

Economic & Health Report VOLTERRA PARTNERS



New City Court – Economic and Health Report

GPE (St Thomas Street) Limited

A report by Volterra Partners, December 2018

Volterra

1 Introduction

1.1 This report provides an assessment of the economic and health impacts of GPE (St Thomas Street) Limited's proposal to redevelop the New City Court site (including the work proposed for Keats House and the Georgian Terraces) in the London Borough of Southwark (LBS) in accordance with an application for planning permission and list building consent.

The Site

- 1.2 The Site is currently occupied by various buildings, including Georgian terraced townhouses at Nos. 4, 6, 8, 12, 14 and 16 St Thomas Street, the New City Court office building at No. 20 St Thomas Street, and Keats House at Nos. 24 to 26 St Thomas Street. The existing site consists of 12,763 sqm gross internal area (GIA) of office floorspace. New City Court occupies the majority of the Site and is a part two, four and part five storey office building constructed in the 1980s. The Site sits at the heart of London Bridge and is bound by:
 - Commercial properties to the north, south-east and west including shops, restaurants, offices, hotels, public houses including The Old King's Head, banks, museums and post offices;
 - Guy's Hospital to the east;
 - Residential properties on St Thomas Street, King's Head Yard, White Hart Yard and Borough High Street; and
 - King's College University facilities including Guy's Campus which comprises student centre, student accommodation as well as a library, IT suite and auditoriums to the south and east.

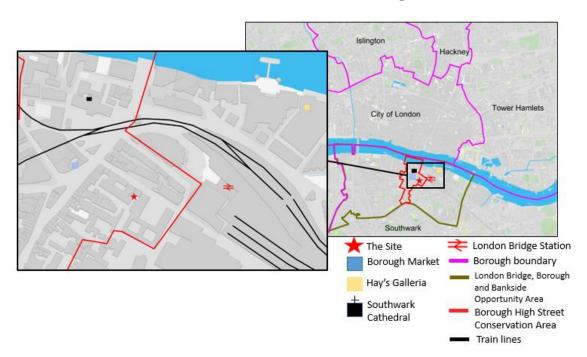


Figure 1: The Site context

1.3 The Site is within the London Bridge, Borough and Bankside Opportunity Area and the Borough High Street Conservation Area in the London Borough of Southwark (LBS) and

is within close proximity of London Bridge mainline and underground stations and the Shard. It is surrounded by a diverse set of attractions such as Hay's Galleria, Shakespeare's Globe Theatre, Southwark Cathedral, Tate Modern and Borough Market. These locations all enjoy high levels of footfall. The Development would act as the missing link, connecting the different locations forming a retail horseshoe surrounding London Bridge Station (Figure 1).

The Development

- 1.4 New City Court is a planned development at No.s 4-26 St. Thomas Street, London SE1 9RS (the "Development"). The Development will involve the demolition of 20th century buildings which occupy the majority of the Site, whilst the listed Georgian townhouses and Keats House façade would be restored and reordered.
- 1.5 The Development would comprise a new 37-storey tower block accompanied by improved public realm and increased permeability. The proposals include:
 - 'Comprehensive redevelopment of the site to include demolition of existing 1980s office buildings and erection of a 37-storey building (including ground and mezzanine) of a maximum height of 144m [above ordnance datum] (AOD), restoration and refurbishment of existing listed terrace, and redevelopment of Keats House with retention of existing façade to provide a total of 46,374 sqm of Class B1 office floorspace, 765 sqm of Class A1 retail floorspace, 1,139 sqm of Class A3 retail floorspace, 615 sqm of leisure floorspace (Class D2), 719 sqm hub space (Class B1/D2) and a 825 sqm elevated public garden, associated public realm and highways improvements, new station entrance, cycling parking, car parking, servicing, refuse and plant areas, and all ancillary or associated works.'
- This report sets out the key socio-economic impacts, both direct and indirect, of the scheme, accompanied by an assessment of the health impacts. The Health Impact Assessment (HIA) addresses impacts which are relevant to the scheme, broadly aligning with sections within the Healthy Urban Development Unit (HUDU) matrix but omitting sections which are not considered relevant to the Development. The HUDU matrix forms an appendix to this report. The key health related topics that are considered include:
 - Accessibility to the Site and active travel;
 - Health impacts and access to healthcare; during both the construction and operational phases;
 - Air quality, noise and neighbourhood amenity; during both the construction and operational phase;
 - Crime reduction and community safety; this will be combined with social cohesion and the consideration of design features;
 - Minimising the use of resources; land use and construction procedures; and
 - Climate change; approach to energy consumption and design.
- 1.7 For each of these topics a high level baseline has been set out to provide a broad understanding of the existing characteristics of the area. This is then followed by a summary of the positive and negative impacts associated with the Development.

Where appropriate, the sections consider separately the impacts of the construction and operation phases, others (if relevant) just consider the operational phase.

- 1.8 The HUDU sections which have been omitted from this report are:
 - Housing quality and design this scheme does not provide any residential units and for that reason an assessment of housing quality is not possible; and
 - Access to healthy food this scheme does not involve significant food and beverage provision and for that reason it is not considered relevant.

2 Economic Impacts

Construction impacts

Construction jobs

- 2.1 The construction of the Development would result in economic activity in terms of demolition and construction employment which would in turn will result in spending in the local area. The standard method of estimating the number of construction workers onsite is to divide the expected construction cost of the proposal by the Gross Value Added (GVA) of the average construction worker.
- 2.2 On this basis, it is estimated that the demolition and construction phase would support 2,250 gross job years (225 full time equivalents (FTEs))¹. The total demolition and construction period is expected to take three years and 11 months. There would be an expected average of 575 construction jobs on site throughout the demolition and construction period.

Construction spend

- Typically, construction workers are one of the most mobile sectors of the workforce, travelling to where the work is. As a result, construction benefits are not generally viewed as having large local impacts. Whilst the employment effects from construction activity don't tend to be particularly local, their expenditure does have a local impact. It is expected that the construction workers will spend c. £3.4m in the local area over the duration of the construction period, equivalent to annual spending in the local area of £870k.²
- 2.4 Typical expenditure in the local area before, during and after work can be on things such as food and beverages (e.g. lunch), after work activities and retail shopping at nearby stores.

Operational impacts

Direct employment

The scheme will deliver significant office and retail floorspace and associated jobs. The Development will provide a total of 49,612 (GIA) (Table 1) of employment supporting commercial space. This will be split across retail, office space, a gym and an auditorium exhibition space, providing both occupant and public amenity in the heart of the tower, referred to as the Hub.

 $^{^{1}}$ The standard assumption is that ten job years of employment are equivalent to one FTE job.

² Assuming 60% of workers spend £11.50 a day for 220 days a year. The £11.50 is based on a YouGov survey which found that UK workers spent £6 in the local area on average in 2005 – this has been uplifted to reflect earnings growth in the period to 2016 and the discrepancies between earnings in different industries. Although this study dates back to 2005, it is the most up to date data and most frequently used assumption concerning local worker spend.

Table 1: Total proposed employment floorspace (sqm, GIA)

	Office (B1)	Retail (A1)	F&B retail (A3)	Gym (D2)	Hub (B1/D2)	Total
Main building	44,906	132	931	615	719	47,303
Georgian Terrace	1,067	633				1,700
Keats House	401		208			609
Total	46,374	765	1,139	615	719	49,612

- 2.6 Gross employment has been estimated using the employment densities from the *Employment Densities Guide*³ to estimate employment based on the quantum of floorspace of different uses. It is estimated that the Development would support 2,750 FTEs, equivalent to 2,960 jobs accounting for the proportion of part time employment⁴.
- 2.7 It is standard practice to compare the proposed use against the current use in order to understand the extent to which the economic activity created by the Development would be additional to what is there now and how the types of activity might change. The Site supports 900 office employees (equivalent to 845 FTEs), therefore the Development is expected to support approximately 1,905 additional FTEs, equivalent to 2,060 jobs. There are currently no small to medium-sized enterprises at the Site, they are all fairly large occupiers. The Applicant will not take back the buildings for three years following a successful application so current occupiers should have sufficient time to find alternative premises. The Applicant has already facilitated one intra-portfolio move for the health uses that were located at the Site.

Table 2: Gross Additional Employment

	Hub	Gym	Office	Retail	Total
Gross direct FTEs	10	10	2,640	90	2,750
Gross direct jobs	10	10	2,820	120	2,960
Existing FTEs	0	0	845	0	845
Existing jobs	0	0	900	0	900
Gross additional FTEs	10	10	1,795	90	1,905
Gross additional jobs	10	10	1,920	120	2,060

NB figures are rounded

Worker expenditure

A 2005 YouGov survey found that workers in the UK spent on average £6 a day in the local area around their place of work. Uplifting this for earnings growth between 2005 and 2018, the higher earnings in London, and the earnings differential between the different industries, it is estimated that employees on-site are expected to spend on average between £8.40 (retail workers) and £13.50 (office workers) per day.

³ Homes & Communities Agency's (HCA) Employment Densities Guide, 3rd edition, 2015

⁴ Based on the assumption that 13% of office workers will be part time and 50% of retail workers will be part time (this is the average for LBS in 2017 – BRES) and one part time job is equivalent to 0.5 FTEs

2.9 The Site is currently estimated to support £1.6m in local expenditure each year. The Development, once fully operational, is expected to support £5.1m of worker expenditure in the area each year⁵ – an additional £3.5m on existing levels.

Local employment

2.10 The Development would provide a range of employment opportunities to people who live within the borough and will help address issues of unemployment. Figure 2 shows that LBS, London and Great Britain unemployment rates (16+) have largely followed the similar trends between 2004 and 2017. There was a significant increase in unemployment in 2008 around the time of the recession and since 2013 there has been a steady decline. Unemployment across all three geographies is now at its lowest point for the time period shown. However, despite the reduction, LBS has always had a higher unemployment than the average for both London and Great Britain. In 2017, LBS unemployment was 2.1 percentage points higher than the national average.

