



Planning Statement
DP9 LTD

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APPENDIX 1 – PLANNING HISTORY

1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by DP9 Limited ('DP9') on behalf of GPE (St Thomas Street) Limited ('the Applicant') in support of an application for full planning permission and listed building consent ('the Application') for the redevelopment of New City Court, 4-26 St Thomas Street, London, SE1 9RS ('the Site').

1.2 The Application relates to proposals for comprehensive redevelopment of the Site to provide a high-quality, mixed-use scheme, comprising office accommodation, retail and leisure floorspace, an elevated public garden and significant public realm enhancements ('the Proposed Development').

1.3 The description of development is set out below:

'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 (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.'

1.4 The Proposed Development will play an important role at both the strategic and local level, with the regeneration of the Site delivering up to 46,374 sqm of Cat A office accommodation (Class B1), 1,904 sqm of high-quality retail floorspace, a gym, hub space and an elevated public garden, along with significant public realm improvements which include a new pedestrianised square and entrance to London Bridge Underground Station.

1.5 The proposals will result in a development of the highest architectural quality which will complement the vision for the regeneration of London Bridge. The project architect, Allford Hall Monaghan Morris (AHMM), is an award-winning practice with an outstanding track record designing exemplary office schemes across London.

1.6 The submission of this Application follows extensive discussions with a wide range of stakeholders and statutory consultees, including (but not limited to) the London Borough of Southwark ('LBS'), the Greater London Authority ('GLA'), Historic England, the Commission for Architecture and the Built Environment ('CABE'), Guy's and St Thomas' Hospital, ward councillors, local residents, businesses and other stakeholders.

1.7 This Planning Statement should be read and considered in conjunction with the plans and drawings submitted as part of this Application, together with the following supporting documents:

- Full Planning Permission and Listed Building Consent Application Forms and Ownership Certificates, prepared by DP9;
- CIL Additional Information Form, prepared by DP9;
- Existing and Proposed Drawings (please see enclosed Drawing Schedule), prepared by AHMM;
- Design and Access Statement, prepared by AHMM;
- Landscape Strategy, prepared by MRG Studio;
- Listed Building Consent Detailed Study, prepared by AHMM;
- Heritage Statement, prepared by Peter Stewart Consultancy;
- Listed Building Heritage Statement, prepared by KMHeritage;
- Keats House Façade Survey and Reconstruction Methodology, prepared by PAYE;
- Transport Assessment, prepared by TPP;
- Delivery, Servicing and Waste Management Plan, prepared by TPP;
- Travel Plan, prepared by TPP;
- Energy Statement, prepared by Chapmans BDSP;
- Sustainability Strategy (including BREEAM Pre-Assessment), prepared by Chapmans BDSP;
- Ventilation & Extraction Statement, prepared by Chapmans BDSP;
- Structural Statement, prepared by AKT;
- Drainage Strategy, prepared by AKT;
- Basement Impact Assessment, prepared by AKT;
- Flood Risk Assessment, prepared by AKT;
- Economic & Health Report, prepared by Volterra Partners;
- Pedestrian Forecast and Landscape Assessment, prepared by Space Syntax;
- Television and Radio Reception Impact Assessment, prepared by G Tech;
- Telecommunication Network Impact Assessment, prepared by G Tech;
- Social Value Strategy, prepared by Greengage;
- Preliminary Ecological Appraisal, prepared by Waterman;
- Construction Management Plan, prepared by Gardiner & Theobald; and
- Statement of Community Involvement, prepared by KANDA.

1.8 The Application is also accompanied by an Environmental Statement ('ES'). This document has been produced by Waterman and includes the following chapters:

- **Chapter 1** – Introduction;
- **Chapter 2** – EIA Methodology;
- **Chapter 3** – Existing Land Uses and Activities;
- **Chapter 4** – Alternatives and Design Evolution;
- **Chapter 5** – The Development;
- **Chapter 6** – Development Programme, Demolition, Deconstruction, Refurbishment and Construction;
- **Chapter 7** – Transport;
- **Chapter 8** – Noise and Vibration;
- **Chapter 9** – Air Quality;
- **Chapter 10** – Archaeology;

- **Chapter 11** – Water Resources and Flood Risk;
- **Chapter 12** – Wind Microclimate;
- **Chapter 13** – Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare;
- **Chapter 14** – Cumulative Effects; and
- **Chapter 15** – Residual Effects and Monitoring

1.9 This Planning Statement provides an overview of the Site, the development proposal and an evaluation of the Proposed Development against planning policy and guidance. It is structured as follows:

- **Section 1** provides an introduction and scope;
- **Section 2** describes the Site and the context of the surrounding area;
- **Section 3** provides a description of the Proposed Development;
- **Section 4** provides an overview of the pre-application advice received;
- **Section 5** sets out the relevant national, regional and local planning policies relevant to the planning application;
- **Section 6** provides an assessment of the Proposed Development against key planning policies;
- **Section 7** sets out the draft Section 106 Heads of Terms;
- **Section 8** sets out the overall conclusions.

1.10 Overall, the Site represents a significant opportunity to deliver a scheme which optimises the development potential of a prominent, underutilised site, resulting in the delivery of a significant quantum of office, retail and leisure floorspace, whilst providing substantial public realm benefits.

2.0 SITE & SURROUNDING AREA

The Application Site

- 2.1 The Site is situated to the south of St Thomas Street and east of Borough High Street in the London Borough of Southwark ('LBS'). The Site is bound to the east by Guy's Hospital Chapel and to the south by Kings Head Yard. The majority of the Site is occupied by the early 1980s offices of New City Court (no. 20 St. Thomas Street), which comprises a part four-storey, part five-storey office building (Class B1) with a curved glazed frontage onto St Thomas Street. The existing building is dated and is not considered to be of any architectural merit.
- 2.2 To the immediate east of the St Thomas Street entrance of New City Court is Keats House (24-26 St Thomas Street), which comprises an unlisted four-storey office building (Class B1) with a basement level, originally constructed in the late 19th Century with a retained red brick and stone Italianate-style façade.
- 2.3 To the west of the main entrance along St Thomas Street is a row of Grade II listed Georgian terrace buildings (4-16 St Thomas Street). The buildings were constructed in the early 19th Century and are currently in Class B1 office use. Despite their Grade II listing, the buildings are in a poor state of disrepair, having been heavily altered both internally and externally, with the listing based on the heritage significance of the St Thomas Street facade only. Each of the existing buildings were connected laterally as part of works undertaken during the 1980s, resulting in the substantial removal of historic fabric from the listed buildings.
- 2.4 The Site forms part of a prominent strategic location within the London Bridge, Borough and Bankside Opportunity Area, Central Activities Zone, and London Bridge District Town Centre, all of which serve an important economic function in the future growth of Southwark and London as a whole.

Surrounding Area

- 2.5 The context of the surrounding area is characterised by St Thomas Street and London Bridge Station, which have recently been the subject of significant regeneration, reflecting London Bridge Station's status as one of London's key railway termini.
- 2.6 Building heights in the surrounding area vary significantly, from the four-storey terrace buildings along St Thomas Street to the tall building cluster around London Bridge, which includes the Shard (306m in height), Guy's Tower (142m in height) and Shard Place (99m in height), which is currently under construction.
- 2.7 The Site is situated within the Borough High Street Conservation Area and the Borough, Bermondsey and Rivers Archaeological Priority Zone. In addition to the listed buildings within the Site extent, the Site is situated within close proximity to a number of neighbouring listed buildings, including no. 2 St Thomas Street (Grade II listed), Guy's Hospital Chapel (Grade II*

listed) and St Thomas' Church (Grade II* listed). Southwark Cathedral and The George Inn, both of which are Grade I listed, are also situated within the locality.

Accessibility

- 2.8 Pedestrian access to the Site is currently provided from St Thomas Street and King's Head Yard, with vehicular access to the service area to the rear provided from Kings Head Yard.
- 2.9 The Site benefits from an 'excellent' Public Transport Accessibility Level (PTAL) rating of 6b, largely attributed to its close proximity to London Bridge Station. London Bridge Railway Station serves the south-east rail networks and provides direct access to London Gatwick Airport, whilst London Bridge Underground Station is served by both the Northern Line and Jubilee Line. London Bridge Bus Terminal, which is served by 14 bus routes (including 3 24-hour services), is also situated to the north.
- 2.10 The Site is also highly accessible to pedestrians and cycles, notably through the significant public realm improvements along St Thomas Street and the provision of improved cycle lanes in the locality.

Planning History

- 2.11 Since its construction in the 1980s, the planning history for the Site has been limited, with the majority of planning applications and listed building consent applications relating to minor internal and external alterations to the existing buildings. Most recently, planning permission was granted in February 2012 (Ref: 11/AP/3137) for the refurbishment of the ground and lower ground floors of no. 20 St Thomas Street.
- 2.12 A full schedule of the Site's planning history has been included in Appendix 1 for reference.

3.0 PROPOSED DEVELOPMENT

- 3.1 This section should be read in conjunction with the proposed application drawings, Design and Access Statement and Landscape Strategy which are submitted to accompany the Application and describe the principal components of the Proposed Development.

Description of Development

- 3.2 The Application seeks full planning permission and listed building consent for the following:

‘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 (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 .’

Summary of Works

- 3.3 The proposed scheme will play an important role at both strategic and local level. The development of the Site will deliver a substantial quantum of office, retail and leisure floorspace alongside significant public realm improvements in a high-quality development that will regenerate the Site, contribute substantially towards the local employment offer, and deliver on the Council’s vision for the area. A summary of the proposed works is set out below:

- Demolition and removal of the existing dated 1980s components;
- Delivery of a 37-storey building (including ground, mezzanine and two storeys of plant) extending to 144m AOD, providing high quality office, retail and leisure floorspace;
- Introduction of retail floorspace at ground, lower ground and first floor level providing an enhanced retail offer for local area and provision of active frontages along St Thomas Street and the proposed public square;
- Provision of hub space at 21st and 22nd floor level with a 250-seater auditorium and outdoor terrace for both office and wider commercial use;
- Sympathetic restoration of listed Georgian terrace along St Thomas Street to provide retail and office accommodation, including affordable retail and workspace provision;
- Reconstruction and improvement of unlisted Keats House as a standalone building for office and retail use and retention of façade;
- Delivery of high quality and fully accessible public realm, providing enhanced connectivity through new public routes and a new public square;
- Delivery of an elevated double height public garden at fifth and sixth floor level with a café/restaurant and outdoor terrace;

- Creation of a new entrance to London Bridge Underground Station from the Site's proposed public square; and
- Improved servicing strategy to improve existing servicing situation.

