between the Council, TfL and the applicant for the previous planning application on this site (18-AP-4039) and there was a particular concern regarding the servicing arrangements, due to potentially adverse impacts on road safety (Vision Zero) and Healthy Streets environment on the Transport for London Road Network (TLRN). We are pleased to see that this new planning application addresses this issue in the way that was suggested by TfL officers at the time. Other issues raised then remain broadly similar.

The site is very well suited to a high trip generating development, being directly adjacent to the London Bridge station complex, which offers a range of public transport services to and from a wide part of London and the south east. The public transport accessibility level (PTAL) of the site is unsurprisingly the highest possible, at PTAL 6b. The site is also well located for a high cycle mode share, with the recent improvements delivered both by the Council and TfL, such as Cycleway 4 and its temporary extension along Tooley Street and the closure of London Bridge and Bishopsgate to general traffic.

Cycle and car parking

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.

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.

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

The proposed development would provide a pedestrian route between St Thomas Street and King's Head Yard, a movement that can't be made directly 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. Both these roads are part of the TLRN. The temporary London Streetspace (LSP) scheme is a response to this very issue, and further crowding can be expected post-pandemic.

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.

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.

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.

The scope and value of the Healthy Street contribution should be subject to further discussion between TfL and the Council.

Public transport impacts

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.

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).

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.

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

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

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. As mentioned above, 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.

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.

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.

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

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.

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

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 Cycles. The Council has a new policy of securing free Santander Cycles 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 would be supported in this case.

Mitigation and conclusions

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.

Provided this mitigation is secured, we consider that the development would on balance be in accordance with London Plan policy in terms of strategic transport.

I hope you find these comments useful in your determination of the planning application, and please let me know if you have any questions.

Regards
Andrew

From: Hiley Andrew [<mailto:Hileyan@tfl.gov.uk>]

Sent: Thursday, June 10, 2021 5:17 PM

To: Crosby, Victoria

Cc: 'Valeria Cabrera'

Subject: Re 21/AP/1361 New City Court, 4-26 St Thomas Street, London

Proposal: Redevelopment to include demolition of the 1980s office buildings and erection of a 26-storey building (plus mezzanine and two basement levels) of a maximum height of 108.0m AOD, restoration and refurbishment of the listed terrace (nos. 4-16 St Thomas Street), and redevelopment of Keats House (nos. 24-26 St Thomas Street) with removal, relocation and reinstatement of the historic façade on a proposed building, to provide 46,851sqm GEA of Class E(g)(i) office floorspace, 360sqm GEA flexible office E(g)(i)/retail E(a) floorspace, 592sqm GEA Class E(b) restaurant/café floorspace and a public rooftop garden, and 5,190sqm GEA of affordable workspace within the Georgian terrace, Keats House and part of the tower, associated public realm and highways improvements, provision for a new access to the Borough High Street entrance to the Underground Station, cycling parking, car parking, service, refuse and plant areas, and all ancillary or associated works.

Hi Victoria

Thank you for consulting TfL Spatial Planning. As this planning application has been referred to the GLA, in line with the protocol we have agreed with them I will provide you with TfL's comments within 5 days of the issue of the Stage 1 report and letter.

Regards
Andrew

Andrew Hiley | Principal Planner (Spatial Planning) | TfL City Planning
Transport for London | 9th Floor, 5 Endeavour Square, Westfield Avenue, E20 1JN
Telephone number: 020 3054 7032 (auto 87032)
Mobile number: 07545 200056 | Email: andrewhiley@tfl.gov.uk
Alternative group email: SpatialPlanning@tfl.gov.uk



Our ref: 18/2668

Russell Vaughan
TPP
-by email only-

29th August 2018

Transport for London
City Planning

5 Endeavour Square
Westfield Avenue
Stratford
London E20 1JN

Phone 020 7222 5600
www.tfl.gov.uk

Dear Russell,

New City Court, St Thomas Street, Southwark – TfL's pre-application advice

Thank you for taking part in formal pre-application discussions with TfL, the aim of which is to ensure that this development is successful in transport terms and in line with relevant London Plan policies.

This letter concerns the recent pre-application meeting that we held to discuss the proposals for New City Court, St Thomas Street.

The following comments are made by Transport for London (TfL) officers on a 'without prejudice' basis only. You should not interpret them as indicating any subsequent Mayoral decision on any planning application based on the proposed scheme.

General

The Transport Assessment (TA) report to be produced by the applicant as part of the planning application submission should be in line with TfL's Transport Assessment guidance available at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance>

TfL will continue to provide transport technical advice through the pre-application stage and will welcome the opportunity to provide further pre-application advice on specific matters as and when appropriate. The applicant should note that if further meetings are required they will need to pay a follow up pre-app fee.

The attendees of the pre-app meeting on 14 August 2018 are listed below. Prior to the meeting, a Transport Note and Servicing Note was circulated to attendees to inform the meeting. Michael Welch visited the site on 9 August and Duncan Lawrence visited the site on 13 August 2018.