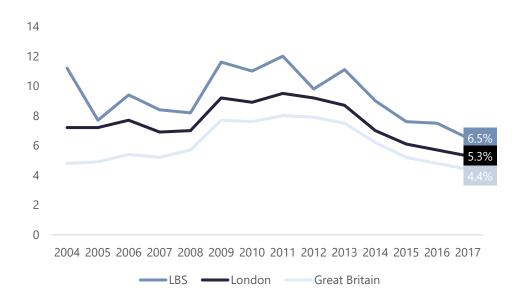


Figure 2: Unemployment (16+) by geography (%)

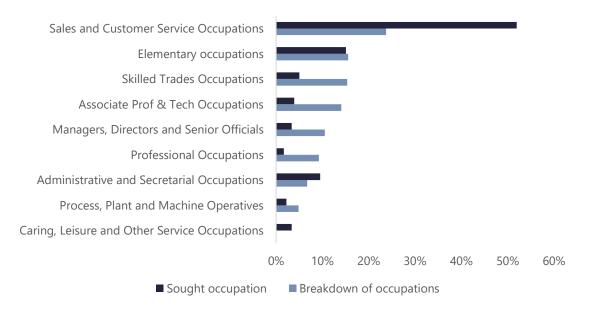
Source: Annual Population Survey

- 2.11 Retail disproportionately supports local jobs and provides a high proportion of entry-level positions, creating opportunities for unemployed local residents. Figure 3 provides evidence on the type of jobs that unemployed local residents in LBS are searching for. The graph shows:
 - Current occupations the breakdown of current types of occupation in the 'distribution, hotels and restaurant' (the industry group which retail is categorised within) industry in LBS. It shows that a high proportion of LBS' existing 'distribution, hotels and restaurants' workforce work in both 'sales and customer service' (24%) and 'elementary' (26%) positions; and

 $^{^{\}rm 5}$ Assuming 60% of retail workers spend £8.40 and 60% of office workers spend £13.50 for 220 days a year

- Sought occupations the type of occupations that unemployed LBS residents are currently seeking. This shows that 52% of borough residents on Jobseekers Allowance are seeking work in 'sales or customer service'.⁶
- 2.12 Figure 3 shows that the retail jobs at the Development would be well suited to the locally unemployed as they are provided in an industry (distribution, hotels and accommodation) that has a high proportion of occupations that match what local residents are seeking. For example, 52% of local unemployed residents want to work in 'sales and customer service' occupations and 24% of 'distribution, hotels and restaurant' jobs have that occupation. The retail uses at the Development which are estimated to support 90 jobs are therefore likely to provide occupations well suited to unemployed residents and hence support local jobs.

Figure 3: Job Seekers Allowance in LBS by sought occupation



Source: Jobs Seekers Allowance, ONS, August 2018

2.13 Leakage relates to the employment that benefits those outside of an intervention area. Table 3 shows the expected distribution of total onsite employment once the Development is operational. This estimate is based on the commuting data from the 2011 census of workers to LBS weighted by the types of employment. It shows that 76% of workers are expected to commute from within London, of which 10% are expected to commute from LBS whilst 33% and 32% will commute from the rest of Inner London and Outer London respectively⁷.

⁶ Jobseeker's Allowance consists of two components - 'contribution-based Jobseeker's Allowance' which is based on national insurance contributions and 'income-based Jobseeker's Allowance' which is based on the claimant's income and savings. Only 'income-based Job Seeker's Allowance' is included in the new Universal Credit benefits scheme. Following the introduction of Universal Credit, the Claimant Count is now measured as the number of people claiming JSA plus the number of Universal Credit claimants who are required to look for work, of which some will be on 'income-based Jobseeker's Allowance'.

⁷ Office for National Statistics (2011): location of usual residence and place of work by industry (safeguarded data) SRS agrees that the figures and descriptions of results in the attached document may be published. This does not imply ONS' acceptance of the validity of the methods used to obtain these figures, or of any analysis of the results.

Table 3: Distribution of total onsite employment

	LE	3S	FTEs		J	obs
LBS	10%		285		310	
Rest of Inner London	33%	76%	915	2,085	985	2,250
Outer London	32%		885		955	
Outside of London	24%	24%	660	660	710	710
Total	100%	100%	2,750	2,750	2,960	2,960

Source: census 2011, NB totals may not add due to rounding

Total net additional employment

- 2.14 The previous analysis has dealt with gross economic impacts created by the Development. In order to present the net impact of the Development, displacement and multiplier impacts must be accounted for. The HCA Additionality Guide⁸ provides a framework for estimating the additionality impacts of the Development:
 - Displacement is the proportion of jobs that would have been supported elsewhere.
 Given the high levels of economic activity in London and the high levels of demand to operate within the region it is anticipated the Development would have a low impact upon existing levels of employment. The guidance provides a standardised figure of 25% for minor levels of displacement; and
 - The multiplier impact is the indirect benefits to other sectors supported by the proposed scheme, generated through both the supply chain and worker expenditure. The scale of the multiplier depends on the size of the geographical area that is being considered, the local supply linkages and income leakage from the area. The HCA Additionality Guide provides a composite multiplier, which is the combined effect of indirect and induced multipliers. The scale of the geographical area under which the impact of employment is assessed, and the strong supply linkages that occur in Greater London, imply a high multiplier. This analysis has conservatively assumed that the Development is likely to have at least "average" supply linkages given the scale of its economy. As a result, a medium regional level composite multiplier of 1.5 has been selected.
- 2.15 Table 4 summarises the total net additional employment by employment category. Applying the 25% displacement factor the 1,905 gross additional FTEs, there are 1,435 net direct FTEs. A further 675 indirect and induced FTEs would be expected once multiplier impacts (1.5) are considered. It is therefore estimated that the scheme would support 2,155 total net additional FTEs (2,325 total net additional jobs).

⁸ HCA, Additionality Guide, 2014

Table 4: Total onsite employment

	Hub	Gym	Office	Retail	Total
Net direct FTEs	10	10	1,345	70	1,435
Net direct jobs	10	10	1,440	90	1,550
Net indirect FTEs	5	5	675	35	720
Net indirect jobs	5	5	720	45	775
Total net additional FTEs	15	15	2,020	105	2,155
Total net additional Jobs	15	15	2,160	135	2,325

NB totals may not add due to rounding

Office provision

- 2.16 The Site is located within the London Bridge area, which lies within the London Bridge, Borough and Bankside Opportunity Area⁹. The area is a part of LBS within the London Central Activities Zone (CAZ) and the LBS part of the Southbank office submarket¹⁰. The London Plan recognises that this area has considerable potential for intensification, especially with regards to office provision.¹¹
- 2.17 London Bridge began as an alternative to the City of London. The area had limited success until the late 1990s when significant development started to occur with many companies relocating from the City of London. Since then, major developments such as the Shard have taken place making the area an important hotspot for the London CAZ and the wider regional economy.
- 2.18 From an overall local authority perspective, LBS supports 5% of London's total office employment. Of the 33 London boroughs (including the City of London), LBS has the seventh highest overall employment density and office employment density. It is still somewhat behind densities elsewhere in London, as shown in Table 5. The City of Westminster supports office employment at four times the density of LBS.

Table 5: Total employment and office employment densities, ranked by borough

Rank (office employment density)	London borough	Office employment density	Total employment density
1	City of London	1,487	1,768
2	Westminster	158	336
3	Tower Hamlets	93	149
4	Islington	86	152
5	Camden	80	172
6	Kensington and Chelsea	42	115
7	Southwark	40	83

Source: BRES, 2017

⁹ GLA, The London Plan, 2016

¹⁰ BNP Paribas, Central London Office Market Update, Q3 2018

¹¹ GLA, The London Plan, 2016

2.19 Between 2000 and 2016, LBS office stock increased by 20%, the 5th highest growth of all London boroughs¹² (Figure 4).

Figure 4: Percentage change in office provision by London borough (2000 to 2016)



Source: GLA, 2017

- 2.20 Whilst the increase in office floorspace has helped rents in Southbank offices remain competitive, vacancy across the area is very low (Figure 5). According to BNP Paribas, vacancy rates were 2.63% as of Q3 2018. Whilst this is a marginal improvement on Q2, BNP Paribas find that "Southbank remains the most supply restrained submarket in Central London".¹³
- 2.21 In any market with an active and growing business base there will be a natural churn of businesses. Turnover is a positive sign showing that businesses are growing and requiring new office space. It is therefore necessary that some space is vacant to facilitate this churn. The Land for Industry and Transport Supplementary Planning Guidance suggests that this frictional vacancy should be managed at around 5-8% of stock. Vacancy rates in the submarket imply that there is effectively no spare capacity in the area.
- 2.22 If the office market in LBS and Southbank is to remain price competitive, then additional supply is required to meet the strong demand and continue to attract businesses.¹⁵

¹² GLA, London Office Policy Review, 2017

 $^{^{13}}$ BNP Paribas, Central London Office Market Update, Q3 2018

¹⁴ Greater London Authority (2012), Land for Industry and Transport: Supplementary Planning Guidance, GLA

¹⁵ BNP Paribas define Southbank as the area along the river from Nine Elms to the east of the Shard.