Land Use

- 3.4 A breakdown of proposed floorspace in the tower, Keats House and the Georgian Terrace is provided in Tables 1 – 3 below, with the total proposed floorspace across the Site set out in Table 4. An assessment of the proposed uses against planning policy is set out in Section 6.0 of this Statement.

Table 1 – Tower Areas

Use	Proposed (GIA sqm)
Office (Class B1)	44,906
Retail (Class A1)	132
Food and Beverage (Class A3)	931
Gym (Class D2)	615
Public Garden (Class D2)	825
Hub Space (Class B1/D2)	719
Servicing	1,918
Plant	2,146
Total	52,192

Table 2 – Keats House Areas

Use	Proposed (GIA sqm)
Office (Class B1)	401
Retail (Class A3)	208
Total	609

Table 3 – Georgian Terrace Areas

Use	Proposed (GIA sqm)
Office (Class B1)	1,067
Retail (Class A1)	633
Total	1,700

Table 4 – Total Proposed Areas

Use	Proposed (GIA sqm)
Office (Class B1)	46,374
Retail (Class A1)	765
Food and Beverage (Class A3)	1,139

Gym (Class D2)	615
Public Garden (Class D2)	825
Hub Space (Class B1/D2)	719
Servicing	1,918
Plant	2,146
Total	54,501

Design Concept

- 3.5 The scheme has been subject to a rigorous design process, led by award-winning architects AHMM. The concept has evolved following close consultation with LBS, the GLA, Historic England and CABE, and feedback throughout public consultation.
- 3.6 The proposed scheme will result in the delivery of a 37-storey building (including ground, mezzanine and two storeys of plant at roof level) extending to 144m AOD, which will form the focal point of the Proposed Development.
- 3.7 The form of the building has been carefully considered and developed, responding to both strategic and local views as well as the setting of the various designated heritage assets situated within close proximity to the Site. A number of massing approaches have been tested in the development of the design.
- 3.8 Several steps have been undertaken during the design development to ensure the proposed building appears as an elegant addition to the London Bridge tall building cluster. The form has been articulated through the reduction of massing on the corners of the building and the use of stepped levels at roof level to give the tower a slender and defined appearance. The introduction of a curve on the north elevation helps eliminate overhanging soffits and achieve the same overall massing form, whilst further enhancing the elegant appearance of the building.
- 3.9 The design of the tower has been informed by extensive historical character studies of Southwark, with the striking, exposed steel frame directly influenced by the prominent railway bridges across the Borough, and the extensive use of glazing reflecting the aesthetic of warehouses and glass towers in the surrounding area.
- 3.10 It is also proposed to deliver a hub space within the office building at 21st and 22nd floor levels, which provides a multi-level space linked via a fixed seat auditorium with unique views across London. The hub will serve as a flexible exhibition and events hire space for both commercial and community use (Class B1/D2). The hub will also benefit from the provision of an attached outdoor terrace.

Keats House

- 3.11 It is proposed to retain the original main façade of Keats House, which will be relocated 2.7m to the west to allow for a new service access to be provided from St Thomas Street. The

remainder of the building, which dates from the 1980s, will be replaced with new sympathetic elevations to the flank and rear elevations. The proposals will reinstate Keats House as a standalone building, whilst providing active retail frontage along St Thomas Street and to the proposed public square to the rear.

- 3.12 It is also proposed to sympathetically reinstate pitched roofs and the historic plan form using the most consistent plan form as a reference. The proposed building will provide retail floorspace at ground and first floor level (Class A3), with office accommodation above (Class B1).
- 3.13 The building will also benefit from improvements to its thermal performance and the provision of step-free access, where possible, to improve accessibility and allow the building to meet the needs of modern office and retail tenants.

Georgian Terrace

- 3.14 It is proposed to sensitively restore and refurbish the existing Grade II listed Georgian terrace buildings, providing a total of seven retail units (Class A1) at ground floor and lower ground floor level, with office accommodation (Class B1) on the upper floors. The individual entrances and historic plan form will be reinstated, enhancing the character and appearance of the listed buildings.
- 3.15 The rear elevation of the terrace, which is a 1980s addition, will be sensitively restored, with the addition of retail frontages at ground floor level providing an active frontage onto the yard. The frontages will comprise individually-designed, traditional frontages which contribute to the character of the listed buildings, rather than providing a uniform retail look.

Affordable Workspace and Retail Units

- 3.16 As a result of the reinstatement of the historic plan form, the enhanced Georgian terrace will provide smaller floorplates appropriate for small businesses, with the upper floors (floors 1-3 of nos. 4-16 St Thomas Street) providing 1,067 sqm of affordable workspace and two of the ground floor/lower ground floor retail units (nos. 4-6 St Thomas Street) providing 181 sqm of affordable retail floorspace.

Landscaping and Public Realm

- 3.17 Providing a high quality public realm and improved pedestrian links is one of the key objectives and primary public benefits of the Proposed Development. From the project's inception, a key focus has been on how the proposed scheme could enhance the surrounding area and unlock both the regeneration of the underutilised historic yards and provide generous and accessible new public spaces and routes.
- 3.18 The proposed generous public square, described as 'New Yard', provides connections and improved permeability, and is envisaged as a busy and thriving retail destination which

complements and enhances the existing retail offer in London Bridge. The square will benefit from high quality landscaping, trees and street furniture, creating a space where visitors can dwell and relax.

- 3.19 It is also proposed to deliver a double height elevated public garden within the proposed tower at fifth and sixth floor level. The garden will be set at a similar datum to the existing building's main roof level, allowing excellent views across London. The elevated garden will provide a sheltered environment to complement outdoor public spaces in and around New City Court. It is intended to be fully accessible with no entrance fee and a dedicated high-capacity lift access. The garden will also benefit from the addition of a café/restaurant (Class A3). Further details of the proposed public realm and landscaping is set out in the supporting Landscaping Strategy, prepared by MRG.

Transport

- 3.20 The scheme will provide exemplary cycle facilities for employees and visitors, with a total of 1,322 cycle parking spaces, 447 lockers and 70 showers. The scheme will be predominately car-free, with the exception of two blue badge car parking spaces.
- 3.21 With regards to servicing, the relocation of Keats House 2.7m to the west will facilitate service access onto the Site from a holding area on St Thomas Street for HGVs and refuse vehicles.
- 3.22 LGVs and cars will access an on-site loading bay at basement level via White Hart Yard. Two vehicle lifts are proposed to be installed at the rear of the proposed tower to allow for servicing and delivery access at lower basement level, as well as providing access for accessible visitors. The lifts will be positioned at the widest part of King's Head Yard, offering the greatest manoeuvring potential for vehicles, and the highest degree of visibility for entering and exiting the premises.

Listed Building Consent for Keats House and Conybeare House Interface

- 3.23 It should be noted that the proposed relocation of Keats House may require works to be carried out to the interface Keats House shares with Conybeare House, which neighbours Keats House to the east. Conybeare House forms part of the Grade II* listed Guy Hospital and therefore, any works would require listed building consent.
- 3.24 Site investigation works will be carried out in advance of any proposed works onsite to establish details of the interface between both buildings. Should any works need to be carried out to the fabric of Conybeare House, a separate listed building consent application will be submitted to LBS.

4.0 PRE-APPLICATION CONSULTATION

- 4.1 This Section should be read in conjunction with the Statement of Community Involvement, prepared by Kanda, which accompanies the Application and explains the public consultation that has been carried out during the pre-application stage. This Section provides an overview of the formal pre-application process with the Local Planning Authority, other statutory bodies, and other stakeholders.
- 4.2 All matters associated with the Proposed Development were discussed at length at the pre-application stage, with early engagement helping to inform the overall scheme design.

EIA Screening Request

- 4.3 The Applicant has undertaken an Environmental Impact Assessment, which has been carefully scoped and undertaken in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Environmental Statement submitted to accompany the Application has been prepared in accordance with the Scoping Report submitted to the Council, which is included as an appendix to the submitted Environment Statement prepared by Waterman.

Mayoral Referral

- 4.4 The Application is referable to the Greater London Authority (GLA) as it exceeds the development thresholds (over 30m in height, over 150 residential units) set out in the Town and Country Planning (Mayor of London) Order 2008 (as amended). Accordingly, the GLA has been involved in formal pre-application discussions with the Applicant and the Council.

Pre-Application Discussions

- 4.5 An extensive programme of consultation has been undertaken during the evolution of the Development. Consultation has been undertaken with a number of stakeholders, including (but not limited to) LBS, the GLA, TfL, Historic England, CABE and Historic Royal Palaces.
- 4.6 The design has undergone significant evolution and amendment through the course of the consultation process, which has helped to inform the design and layout of the Proposed Development. A summary of the main points raised in the written feedback issued by key stakeholders and our response to each has been set out below.

Southwark Council

- *Strong support for the proposed public realm improvements, including a significant enhancement of the yards – Noted.*
- *Strong support for the provision of a new station entrance – Noted.*
- *Concern with regards to harm to the character and appearance of the Borough High Street Conservation Area – The overall effect of the proposals on the character and*

appearance of the Borough High Street Conservation Area would be positive. Any minor loss of heritage significance would be outweighed by the very great benefits delivered by the proposals. The impact on the Conservation Area has been robustly assessed in the supporting Heritage Statement, prepared by Peter Stewart Consultancy.