TfL attendees:

Duncan Lawrence – Spatial Planning, Assistant Planner (Case Officer)
Andrew Hiley – Spatial Planning, Principal Planner
Michael Welch – Spatial Planning, Planner
David McKenna – Network Sponsorship, Lead Sponsor
David Leboff – LU Strategy & Network Development, Principal Sponsor
Puja Jain – Operational Property

Applicant attendees:

Russell Vaughan – TPP
Matthew Evanson – Gardiner & Theobald
Haydn Thomas – AHMM
David Shiels – DP9
James Shipton – Great Portland Estates

Southwark Council attendee:

Alex Oyebade – Transport Planning

Apologies:

Gary Snewing – TfL (Taxis and Private Hire Ranks) – written comments provided for this letter

Policy context

The draft new London Plan was published on 29 November 2017 and we will be expecting all new planning applications to give material consideration to the policies set out within this document, noting that the decision-maker is to determine the balance of weight to be given to adopted and draft policies. The following Policies are particularly relevant to the Applicants proposals

Policy T2 Healthy Streets

This Policy requires that Development proposals should demonstrate how they will deliver improvements and reduce the dominance of vehicles on London's streets whether stationary or moving. It also requires better management of freight so the impact of moving goods, carrying out servicing and supporting construction delivering services on London's streets is lessened.

The Policy encourages the development of more creative solutions to managing freight and deliveries which include considering the different uses of London's streets across the day so that more street space is available for walking, cycling and leisure purposes, while ensuring shops and services continue to thrive.

The Mayor has a long-term vision to reduce danger on the streets so that no deaths or serious injuries occur on London's streets. This Vision Zero will be achieved by designing and managing a street system that accommodates

human error and ensures impact levels are not sufficient to cause fatal or serious injury. This will require reducing the dominance of motor vehicles and targeting danger at source.

The Healthy Streets Approach uses 10 indicators that reflect the experience of being on streets. These indicators are based on evidence of what is needed to create a healthy, inclusive environment in which people choose to walk, cycle and use public transport. New developments and public realm schemes should deliver improvements against the Healthy Streets Indicators.

Policy T7 Deliveries, servicing and construction

This Policy requires that Development proposals should facilitate sustainable deliveries and servicing, including through the provision of adequate space for servicing, storage and deliveries off-street. They should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night time and minimise additional freight trips arising from missed deliveries. At large developments, facilities to enable micro-consolidation should be provided.

Proposals should be supported by Construction Logistics Plans and Delivery and Servicing Plans (detailing how the development will be managed), and be developed in accordance with Transport for London guidance which can be found at

<http://content.tfl.gov.uk/construction-logistics-plan-guidance-for-developers.pdf>

Development proposals must adopt appropriate construction site design standards that enable the use of safer, lower trucks with increased levels of direct vision on waste and landfill sites, tip sites, transfer stations and construction sites. The construction phase of development should prioritise and maintain inclusive, safe access for people walking or cycling at all times

We will be expecting proposals and assessments that demonstrate compliance with these policies

Site and surrounding area

The site is bounded by St Thomas Street to the north; buildings which front on to Borough High Street as well as St Thomas Street to the west; King's Head Yard to the south; and commercial buildings to the east.

Both St Thomas Street and the A3 Borough High Street form part of the Transport for London Road Network (TLRN). The nearest section of the Strategic Road Network (SRN) is Cannon Street, which is located approximately 750m to the north of the site on the other side of the Thames.

The nearest London Underground (LU) station is London Bridge, which is served by the Jubilee and Northern lines. The nearest entrance is approximately 50m from the site on Borough High Street. St Thomas Street also has an entrance to the station, approximately 150m to the east of the site. London Bridge is also served by National Rail services, the nearest entrance being the aforementioned one on St Thomas Street. Bus stops are accessible within 220m of the site on Southwark Street, Borough High Street and London Bridge Bus Station. These are served by routes 21, 35, 40, 43, 133, 141, 343 and 381. River Services can be accessed approximately 620m to the north of the site from London Bridge Pier.

Due to the aforementioned public transport connections, the site achieves a Public Transport Accessibility Level (PTAL) of 6b, the highest possible (where 1 represents the lowest accessibility level).

The site is also served by the Mayor's cycle hire scheme. The nearest docking station is 'Hop Exchange, The Borough' (51 cycle capacity), located approximately 260m to the west of the site on Southwark Street.

The site is also in close proximity to several cycle routes. Cycle Superhighway 7 (CS7) can be accessed approximately 500m to the west of the site on Southwark Bridge Road. Cycle Superhighway 4 (CS4) is planned to run between Tower Bridge and Greenwich with the nearest point being some 1km to the east, and there is an aspiration to extend this to London Bridge via Tooley Street. National Cycle Network Route 4 (NCN 4) can be accessed approximately 200m north of the site on Tooley Street. Union Street and Newcomen Street, approximately 310m to the south of the site forms part of the Central London Grid/proposed Quietway 14.

The site is currently made up of five or six buildings which between them provide approximately 9,000sqm of office floorspace. Two of these buildings, 4-8 and 12-16 St Thomas, are Grade 2 listed. LU lines run almost directly under the site.