Figure 5: Rent per sqft and vacancy rates of the central London office market, Q3 2018



Source: BNP Paribus Real Estate, 2017

- 2.23 The London Office Policy Review expects 6.0m sqm of additional (GIA) floorspace growth across London between 2016 and 2041. LBS is expected to deliver 506,800 sqm or 8% of this growth, which is equivalent to 20,270 sqm of additional office space per year. This will be critical in achieving the 156k office employment target for LBS by 2041.
- The Development would supply 46,374 sqm (GIA) of high quality office space within the London Bridge, Borough and Bankside Opportunity Area, of which 33,611sqm (GIA) would be additional to what is currently supported. This would equate to 6.6% of LBS' projected target to 2041 and 0.6% of the overall projection for London (Table 6). This is a significant contribution for one scheme and will help maintain northern LBS' price competitive position thus helping it compete with traditionally dominant locations within the Inner London office market such as the City of London and the West End.

Table 6: The Development's additional contributions to office space provision

	LBS (507k sqm)	London (6.1m sqm)
% of GLA projection	6.6%	0.6%
% of GLA annual projection	166%	14%

Source: GLA, 2017

2.25 Planning policy supports development in the most accessible places. The Site is very accessible, located near London Bridge Station with the highest public transport (PTAL) rating of 6b, and so is a prime location for development.

¹⁶ GLA, Ramidus Consulting, London Office Policy Review, 2017

Retail provision

- 2.26 There is a total of 208,666 sqm of retail floorspace across LBS¹⁷. The LBS Core Strategy¹⁸ categorises London Bridge as a District town centre (indicating a good level of retail provision). According to the LBS Core Strategy¹⁹, London Bridge currently performs the role of a leisure, retail and specialist food shopping destination. However, with steady growth in businesses and homes in the area, retail capacity will need to increase.
- 2.27 Retail has the ability to play a key role in maintaining the vitality and attractiveness of an area. For this reason, it is essential that LBS continues to ensure it has the required level of retail provision to maintain the vitality of its town centres and its collective retail scene is able to compete with other London boroughs.
- The LBS Retail Study states that LBS is expected to supply 50,802 sqm of additional retail floorspace between 2015 and 2031, equating to 3,175 sqm per year. Within the borough, north west LBS (the retail district in which London Bridge is located) is expected to supply 9,203 sqm GIA of additional floorspace between 2015 and 2031, equating to 575 sqm GIA per year.
- Once the Development is operational it will provide an additional 1,904 sqm GIA of additional retail floorspace, equivalent to 21% of the north west LBS' target and 4% of the borough wide target (Table 7). Furthermore, the Site is surrounded by the strong retail provision within the revitalised London Bridge Station to the north and Borough Market to the west. If St. Thomas Street was to develop retail outlets, as proposed by this scheme, it would connect London Bridge Station and Borough Market as one single retail horseshoe.

Table 7: Development's contributions to retail

	LBS North West target	LBS target
% contribution	21%	4%
% annual contribution	331%	60%

Source: LBS, Retail Study, 2015

¹⁷ LBS Retail Study, NLPPlaning, 2015

¹⁸ LBS Council, Core Strategy, 2011

¹⁹ LBS Council, Core Strategy, 2011

3 Health Impact Assessment

Access to healthcare services and other social infrastructure

3.1 For this assessment a catchment area of one mile has been used, which is considered a typical walking distance to a GP surgery (Table 8). There are twelve GPs within a one mile catchment area of the Site, but data is only available for nine. These nine GPs have a total list size of 56k patients and supported by 37 doctors. The average ratio of registered patients per GP across the practices is 1,517, falling within the patient list size of 1,800 per GP recommended by the Department of Health and Social Care (DHSC)²⁰. This suggests that the provision of primary care is not particularly constrained. GPs with a patient to GP ratio over the NHS recommendation of 1,800 are highlighted in red below.

Table 8: GP Surgeries within a one mile radius of the Site

Name	No. GPs	List size	Patient to GP ratio
Borough Medical Centre (Dr Misra)	1	2,669	2,669
Borough Medical Centre (Dr Sharma)	1	2,368	2,368
Falmouth Raod Group Practice	5	6,168	1,234
Blackfriars Medical Practice	6	7,940	1,323
The New Mill Street Surgery	3	5,885	1,962
St. Katherine's Dock Practice	1	2,119	2,119
Bermondsey Spa Medical Centre	5	11,014	2,203
Old Kent Road Surgery	8	9,788	1,224
Dr At Bradford's Practice	7	8,195	1,171
Total	37	56,146	1,517

Source: NHS Choices, 2018; NB this data does not include The Bermondsey And Lansdown Medical Mission, The Nexus Health Group or The Artesian Health Centre because it has not been published by the NHS

- The closest accident and emergency (A&E) services to the Site is St. Thomas Hospital, which is operated by the Guy's and St. Thomas NHS Foundation. The hospital is located one and a half miles from the Site.
- 3.3 The A&E target is that 95% of patients who attend an A&E department are to be admitted to a hospital bed, discharged from the department, or transferred to another hospital, within four hours of arrival. The standard recognises that for some patients it may be clinically inappropriate to manage them within four hours of arrival in the department.
- In the most recent quarter for which data is available (to June 2018), 89.9% of patients across England were admitted within the four hour target time. The Guy's and St. Thomas NHS Foundation achieved a maximum wait time of four hours for 86% of cases, suggesting the A&E department is more constrained than average.²¹

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 ²⁰ Benchmark patient list size of 1,800 per GP recommended by the NHS Healthy Urban Development Unit and adopted by the DHSC
 21 NHS England, A&E Attendances & Emergency admission quarterly statistics, 2017; this data is for trust level only but due to The Guy's and St. Thomas NHS Foundation Trust only operating one A&E (located at St. Thomas) the trust level figure only relates to St. Thomas Hospital

Health during the construction phase

- 3.5 Accidents during the demolition and construction phase would be more likely to occur than during the operational phase. Between 2014/15 and 2016/17, 2.9% of construction workers in Great Britain were injured while at work compared to 1.9% of workers injured across all industries.²²
- 3.6 Based on this it is estimated that there would be 17 construction related accidents per year during the construction phase.
- 3.7 The Guy's and St. Thomas NHS Foundation Trust had an attendance of 44,978 in the quarter to June 2018. It is therefore estimated that the demolition and construction phase of the Development would increase A&E attendance by less than 0.01% per year at a trust level.²³
- 3.8 There will be a first aid station onsite to address any minor heath issues arising at work and prevent them needing to access outside medical attention this has been incorporated into the construction plan with welfare buildings located adjacent to the Site office.

Health during the operational phase

- 3.9 Typically, individuals register with GPs close to their place of residence, however since January 2015, GPs have been allowed to accept patients who are living outside their practice boundaries, although it is for the practice to decide whether this is appropriate. A GP can refuse to accept patients because:
 - It does not have the capacity to take on new patients;
 - It is not accepting patients that do not live within in its practice boundary; and
 - It is not appropriate for a particular individual to register with a practice that is a long way from where they live.
- 3.10 This analysis conservatively assesses the worst case scenario that all workers and residents would impact upon local facilities.
- 3.11 The average ratio of registered patients per GP across the nine GPs that lie within one mile of the Development is 1,517, which currently meets the target list size of 1,800 per GP as recommended by the DHSC. If all workers employed at the Site during the operational phase were to use the existing local GP practices which is highly unlikely the ratio of patients per GP would increase to 1,597 which is still within the target list size of 1,800.
- 3.12 In contrast to the construction phase, accidents at work are less likely to occur during the operational phase. Indeed, on average 1.9% of workers across all industries are injured at work a year²⁴. Based on this, it is estimated that there will be 56 additional workplace related accidents per year. This would result in a less than 0.03% increase in the Guy's and St. Thomas' NHS Foundation annual A&E visits.



²² HSE (2017), LFS – Labour Force Survey – Self-reported work-related ill health and work related injuries

²³ This is assuming that annual A&E attendance at trust level is the equivalent of four times the A&E attendance in the quarter to June 2018

 $^{^{24}}$ HSE (2017), LFS – Labour Force Survey – Self-reported work-related ill health and work related injuries

Access to open space and nature

- 3.13 The latest LBS Open Space Strategy²⁵ states that there was 2.22 hectares (ha) of open space per 1,000 residents in 2013, which is below the national recommendation of 2.43 ha per 1,000 residents set by the National Playing Fields Association (NPFA). This suggests that LBS is suffering from an under provision of open space.
- 3.14 At a local level, there are a number of open and play spaces within close proximity to the Site (Table 9). These spaces are all within ten minutes walking time²⁶ from the Site. The drawback of these spaces is that none exceed two ha in size, which means that they are only classed as 'pocket parks', the lowest category for public parks set out within the GLA guidelines²⁷.

Table 9: Pocket Parks within ten minutes walking distance of the Site

Park name	Walking distance
Leathermarket Gardens	6 minutes
Guys Street Park	6 minutes
Little Dorit Park	8 minutes
Mint Street Park	8 minutes
Potters Fields Park	9 minutes
St. John Church Park	9 minutes
Tabard Gardens	10 minutes

Source: Google Maps, 2018; NB all parks listed as less than 2 ha in size

- 3.15 In terms of existing public realm and permeability, the local area has a number of landmarks and destinations such as the Shard, Hayes Galleria and Southwark Cathedral as well key transport nodes. These attract footfall to the area and create a need to develop commensurate public routes within the area.
- 3.16 As described in the Design and Access Statement, the site is currently inaccessible as a pedestrian route, offering limited north/south permeability.
- 3.17 The Development will provide new ground level pedestrian routes offering greater permeability through the Site. The enhanced permeability and connectivity would relieve pressure on Borough High Street, whilst making the Site more accessible. These pedestrian routes will be accompanied by hard and soft landscaping to maximise their benefits to local pedestrians.
- 3.18 An elevated garden will also be provided by the Development. This will provide a sheltered environment usable all year-round in all weather conditions and will complement the other outdoor public spaces in and around the Site. It will not require any form of prior booking and will be open to the general public.
- 3.19 Refer to the Design and Access Statement for further information.