- *Concern with regards to harm to the setting of Southwark Cathedral* – An assessment of the impact on the setting of the Cathedral has been set out in detail in the supporting Heritage Statement however, in short, the degree of change to the setting of the cathedral, considered in the round, would be moderate and consistent with the established character of its setting, which contributes to the heritage significance of the cathedral only to a limited degree.
- *Public benefits insufficient to outweigh harm that would result to heritage assets* – The Proposed Development will deliver many economic, social, heritage and environmental public benefits, as set out in Section 6.0 of this Statement. These are considered to far outweigh any harm.
- *Proposed height not necessary to provide the proposed public benefits* – The proposed height is integral to unlocking the proposed public benefits, as the provision of a tall building allows for a smaller building footprint, which in turn facilitates the provision of the proposed public realm, a new station entrance, active frontages onto the yard and an elevated public garden.

GLA

- *Proposal for an office-led mixed-use development would significantly contribute towards meeting and potentially exceeding the objectives for the opportunity area* – Noted.
- *Provision of affordable workspace is welcomed* – Noted.
- *The proposal to provide new public open space and public realm, whilst improving access to and through the site, is strongly supported in principle* – Noted.
- *Strong support for the new access point to London Underground station* – Noted.
- *Scale and height of the proposals broadly supported, subject to confirmation of heritage impacts and level of public benefit* – The application hereby submitted is supported by a Townscape, Visual Impact and Built Heritage Assessment (prepared by Peter Stewart Consultancy + Millerhare) and a Heritage Statement (prepared by Peter Stewart Consultancy). Together these assess the impacts of the proposed scheme on the relevant neighbouring heritage assets in substantial detail. As set out in Section 6.0 of this Statement, it is considered that the proposed public benefits far outweigh any identified harm.
- *Provision of full rendered images in final TVIA to assess visual impact upon all relevant views* – The Townscape, Visual Impact and Built Heritage Assessment includes images which robustly assess the visual impact of the Proposed Development.
- *Reconsideration of design of elevated open space* – As set out in the supporting Landscape Strategy, the design of the proposed elevated garden has been developed through extensive consultation with a number of stakeholders. The height of the space

has been increased to create a more open feel, and an outdoor terrace has been provided to further enhance the visitor experience.

- *Robustly demonstrate that proposals would deliver substantial public benefit to outweigh any less than substantial harm identified* – As set out above, the Proposed Development will deliver many economic, social, heritage and environmental public benefits, as set out in Section 6.0 of this Statement. These are considered to far outweigh the resulting harm, which is assessed as being at the lower end of less than substantial.
- *Proposals should include provision of flexible, affordable workspace* – The Proposed Development includes the provision of 1,067 sqm of flexible, affordable workspace suitable to meet the needs of a range of businesses.
- *Ensure new public space is secure, accessible, inclusive, connected, easy to understand and maintain and relates to local context* – As set out in the supporting Landscape Strategy, the proposed public realm will be of the highest quality, creating a space which is permeable, legible and accessible to all.

CABE

- *The proposals are clearly a huge improvement in design terms on the existing building fabric and a significant potential contribution to the economic and social life of an already productive and growing part of Southwark* – Noted.
- *The provision of an elevated garden is supported* – Noted.
- *General support for the architectural detailing and material choice* – Noted.
- *In principle, no opposition to height in this location* – Noted.
- *Further development of ground floor and public spaces could mitigate perceived negative impacts of tall building* – The numerous proposed public benefits have been set out in Section 6.0 of this Statement, which are considered to outweigh any perceived negative impacts of the tall building.
- *Further consideration of route to garden from ground floor, position of garden lift and choice of planting* – The proposed elevated garden design has been developed in response to these comments. The revised design is detailed in the supporting Design and Access Statement.
- *Alternative design solutions to mitigate wind effects should be explored* – An assessment of the wind implications of the Proposed Development has been carried out by Wirth in Chapter 12 of the ES, which sets out the various mitigation measures which have been incorporated into the design to ensure wind impacts are minimised and potential effects remain insignificant.
- *Concern regarding proposed environmental engineering and solutions* – As set out in the supporting Energy Statement and Sustainability Strategy, the Proposed Development will adopt a range of passive design measures and sustainability measures, resulting in a highly sustainable scheme which results in a 40.7% reduction in CO2 emissions, significantly exceeding current London Plan requirements.
- *Important that the courtyard feels and functions all year round as a public amenity* – The proposed public square will benefit from high-quality hard landscaping, tree planting and the provision of street furniture, ensuring it remains a space which is

usable and accessible for all throughout the year. As set out in Chapter 12 of the ES, the building design and proposed mitigation measures will ensure wind effects in the public realm around the tower are insignificant.

- *Concern regarding the size of the public realm and potential number of employees* – The Pedestrian Forecast & Landscaping Assessment, prepared by Space Syntax, provides a robust assessment of proposed pedestrian comfort levels in and around the Site. The assessment concludes that the Proposed Development will in fact significantly improve the existing condition around the Site and will ensure all locations within the development are comfortable and well above the minimum recommended.
- *Concern regarding impact on key views, particularly from Kenwood House to St Pauls and from the courtyard of Southwark Cathedral* – A detailed assessment of both views is set out in the Townscape, Visual Impact and Built Heritage Assessment. The assessment concludes that the proposals will not result in any harm to any strategic views or borough views.
- *Concern regarding potential overheating and thermal comfort levels* – As set out in the supporting Energy Statement and Sustainability Strategy, the Proposed Development will incorporate a range of passive measures to reduce overheating and improve thermal comfort levels, including the use of concrete slabs, natural ventilation and low G-value (0.28) glazing in the tower.

Historic England

- *The scheme has potential to offer some enhancement to the Borough High Street Conservation Area through the removal of unsympathetic 1980s infill development* – Noted.
- *No objection to the principle of new public realm within the backland area* – Noted.
- *Recognition for the benefits of improved public access to the London Underground Station* – Noted.
- *Concern with regards to harm to the character and appearance of the Borough High Street Conservation Area* – The overall effect of the proposals on the character and appearance of the Borough High Street Conservation Area would be positive. Any minor losses of heritage significance would be outweighed by the very great benefits delivered by the proposals. The impact on the Conservation Area has been robustly assessed in the supporting Heritage Statement.
- *Concern with regards to harm to the setting of Southwark Cathedral* – An assessment of the impact on the setting of the Cathedral has been set out in detail in the supporting Townscape, Visual Impact and Built Heritage Assessment and Heritage Statement however, in short, the degree of change to the setting of the cathedral, considered in the round, would be moderate and consistent with the established character of its setting, which contributes to the heritage significance of the cathedral only to a limited degree.
- *Erosion of historic street pattern and backland character of King's Head Yard* – The proposals will bring the yards back into active use, rather than the unsafe, underused and poorly legible spaces currently in place. The scheme has been developed to ensure the correct balance is achieved between preserving the historic pattern of the yards

and opening up routes through the site to provide a significant public benefit to the local area.

- *Site is isolated from the London Bridge tall building group* – The proposed scheme would undoubtedly form part of the tall building cluster around London Bridge, given the Site's proximity to the Shard, Guy's Tower and Shard Place. It is considered that the proposed height will complement and add visual interest to the cluster.
- *Impact on daylight levels to interior of the Hospital chapel* – Whilst it is accepted that the windows facing the Site will experience a loss in VSC, the NSL results, which represent the internal light levels, demonstrate that the daylight distribution within the room will not be materially affected.
- *Concern regarding harm to Outstanding Universal Value of the World Heritage Site* – The impact on the Tower of London World Heritage Site has also been carefully considered. The scheme would be visible in the same cluster of buildings already visible from within the Tower of London, including More London, The Shard, and Guy's Tower. The approved scheme at Fielden House (currently under construction) will also be visible in such views. The supporting Townscape, Visual Impact and Built Heritage Assessment includes a full assessment of the effect of the proposals on the heritage significance and outstanding universal value ('OUV') of the World Heritage Site and the listed buildings within.
- *Concern regarding harm to the significance of St Paul's Cathedral* – The Proposed Development would consolidate the emerging cluster of tall buildings at London Bridge, visible to the right of the dome of St Paul's. The visibility of the dome of St Paul's Cathedral would be unaffected. A robust assessment of the impacts is set out in the supporting Townscape, Visual Impact and Built Heritage Assessment.
- *Tall building not supported in local or London-wide planning policy* – As set out in detail in Section 6.0 of this document, the proposed tall building is in accordance with both adopted and emerging tall building policies.
- *Proposed works to listed terrace would disrupt plan form and hierarchy of spaces* – The existing terrace has been much altered over the years to the detriment of its original design. The proposals seek to sensitively restore the terrace as far as possible to its original plan form and the team have worked hard with LBS to ensure this is achieved sympathetically. The works include reinstating active frontages and removing lateral corridors.
- *Proposed works to Keats House do not constitute a heritage-related public benefit* – It is considered that the retention of the majority of the original façade, removal of the unsympathetic 1980's additions to create a detached building, and reinstatement of the pitched roofs and original plan form represent significant heritage benefits which will undoubtedly enhance the character and appearance of an undesignated heritage asset and the surrounding Conservation Area.
- *Proposed public space would harm rather than enhance the setting of listed King's Head Public House* – The Proposed Development would improve the setting of adjacent listed buildings, including The Old King's Head, creating greater public appreciation of this listed building in views from newly created vantage points within the proposed public realm.