To the immediate south of the site is King's Head Yard. This forms the northern part of a small 'u' shaped route accessed from Borough High Street. The southern part of this is called White Hart Yard. Both of these are narrow, largely cobbled and have restricted height access. These currently operate two-way. As witnessed on the site visit and noted in the scoping material they are lightly trafficked.

Development overview

It is understood that the proposal is for the demolition of most of the office buildings currently on-site and the creation of a new development of around

52,000sqm. The primary use of this will be office floorspace (around 51,000sqm), with a small amount of retail floorspace (around 1,000sqm) provided mostly on lower ground and ground floors, and a small portion provided on first floors. As yet no tenants have been identified for the retail uses, however it is envisaged that these will be occupied by small independent businesses. Two basement levels will be retained, which will be largely made up of plant equipment, cycle parking, disabled car parking and servicing space. It is proposed access to the basement servicing area and disabled car parking will be provided off King's Head Yard via two car lifts (one for entering and one for exiting). As part of the TA, the applicant should clearly set out how servicing operates for the existing site.

St Thomas Street proposals

The applicant is aware that TfL's long term vision for St Thomas Street is to reduce vehicular traffic and make it into an area where pedestrians and cyclists are prioritised. St Thomas Street already experiences high pedestrian footfall throughout the day given its location in close proximity to London Bridge Station, Guy's Hospital and a King's College campus, The Shard and Fielden House (which is currently being redeveloped for a significant amount of residential apartments and retail floorspace). Footfall is expected to continue to grow over future years, especially when London Bridge Station fully opens and nearby development (including Fielden House) are completed.

David McKenna provided an update on proposals at the meeting. In the short term, only fairly small changes are proposed on St Thomas Street using 'signs and lines' to reduce vehicular traffic. Eastbound traffic from Borough High Street would be restricted to vehicles under 7.5t, whilst westbound from Bermondsey Street would be 'access only'. The long term vision would be an eastbound-only arrangement for vehicles, with a westbound stepped track provided for cyclists. Other restrictions and changes to access may be put in place in future; in particular left turns from London Bridge to Tooley Street may be banned for certain vehicles.

The applicant should ensure that both the two-way and the eastbound-only arrangements are taken account of when considering the design of the development for the site and in particular servicing/construction arrangements.

St Thomas Street Masterplan

Since the Pre-application meeting we have been contacted by Consultants working on behalf of Southwark to produce a Masterplan for St Thomas Street which may be relevant to the proposals. We will advise further when we have some more information after those meetings have been scheduled and held.

Servicing arrangements

The Vehicle Servicing Note was discussed at the meeting which detailed the forecast volume of vehicles and types expected to service the development, together with the two proposed access arrangements to the site.

For HGV access it is proposed to relocate an existing Loading Bay on St. Thomas Street (retaining the 7pm – 7am and 10am – 4pm operation) to provide easier access to the site. Forecasts suggest that the bay will have adequate capacity to accommodate the developments needs, although at the upper end of the range it would be at 89% utilisation.

The high number of HGVs was queried for what is largely an office development with only a small amount of retail. It was stated that the calculation has simply scaled up the number of HGVs based on the floorspace proposed, rather than assuming a more efficient pattern of servicing which would include consolidation and other efforts to reduce vehicle numbers.

Proposals for LGV and Car access are vehicles to approach and exit from Borough High Street (that forms part of the TLRN), running in both directions White Hart Yard, as it is proposed that King's Head Yard becomes a mostly Pedestrianised environment. The vehicles enter and exit the building via a pair of Vehicle lifts which lead to Loading Bays and a Turning area located on the second level Basement.

As discussed at the meeting, the proposed servicing of the site is a key concern for TfL and ensuring that the proposals are in line with the draft New London Plan Policies T2 and T7. Our main concerns are as follows

Policy

- The existing arrangements at White Hart Yard are far from ideal, and it was acknowledged at the meeting that the proposals worsen the situation, albeit there are forecast to be a relatively small number of vehicles involved.
- We can however foresee a number of potential challenges and conflicts with Policy T2 of the draft new London Plan (Healthy Streets) the thrust of which is towards delivering improvements and reducing road danger.

Road Safety

- TfL's main concern with this is the access from Borough High Street to White Hart Yard.
- A left turn-in obviously creates the potential for conflicts with cyclists, particularly those who may be out of site to drivers due to buses being in the way.

- A right turn-in raises issues with vehicles blocking the outside lane whilst waiting for a suitable gap to turn in.
- Finally, the movement over the footway of Borough High Street to access White Hart Yard creates the potential for conflicts with pedestrians.
- There are also issues surrounding the proposed loading bay on St Thomas Street which will can hopefully be overcome with night-time deliveries when pedestrian and cyclist activity is at a minimum.

It is understood that a Stage 1 Road Safety Audit/Assessment will be undertaken for the proposed access, which should inform the applicant, TfL and Southwark Council of safety concerns and measures to mitigate these. TfL will expect the Audit/Assessment to be submitted as part of the planning application.