²⁵ Southwark Open Space Strategy, Southwark Council, 2013

²⁶ Google maps, 2018

²⁷ GLA, The London Plan, Chapter Seven: London's Living Spaces and Places, 2016

Air quality, noise and neighbourhood amenity

Air quality during construction phase

- 3.20 The construction and demolition phase of the Development is not expected to result in a significant effect on air quality. There are however mitigation measures in place, including but not limited to:
 - All skips and muck away lorries will be dampened down via a water point adjacent to the loading area;
 - Skips to be securely covered and drop heights to be minimised for redundant materials to reduce dust arising when loading;
 - All cutting equipment to use water as suppressant or suitable local exhaust ventilation systems where applicable;
 - When demolition is taking place areas to be dampened down to reduce dust arising all vehicles will be washed down before leaving;
 - All vehicles will switch off engines no idling vehicles; and
 - Spill kits are available and will be used where required.
- For further details refer to the Dust Management Plan (DMP), Construction Management Plan, and Chapter 9: Air Quality of the ES.

Noise during the construction phase

- 3.22 Measures to control the noise and vibration effects from the Works will be incorporated into a Site Environmental Management Plan (SEMP). This SEMP will have regard to appropriate legislation, guidance and measures to minimise construction noise, including but not limited to:²⁸
 - Application of the principle of Best Practical Means (BPM) as defined in Section 72
 of the Control of Pollution Act 1974, carrying out all work in such a manner as to
 reduce any disturbance from noise to a minimum.
 - Identification and use of low noise techniques. For example, equipment that
 breaks concrete by munching or similar, rather than by percussion. Where
 construction plant is known to generate significant levels of noise then it is to be
 used sparingly and the construction activity closely monitored to minimise noise
 levels.
 - All plant brought on to Site should comply with the relevant EC / UK noise limits applicable to that equipment. Plant should be properly maintained and operated in accordance with manufacturers' recommendations.
 - Where feasible, all stationary plant should be located so that the noise at all occupied SRs [sensitive receptors] is minimised and, if practicable, every item of static plant when in operation should be sound attenuated using methods based on the guidance and advice given in BS 5228 (e.g. local screening)²⁹.
 - Items of plant on the Site operating intermittently should be shut down in the intervening periods between use.
 - The use of tower cranes for vertical transportation to reduce noise and vibration.
 - Adoption of a noise monitoring regime and the establishment of noise Action Levels in consultation with SC [Southwark Council], above which consideration will

 $^{^{\}rm 28}$ The following measures are presented in Chapter 8: Noise and Vibration of the ES.

²⁹ BS 5228-1:2009+A1:2014: Code of practice for noise vibration control on construction and open sites

be given to the use of alternative techniques and / or other means of controlling noise levels.

- Use of hoarding to the required height and density appropriate to the noise sensitivity of the area.
- Implementation of a Construction Logistics Plan (CLP) to pre-plan and manage traffic associated with the works to minimise disturbance to SRs.
- 3.23 Based on the implementation of mitigation measures as detailed above, the likely residual effects from construction noise are assessed as insignificant at all SRs apart from SRC [Guy's Hospital including Chapel], SRD [Bunch of Grapes] & SRF [Iris Brook House/Orchard Lisle House]. However, this conclusion is predicated on the basis that all on-Site plant activities operate simultaneously at the shortest distance to the SR, a situation which in practice is seldom likely to occur. This assessment therefore represents a worst case scenario. As such, for the majority of the construction phase potential impacts will range from insignificant to, at worst, a temporary local adverse effect of moderate significance.

"Although insignificant effects are predicted to arise from construction related traffic noise, due to the small percentage increase in base flows, a Construction Logistics Plan (CLP) will be implemented. The CLP will pre-plan and manage traffic associated with the [w]orks as far as practically possible to minimise any potential disturbance to local-residents and businesses from noise associated with road-going vehicles, including haulage vehicles.

Following the application of the principle of BPMs [best practical means] and implementation of a Site-specific CLP, the likely residual effects from construction traffic are expected to remain insignificant."³⁰

3.24 Refer to Chapter 8: Noise and Vibration of the ES for further information.

Air quality during operational phase

- 3.25 Chapter 9: Air Quality of the ES notes that the emissions from the Development are predicted to have an insignificant impact at all 12 receptor locations.
- Despite this, the Development does incorporate a number of measures that would benefit local air quality. These include (amongst others):
 - The ability to accommodate a new entrance/exit to the London Bridge Underground Station, which would reduce pedestrian footfall on Borough High Street and encourage the use of public transport; and
 - New open space surrounding the area identified as a potential new entrance /exit to the London Underground, which would be planted with medium and tall trees.
- 3.27 Refer to Chapter 9: Air Quality of the ES for further information.

Noise during operational phase

3.28 The Development has been designed in such a way that the noise levels coming from the Site, once operational, will be in line with local planning requirements. Once operational, the building services plant noise and commercial uses and servicing noise is expected to be insignificant. These will nonetheless be mitigated through:

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 $^{^{\}rm 30}$ Chapter 8: Noise and Vibration, paragraphs 8.76 and 8.77

- Building services plant noise plant noise limit secured through planning conditions; and
- Commercial uses and servicing noise building envelope and delivery and servicing management plant.
- 3.29 Refer to Chapter 8: Noise and Vibration of the ES for more information.
- 3.30 The noise produced by the Site is no greater than +5dB during the day and no greater than +3dB during the night. This is not judged to be a significant amount.
- 3.31 Refer to the Sustainability Strategy for more information.

Accessibility and active travel

Access to the site

- 3.32 The Site is in Zone 1 and has extremely high levels of accessibility. TfL identifies the Site as having a public transport accessibility level (PTAL) of 6b, indicating that the site has excellent public transport links. The Site is located approximately 50m from London Bridge Underground Station, which has an entrance on Borough High Street, whilst London Bridge National Rail Station is situated within 200m of the Site, providing access National Rail, Northern Line and Jubilee Line services. It is bound by St Thomas Street to the north, shops on Borough High Street (the A3) to the west, King's Head Yard to the south and Guy's Hospital buildings to the east.
- 3.33 Vehicular and pedestrian access to the site is currently from St Thomas Street (A200) and King's Head Yard. King's Head Yard provides access to the Site's car parking area whilst St Thomas Street is used for servicing. There is currently no public open space or a public route through the Site.
- 3.34 The Site is located in close proximity to established cycle routes, including Cycle Superhighway 7 and National Cycle Network Route 4. It has access to several bus routes including 15 local bus services within close proximity to the Site, and it is within 550m walking distance of four river taxi services at the London Bridge City Pier.
- 3.35 A Pedestrian Environment Review System (PERS) audit of the existing pedestrian network surrounding the Site has been undertaken:

"The audit shows that at present, a number of links achieved a red rating which indicates poor level of provision. These include the southern side of St Thomas Street, on the southern side of Borough High Street outside of the Site, on White Hart Yard and on King's Head Yard. The links have scored based on several parameters with worst scoring parameters being poor maintenance, user conflict, colour contract, tactile information and permeability."31

3.36 Refer to Chapter 7: Transport and Access of the ES and the Transport Assessment for a detailed assessment of the Site's accessibility.

Demolition and construction traffic management

3.37 During the demolition and construction phase there will be an increase in the amount of people travelling to the Site. Due to limited car parking, these workers will travel to the Site by public transport and as a result will not contribute towards an increase in

³¹ Chapter 7: Transport and Access of the ES, paragraph 7.56

vehicle trips. Furthermore, the working hours will be between 8am and 6pm. This means the majority of the construction workers will be travelling to the Site outside of peak periods therefore it should not make a significant difference to the level of demand for public transport.

3.38 The construction and demolition workers would generate short-term increases in vehicle movements on the highway near the site. These increases would not be constant over the construction period. The Transport Assessment looks at the highest peak frequency as it provides a worst case assessment and finds that "the overall traffic flows, the increase in vehicle movements would be less than 10% on all road links and therefore insignificant."

"Potential traffic and transportation related effects could arise causing temporary disruption to road users and pedestrians from vehicles (particularly HGVs) entering and leaving the site. These include footway closure on the southern side of St Thomas Street outside the site with pedestrians being diverted onto the opposite side of the road."³²

3.39 Chapter 7: transport and access of the ES also notes that:

"Consideration has been given to the likely numbers of construction vehicles and the routes to and from the Site. The construction vehicles would be managed in accordance with a CLP and a SEMP. These documents would be agreed with the SC prior to the commencement of works and are expected to be secured by planning conditions.

Other potential effects as a result of construction would be on road surfaces from mud and dirt, as well as temporary footway closure on the southern side of St Thomas Street which would be actively managed in accordance with measures set out in the SEMP and the CLP. These measures would be expected to be incorporated as planning conditions / Section 106 measures and are therefore considered as mitigation measures rather than part of the scheme design, hence their consideration as such within this assessment. These measures are summarised as follows:

- Restricted hours of work;
- Demolition and construction method statements;
- Considerate Constructors Scheme;
- Management of deliveries and trade contractors;
- Management of noise, vibration and dust; and
- Management of construction waste."
- 3.40 Chapter 7: transport and access of the ES finds that whilst there would be some adverse effects relating to "effects of traffic flows from construction vehicle movements upon the local highway network users" and "effects of construction activities on pedestrians in terms of movement and capacity, severance, delay, fear and intimidation, amenity", both would however be insignificant after mitigation.

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 $^{^{\}rm 32}$ Chapter 7: Transport and Access of the ES, paragraph 7.102

3.41 For further details refer to Chapter 6: development programme, demolition, deconstruction, refurbishment and construction and Chapter 7: transport and access of the ES, the Transport Assessment and the Construction Management Plan.