Transport for London

- *Proposed car parking and cycle parking arrangements are supported – Noted.*
- *Proposed new station entrance is strongly supported – Noted.*
- *Proposals should be supported by a Construction Logistics Plan (CLP) and Delivery and Servicing Plan (DSP) - A Construction Management Plan and Delivery, Servicing and Waste Management Plan, produced in accordance with TfL guidance, have been submitted in support of the Application.*
- *A Stage 1 Road Safety Audit/Assessment should be undertaken for proposed access - A Safety Audit has been undertaken and is submitted in support of the application.*
- *Issues surrounding the proposed loading bay on St Thomas Street - There is already an on-street service bay serving the Site and the deliveries will not take place during the morning or evening pedestrian peak due to the restrictions on the use of the bay. Further details are set out in the supporting Delivery, Servicing and Waste Management Plan.*

- 4.7 A detailed note responding to the servicing queries raised by TfL, prepared by TPP, was also issued to TfL ahead of submission of the planning application.

Public Consultation

- 4.8 Public consultation is described in detail in the Statement of Community Involvement (SCI), prepared by Kanda, that accompanies this Application. In summary, an extensive process of consultation was undertaken to initiate a dialogue between the Applicant and the key stakeholders and local community in order to understand their objectives, aspirations and expectations, which have helped inform the evolution of the Proposed Development.

- 4.9 A number of individual consultation events and surveys were held over the course of the pre-application consultation period targeted at different stakeholders. Over 730 people were involved in the consultation process, with many people engaging with the project at more than one stage. Individual meetings were held with the following stakeholders:

- Bankside Open Spaces Trust;
- Bankside Residents Forum;
- Better Bankside;
- Sustainable Bankside;
- Southwark Cathedral Fabric Advisory Committee;
- Borough Market;
- Bunch of Grapes Pub;
- The Old King's Head Pub;
- Guy's and St Thomas' Trust (GSTT); and
- King's College.

- 4.10 The Applicant also held a number of public exhibition events throughout 2018. These have been set out below.

- Public Exhibition at Guy's and St Thomas' Hospital, 18th July 2018;
- Public Exhibition at the London Bridge Hotel, 19th – 21st July 2018;
- Public Exhibition at the London Bridge Hotel, 12th – 13th October 2018;
- Invite only Public Exhibition for Southwark Cathedral at The London Bridge Hotel, 14th October; and
- Survey at Guy's and St Thomas' Hospital, 17th October 2018.

4.11 In total, 43 people attended the exhibition, all of whom were offered a feedback form to complete. To date, 15 forms have been received, the majority of which were supportive of the proposals.

4.12 Additionally, a website was set up displaying information about the proposals, which was updated throughout the public consultation and planning process.

Key Themes from the Consultation Process

4.13 Overall there was support from the public consultation for the scheme design, particularly with regards to the proposed design, public realm improvements, proposed new station entrance and provision of an elevated public garden.

4.14 Following the submission of the Application, the Applicant remains committed to consulting and engaging with local residents, businesses and other stakeholders. The intention is to maintain the dialogue with those individuals and organisations who have expressed an interest in the scheme and to keep people up to date with the project.

5.0 PLANNING POLICY CONTEXT

- 5.1 The purpose of this Section is to identify the key national, regional and local planning policy and guidance relevant to the determination of the Application for the Proposed Development, and against which the proposals have been considered during design development. An analysis of the key policies and tests relating to the principle of the Proposed Development is therefore included in the relevant sections of this Statement.

National Planning Policy

- 5.2 National planning policy is set out in the form of the National Planning Policy Framework (NPPF), which was adopted on 24 July 2018. At the heart of the NPPF is a presumption in favour of sustainable development (para 10), with three overarching objectives: economic, social and environmental (para 8). These are to be delivered through the preparation and implementation of plans and the application of the policies within the Framework.
- 5.3 This means approving development proposals that accord with the development plan without delay and where the development plan is absent, silent or out of date, granting planning permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of development, or specific policies in the NPPF indicate otherwise.

The Development Plan

- 5.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) states that the determination of planning applications should be in accordance with the development plan, unless material considerations indicate otherwise. The statutory development plan for LBS is:
- The London Plan: Spatial Development Strategy for Greater London – Consolidated with Alterations Since 2011 (March 2016);
 - The Southwark Council Core Strategy (April 2011); and
 - Saved policies of the Southwark Plan (July 2007).

- 5.5 The Development Plan policies referred to in this Planning Statement carry full weight in the decision-making process as they are consistent with the National Planning Policy Framework.

Emerging Policy

Regional

- 5.6 The Mayor is in the process of preparing a new London Plan. On 13th August 2018, the Mayor published the 'Draft New London Plan showing Minor Suggested Changes', which incorporates clarifications, corrections and factual updates to the previous draft to help inform the upcoming Examination in Public. The examination hearing sessions are to take place early-2019, with adoption of the new London Plan anticipated late-2019.

- 5.7 Once adopted, the new London Plan will replace the currently adopted London Plan and form the basis for decision making at the regional level. The proposed scheme has been assessed against the draft policies, where relevant.

Local

- 5.8 LBS is also preparing a new Local Plan, having most recently consulted on the draft New Southwark Plan (Proposed Submission Version) in February 2018. The New Southwark Plan will include strategic, development management and site-specific policies, replacing the 2007 saved Local Plan policies and 2011 Core Strategy to form the key Development Plan Document for the Borough up to 2033.

Supplementary Planning Documents (SPDs)

Regional

- 5.9 The GLA has produced a number of guidance documents, which amplify London Plan policy and are relevant to the Proposed Development. These documents are material considerations but do not form part of the Development Plan. These documents include:

- Accessible London: Achieving an Inclusive Environment SPG (April 2004);
- The Mayor's Energy Strategy (February 2004);
- Sustainable Design and Construction SPG (April 2014);
- Planning for Equality and Diversity in London SPG (October 2007);
- The Mayor's Transport Strategy (May 2010);
- The Mayor's Economic Strategy (October 2010);
- The Mayor's draft Climate Change, Mitigation and Energy Statement (October 2011);
- London View Management Framework SPG (July 2012);
- All London Green Grid (March 2012);
- London World Heritage Sites – Guidance on Settings SPG (March 2012);
- Town Centres (July 2014); and
- Central Activities Zone (CAZ) SPG (March 2016).

Local

- 5.10 LBS has also prepared a number of supplementary documents to provide guidance on adopted planning policies. Again, these documents form material considerations but do not form part of the Development Plan. Of relevance to the Proposed Development are the following supplementary planning documents (SPD):

- Design and Access Statements (2007);
- Section 106 Planning Obligations / CIL (2015);
- Sustainability Assessment (2007);
- Sustainable Design and Construction (2009);
- Sustainable Transport (2009);

- 5.11 Also of relevance is the Draft Bankside, Borough and London Bridge Supplementary Planning Guidance (2011), which provides guidance on the development of the Opportunity Area, although has never been formally adopted.

Historic England

- 5.12 Advice Note 2, prepared by Historic England in February 2016, provides guidance on making changes to heritage assets, including repair, restoration, addition and alteration works.
- 5.13 Advice Note 3, published March 2015, sets out guidance with regards to the setting of heritage assets, and managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes. It gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated.
- 5.14 Advice Note 4, published December 2015, provides advice on tall buildings, as an update to previous advice published by CABI and English Heritage. The note establishes a number of criteria which tall buildings should adhere to in order to achieve architectural quality and address the historic environment.

Site Designations

- 5.15 The Site is subject to the following designations, as identified in the LBS adopted Policies Map and the London Plan:
- Central Activities Zone (CAZ);
 - London Bridge District Town Centre;
 - Bankside, Borough and London Bridge Opportunity Area;
 - Bankside, Borough, London Bridge Strategic Cultural Area;
 - Borough, Bermondsey and Rivers Archeological Priority Zone;
 - Borough High Street Conservation Area;
 - Air Quality Management Area; and
 - Flood Zone 3.

6.0 PLANNING POLICY ASSESSMENT

6.1 This section reviews all of the above policies which are relevant to the Proposed Development and provides an assessment of how the Proposed Development complies with planning policy in respect of the following:

- Principle of Development;
- Land Use;
- Affordable Workspace;
- Principle of a Tall Building;
- Heritage and Townscape;
- Landscaping and Public Realm;
- Transport and Parking;
- Servicing Arrangements; and
- Environmental Considerations.

Principle of Development

6.2 At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 11). The NPPF sets out the Government's commitment to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.

6.3 Paragraph 118 of the NPPF states that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements and promote and support the development of under-utilised land and buildings.

6.4 Paragraph 80 of the NPPF states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

6.5 The London Plan sets out a number of objectives for development throughout its policies. These have been summarised below:

- Optimise output and densities, provide necessary social and other infrastructure to sustain growth and... support wider regeneration in Opportunity Areas such as Bankside, Borough and London Bridge (Policy 2.13);
- Promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London (Policy 4.1);
- Support the management and mixed-use development and redevelopment of office provision to improve London's competitiveness (Policy 4.2);
- Sustain and manage the attractions of Central Activities Zone (CAZ) as the world's leading visitor destination (Policy 2.10); and

- Support the continued success of London's diverse range of arts, cultural, professional sporting and entertainment enterprises and the cultural, social and economic benefits that they offer to its residents, workers and visitors (Policy 4.6).

6.6 London Plan Policy 4.7 states that retail, commercial, culture and leisure development should be focused on sites within town centres. This is reiterated by draft London Plan Policy SD6.

6.7 London Plan Table A1.1 'Opportunity Areas' identifies the London Bridge, Borough and Bankside Opportunity Area (reference 21), as providing an employment capacity of 25,000. Policy 2.13 of the London Plan specifically relates to Opportunity and Intensification Areas. It states that development proposals within Opportunity Areas and Intensification Areas should:

"Seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses; and contribute towards meeting (or where appropriate, exceeding) the minimum guidelines for housing and/or indicative estimates for employment capacity."

6.8 Bankside, Borough and London Bridge has long been identified as a significant opportunity for development by both regional and local strategic plans. The Council's adopted Core Strategy acknowledges that the opportunity area will continue to be home to a mix of uses providing high quality office accommodation alongside world class retail, tourism, culture and entertainment facilities and public spaces.