Forecast Servicing Volumes

- Whilst welcoming the surveys that have been done to date it is noted that there have been nearby examples such as the Shard where previous forecasts have significantly underestimated demand, or where demand has grown much quicker than expected.
- These underestimates have caused problems both on and off site. Given the constrained nature of the site it is felt that there is little room for error and potentially large internal and external consequences if similar variations were to prove the case here.
- As there is not currently a large evidence base regarding this sort of development I think that we would have to adopt a pessimistic approach to forecasts and require further work to demonstrate that like is being compared to like, and potential variations between similar developments.
- Regardless of the proposed development we be expecting to see pedestrian and cycling volumes increase over time, this will also need to be considered when assessing the impact and road safety of the current proposals

Management and Enforceability

- We would need to see a detailed and robust plan indicating how the access and servicing is to be managed
- This should detail contingency plans to manage on-site operational issues if the trip rates and forecasting prove to be conservative once the development is implemented.
- Driver behaviour should also be considered, for example if vehicles are 'in a hurry' how is it proposed to ensure that they will follow procedure
- The current proposals indicate small independent occupiers of the retail floorspace which is supported, as these are likely to generate fewer servicing trips than more traditional high street retailers. However it is not

clear how this arrangement will be secured and enforced which should be set out in the submission.

The above should be provided in the TA or Framework Delivery and Servicing Plan (DSP). TfL will request that Southwark Council secure a Full DSP by condition. Guidance on producing this document can be found here:

<http://content.tfl.gov.uk/delivery-and-servicing-plans.pdf>

In summary there are a number of concerns with the current proposals and at this stage we cannot guarantee that the current proposals will not turn out to be a showstopper.

In the first instance we would suggest the exploration of further opportunities to reduce and minimise the impact of servicing and deliveries and see what level of HGV access is most likely to be required. Information on consolidating and re-timing deliveries can be found on the TfL webpage at

<https://tfl.gov.uk/corporate/publications-and-reports/freight>

Specific measures we can suggest would be to

Using the current site and 240 Blackfriars Road as a template and undertake a full delivery survey / audit.

This would

- Provide a full weeks' worth of information about deliveries
- Understand what is being delivered, when and by what vehicles
- Understand how full the delivery vehicles are on arrival
- Establish the scope for consolidation at this type of development

Investigating an off-site warehouse / micro-consolidation solution. This would

- Enable off-site storage and consolidation
- The use of smaller vehicles
- Easier Management through timed deliveries and vehicle types
- Provide a flexible solution if servicing demand exceeds forecasts
- Minimise the footprint required in the development site, potentially releasing space for more profitable development.

Design and Potential Alternative Servicing arrangements

It was mentioned at the meeting that many other options had been considered and discounted. It would be helpful if we could have sight of these in order to further understand the design process and rationale to demonstrate and justify that the best or 'only' option for servicing is being pursued.

We welcome the retention of the unlisted Keat's House Façade and think that its placement is key to improving the Servicing arrangements and reducing its impacts. We also note that the area behind Keat's House appears to be relatively underutilised.

Given our concerns and the utilisation of the space behind Keat's House we would request that you consider alternative servicing arrangements before progressing your current proposals any further.

We have had some internal discussions and have generated a couple of 'workable' options which we feel would warrant further investigation

Option A would involve

- Moving the Facade further by more than 2 metres so that a one-way in LGV access could be created into the development site from St Thomas Street.
- Replacing the current Basement servicing proposals with a Ground Floor servicing area behind Keat's House and where some of the proposed Retail is located
- Use the White Hart Yard as exit only with vehicles turning left into Borough High Street.
- Reconfigure the existing proposed development and create new development above the new Ground Floor servicing area.

Rationale

- It is already proposed to move the Façade, so the proposed change would not represent a huge new cost and enable efficiencies and gains elsewhere in the development.
- The area behind Keat's House appears to be currently underutilised, this would represent a more efficient use of land.
- A Ground floor Service Area would eliminate the need for vehicle lifts and a basement level service area which could potentially be used for other revenue generating opportunities
- It would be possible to develop a greater surface area above the newly created Service Area adding value to the development
- Using White Hart Yard as a one-way exit with a left turn into Borough High Street halves the number of vehicles needing to use it and avoids the conflicts associated with vehicles entering the site.

Option B would involve

- Relocate the Keat's House Façade so that it is at right angles to the main building, linked to the main building, and is incorporated into the new Public Square facing the footfall from the newly created entrance to the Underground

- Create a functional and fit for purpose frontage where the façade currently sits, to include Vehicle / HGV access to the site
- Set the Ground Floor frontage back to widen the footway and to address some of the visibility and safety issues associated with the new vehicle access
- Replace the current Basement servicing proposals with a Ground Floor servicing area behind Keat's House and where some of the proposed Retail is located
- Install a HGV Turntable in the area of the proposed vehicle lifts to enable vehicle turning
- Relegate White Hart Yard as a one-way exit for emergency / Fire service access
- Reconfigure the existing proposed development and create new development above the new Ground Floor servicing area.