Operational traffic management

- 3.42 The Development, once operational, is expected to have a negligible impact upon traffic levels. The Development will be car free (with the exception of deliveries and two disabled car parking spaces), all workers and visitors to the Site will be not be able to drive as there will be no car parking provided and there is a very limited supply of car parking in the surrounding area. This will mean people travelling to the Site will be encouraged to use the pre-existing public transport. A Travel Plan will also be written which will aim to ensure the predicted travel patterns are achieved and maintained.
- In terms of delivery vehicles driving to the Site, various measures have been undertaken in order to mitigate the impact upon the local road network. Firstly, all deliveries to the Site will need to be pre-booked with only two slots available during the AM and PM peak. This will mean that during the times of day when congestion is a genuine problem the Development would be generating a maximum of two trips to the Site. In addition, a proportion of servicing will take place overnight (between 12 and 6am) to further reduce the number of vehicle trips during the day.
- 3.44 Lastly, as a result of the public realm improvements pedestrians along King's Head Yard, it will become a much more pleasant environment for pedestrians. It is hoped that this will encourage them to travel along King's Head Yard as oppose to White Heart Yard. This will mean less pedestrians will be affected by the additional vehicle movements along White Heart Yard.
- 3.45 For further details refer to the Transport Assessment.

Active travel

- 3.46 Pedestrian access will be significantly improved through:
 - Improvements in the public realm and increased permeability between King's Head Yard and St Thomas Street. The public realm within the development comprises a variety of new spaces including squares, passages and yards;
 - The main tower will have a pedestrian entrance from New Yard which is one of the two yards created by the public realm proposals within the site. The Yard will be for pedestrian use only and will link with St Thomas Street through the proposed St Thomas Square;
 - Permeability will be further enhanced through opening up of the original passage through the Georgian townhouses linking the site with St Thomas Street;
 - A proposal to open up the rear of London Bridge underground station to provide a new entrance directly within the Site;
 - King's Head Yard will also be improved to offer a better pedestrian environment and will be largely car free.
- 3.47 Walking will be encouraging through the new pedestrian access routes connecting the Site to the existing streets and the use of hard and soft landscaping in order to improve the public realm. The Development will involve the provision of basements and pavement vaults beneath the new office building and Keats House. These will provide cycle storage, showers and lockers. This will encourage people to cycle to work.

Workers will be discouraged from driving to the Site as the only parking available will be for blue badge holders.

3.48 Refer to the Transport Assessment for further detail.

Accessibility

3.49 The Development has been designed to comply with relevant planning policy and meet all relevant building regulation requirements as a minimum. The Design and Access Statement explains how it will improve accessibility by introducing step-free access where possible.

Crime reduction, community safety and social cohesion

Crime reduction and community safety

- 3.50 The Indices for Multiple Deprivation (IMD) reports 'crime and disorder' deprivation which is a measure of the risk of personal and material victimisation. The majority (70% or 117 Lower Super Output Areas (LSOAs)) of the 166 LSOAs which make up LBS Local Authority are within the top 20% most deprived in England for crime. Indeed, LBS is the sixth worst local authority in England in terms of crime deprivation. However, it should be acknowledged that inner city local authorities do tend to be worse for crime deprivation: of the top ten worst local authorities for crime deprivation in England, nine are in London and the other is the city of Manchester.
- 3.51 Figure 6 shows a map of crime deprivation for LBS by LSOA. On a more specific geographical level, LBS 002E has crime deprivation score of 3, meaning it is in the 30% most deprived LSOAs in England in terms of crime. This suggests crime is of a concern of the immediate area.

Southwark crime deprivation by LSOA

10% least deprived nationally (0)
9 (1)
8 (2)
7 (2)
6 (3)
5 (12)
4 (13)
3 (16)
2 (53)
10% most deprived nationally (64)

Figure 6: LBS crime deprivation by LSOA, 2015

Source: IMD, 2015

3.52 Similarly, see Figure 7, the crime rate per 1,000 residents for LBS shows that crime is more of a concern for the north west of the borough. LBS 002E has a crime rate of 304 per 1,000 residents, this is significantly above the average for the borough of 133 per 1,000 residents.

Crimes per 1,000 residents by LSOA

600 to 730 (3)
400 to 600 (2)
200 to 400 (19)
100 to 200 (60)
30 to 100 (82)

Figure 7: Crime rate by for LBS LSOAs

Source: Data. Police, 2017

Designing out crime and improving community safety

- 3.53 The Construction Management Plan describes the security measures for the construction period. It notes that there will be security at the main entrance to the site and the entrance will be manned by a full time security guard. Signage will also identify the work zones and safe routes so both site operatives and visitors will be aware of nogo areas, safe routes and escape routes. The Construction Management Plan also notes that the following control measures shall be in place:
 - There will only be one means of access into the building. The primary access point shall be through the access gate situated adjacent to the main entrance gate;
 - Any access for bulk materials will be through the double (sliding/ bi-folding) gate along St Thomas Street, but only under supervision of the main contractor's site team and with prior arrangement. This gate will remain locked at all other times and fully supervised by a traffic marshal/ banksman;
 - A digi keypad shall be fitted to the external door at the main entrance to the site;
 - Turnstiles with an access control system will be installed adjacent to the site entrance;
 - Entrance to the site to be secured with mortice locks at all times outside of working hours;
 - Access to the site works areas from all other external doors shall remain locked and secured with emergency break glass bolts; and
 - Operatives and visitors will have to attend an induction prior to working on site;
 this will be carried out by the Main Contractor.
- 3.54 Refer to the Construction Management Plan for more detail.

- 3.55 Once operational, the Development would be expected to reduce crime in the local area. The ability of well-designed developments to 'design-out' crime is well studied. Architects and criminologists have long recognised the role of urban design in crime prevention. Crime Prevention Through Environment Design (CPTED)³³ holds that proper design, through application of CPTED guidance, results in behavioural responses that deter and reduce the fear of crime. For example, encouraging natural surveillance in order to have 'more eyes on the street' will deter criminal activity as will ensuring a good level of maintenance and management because visual deterioration may encourage crime and reduce 'pride of place'.
- 3.56 The design team has completed two meetings with police security stakeholders to inform the Security Design Strategy. Security measures which may be considered for the Development, dependent on the security risk assessment and to be developed in subsequent design phases, include:
 - Security and front of house staffing in public areas;
 - Security rated doors in vulnerable locations, to reduce the attractiveness and likelihood of success of theft and criminal damage;
 - Consideration of Crime Prevention Through Environmental Design (CPTED) in related design packages including lighting and landscaping;
 - Suitably robust glazing to provide a proportionate response to a nearby blast;
 - Access control and intercom to manage access to and within the building;
 - Intruder alarm sensors to external doors to reduce misuse and assist in managing security;
 - Duress buttons to allow staff to summon an emergency response;
 - Video surveillance to external and front of house areas to deter crime and antisocial behaviour; and
 - Preparation for potential future tenant and building operation security requirements, e.g. provision of power and data for personnel and mail screening.
- 3.57 The Development will provide increased natural surveillance all around the Site, with activated frontages and improved legibility to create a sense of place. Lower levels of visual deterioration through the landscaped public realm, and a greater 'pride of place' are also likely to reduce the relatively high levels of crime deprivation in the surrounding area. In addition, the series of open public spaces created by the public realm improvements will attract a constant stream of visitors to the area and help to deter criminal activity. The Development also includes security design measures within the public realm which are included in the confidential documents on security design access.
- 3.58 Refer to the Design and Access Statement for more information.

Community consultation

- 3.59 The Applicant has undertaken a detailed pre-application consultation and a full public consultation with local stakeholders. The objective of the consultation period was to involve local people and groups in developing the proposals for the Site and ensuring the planning process was transparent and accessible to all.
- 3.60 Activities undertaken as part of the consultation process have included:

³³ International CPTED Association, CPTED.net

ComRes: Initial Survey – September 2017

A survey of the population of the area, commissioned by the Applicant.

Informal Consultation – April to June 2018

Meetings with Stakeholder Groups

Stage 1 Public Consultation – July 2018

- Meetings with Stakeholder Groups
- Public exhibition at Guys and St Thomas Street Hospital
- Public exhibition at the London Bridge Hotel
- 3.61 The Stage 1 consultation events were attended by over 200 people, 17 feedback forms were submitted as part of this stage of the consultation.

Stage 2 Public Consultation - October 2018

- Public Exhibition at the London Bridge Hotel
- Exhibition for Southwark Cathedral
- Survey at Guys and St Thomas Street Hospital
- 3.62 The Stage 2 consultation events were attended by approximately 47 people, 17 feedback forms were submitted as part of this stage of the consultation. Feedback forms continue to be submitted as part of the consultation.
- 3.63 In total, over 730 people have participated in the consultation process to date, and the project team have engaged with a wide range of stakeholder and interest groups as part of the consultation process.
- 3.64 The Statement of Community Involvement summarises the feedback as follows (refer to the report for further detail):

"Throughout the process to date, GPE has sought input from a wide range of stakeholders on the proposals, and has actively taken such input into account in the design of the proposed scheme. This has included, but is not exclusive to:

- The design of the building was adjusted following extensive wind studies, in response to concerns about the impact the proposed new building would have on the micro-climate, incorporating wind mitigation details that ground wind issues
- At the request of local residents and key stakeholders, publicly accessible facilities such as toilets and a water fountain have been incorporated into the proposals
- [The Applicant] has explored the opportunity and, as a result, has been able to provide affordable workspace and affordable retail as part of the proposals
- [The Applicant] has engaged with community groups to find ways in which they can interact with their existing buildings in the area, either through temporary greening projects or by facilitating pop-ups and events in our courtyard spaces

[The Applicant has] had initial conversations with local specialist charities such as Bankside Open Spaces Trust to assist with the design and eventual maintenance of proposed public spaces including the elevated garden