6.9 This objective is supported within AV.10.2 of the draft New Southwark Plan, which states that development in London Bridge should attract global commerce with headquarter and local offices and build on its reputation for arts and crafts, food and trade while serving local needs through its town centre role.

6.10 Despite its prominent and highly accessible location within London Bridge District Centre and the Bankside, Borough and London Bridge Opportunity Area, the existing Site is underutilised, with a limited employment floorspace and no existing retail offer. The proposed scheme will optimise the development potential of the Site through the delivery of a significant quantum of office, retail and leisure floorspace, strengthening the area's status as an attractive location for global commerce, in line with both LBS and GLA objectives. It is therefore considered that the principle of development is acceptable in this instance, and the redevelopment of the Site should be encouraged.

Land Use

Office Floorspace

6.11 The existing site, which currently provides a total of 12,763 sqm of office floorspace, is located within the Central Activities Zone (CAZ), the Bankside, Borough and London Bridge Opportunity Area and the London Bridge District Town Centre. Strategic Policy 10 of the Core Strategy sets

out Southwark's approach to employment, which seeks to protect existing employment floorspace and support the provision of employment space, specifically on sites within the CAZ, Opportunity Areas and Town Centres.

- 6.12 In addition, draft New Southwark Plan Policy P26 states that in the Central Activities Zone, town centres, and opportunity areas, development must retain or increase the amount of employment floorspace (GIA) on-site.
- 6.13 The significant increase in office space, which will result in an uplift of 33,611 sqm of office floorspace, is strongly supported by local and regional policies, including Core Strategy Strategic Policy 10 and draft New Southwark Plan Policy P26. On this basis, the principle of increasing the existing B1 Use Class floorspace is fully policy compliant and should be supported.

Retail and Leisure Floorspace

- 6.14 Despite its central location within a designated town centre, the existing site does not provide any retail or leisure floorspace. Planning policies at all levels support the provision of new retail and leisure floorspace in existing town centres.
- 6.15 London Plan Policy 4.7 states that the Mayor supports a strong, partnership approach to assessing need and bringing forward capacity for retail, commercial, culture and leisure development in town centres.
- 6.16 Core Strategy Strategic Policy 3 recognises that London Bridge will benefit from the addition of new shops and facilities to better meet the needs of local people, whilst saved Southwark Plan Policy 1.7 states that most new developments for retail and other town centre uses should be accommodated within the existing town centres.
- 6.17 Furthermore, emerging New Southwark Plan Policy P30 states that development of town centre uses including markets, community, civic and cultural uses will be permitted in town centres and local centres where the following criteria are met.
- The scale and nature is appropriate to the role and catchment of the centre; and
 - A Use Classes are retained or replaced by an alternative use that provides a service to the general public, and would not harm the vitality and viability of the centre; and
 - The development would not harm the amenity of surrounding occupiers or result in a concentration of uses that harms the character of the area; and
 - The development provides an active use at ground floor in locations with high footfall; and
 - Large schemes for town centre uses that are 1,000 sqm or more provide public toilets, public drinking fountains and public seating.

- 6.18 The proposed scheme will result in the provision of 1,904 sqm of retail floorspace (Class A1 and A3) and 2,159 sqm of leisure floorspace (Class D2). The retail offer will include a range of unit sizes, providing a mix of retail (Class A1) and food and beverage (Class A3) to meet the needs of a range of retail tenants, including small, independent businesses, in accordance with London Plan Policy 4.9. The proposed leisure floorspace (Class D2) will comprise an 825 sqm elevated public garden, 615 sqm gym and a 719 sqm hub space (Class B1/D2) within the proposed tower serving those living and working in the local area.
- 6.19 The proposed provision of retail floorspace will provide active frontages onto St Thomas Street and the proposed public square, enhancing the vitality and viability of the London Bridge District Centre whilst significantly improving the existing retail offer in the surrounding area. It is therefore considered that the provision of retail floorspace is in accordance with local and regional policy and should therefore be supported in this location.

Affordable Workspace and Retail Floorspace

- 6.20 Although the adopted London Plan and LBS policies do not require the provision of affordable workspace, draft London Plan Policy E3 encourages the use of planning obligations to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose.
- 6.21 Additionally, draft New Southwark Plan Policy SP4 sets a strategic target for the delivery of 500 new affordable small business units within the Borough, whilst draft New Southwark Plan Policy P28 requires development to incorporate well designed and flexible units suitable for small and independent businesses which include a range of unit sizes and types. Opportunities for long term management of small business units by workspace providers should be fully explored.
- 6.22 The proposed scheme will result in the provision of 1,067 sqm of high-quality affordable workspace floorspace (equating to 2% of the overall employment offer), suitable for a range of small businesses, which will be provided on the upper floors (1st – 3rd floor level) of the Georgian terrace (nos. 4-16 St Thomas Street).
- 6.23 The scheme will also provide two affordable retails at ground floor and lower ground floor level of the Georgian terrace (nos. 4-6 St Thomas Street), measuring a total of 181 sqm (equating to 24% of the overall Class A1 retail offer). The location and extent of the affordable workspace and retail floorspace is set out in the Design and Access Statement.
- 6.24 It is considered that the proposed affordable workspace and retail offer is in accordance with emerging policy and should therefore be supported.

Principle of a Tall Building

- 6.25 The proposed scheme includes delivery of a 37-storey building (including ground, mezzanine and two storeys of plant at roof level) extending to 144m AOD, providing high quality office and retail floorspace.
- 6.26 The principle of a tall building in this location is supported by London Plan Policy 7.7, which requires tall buildings to be generally limited to sites within the CAZ, Opportunity Areas, areas of intensification or town centres, that have good access to public transport. The policy sets out the following criterion when assessing a Site's suitability for a tall building, which have each been dealt with in turn below:

Tall buildings should:

- a. *Generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport* - The Site is located in the Central Activity Zone, within Bankside, Borough and London Bridge Opportunity Area and London Bridge District Centre. Furthermore, the Site is located within close proximity to London Bridge Station, resulting in the highest PTAL rating of 6b.
- b. *Only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building* - The Proposed Development has been designed in response to the historic character and townscape of the local area and will enhance the local townscape through reinstating the historic use and vibrancy of the yards whilst complementing the appearance of the cluster of tall buildings
- c. *Relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level* - The Proposed Development would relate well to contextual buildings within the vicinity of the Site. The tall building is of a comparable scale to nearby tall buildings including Guy's Hospital Tower and Shard Place.
- d. *Individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London incorporate the highest standards of architecture and materials, including sustainable design and construction practices* - The scheme has been thoughtfully designed using high quality materials to ensure the proposed tall building adds to the vibrancy and visual interest of the existing cluster of tall buildings at London Bridge.
- e. *Have ground floor activities that provide a positive relationship to the surrounding streets* – The proposals will provide active retail frontages onto St Thomas Street and the proposed public square, enhancing the vitality of the surrounding area.
- f. *Contribute to improving the permeability of the site and wider area, where possible* – It is proposed to deliver significant public realm improvements at street level, which will significantly improve pedestrian permeability from Borough High Street towards St Thomas Street. The scheme will also result in the delivery of a new entrance to London Bridge Underground Station.

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- g. *Incorporate publicly accessible areas on the upper floors, where appropriate* – The Proposed Development will result in the delivery of a publicly accessible elevated garden at fifth and sixth floor level of the proposed tower. The garden will benefit from high-quality landscaping and spaces for the public to relax.
 - h. *Make a significant contribution to local regeneration* - The Proposed Development offers significant regenerative benefits through the redevelopment of an underutilised site of no architectural merit to provide a building of high architectural quality, public realm improvements and the sensitive refurbishment of several listed buildings.
- 6.27 In light of the above, it is clear that the scheme conforms to the London Plan Policy requirements and adheres to the principles required for a tall building by virtue of Policy 7.7.
- 6.28 It is important to note that the draft London Plan makes additions to Policy 7.7 through draft Policy D8, which seeks to assess tall buildings in terms of visual impact, functional impact, environmental impact and cumulative impact.
- 6.29 In terms of visual impact, Policy D8 makes a notable addition in that proposals should take account of and avoid harm to the significance of London's heritage. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area. A detailed assessment of the impact of the proposed scheme on the relevant designated heritage impacts has been provided in the supporting Townscape, Visual Impact and Built Heritage Assessment (prepared by Peter Stewart Consultancy + Millerhargreaves) and Heritage Statement (prepared by Peter Stewart Consultancy). An assessment of potential harm weighed against the many public benefits of the scheme has been set out in paragraph 6.51.
- 6.30 At a local level, Paragraph 4.22 of the Core Strategy acknowledges that there will be excellently designed tall buildings in the area around London Bridge Station east of Borough High Street, which will add interest to the skyline, raise the profile of Southwark and London, and create new public spaces. Additionally, saved Policy 3.20 of the Southwark Plan supports the principle of tall buildings which are significantly taller than their surroundings or have a significant impact on the skyline, on sites which have excellent accessibility and are located in the CAZ, particularly in opportunity areas outside of landmark viewing corridors. Proposals should also ensure excellent links to public transport services.
- 6.31 It is considered that the Proposed Development adheres to these principles strongly, with its location in very close proximity to London Bridge Station, PTAL rating of 6b, and its location within the CAZ and Borough, Bankside and London Bridge Opportunity Area. It will also further enhance link to public transport by way of an on-site entrance to the Underground.
- 6.32 Saved Local Plan Policy 3.20 establishes further criteria for which tall buildings must adhere, which have been assessed in turn below:

- a. *Makes a positive contribution to the landscape* - The proposals will deliver significant public realm improvements, including the provision of a public square, active frontages onto St Thomas Street and the yards, and restoration of the Georgian terrace and Keats House.
- b. *Is located at a point of landmark significance* - The Site is located in a prominent position within an existing tall building cluster in the Bankside, Borough and London Bridge Opportunity Area and London Bridge District Centre, adjacent to London Bridge Station.
- c. *Is of the highest architectural standard* – The Proposed Development is of the highest architectural quality, using materials which respond well the surrounding area. It is considered that the building would be an elegant addition to the surrounding townscape.
- d. *Relates well to its surroundings, particularly at street level* – The Proposed Development would relate well to contextual buildings within the vicinity of the Site, including Guy's Hospital Tower and Shard Place, whilst referencing the historic building typology in the surrounding area, including railway bridges and historic warehouses. The ground floor would be delivered alongside significant public realm improvements which would relate well to the surrounding area.
- e. *Contributes positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views* – As set out in the supporting Townscape, Visual Impact and Built Heritage Assessment, it is considered the building would contribute positively to a number of key views in the surrounding area.