We think that both of these options have the potential to enhance design and add value to the development as well as avoiding the many problems associated with the current servicing proposals in the process. It would also avoid servicing expenditure and space requirements which may end up being underutilised in the future if consolidation is achievable.

Trip generation

Details on trip generation were provided in the scoping material and at the meeting. Given the size of the proposed office and the lack of comparable sites in TRICS (in terms of floorspace), the applicant proposes to undertake a first principles approach to trip generation. Details provided in the scoping material demonstrate that this will result in more onerous (higher) trip rates than using sites from TRICS. The likely arrival/departure profile has been informed by TRICS, which demonstrates peak hours of 8:30am – 9:30am and 5pm – 6pm.

The following assumptions will be used for the assessment:

- 1 employee per 8sqm (NIA).
- 85% of employees in the office on any given day.
- 45% of employees arrive during the morning peak hour.

The above assumptions are considered generally reasonable, although as discussed at the meeting the figure of 45% of employees arriving during the morning peak hour is at the low end of what would be expected and consideration should be given to taking account of visitors. The applicant proposes to use 2011 Census data to derive the mode share, which will be adjusted to reflect the car-free nature of the site; this is accepted.

For the existing trip generation TfL's preference would be for a survey of the site to be undertaken, however it is understood that this may be difficult for practical

reasons and lack of available time. The applicant is therefore proposing to undertake the same first principles approach for the existing site. This is acceptable although the applicant should ensure that this is evidence based – if the number of employees at the office is known or it is known that the office is not operating at full capacity then this should be taken into account.

Car parking

Two disabled parking bays are proposed on-site within the basement, accessed through the vehicle lifts used for servicing. This provision accords with draft New London Plan Policy T6.5 and is therefore supported subject to careful management to avoid conflicts with Servicing. It is understood that the bays will be provided with electric vehicle charging facilities, which is also supported in line with draft New London Plan Policy T6.

Interface with London Bridge station

At the Eastern Borough High Street entrance to the station the applicant is proposing to create a new exit into the developments Public Realm. This new Pedestrian link through to St Thomas Street and King's Head Yard is supported in Principle as delivering improvements in line with draft New London Plan Policy T2.

Further liaison with LUL was proposed regarding the construction of the new entrance and how to minimise its impact on customers using the station. This could include carrying out the work in one go at a weekend, or to undertake works to coincide with a scheduled track / Station closure.

A Development Agreement (DA) will need to be signed between the applicant and TfL/LU which will need to take account of the potential disruptions to customers, risks to infrastructure and consider commercial aspects of the proposed scheme.

As this is expected to form part of the necessary transport mitigation for the development it is strongly advised that this is prepared as soon as possible, and TfL will need further details of the scheme to be provided so that this can be progressed. This is so that so that good progress on this can be reported both when the application reaches the Southwark Planning Committee and for when TfL report to the Mayor at Stages 1 and 2.

The current and ongoing engagement with TfL Infrastructure Protection engineers is welcomed in order to ensure that proposed works are compatible with the LU operations and infrastructure requirements. Conditions related to LU infrastructure would be expected should the application be granted permission and are particularly necessary for detailed design and during construction.

Impact assessment

Public transport

As discussed at the meeting, the main public transport impact that will need assessing are line capacity and the gateline and escalators leading to the Borough High Street exit. The applicant will also need to consider how passengers will split between the main ticket hall and the Borough High Street ticket hall. In terms of line capacity, a distributional analysis using Census data to assign trips to the four available LU routes (Northern line northbound/southbound and Jubilee line eastbound/westbound) would be appropriate. In terms of the gateline and escalator impact assessment, a static analysis would be appropriate. This should be undertaken in accordance with the LU Station Planning Standard, which has been sent to the applicant.

Pedestrians and cyclists

As discussed at the meeting, it would be helpful if the impact of the proposed new London Bridge station exit and pedestrian route through the site on surrounding footways were to be quantified in the TA. A Pedestrian Comfort Level (PCL) assessment showing the existing AM and PM peak PCL scores, as well as the future with development PCL scores (with and without the new station exit) would be an appropriate way of showing this. This should also take account of the intended servicing arrangements and their adverse impact on pedestrians and cyclists when in use.

In terms of walking and cycling assessments, as per the GLA pre-application response TfL will expect to see PERS and CLoS assessments included in the TA. These should examine routes to London Bridge station, bus stops including London Bridge Bus station, local amenities, and in the case of the CLoS assessment London's Strategic Cycle Network. These audits will inevitably identify areas where improvements to the walking and cycling networks can be provided to the benefit of the proposed development's employees and visitors. Given the proposed new station exit and public realm, the provision of new/updated Legible London signage would be supported. A commitment towards funding Legible London signage and improvements raised by the PERS and CLoS assessments would be expected.

Cycle parking

It is understood that the overall provision of cycle parking across the site will exceed draft New London Plan Policy T5 standards, which is welcomed. The location, access and type of cycle parking provided should accord with London Cycle Design Standards (LCDS) guidance. From the information provided at the meeting, TfL's comments on the current proposals are set out below.