The majority of respondees across all stages of the consultation were positive about the redevelopment of the New City Court Site. Although some respondees expressed concerns relating to the height of the development many members of the public and stakeholder groups thought the proposals would make a positive contribution to the area in design terms as well as in terms of amenities. Respondees were generally supportive of the proposals to create new employment space on the New City Court Site, the creation of the new public square, and the creation of a new London Underground exit."34

Access to work and training

- 3.65 The construction and demolition phase is estimated to support 2,250 gross job years and the Development is expected to support 2,060 additional jobs over and above what is currently supported once operational. The Applicant has taken the necessary steps to maximise the number of employment opportunities associated with the development that can be fully exploited within the local area. In their Community Strategy, Great Portland Estates (the Applicant's parent company) outline their ten long term commitments. Those include:
 - Work with industry bodies and our supply to maximise apprenticeship opportunities at our developments and managed buildings - during construction, at least 5 apprentices will be recruited, and 5 or more apprentices will be recruited within the relevant parties during construction. The Applicant will also work with local universities and colleges to engage with the project team and provide access to the Applicant's active sites to support learning;
 - Promote the property and construction industry through engagement with local schools – provide opportunities for work experience and career events for schools located in the communities in which our occupied buildings are located.
 - Work with colleges and universities to develop the knowledge and skills of the future workforce - provide work experience for at least one university/college student per annum to work within our occupied buildings.
 - Help the existing workforce to adapt to new ways of working champion health and wellbeing at our buildings and for our employees.
- 3.66 The Development will provide some affordable workspace. Additionally, the provision of additional retail in the area to complement the provision at borough market will help to draw in and retain visitors to the area.

Social cohesion and lifetime neighbourhoods

Social cohesion

3.67 The public and workers will have access to a variety of facilities including retail, restaurants, new access routes, a gym, gardens and improved public realm. These provide opportunities for users to interact and build a sense of community within the Development.

³⁴ Statement of Community Involvement – Executive Summary.

3.68 Throughout the application process there has been extensive pre-application consultation as well as public consultation. Consultation can improve community outcomes: as noted by the National Planning Policy Framework 'good quality preapplication discussion enables better communication between public and private resources and improved outcomes for the community'. Full details of the comprehensive consultation process undertaken by the Applicant and project team can be found in the accompanying Statement of Community Involvement.

Lifetime neighbourhoods

- The Development supports all of the relevant components of lifetime neighbourhoods: 3.1
 - Access: the accessibility of the Development will enable residents to travel out in the area in which they live, connecting them with services and people in the immediate neighbourhood and beyond;
 - Services and amenities: the Development will provide significant services and amenities, such as a gym and retail provision;
 - Built and natural environment: the Development is delivering an improvement in the local built environment through replacing buildings which lack the necessary density with purpose built, well-designed, high-quality office space; and
 - Social networks/well-being: the Development will provide a gym and retail space. In addition, there will be an elevated garden which will be accessible to everyone and will not require any form of pre-booking. This will help build the connection between the Development and local community.

Minimising the use of resources

3.2 There are various aspects for the scheme which ensure the use of resources have been minimised.

> "The scheme will also incorporate water efficient fittings targeting a 50% water demand reduction against nondomestic baselines. Additional features include for the non-domestic assets the specification of greywater recycling, water meters with pulsed output, flow control devices in high demand areas and a major leak detection system. Water efficient irrigation systems will also be specified for the scheme.35"

- 3.3 In terms of land use, the Development makes the best use of existing land because it is increasing the density of the development within the Site in a location that has good quality access to rail, underground and bus services. The Development will intensify a previously developed Site, in a highly accessible location, offsetting the need for greenfield development.
- 3.4 Recycling at the Site will be encouraged where possible during both the construction and operational phase. This will be outlined through a waste management plan and the provision of dedicated on site waste storage and recycling facilities.
- 3.5 The design proposal for the Development is supported by a robust energy strategy which commits to the London Plan policies whilst not compromising on the quality of

³⁵ Sustainability Strategy, Executive Summary

the development. The energy strategy outlines the following targets which will be applied to the Site:

- 'Be lean': 37.1% lower regulated CO₂ emissions when compared to the baseline building;
- 'Be green': 3.7% lower regulated CO₂ emissions when compared to the baseline building;
- Total cumulative CO₂ emissions reduction: 40.7%.
- Therefore, the Development would exceed the carbon reduction target of 35% for new buildings set by the London Plan (Policy 5.2).³⁶
- 3.7 BREEAM pre-assessment reports have been carried out and indicate that the all aspects of the scheme are likely to achieve a BREEAM rating of at least 'very good' with the Tower and Keats House achieving a BREEAM rating of 'excellent'. This demonstrates, the Development will holistically incorporate sustainable principles into the full range of sustainability aspects such as management, health & wellbeing, energy, transport, water, materials, waste, land use & ecology and pollution.
- 3.8 Refer to the Sustainability Strategy for further details.

Climate change

Energy use and renewable energy

- 3.9 Various measures have been included in the Development in order to both mitigate against the effects of climate change but also help reduce the impact the Development will have in relation to climate change.
- 3.10 The scheme design has incorporated energy efficient systems and solar panels (photovoltaic panels) to provide a proportion of the energy demand of the Development. This use of renewable energy sources will have the impact of reducing the use fossil fuels and the amount of greenhouse gas emissions. The panels will be installed facing towards east-west. This has been shown to have a number of benefits such as the ability to capture more solar energy easier in the day and later during the afternoon than a conventional south-facing system. This will help smooth the energy demand and avoid having a situation where there is a spike in energy generating during the middle of the day, the time where energy demand is low.
- 3.11 The Development will be able to adjust to hot temperatures and is looking to achieve the BREEAM 'thermal comfort' credit. The various measures are as follows:
 - There will be substantial ventilation which will provide fresh air to all areas of the Site, including the basements;
 - Low G-value (0.28) glazing will be used in the proposed tower in order to reduce the risk of overheating;
 - Highly efficient LED lighting will be used throughout the Development. This will minimise internal heat generation;
 - The proposed concrete slabs provide high thermal mass to moderate the cooling loads for the tower; and

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³⁶ GLA, London Plan, 2016

- Highly efficient air conditioning will used for the retail assets within the Georgian Terraces.
- 3.12 Refer to the Sustainability Strategy and Energy Statement for further details.

Enhancing biodiversity

3.13 The Sustainability Strategy notes that:

"A Preliminary Ecological Appraisal has confirmed that the site and Zone of Influence (ZoI) do not support any 'Important Ecological Features' (IEF's) that would likely be significantly affected by the ... Development.

All relevant EU and UK legislation relating to protection and enhancement of ecology will be complied with and the contractors will be required to minimise the ecological impact of construction activities.

An elevated garden is a core part of the scheme which provides a range of habitats and enhances biodiversity on site. All soft landscaping will be fully irrigated to encourage healthy plant growth. A Landscape Management Plan will be produced and handed over to the scheme's occupants.

Furthermore, the ground floor landscape also enhances site biodiversity. Please refer to the landscape and biodiversity sections of the Landscape Strategy report."

Sustainable urban drainage techniques

3.14 The Sustainability Strategy notes that:

"The drainage strategy for the scheme will ensure the proposed Development does not increase flood risk elsewhere. Sustainable drainage systems (SUDs) such as blue roofs and greywater recycling will be specified to reduce the peak surface water discharge from the proposed Development, reducing the risk of flooding from sewer to the Site and other properties downstream. The proposed building design has also taken into consideration the existing soil characteristics to make sure the foundations are designed to withstand heavier rainfalls as well as long periods of dry weather."³⁷

3.15 These measures will be accompanied by a full Drainage Strategy Report.

Volterra

³⁷ Sustainability Strategy, Executive Summary

4 Conclusion

- 4.1 The economic benefits of the Development are significant. The construction and demolition phase is estimated to support 2,250 gross job years and the Development is expected to support 2,060 additional jobs over and above what is currently supported once operational. Allowing for displacement and multiplier effects, it is estimated that the Development would support 2,325 net additional jobs.
- 4.2 The team is committed to building on the Applicant's track record of creating opportunities for local firms, and jobs and training for local residents. In its company's Community Strategy, the Applicant outlines their long term commitments which include: working with industry bodies and their supply to maximise apprenticeship opportunities, promoting the property and construction industry through engagement with local schools, working with colleges and universities to develop the knowledge and skills of the future workforce, and helping the existing workforce to adapt to new ways of working.
- 4.3 The increased level of employment will increase spending within the local area. The Development is expected to generate £870k of worker expenditure per annum during the construction phase and an additional £3.5m per annum during the operational phase.
- 4.4 LBS is a key part of the London's economy, supporting 5% of London's total office employment. Whilst the borough's office stock increased by 20% between 2000 and 2016 (the fifth highest growth of all London boroughs), the Southbank remains the most supply restrained office submarket in central London. According to vacancy rates, in the third quarter of 2018, there was very little vacant office stock in the area. To ensure that LBS continues to grow, there must be a sufficient supply of available office space to attract and retain businesses. The London Office Policy Review 2017 projected a likely requirement of an additional 507k sqm (gross) of office floorspace within the borough to 2041. The Development would make a significant contribution to the borough's requirement at just one site and would also provide some affordable workspace.
- 4.5 Development should be supported in the most accessible places. The Site is very accessible, located next to London Bridge Station and has the highest public transport accessibility (PTAL) rating of 6b and so is a prime location for development.
- The additional retail floorspace will work in conjunction with the improved public realm and increased permeability of the Site to complete the 'retail horseshoe' which surrounds London Bridge Station. This will be further complemented by the possibility of the Development adding another entrance to London Bridge Underground Station. This will improve access to the underground and complement the public realm improvements.
- 4.7 The HUDU matrix summarises the health effects of the Development. It shows that many of the health effects of the Development are insignificant; any significant adverse effects are mitigated.
- 4.8 The Development would increase demand for healthcare services but there is sufficient primary and secondary healthcare within the local area to cater for this.