6.33 Draft New Southwark Plan Policy P14, makes additions to Policy 3.20. The policy acknowledges that tall buildings *“will be located in areas that benefit from the highest levels of public transport access where there is the greatest opportunity for regeneration. Typically, this will be in our major town centres, Opportunity Areas and the Central Activities Zone.”*

6.34 As set out above, the Site falls within these site designations. It should also be noted that London Bridge has been the location for the emergence of tall buildings in recent years, including but not limited to the Shard, the News Building and Shard Place. The proposals will be of an exemplary design, using high quality materials which will complement the existing and expanding London Bridge tall building cluster, will be viewed in this tall building context and will make a positive contribution to the London skyline. An assessment of the proposals against the Southwark Local Plan Policy P14 (Tall Buildings) has been provided below.

New tall buildings must:

- *Be located at a point of townscape significance and have a height that is proportionate to the significance of the proposed location and the size of the site;* - The Site is located within London Bridge, at a strategic river crossing and a landmark for commerce at the confluence of many different modes of transport. It is located next to London Bridge Station and just off Borough High Street. The proposed height will complement and add visual interest to the cluster of tall buildings at London Bridge.

- *Respond positively to local character and townscape;* - The Proposed Development will respond to the historic character and townscape of the local area. It will enhance the local townscape through reinstating the historic use and vibrancy of the yards whilst complementing the appearance of the cluster of tall buildings.
- *Be of exemplary architectural design and residential quality;* - The proposals incorporate exemplary architecture, which is supported by both GLA and CABE.
- *Make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings;* The Proposed Development will add vibrancy and visual interest to the existing cluster of tall buildings at London Bridge.
- *Not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough Views;* - As set out in the supporting Townscape, Visual Impact and Built Heritage Assessment, the proposals will not result in any harm to any strategic views or borough views. A number of LVMF views are potentially relevant to consideration of proposals on the Site. The effect on these, and on a large number of local and mid-distance views, have been assessed in the supporting Townscape, Visual Impact and Built Heritage Assessment. It is considered that the proposals will enhance a number of the views in which they will appear.
- *Avoid unacceptable harm to the significance of designated heritage assets or their settings;* - The listed buildings on Site, and their immediate settings on Site at ground level and lower levels, will be reordered and improved. The overall effect of the proposals on the character and appearance of the Borough High Street Conservation Area would be positive. Any minor losses of heritage significance would be outweighed by the very great benefits delivered by the proposals. These have been set out in paragraph 6.51.
- *Avoid harmful and uncomfortable environmental impacts including wind shear, overshadowing and solar glare;* - Detailed modelling and analysis has been undertaken to assess these impacts and inform the design from an early stage. These have been robustly assessed in the supporting ES.
- *Maximise energy efficiency and prioritise the use of sustainable materials;* - The Proposed Development will incorporate exemplary energy and sustainability principles, as set out in the supporting Energy and Sustainability Report.
- *Have a positive relationship with the public realm, provide opportunities for new street trees, and design lower floors to successfully relate to and create a positive pedestrian experience;* - At street level, the proposals will enhance and respond positively to the historical context of the site alongside the provision of new public realm and routes across the site.
- *Provide a new, functional public space that is commensurate to the height and size of the proposed building when above a height of 30m, or 25m in the Thames Policy Area, and widened footways and routes to accommodate increased footfall;* - The proposals will create a series of new attractive public spaces for the benefit of the local area, including a new pedestrianised public square.
- *Provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents when above a height of 60m;* - The scheme provides a publicly accessible garden at fifth and sixth floor level (28m AOD). It will be

fully accessible and maintained by the building owner. Although not at or near the top of the building, the garden will provide excellent views towards the River Thames and the City beyond.

- 6.35 Having regard to the above, it is considered that the proposed scheme accords with the requirements of the Southwark Local Plan Policy P14 (Tall Buildings), and the provision of a tall building in this location should therefore be supported.
- 6.36 The proposed scheme has also had regard to Historic England Advice Note 4 (December 2015), which states that a successful application will have fully addressed a range of design criteria which will deliver architectural quality involving a consideration, inter alia, of the buildings:
- Scale;
 - Form and massing;
 - Proportion and silhouette;
 - Facing materials;
 - Detailed surface design;
 - Relationship to other structures;
 - Impact on streetscape and near views;
 - Impact on cityscape and distant views;
 - Impact on the skyline.
- 6.37 By virtue of the Proposed Development's assessment against adopted London Plan Policy 7.7 and Southwark Policy 3.20, in addition to emerging London Plan Policy D8 and new Southwark Plan Policy P14, it is considered that the Proposed Development adheres and responds strongly to the considerations as advised by Historic England.
- 6.38 In paragraph 4.9, the advice note reiterates the importance of improving the character and quality of an area, responding to local character and history. As concluded in the Townscape, Visual Impact and Built Heritage Assessment, it is considered that any harmful impact, would be outweighed by the Proposed Development's significant public benefits, which are considered in paragraph 6.51.
- 6.39 In light of the above, it is considered that, alongside the quality of the architecture proposed and the numerous public benefits of the scheme, the building decisively outweighs any perceived harmful impacts and is therefore acceptable in planning policy terms at national, regional and local level.

Heritage and Townscape

- 6.40 The NPPF establishes national level policy on the conservation and preservation of the historic environment. Paragraph 189 requires applicants to describe the significance of any heritage assets affected, including any contribution made by their setting. Paragraph 192 further states that the desirability of new development should make a positive contribution to both local character and distinctiveness.

- 6.41 Paragraph 193 provides that when considering the impact of Proposed Development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. It emphasises that the weight given to an asset's conservation should be proportionate to its significance, and that clear and convincing justification will be required for loss and harm to heritage assets.
- 6.42 Under paragraph 200 of the NPPF, when considering the impact of a Proposed Development on the significance of a designated heritage asset, LPAs should look for opportunities for new development in Conservation Areas and the setting of heritage assets to enhance or better reveal their significance and proposals that preserve or better reveal the significance of heritage assets should be treated favourably.
- 6.43 The London Plan promotes development of the highest architectural quality. Policy 7.6 sets out the Mayor's design guidance and requires developments to optimise the potential of sites and be designed in consideration of the local context including potential impact on listed buildings and conservation areas, providing a development that enhances the public realm, uses a palette of materials that complements the local architectural character, is inclusive and is flexible to allow for different activities.
- 6.44 At local level, draft New Southwark Plan Policy states that development relating to listed buildings and structures will only be permitted where it avoids unjustifiable harm to the special significance of listed buildings and structures and their settings by conserving and enhancing:
- i. The historic fabric, architectural style and features, curtilage, site layout, plan form and readability, and land use; and
 - ii. The contribution of the building to its setting or its place within a group; and
 - iii. Views that contribute positively to the significance of the building or structure or their setting; and
 - iv. The viable use of listed buildings and structures that is consistent with their on-going and long term conservation.

Any harm to the significance of the listed building or structure that results from a proposed development must be robustly justified.

- 6.45 Furthermore, draft New Southwark Plan Policy P17 states that development relating to conservation areas will only be granted where:
- a. The development conserves and enhances the significance of conservation areas, taking into account their local character, appearance and positive characteristics published in Conservation Area Appraisals and Conservation Area Management Plans; and
 - b. The development conserves and enhances the significance of a conservation area's setting, including views to and from the conservation area; and

- c. The demolition of buildings or structures that make a positive contribution to the historic character and appearance of a conservation area will not be generally permitted. Any replacement buildings or structures must conserve and enhance the conservation area's historic character and distinctiveness.
- 6.46 Central to the assessment of the impact of the proposed tower on relevant heritage assets is Paragraph 196 of the NPPF. Where harm is caused to a heritage asset, the NPPF requires decision makers to determine whether the harm is substantial, or less than substantial. If the harm is deemed to be less than substantial, paragraph 196 of the NPPF requires that harm to be weighed against the public benefits of the proposals.
- 6.47 As set out in the supporting Townscape, Visual Impact and Built Heritage Assessment and Heritage Statement, it is considered that the proposed provision of a tall building will result in less than substantial harm to the relevant designated heritage assets, particularly the setting of the Grade I-listed Southwark Cathedral. This view is supported by Historic England, CABE and the GLA in their formal written responses.
- 6.48 It is our view that this harm is far outweighed by the following significant public benefits of the Proposed Development, which have been summarised below:
- Replacement of dated 1980s office building of little architectural merit with a new office building providing 46,374 sqm of high-quality Class B1 office floorspace, resulting in an uplift of 33,611 sqm of office floorspace across the Site.
 - Delivery of approximately 3,000 permanent jobs across the Site.
 - Creation of a substantial quantum of high quality and fully accessible public realm, providing enhanced connectivity through new public routes and a new public square.
 - Provision of a publicly-accessible, double height elevated garden at fifth and sixth floor level, maintained by the building owner, activated by high-quality and varied exotic botanical planting and complemented by a café/restaurant offer to provide amenity for visitors.
 - New access to the London Bridge Underground Station, linked directly into the new public realm, providing a significantly enhanced point of arrival and departure for users of the network alongside a new permeable route to the station for pedestrians using the yards or St Thomas Street.
 - Sympathetic restoration and improvement of the Grade II-listed Georgian terrace buildings along St Thomas Street, enhancing the character and appearance of the listed buildings.
 - Reconstruction and improvement of unlisted Keats House as a standalone building and retention of the original façade, enhancing the character and appearance of an undesignated heritage asset.
 - Creation of double fronted retail units at ground floor of the Georgian terrace to provide active retail frontages along St Thomas Street and the proposed public square, reactivating this section of St Thomas Street.