Long-stay

Long-stay cycle parking is proposed to be located in the basement with a main area for the vast majority of spaces which will be accessed by stairs with a 'mini electric traveller' similar to those often provided in large Dutch facilities. A smaller area for larger/adapted cycles is proposed which will be accessible via a lift

Further information will need to be provided, and the applicant will need to demonstrate that the access arrangements will have the capacity to cope with the expected high and concentrated demand for the facility. Alternative access arrangements should be detailed in the event of the lift (or traveller) breaking down. The provision for larger /adapted cycles should be in line with LCDS guidance, a minimum of 5% of spaces.

A mixture of cycle parking stands will be available, including two-tier racks, Sheffield stands and vertical stands. The use of a mixture of cycle parking stands is supported, as it serves different user needs. The applicant should ensure that the two-tier racks have a mechanically or pneumatically operated system for accessing the upper levels, as some people find these difficult to access. Minimum aisle widths as set out in the LCDS should also be provided.

Supporting facilities for the cycle parking in the form of showers, lockers and changing facilities are proposed, which is supported in line with draft New London Plan Policy T5.

Short-stay

As is common in Central London sites, the provision of short-stay publically accessible cycle parking in the public realm is difficult. The applicant is proposing to place some short-stay spaces in their new public realm, with the rest provided in the basement. Whilst this is of course not ideal, it is welcome that some spaces can be placed in the public realm – the applicant should ensure that the maximum amount possible are placed here, provided that they do not impede pedestrian flow or the potential on-site servicing arrangements mentioned above. Consideration should be given to providing signs or notices on the spaces in the public realm advertising the fact that additional spaces are available in the basement. It is understood that Sheffield stands are proposed for the short-stay cycle parking, which is welcome as it accords with LCDS guidance.

Cycle hire

Although not discussed in detail at the meeting, we may also need to look at the impact on the cycle hire network as the nearest docking stations are already operating close to capacity.

Taxis

Although not discussed in detail at the meeting, consideration will need to be given to taxis on St Thomas Street, and agreement reached with TfL regarding their proposed relocation and re-provision.

Construction

Indicative details of construction arrangements have been provided by the applicant indicating a timeframe of December 2021 to February 2026. Before this commences agreement with TfL will be required for Temporary road, footway closures and hoarding and crane oversailing licences.

Opportunities to collaborate with nearby sites that have similar construction programmes should also be explored as early as possible, in order to minimise the impact of construction traffic on the surrounding highway network and particularly on pedestrians and cyclists.

An Outline Construction Logistics Plan should be provided alongside the planning application which should be produced following TfL guidance which can be found at

<http://content.tfl.gov.uk/construction-logistics-plan-guidance-for-developers.pdf>

TfL will request that Southwark Council secure a Detailed CLP by condition, and a contribution towards the St Thomas Street scheme will be expected. It is expected that this will be implemented once all construction on the Street has been completed

Travel Plan

A Framework Travel Plan should be submitted alongside the planning application, guidance on its contents and preparation can be found at

<https://tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans>

TfL will request that Southwark Council secure, enforce, monitor, review and the funding of the Full Travel Plan through the section 106 agreement.

Crossrail S. 106

The mechanism for contributions to be made payable towards Crossrail has been set out in the Mayor's Supplementary Planning Guidance (SPG) 'Use of planning obligations in the funding of Crossrail and the Mayoral Community Infrastructure Levy' (March 2016), current London Plan Policies 6.5 and 8.3, and draft London Plan Policy T9. The SPG states that contributions should be

sought in respect of uplift in floorspace for office uses (with an uplift of at least 500sqm). The site is within the Central London S106 contribution area where the charge for office floorspace is £140 per sqm.

Crossrail CIL

In accordance with current London Plan Policy 8.3 and draft New London Plan Policy T9, Community Infrastructure Levy, the Mayor agreed to commence CIL charging for developments permitted on or after 1 April 2012. The proposed development is within the London Borough of Southwark, where the Mayoral charge is £35 per square metre Gross Internal Area (GIA).

The applicant should note that the Mayor's CIL charge will be treated as a credit towards the Section 106 liability and therefore only the larger of the two amounts will normally be sought.

The applicant should be aware that in June 2017 the Mayor published proposals for an MCIL2 to contribute to Crossrail 2 funding. This would be levied from April 2019 and would replace both MCIL1 and Crossrail 1 Section 106 contributions.

This letter has set out a number of strategic issues that need to be addressed as part of the forthcoming submission. If you have any queries, further questions or seek clarification please contact the new case officer Michael Welch (020 3054 7557 or email MichaelWelch@tfl.gov.uk) or myself.