4.9 The Development will adopt mitigation measures during the construction and operational phases to ensure the impact upon the environment, with regards to pollution, noise, climate change and the use of resources is at a level which is acceptable and consistent with the needs of the local area. This will be ensured by the appropriate management plans, BREEAM assessments and implementing the best industry practice where possible. Health effects and mitigation measures are detailed in the text and summarised in the appendix.

5 Appendix

1 Housing quality and design³⁸

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal seek to meet all 16 design criteria of the Lifetime Homes Standard or meet Building Regulation requirement M4 (2)?	☐ Yes ☐ No ☑ N/A	The Development contains no new homes so this aspect of the HIA is not deemed relevant	☐ Positive ☐ Negative ☑ Neutral ☐ Uncertain	
Does the proposal address the housing needs of older people, ie extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes?	☐ Yes ☐ No ☑ N/A	The Development contains no new homes so this aspect of the HIA is not deemed relevant	☐ Positive ☐ Negative ☑ Neutral ☐ Uncertain	
Does the proposal include homes that can be adapted to support independent living for older and disabled people?	☐ Yes ☐ No ☑ N/A	The Development contains no new homes so this aspect of the HIA is not deemed relevant	☐ Positive ☐ Negative ☑ Neutral ☐ Uncertain	
Does the proposal promote good design through layout and orientation, meeting internal space standards?	☐ Yes ☐ No ☑ N/A	The Development contains no new homes so this aspect of the HIA is not deemed relevant	☐ Positive ☐ Negative ☑ Neutral ☐ Uncertain	

The HUDU assessment criteria was put together by the NHS: London Healthy Urban Development Unit. More information can be found at: https://www.healthyurbandevelopment.nhs.uk/wp-content/uploads/2017/05/HUDU-Rapid-HIA-Tool-3rd-edition-April-2017.pdf

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal include a range of housing types and sizes, including affordable housing responding to local housing needs?	☐ Yes ☐ No ☑ N/A	The Development contains no new homes so this aspect of the HIA is not deemed relevant	☐ Positive ☐ Negative ☑ Neutral ☐ Uncertain	
Does the proposal contain homes that are highly energy efficient (eg a high SAP rating)?	☐ Yes ☐ No ☑ N/A	The Development contains no new homes so this aspect of the HIA is not deemed relevant	☐ Positive ☐ Negative ☑ Neutral ☐ Uncertain	

2 Access to healthcare services and other social infrastructure

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal retain or reprovide existing social infrastructure?	⊠ Yes □ No □ N/A	There is currently no social infrastructure at the Site, yet the Development will incorporate public space for nearby residents, visitors and workers. Refer to Chapter 3.	□ Positive □ Negative □ Neutral □ Uncertain	
Does the proposal assess the impact on healthcare services?	⊠ Yes □ No □ N/A	Refer to Chapter 3 in the main report, which describes the current context of the primary and secondary healthcare and considers the impact of the Development on this. Based on this, the Development is not expected to have a significant effect upon the provision of healthcare.	☐ Positive ☐ Negative ☑ Neutral ☐ Uncertain	Refer to main report Chapter 3. During the construction phase the risk of accidents will be minimised by the implementation of an appropriate construction management strategy and provision of a first aid station onsite.
Does the proposal include the provision, or replacement of a healthcare facility and does the facility meet NHS requirements?	☐ Yes ☐ No ☑ N/A	The Development does not remove any healthcare facilities from within the local area, nor is it assessed to have a significant adverse effect upon healthcare provision. For that reason no new healthcare facilities are required. Refer to Chapter 3.	☐ Positive ☐ Negative ☑ Neutral ☐ Uncertain	
Does the proposal assess the capacity, location and accessibility of	☐ Yes ☐ No	The Development does not have any residential aspects so it is not expected to contribute to the need for other	☐ Positive ☐ Negative	

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
other social infrastructure, eg schools, social care and community facilities?	⊠ N/A	forms of social infrastructure such as schools, social care or community facilities. However, it does provide a communal garden and public realm.	⊠ Neutral ☐ Uncertain	
Does the proposal explore opportunities for shared community use and co-location of services?	⊠ Yes □ No □ N/A	As a result of the Development, the Site will enjoy an increased level of permeability through the Site. This will relieve pressure on existing pedestrian walkways and streets.	□ Positive □ Negative □ Neutral □ Uncertain	
		The Development will provide an elevated garden which will be accessible to everyone with no requirement to book. This will provide a valuable asset for local residents and workers which could help enhance the sense of community.		
		At the Site there will also be retail provision, ensuring the co-location of services. Refer to Chapter 3, access to open space and nature.		
Does the proposal contribute to meeting primary, secondary and post 19 education needs?	☐ Yes ☐ No ☑ N/A	The Development does not have any residential aspects. It therefore does not contribute towards educational needs.	☐ Positive ☐ Negative ☑ Neutral ☐ Uncertain	

3 Access to open space and nature

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal retain and enhance existing open and natural spaces?	⊠ Yes □ No □ N/A	The Development will not result in any loss of open and natural spaces. However, the Development will provide an elevated garden which is accessible to everyone as well as bringing greater permeability through the Site as a result of new ground level pedestrian routes. This will enhance the public realm. Refer to Chapter 3, access to open space and nature.	☑ Positive☐ Negative☐ Neutral☐ Uncertain	
In areas of deficiency, does the proposal provide new open or natural space, or improve access to existing spaces?	☐ Yes ☑ No ☐ N/A	According to the LBS Open Space Strategy, the borough has 2.22 ha of open space per 1,000 residents in 2013. This is below the requirement of 2.4 ha per 1,000 residents set out by the National Playing Fields Association. The Development will provide new open space through the elevated garden and substantial new public realm and pedestrian routes. For more information refer to Chapter 3, access to open space and nature.	☑ Positive☐ Negative☐ Neutral☐ Uncertain	
Does the proposal provide a range of play spaces for children and young people?	☐ Yes ☐ No ☑ N/A	The Development does not increase the population of children and young people and so therefore this is not deemed necessary. However, the Development does provide an elevated garden which will be a suitable environment for all ages. For more information refer to Chapter 3, access to open space and nature.	☐ Positive☐ Negative☐ Neutral☐ Uncertain☐	

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation cenhancement actions	or
Does the proposal provide links between open and natural spaces and the public realm?	⊠ Yes □ No □ N/A	The Development will substantially improve access through the site. The new pedestrian routes will relieve pressure on Borough High Street and provide links to London Bridge station. Refer to Chapter 3, access to open space and nature.	□ Positive □ Negative □ Neutral □ Uncertain		
Are the open and natural spaces welcoming and safe and accessible for all?	⊠ Yes □ No □ N/A	Walking will be encouraged through the provision of shared open space and high quality public realm which will be connected to existing streets. Refer to Chapter 3, access to open space and nature and the subsection on active travel.	☑ Positive☐ Negative☐ Neutral☐ Uncertain		
Does the proposal set out how new open space will be managed and maintained?	⊠ Yes □ No □ N/A	In order to ensure the effective management of the Site, the elevated garden will be regularly maintained. Refer to the Design and Access Statement.	☐ Positive☐ Negative☐ Neutral☐ Uncertain		

4 Air quality, noise and neighbourhood amenity

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal minimise construction impacts such as dust, noise, vibration and odours?	⊠ Yes □ No □ N/A	The Construction Management Plan outlines the construction management measures to be adopted and implemented for the Development to mitigate the impact of all construction impacts, including noise, vibration, parking and security, amongst others. The Applicant will also ensure that the Considerate Constructors Scheme is operated on site. Refer to the Construction Management Plan and Chapter 3.	Positive Negative Neutral Uncertain	Refer to the Construction Management Plan and Chapter 3.
Does the proposal minimise air pollution caused by traffic and energy facilities?	⊠ Yes □ No □ N/A	Chapter 9: air quality of the ES finds that impacts on air quality in the construction (after mitigation) and operation phases are not significant.	Positive Positive Negative Neutral Uncertain	Refer to Chapter 3.
Does the proposal minimise noise pollution caused by traffic and commercial uses?	⊠ Yes □ No □ N/A	Chapter 8: noise and vibration of the ES and the Construction Management Plan finds that noise impacts in the construction phase require mitigation and will be insignificant to, at worse, a temporary local adverse effect of moderate significance, and impacts in the operational	Positive Negative Negutral Uncertain	Refer to Chapter 3.

Assessment criteria	Relevant?	Details/evidence	Potential health	Recommended mitigation cenhancement actions
		phase are expected to be insignificant but are nonetheless mitigated.	impact?	