- Improvement of the setting of adjacent listed buildings, including The Old King's Head, creating greater public appreciation of this listed building in views from newly created vantage points within the proposed public realm.
- Provision of 181 sqm of the retail offer as flexible, affordable retail floorspace serving a range of small, independent retailers.
- Use of the upper floors of the Georgian terrace (1,067 sqm) as flexible, affordable office space to accommodate new start-up businesses.
- Provision of a dedicated hub space provided on levels 22 and 23 of the tower, comprising a 250-fixed seat auditorium with associated facilities and external terraces, for both office users and as an event space for the wider community.
- Indirect positive benefits, including increased local spend of users and occupiers of the site, and enhanced vibrancy for the local area.
- Significant Mayoral and Southwark Community Infrastructure Levy contributions and appropriate Section 106 contributions, providing considerable economic benefits which would assist in the provision of infrastructure and further improvement of the local area.

6.49 In summary, the Proposed Development will have a beneficial effect on the townscape of surrounding areas and the views in which it is most prominent, together with enhancing the character and appearance of the Grade II listed Georgian terrace and surrounding Borough High Street Conservation Area.

6.50 Whilst it is considered that the proposals will result in less than substantial harm to the setting of the Grade I listed Southwark Cathedral and the Grade II* listed Guy's Hospital, any harm would be at the lower end of the 'less than substantial' scale and the public benefits of the scheme would far outweigh the harm, in line with paragraph 196 of the NPPF.

6.51 For these reasons, the Proposed Development is considered to be in accordance with national, regional and local policies and guidance in respect of design, heritage and conservation.

Landscaping and Public Realm

6.52 Providing a high quality public realm and improved pedestrian links is a key objective of the scheme and one of the primary public benefits of the Proposed Development. It is proposed to provide a new public square, which will enhance the surrounding area and facilitate the regeneration of the underutilised historic yards, whilst creating generous and accessible new public spaces and routes, complemented by a new station entrance into the square. The square will benefit from high quality landscaping, trees and street furniture, creating a space where visitors and occupiers can dwell and relax.

6.53 It is also proposed to deliver a double height elevated public garden within the proposed tower at fifth and sixth floor level, allowing excellent views across London in a fully accessible, free-to-access space. Further details of the proposed public realm and landscaping is set out in the supporting Landscaping Strategy, prepared by MRG.

- 6.54 The delivery of these public realm improvements is strongly supported in policy terms. Policy 7.5 of the London Plan requires London's public spaces to be secure, accessible, inclusive, connected, easy to understand and maintain, relative to the local context and incorporate the highest quality design, landscaping, planning street furniture and surfaces.
- 6.55 Saved Policy 3.13 of the Local Plan supports developments which deliver a high quality of streetscape design, which avoid unnecessary clutter and ensure a safe, informative and attractive environment. It is considered that the proposed public realm associated with the Development strongly achieves these principles.
- 6.56 It is therefore considered that the Development complies with London Plan and local policies in the context of the public realm.

Transport and Parking

- 6.57 This Section should be read in conjunction with the Transport Assessment and Travel Plan, prepared by TPP, which are submitted in support of the Application. These documents, which also inform the relevant Chapter of the ES, provide a comprehensive review of the Proposed Development and a robust assessment of the transportation impacts.
- 6.58 The Travel Plan provides a framework for encouraging and delivering sustainable travel in and around the Site, and identifies the potential measures that may be introduced to promote walking, cycling and the use of public transport for the respective office accommodation and retail uses.
- 6.59 At national level, the NPPF states that development should take opportunities to promote walking, cycling and public transport use (see Paragraph 102).
- 6.60 London Plan Policy 6.1 stresses the importance of close integration of transport and development and hopes to encourage this by adopting a number of strategies including:
- Encouraging patterns of development that reduce the need to travel, especially by car;
 - Seeking to improve the capacity and accessibility of public transport, walking and cycling, particularly in areas of greatest demand;
 - Supporting measures that encourage shifts to more sustainable modes and appropriate demand management; and
 - Promoting walking by ensuring an improved public realm.
- 6.61 The London Plan promotes development that will not adversely affect safety on the transport network, setting out the following requirements:
- Policy 6.9 seeks secure cycle parking in line with the standards set out in Table 6.3 of the London Plan;
 - Policy 6.10 seeks high quality pedestrian environments; and

- Policy 6.13 states the maximum standards for car parking should be achieved as set out in Table 6.2 of the London Plan.

- 6.62 Additionally, draft New London Plan Policy T6.2 states that office and retail development in the CAZ are required to be car-free, whilst draft New London Plan Policy T5 requires developments to provide cycle parking in accordance with the minimum standards set out in Table 10.2 and Figure 10.2.
- 6.63 LBS aspires to encourage walking, cycling and the use of public transport by directing large developments to very accessible locations and requiring a Transport Assessment with applications to show that schemes minimise their impacts, minimise car parking and maximise cycle parking (Core Strategy Strategic Policy 2). The emerging New Southwark Plan also sets out revised cycle parking requirements.

Public Transport

- 6.64 The Site is highly accessible by public transport with a Public Transport Accessibility Level (PTAL) of 6b, which represents the highest level of accessibility, as a result of its proximity to London Bridge Station, which provides access to London Underground services (Northern and Jubilee Lines), National Rail services and local bus services from the London Bridge Bus Terminal.
- 6.65 The Site also has good access to existing cycling infrastructure, with Southwark Bridge Road located to the west of the Site forming part of Cycle Superhighway 7, which connects Southwark to the City of London, Lambeth, Wandsworth and Merton.
- 6.66 The Application is accompanied by a Transport Assessment which has considered the impact of the Proposed Development on existing public transport capacity and concludes that the number of public transport trips generated by the Proposed Development would not significantly affect the local public transport services.

Cycle Parking

- 6.67 The scheme will provide exemplary cycle facilities for employees and visitors, with a total of 1,310 cycle parking spaces, 447 lockers and 70 showers, which exceed both adopted and emerging London Plan and Southwark Plan policy.

Car Parking

- 6.68 LBS Policy for commercial car parking standards is set out in the Southwark Plan. All developments requiring car parking should minimise the number of spaces provided and will be expected to include justification for the amount of car parking sought, taking into account the Site's PTAL, impact on overspill parking, and the demand for parking within Controlled Parking Zones (Policy 5.6).

- 6.69 The Proposed Development will be predominately car-free, with the exception of two blue badge spaces at basement level. This provision is supported by TfL and adopted and emerging London Plan Policy. As such, it is considered that the proposed car parking provision is acceptable.

Servicing Arrangements

- 6.70 This Section should be read in conjunction with the Delivery, Servicing and Waste Management Plan, prepared by TPP, which is submitted in support of the Application.
- 6.71 Saved Southwark Plan Policy 5.2 requires development to make adequate provision for servicing, circulation and access to, from and through the site. Draft New Southwark Plan Policy P47 states that development must ensure safe and efficient delivery and servicing that minimises the number of motor vehicle journeys.
- 6.72 LGVs and cars will access a loading bay on the Site via White Hart Yard. Two vehicle lifts are proposed to be installed at the rear of the proposed tower to allow for servicing and delivery access at lower basement level, as well as providing access for accessible visitors. The lifts will be positioned at the widest part of King's Head Yard, offering the greatest manoeuvring potential for vehicles, and the highest degree of visibility for entering and exiting the premises. The provision of two lifts also allows for multiple deliveries during peak hours and provides continuity of service. Swept path analysis has been undertaken for different vehicles and this is contained in the Transport Assessment.
- 6.73 HGVs and refuse vehicles will service the Site from a holding area on St Thomas Street. The relocation of Keats House 2.7m to the west will facilitate service access onto the Site from St Thomas Street.
- 6.74 With regards to servicing from White Hart Yard, the supporting Delivery, Servicing and Waste Management Plan acknowledges that the Proposed Development would increase the number of light goods vehicles on the yards. However, even with the additional traffic, the overall number of vehicles will remain relatively low. It is also noted that the proposed public realm improvements will divert pedestrians to King's Head Yard, which will further mitigate the impact of the additional vehicle movements on White Hart Yard.
- 6.75 With regards to the proposed servicing arrangement via St Thomas Street, the Delivery, Servicing and Waste Management Plan identifies that the existing loading bay on St Thomas Street has 36% utilisation. Under the proposed servicing arrangement, which seeks to relocate and extend the existing loading bay, utilisation will increase to 50%, which still leaves substantial spare capacity.
- 6.76 It is therefore considered that the proposed servicing arrangements are acceptable.

Environmental Considerations

Energy and Sustainability

- 6.77 As noted previously, the NPPF establishes a presumption in favour of sustainable development. Paragraph 148 encourages proposals which support renewable and low carbon energy and associated infrastructure. Paragraph 153 states that, in determining planning applications, local planning authorities should expect new development to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated that it is not feasible or viable; and take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- 6.78 The London Plan seeks to secure sustainable development by:
- Requiring developments to demonstrate that sustainable design and construction standards have been integral to a proposal, including minimising carbon dioxide emissions, avoiding internal overheating, efficient use of natural resources, minimising pollution and waste, sustainable construction, and promoting biodiversity (Policy 5.3);
 - Requiring developments to minimise carbon dioxide emissions through the latest transitional arrangement targets which have increased from a 25% reduction (during 2010-2013) to a 40% reduction (from 2013 to 2016) in the 2010 Building Regulations (Policy 5.2); and
 - Requiring new development to evaluate the feasibility of Combined Heat and Power ("CHP") (Policy 5.9).
- 6.79 An Energy Statement, prepared by Chapman BDSP, is submitted in support of the Application, which demonstrates how the Proposed Development will comply with relevant carbon reduction and planning policy. Extensive energy efficient measures will be incorporated into the design, including photo voltaic panels on the unobstructed roofs of the tower and air source heat pumps incorporated where additional external space required for the technology is available within the Georgian terrace refurbishment.
- 6.80 These measures result in a 40.7% reduction in carbon emissions when considering both 'Be Lean' and the 'Be Green' case, meeting the London Plan requirement of 35% reduction in CO₂ emissions.
- 6.81 It is therefore considered that the Development accords with London Plan Policies 5.2, 5.5, 5.6 and 5.7, Core Strategy Strategic Policy 13 and saved Southwark Plan Policies 3.3 and 3.4.