Yours sincerely



Lucinda Turner
Director of Spatial Planning
Email: lucindaturner@tfl.gov.uk
Direct line: 020 3054 7133

Copy to:
All meeting invitees
Anne Crane – TfL
Danny Calver – TfL

TfLM1 Required strategic transport mitigation

Ref	2018 scheme	2021 scheme	How secured	Trigger (reason)	Justification/notes
PO1	<p>Santander Cycles new docking station</p> <p>£220,000</p>	<p>Santander Cycles new docking station</p> <p>£220,000</p>	S106 obligation	<p>Payment to TfL 6 months prior to first occupation</p> <p>(to allow time for delivery on first occupation)</p>	<p>The closest Santander Cycles docking station is the Hop Exchange docking station in Southwark Street. This is the 6th busiest docking station in London (out of around 800), and the next nearest, Duke Street Hill docking station, the 12th busiest.</p> <p>The London Bridge area is particularly busy due to the mix of office workers, tourists/visitors, students/medical staff and commuters using London Bridge station. Therefore the addition of 1100 to 1400 additional peak hour trips from both the 2018 and 2021 schemes, some of which will use cycle hire, will require additional docking points.</p> <p>The most efficient way of providing this is via new mid sized (30 docking point) docking station, which costs £220,000. This would have to be on-street near to the</p>

					development, as there is not enough space to provide on-site.
PO2	Legible London signage £22,000	Legible London signage £22,000	S106 obligation	Payment to the Council 6 months prior to first occupation (to allow time for delivery on first occupation)	Legible London signs are a simple and cost effective way to promote active travel, and 'advertise' the development locally. £22,000 provides for two new signs (one at the St Thomas Street entrance, one at the LU entrance) and up to 5 map refreshes of existing signs nearby. This is equally applicable to both schemes.
PO3	Contribution towards the St Thomas Street Healthy Streets scheme £1.7m	Contribution towards the St Thomas Street Healthy Streets scheme £1.7m	S106 obligation	Payment to TfL on request according with the programme for the Healthy Streets Scheme implementation, but not prior to commencement	The St Thomas Street Healthy Streets scheme will introduce two-way cycling along St Thomas Street, which will improve access to the development for cyclists - currently, cyclists can only travel one way, eastbound - and will make permanent the current footway widening, providing more space for pedestrians using the development. Trees will also be planted to improve the environment. The total scheme cost estimated at £5.5m. New City Court is approximately 1/3 of the developments, in terms of peak hour trip generation, in the 'St Thomas Street development

					cluster' (New City Court, Capital House, Becket House, Vinegar Yard, Bermondsey Snowsfield) and for which s106 contributions have been secured, requested or will be requested. As the number of peak hour trips is similarly for both 2018 and 2021 schemes, the contribution requested is the same.
PO4	<p>Cap on number of daily motorised service vehicles</p> <p>St Thomas St:</p> <ul style="list-style-type: none"> • 5 HGVs • 8 motorcycles • 2 refuse trucks <p>White Hart Yard:</p> <ul style="list-style-type: none"> • 23 LGVs 	<p>Cap on number of daily motorised service vehicles</p> <p>38 all movements</p>	S106 obligation	NA	<p>To 'lock in' the predicted vehicle movements, with consolidation, in the respective transport assessments, to minimise impacts on the road network.</p> <p>However, as stated elsewhere the adverse impact of the 38 vehicle movements in total on the local road network will be significantly greater from the 2018 scheme than that arising from the 2021 one. It is accepted that the number and type of vehicle movements estimated in the respective TAs is reasonable.</p>
PO5	<p>Bond to support service vehicle cap</p> <p>£100,000</p>	<p>Bond to support service vehicle cap</p> <p>£100,000</p>	S106 obligation	Payable to the Council should the service vehicle cap be breached.	A standard Council obligation to incentivise adherence to vehicle movement cap. To be used to fund local safety improvements.
PO6	Restriction on hours of LGV service vehicle movements	Restriction on hours of motorised service vehicle movements	S106 obligation	NA	So that service vehicle movements do not coincide with peak cycle and pedestrian movements, reducing collision risks in line with

	<p>using White Hart Yard:</p> <p>No vehicles to enter or exit between 7am and 10am, 12 noon and 2pm and 4pm to 7pm weekdays, 1pm to 11pm weekends/public holidays.</p> <p>HGVs can only use a loading bay on St Thomas Street outside of red route restrictions ie before 7am,between 10am and 4pm (20 minute max stay), and after 7pm. We would expect the applicant to agree to a voluntary (due to lack of options for specific enforcement) restriction between 12 noon and 2pm weekdays</p>	<p>using St Thomas Street access</p> <p>No vehicles to enter or exit between 7am and 10am, 12pm and 2pm and 4pm to 7pm weekdays</p>			<p>London Plan Vision Zero/Healthy Streets policy T2.</p>
PO7	Motorised service vehicle monitoring:	Motorised service vehicle monitoring:	S106 obligation	Prior to commencement	To support restrictions on motorised service vehicles