5 Accessibility and active travel

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal prioritise and encourage walking (such as through shared spaces?)	⊠ Yes □ No □ N/A	Pedestrian access will be significantly improved through: improvements to the public realm, permeability improvements, new access to London Bridge underground station, and removal of car access, among other things. Refer to Chapter 3 and the Transport Assessment.	☐ Positive ☐ Negative ☐ Neutral ☐ Uncertain	
Does the proposal prioritise and encourage cycling (for example by providing secure cycle parking, showers and cycle lanes)?	⊠ Yes □ No □ N/A	The Development will provide lockers, changing rooms, showers and cycle parking to encourage cycling to the Site Refer to the Transport Assessment.	Positive Negative Neutral Uncertain	
Does the proposal connect public realm and internal routes to local and strategic cycle and walking networks?	⊠ Yes □ No □ N/A	The Development will improve the pedestrian routes through the site which will better connect pedestrian walkways to pre-existing streets. It is also in close proximity to established cycle routes, including Cycle Superhighway 7 and National Cycle Network Route 4. Refer to the Transport Assessment and Chapter 3.	Positive Negative Neutral Uncertain	
Does the proposal include traffic management and calming measures to help		The Development has a range of measures which will be put in place in order to minimise trip generation.	☐ Positive ☐ Negative ☑ Neutral	Refer to Chapter 3 of the supporting report for further information.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
reduce and minimise road injuries?		Refer to Chapter 3 for further information.	Uncertain	
Is the proposal well connected to public transport, local services and facilities?	⊠ Yes □ No □ N/A	The Site has a PTAL rating of 6b. This is categorised as having the best level of public transport accessibility. Refer to Chapter 3 for further information.	Positive Negative Neutral Uncertain	
Does the proposal seek to reduce car use by reducing car parking provision, supported by the controlled parking zones, car clubs and travel plans measures?	⊠ Yes □ No □ N/A	The Development is expected to have a negligible impact upon travel levels – it will be car free (apart from deliveries). A Travel Plan will also be written which will aim to ensure the predicted travel patterns are achieved and maintained. Refer to Chapter 3 for further information.	☐ Positive ☐ Negative ☐ Neutral ☐ Uncertain	
Does the proposal allow people with mobility problems or a disability to access buildings and places?	⊠ Yes □ No □ N/A	The Development has been designed to comply with relevant planning policy and meet all relevant building regulation requirements as a minimum. The Design and Access Statement explains how it will improve accessibility by introducing step-free access where possible.	Positive Negative Neutral Uncertain	

6 Crime reduction and community safety

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal incorporate elements to help design out crime?	⊠ Yes □ No □ N/A	The Development will take account of the principles outlined in Secured by Design. The scheme will subscribe to the related design measures outlined by the CPTED. In addition, there will be a number of security measures in place such as video surveillance, access controls and intruder alarms. Refer to Chapter 3 for more information.	☑ Positive☐ Negative☐ Neutral☐ Uncertain	
Does the proposal incorporate design techniques to help people feel secure and avoid creating 'gated communities'?	⊠ Yes □ No □ N/A	The Development will improve pedestrian routes through the Site to enable greater permeability. The elevated garden incorporated into the Development is accessible to all. This should help prevent any feelings of 'us' and 'them' between workers at the Site and the local residents and those who work elsewhere in the local area. Refer to the Design and Access Statement.	□ Positive □ Negative □ Neutral □ Uncertain	
Does the proposal include attractive, multi-use public spaces and buildings?	⊠ Yes □ No □ N/A	The Development will comprise of mixed use buildings. A key aim of the Development is to retain and enhance heritage buildings to improve the attractiveness of the Site. Refer to the	☑ Positive☐ Negative☐ Neutral☐ Uncertain	

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
		Design and Access Statement, which describes the design principles of the Development. This will be complemented with public gardens and public realm improvements.		
Has engagement and consultation been carried out with the local community?	⊠ Yes □ No □ N/A	A comprehensive public consultation has been undertaken with the local community, including residents, residents' groups, local businesses, elected representatives and community groups. Refer to the Statement of Community Involvement.	☑ Positive☐ Negative☐ Neutral☐ Uncertain	

7 Access to healthy food

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal facilitate the supply of local food, i.e. allotments, community farms and farmers' markets?	☐ Yes ☐ No ☑ N/A	The Development does not involve any food and beverage provision.	☐ Positive ☐ Negative ☑ Neutral ☐ Uncertain	
Is there a range of retail uses, including food stores and smaller affordable shops for social enterprises?	☐ Yes ☑ No ☐ N/A	The Development does provide retail outlets but does not involve any food and beverage provision.	☐ Positive ☐ Negative ☑ Neutral ☐ Uncertain	
Does the proposal avoid contributing towards an over-concentration of hot food takeaways in the local area?	☐ Yes ☐ No ☑ N/A	The Development does not involve any food and beverage provision	☐ Positive ☐ Negative ☑ Neutral ☐ Uncertain	

8 Access to work and training

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal provide access to local employment and training opportunities, including temporary construction and permanent 'end-use' jobs?	⊠ Yes □ No □ N/A	The construction and demolition phase is estimated to support 2,250 gross job years and the Development is expected to support 2,060 additional jobs once operational. The Applicant has taken the necessary steps to maximise the number of employment opportunities associated with the development that can be fully exploited within the local area. Refer to Chapter 3 for further information.	⊠ Positive □ Negative □ Neutral □ Uncertain	
Does the proposal provide childcare facilities?	☐ Yes ☐ No ☑ N/A	As the scheme does not include residential, this is not deemed necessary.	☐ Positive ☐ Negative ☑ Neutral ☐ Uncertain	
Does the proposal include managed and affordable workspace for local businesses?	⊠ Yes □ No □ N/A	Affordable workspace will be provided in the upper levels of the Georgian townhouses, above the ground floor retail. Refer to Design and Access Statement	☑ Positive☐ Negative☐ Neutral☐ Uncertain	
Does the proposal include opportunities for work for local people via local procurement arrangements?	⊠ Yes □ No □ N/A	The Applicant will take the necessary steps to maximise the number of employment opportunities associated with the Development that can be exploited within the local area. Refer to Chapter 3 for further information.	☑ Positive☐ Negative☐ Neutral☐ Uncertain	

9 Social cohesion and lifetime neighbourhoods

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal connect with existing communities, ie layout and movement which avoids physical barriers and severance and land uses and spaces which encourage social interaction?	⊠ Yes □ No □ N/A	The Development will improve the permeability through the Site. This will help avoid creating a disconnect between the Site and the wider community. The retail provision, combined with the public realm will help create a 'retail horseshoe' surrounding London Bridge. As a result the Development will not exist in isolation but will operate in conjunction with the wider London Bridge retail and office landscape. Refer to the Design and Access Statement.	☑ Positive☐ Negative☐ Neutral☐ Uncertain	
Does the proposal include a mix of uses and a range of community facilities?	⊠ Yes □ No □ N/A	The Development will consist of a mix of uses. The majority of the Site will be office space but this will also be accompanied by retail provision, a gym and community space in the hub, supporting business users and local enterprise. The Development will provide an elevated garden. This garden will be accessible for everyone and will not require pre-booking. Refer to the Design and Access Statement.	☐ Positive ☐ Negative ☐ Neutral ☐ Uncertain	
Does the proposal provide opportunities for the voluntary and community sectors?	☐ Yes ☐ No ☑ N/A	The Applicant's Community Strategy notes how it will: work with industry bodies and its supply chain to maximise apprenticeship opportunities,	☐ Positive ☐ Negative ☑ Neutral	

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
		promote the property and construction industry through engagement with local schools, work with colleges and universities to develop the knowledge and skills of the future workforce, and help the existing workforce adapt to new ways of working. For further information, refer to Chapter 3.	☐ Uncertain	
Does the proposal address the six key components of Lifetime Neighbourhoods?	⊠ Yes □ No □ N/A	The Development addresses all of the relevant components of lifetime neighbourhoods. Refer to Chapter 3 for further information.	☐ Positive ☐ Negative ☑ Neutral ☐ Uncertain	

10 Minimising the use of resources

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal make best use of existing land?	⊠ Yes □ No □ N/A	Transport accessibility is a key determinant of development density, with the densest development expected in the most accessible places. The Development makes best use of existing land by increasing the density of development within the Site in an accessible location. The Development will intensify a site, in a highly accessible location, offsetting the need for greenfield development.	□ Positive □ Negative □ Neutral □ Uncertain	
Does the proposal encourage (including building materials)?	⊠ Yes □ No □ N/A	Recycling at the Site will be encouraged wherever possible during both the construction and operational phase. Within the Site waste storage and recycling facilities will be provided This will be outlined in a waste management plan. Refer to the Sustainability Strategy for further information.	☑ Positive☐ Negative☐ Neutral☐ Uncertain	
Does the proposal incorporate sustainable design and construction techniques?	⊠ Yes □ No □ N/A	Sustainable development is a key principle that has informed the design. From the outset. BREEAM pre-assessments have been carried out and indicate that all aspects of the scheme are likely to achieve a BREEAM rating of at least 'very good'. The Development will also exceed the London Plan's carbon reduction target of 35% for all new buildings. Refer to Chapter 3 for more information on the sustainable initiatives incorporated into the Development.	□ Positive □ Negative □ Neutral □ Uncertain	

11 Climate change

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal incorporate renewable energy?	⊠ Yes □ No □ N/A	The scheme design has incorporated energy efficient systems and solar panels (photovoltaic panels) to provide a proportion of the energy demand of the Development. Refer to Chapter 3, climate change.	☑ Positive☐ Negative☐ Neutral☐ Uncertain	
Does the proposal ensure that buildings and public spaces are designed to respond to winter and summer temperatures, i.e ventilation, shading and landscaping?	⊠ Yes □ No □ N/A	The Development will be able to adjust to hot temperatures and is looking to achieve the BREEAM 'thermal comfort' credit. Refer to the Sustainability Report Refer to Chapter 3, climate change and the Sustainability Strategy for further information.	☐ Positive ☐ Negative ☑ Neutral ☐ Uncertain	
Does the proposal maintain or enhance biodiversity?	⊠ Yes □ No □ N/A	All relevant EU and UK legislation relating to protection and enhancement of ecology will be completed with and the contractors will be required to minimise the ecological impact of construction activities The elevated garden being provided by the Development will provide a habitat that can support biodiversity. Refer to Chapter 3.	□ Positive □ Negative □ Neutral □ Uncertain	

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal incorporate sustainable urban drainage techniques?	⊠ Yes □ No □ N/A	Sustainable Drainage Systems (SUDs) as permavoid permeable paving at ground floor and blue roof on the tower are being proposed for the site. Please refer to the Flood Risk Assessment and the Sustainability Strategy.	☐ Positive ☐ Negative ☑ Neutral ☐ Uncertain	

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