	Vehicle movements recorded by the developer, with a monitoring regime stipulated via an approved Monitoring Plan. £1,600 monitoring fee payable to the council	Vehicle movements recorded by the developer, with a monitoring regime stipulated via an approved Monitoring Plan. £1,600 monitoring fee payable to the council			
PO8	A delivery and servicing plan (DSP), drawn up in accordance with TfL guidance, to be submitted for approval by the Council in consultation with TfL	A delivery and servicing plan (DSP) to be submitted for approval by the Council in consultation with TfL	S106 obligation	Prior to commencement	DSP to include restrictions on service vehicle movements as stipulated in PO4 and PO6. In line with London Plan policy T7
PO9	A construction logistics plan (CLP) and a construction environmental management plan (CEMP), drawn up in accordance with TfL guidance, to be submitted for approval by the	A construction logistics plan (CLP) and a construction environmental management plan (CEMP), to be submitted for approval by the Council in consultation with TfL	S106 obligation	Prior to commencement (including demolition, site clearance and any enabling works)	In line with London Plan policy T7. Construction is likely to have a impact on the TLRN directly (eg scaffolding) and indirectly (eg construction vehicle movements). There will be additional licences and approvals required from TfL in respect of the TLRN and/or the LU infrastructure and assets, notably but not only the IPA (PO11)

	Council in consultation with TfL				
PO10	A development agreement (DA) with TfL to deliver the new LU station entrance	A development agreement (DA) with TfL to deliver the new LU station entrance	S106 obligation	<p>DA to be signed prior to commencement (to ensure scheme design accords with TfL requirements).</p> <p>Delivery of the new entrance required prior to first occupation (to mitigate impact from first day).</p> <p>Heads of terms to be agreed between the parties and included in s106 agreement.</p>	To provide alternative pedestrian routes to mitigate increased pedestrian demand on Borough High Street and St Thomas Street, in line with Healthy Streets policy T2.
PO11	Requirement for an infrastructure protection agreement (IPA) with TfL for existing surface and sub-surface LU infrastructure	Requirement for an asset protection agreement (IPA) with TfL for existing surface and sub-surface LU infrastructure	S106 obligation	<p>IPA signed 6 months prior to commencement (to ensure all necessary protections are in place before works start).</p> <p>Heads of terms to be agreed between the parties and included in s106 agreement</p>	To ensure LU infrastructure is not damaged through excavation, piling, changes in load bearing etc. during construction and ensure mitigation of residual impacts.
PO12	On site public realm: 24/7 public access to the public realm	On site public realm: 24/7 public access to the public realm	S106 obligation	NA	To ensure accordance with London Plan policy Policy D8 Public realm, T2 Healthy Streets and the Public London Charter (London Plan

	within the site to be secured, including appropriate management and maintenance arrangements in accordance with an approved (by the LPA in consultation with TfL) Public Realm Management Plan	within the site to be secured, including appropriate management and maintenance arrangements in accordance with an approved (by the LPA in consultation with TfL) Public Realm Management Plan			guidance 2021) which states ‘as a default, all public spaces should be open 24 hours a day throughout the year’.
PO13	<p>A requirement to enter into a s278 agreement with TfL to deliver, at cost to the applicant:</p> <ul style="list-style-type: none"> • a loading bay on St Thomas Street • repaving the footway on the site frontage on St Thomas Street and Borough High Street (Keats House to White Hart Yard) • any other necessary works to the TLRN (St Thomas Street and/or Borough 	<p>A requirement to enter into a s278 agreement with TfL to deliver, at cost to the applicant:</p> <ul style="list-style-type: none"> • a crossover on St Thomas Street • repaving the footway on the site frontage on St Thomas Street and Borough High Street (Keats House to White Hart Yard) • any other necessary works to the TLRN (St Thomas Street 	S106 obligation	Prior to commencement, with delivery prior to first occupation	<p>To deliver Healthy Streets in line with London Plan policy T2</p> <p>These are works additional to the Healthy Streets Scheme for St Thomas Street, being consequent upon the specific requirements of the development.</p>

	High Street) as a consequence the development	and/or Borough High Street) as a consequence the development			
PO14	A travel plan, drawn up in accordance with TfL guidance, to be submitted for approval by the Council in consultation with TfL	A travel plan, drawn up in accordance with TfL guidance, to be submitted for approval by the Council in consultation with TfL	S106 obligation	Prior to commencement	To accord with London Plan policy T4
PO15	Santander Cycle Hire Business Pooled Account: a minimum of 20 membership keys to be made available to tenants of the Development for a period of 3 years and a strategy to raise awareness of the availability of such accounts	Santander Cycle Hire Business Pooled Account: a minimum of 20 membership keys to be made available to tenants of the Development for a period of 3 years and a strategy to raise awareness of the availability of such accounts	S106 obligation	from first occupation	In line with local policy, and to support active travel
PO16	The requirement for technical approval from TfL due to excavation adjacent to the TLRN	The requirement for technical approval from TfL due to excavation adjacent to the TLRN	Informative		In line with CG 300 of the Design Manual for Roads and Bridges, to ensure the maintenance of the integrity of the public highway.

PO17	Notify the developer of the likely requirement for highway licences/approvals from TfL during construction	Notify the developer of the likely requirement for highway licences/approvals from TfL during construction	Informative		Highway licences/approvals required from TfL may include: scaffolding, crane oversail, Traffic Management Act Notification Approval, temporary traffic orders to allow temporary changes to red route controls
------	--	--	-------------	--	--