Noise and Vibration

- 6.82 London Plan Policy 7.15 requires development proposals to manage noise by avoiding significant adverse noise impacts on health and quality of life as a result of new development.

- 6.83 Saved Southwark Plan Policy 3.1 states that planning permission will not be granted for the establishment of uses that would cause material adverse effects on the environment, whilst saved Southwark Plan Policy 3.2 states that planning permission for development will not be granted where it would cause loss of amenity, including disturbance from noise, to present and future occupiers in the surrounding area or on the application site.
- 6.84 A noise assessment has been carried out by Waterman as part of the ES to assess the likely significant noise and vibration effects associated with the Proposed Development on existing noise sensitive receptors surrounding the Site during both the construction and operational phases of the Proposed Development.
- 6.85 The assessment acknowledges that, for the construction phase, measures to control the noise and vibration effects from the works will be incorporated into a Site Environmental Management Plan (SEMP) to ensure any noise and vibration impacts are minimised. It should be noted that the Proposed Development may result in a temporary local adverse effect of moderate significance during the construction stage however, this is based on a worst-case scenario which is seldom likely to occur.
- 6.86 During operation, the main sources of noise and vibration will be plant and servicing. Noise from commercial uses will be subject to standard controls that could be secured through planning conditions and is likely to be negligible in any case. Furthermore, the Delivery, Servicing and Waste Management Plan submitted in support of the application sets out the measures to be adopted to manage the arrival and departure of delivery and servicing vehicles and their activities when on-site to ensure noise impacts are minimised.
- 6.87 Overall, it is considered that the Development is in accordance with London Plan Policy 7.15 and Southwark Plan Policies 3.1 and 3.2.

Daylight, Sunlight, Solar Glare and Overshadowing

- 6.88 Core Strategy Policy 13 requires development to support measures for reducing air, land, water, noise and light pollution and avoiding amenity and environmental problems that affect how we enjoy the environment in which we live and work.
- 6.89 An assessment of the likely effects of the Development in respect of daylight, sunlight, overshadowing, light pollution and solar glare has been undertaken by GIA as part of the ES.
- 6.90 In terms of daylight impacts, the ES confirms that the Proposed Development is likely to result in long term, local, insignificant to 8 properties, minor adverse to 5 properties, and moderate adverse to 5 properties. With regards to sunlight, the ES confirms that the Proposed Development is likely to result in long term, local, insignificant to 14 properties, and moderate adverse to 2 properties. As part of the design process, the massing and façade details of the development were informed by the potential daylight and sunlight effects. However, owing to the scale of the Proposed Development in comparison to the existing buildings, its close

proximity and low existing daylight and sunlight levels, changes in conditions are considered to be unavoidable.

- 6.91 In terms of solar glare, the ES confirms that the Proposed Development would result in Long term, local, insignificant to 8 locations, minor adverse to 17 locations, and moderate adverse to 2 locations. However, it should be noted that these instances would last for short periods and would largely occur above the driver's visor cut-off line.
- 6.92 With regards to overshadowing and light pollution, the ES concludes that the Proposed Development would have an insignificant effect on all properties and amenity areas.
- 6.93 Overall, owing to the Site's location within an urban area, it is considered that the proposed scheme is in accordance with the NPPF, Core Strategy Policy 13, and the impact of the proposed scheme is acceptable in terms of daylight, sunlight, overshadowing and solar glare.

Wind

- 6.94 London Plan Policy 7.6 seeks to ensure proposals do not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. Emerging New Southwark Plan Policy P14 states that proposals for tall buildings should avoid harmful and uncomfortable environmental impacts including wind shear.
- 6.95 Saved Southwark Plan Policy 3.12 states that developments should enhance the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit.
- 6.96 An assessment of the wind microclimate of the Proposed Development has been carried out by Wirth as part of the ES. The assessment has considered the impact of wind on pedestrian comfort, particularly within the proposed public square and outdoor terraces within the proposed tower. Throughout the design process, the results have informed the design as appropriate.
- 6.97 It has been established that the wind conditions within and around the Proposed Development would be appropriate given the uses proposed, ensuring that wind remains at comfortable levels for pedestrians. Design mitigation measures have been introduced to improve wind conditions, including tree planting and screening. Please refer to Chapter 12 of the ES for detailed analysis.
- 6.98 It is therefore considered that the Development accords with planning policy and best practice, specifically London Plan Policy 7.6 and Southwark Plan Saved Policy 3.12.

Flood Risk

- 6.99 London Plan Policy 5.12 states that development proposals must comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical Guidance on flood risk over the lifetime of the development.
- 6.100 Core Strategy Strategic Policy 13 requires developments to help reduce flood risk by reducing water run-off, using sustainable urban drainage systems and avoiding the paving over of gardens and creation of hard standing areas.
- 6.101 An assessment of water resources and flood risk, prepared by AKT II, forms Chapter 11 of the ES and concludes that the Site is acceptable for the uses proposed. The Proposed Development therefore complies with London Plan policy 5.12, 5.13 and Core Strategy Strategic Policy 13.

Archaeology

- 6.102 London Plan Policy 7.8 requires development to make provision for the protection of archaeological resources, landscapes and significant memorials. Core Strategy Policy 12 seeks to conserve or enhance the significance of Southwark's heritage assets, their settings and wider historic environment, including conservation areas, archaeological priority zones and sites. Saved Southwark Plan Policy 3.19 requires planning applications affecting sites within Archaeological Priority Zones (APZs) to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.
- 6.103 A desk-based archaeological assessment of the Site has been undertaken by the Museum of London Archaeology (MOLA) and forms part of the ES (Chapter 10). The Site is located within an Archaeological Priority Zone, which requires an archaeological assessment and evaluation of the Site to be included within planning applications.
- 6.104 The assessment concludes that archaeological survival potential at the Site is very limited, and no buried heritage assets of Very High or High significance are anticipated which would merit a mitigation strategy of permanent preservation in situ.
- 6.105 It is therefore considered that the likely adverse effects of Moderate to Major significance can be successfully mitigated by a suitable programme of archaeological investigation before demolition. As such, the Proposed Development is considered to be in accordance with the NPPF, London Plan Policy 7.8, Core Strategy Strategic Policy 12 and saved Local Plan Policy 3.19.

7.0 DRAFT SECTION 106 HEADS OF TERMS

7.1 This section sets out a summary of the draft Heads of Terms for the Proposed Development and identifies where financial contributions could be made and where works 'in kind' are proposed in lieu of payment. The draft Heads of Terms have been considered in relation to the LBS Section 106 Planning Obligations and CIL SPD adopted in April 2015.

7.2 It is envisaged that discussions relating to the following draft heads of terms and the Section 106 Agreement will continue with LBS during the determination of the Application.

- **Archaeology Contribution (payment of £11,171)** – A contribution towards the cost of providing technical archaeological support. Calculated as £11,171 for 10,000 and more sqm of development.
- **On-site affordable workspace (in-kind provision)** - The provision of 1,067 sqm GIA of affordable small business units (2% of overall office floorspace).
- **On-site affordable retail (in-kind provision)** - The provision of 181 sqm GIA of affordable retail units (24% of overall Class A1 retail floorspace).
- **Public garden management plan (in-kind provision)** – Management plan addressing access, maintenance and opening hours of the proposed public garden.
- **Employment and Enterprise during Construction (in-kind provision)** - One job lasting a minimum 26 weeks for an unemployed Southwark resident per 500sqm GEA, one Southwark resident trained in pre-or post-employment short courses per 500sqm GEA, and one new apprenticeship start or in work NVQ per 2,000sqm. Where the target number of sustained jobs, short courses or apprenticeships cannot be provided, a contribution will be sought to be used by Southwark, calculated as £4,300 for shortfall against target number of jobs lasting minimum 26 weeks, £150 for shortfall against target number of Southwark residents trained in short courses, and £1,500 for shortfall against target number of apprenticeship starts.
- **Employment and Enterprise in Operational Development (in-kind provision)** – Requirement to provide jobs lasting a minimum of 26 weeks for unemployed Southwark residents calculated at 10% (for office floorspace) or 20% (for retail floorspace) of the estimated Full Time Employee (FTE) employment on site according to Homes and Community Agency (HCA) employment densities or an alternative measure agreed by the council. An employment and training contribution will be sought, to be set at the target number of jobs lasting a minimum of 26 weeks for unemployed Southwark residents multiplied by £4,300.
- **Delivery of highway works (in-kind provision)** – Provision of highways improvements and associated obligations.

- **Delivery of public realm improvements, including management (in-kind provision)** – Provision of public realm improvements within the Site and along St Thomas Street, and associated surface treatment, tree planting, street furniture and outdoor lighting. Associated management plan for public spaces.
- **Delivery of new station entrance (in-kind provision)** – The provision of a new entrance to London Bridge Underground Station.
- **Administration charge (payment TBC)**- An administration charge of 2%, which excludes all legal costs associated with the preparation of an actual section 106 agreement.

8.0 CONCLUSIONS

- 8.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires proposals to be determined in accordance with the Development Plan unless other material considerations indicate otherwise.
- 8.2 This Statement assesses the Proposed Development against the Development Plan and other relevant national, regional and local planning policy. The principle of the Development accords with adopted planning policy and guidance. National policy, the London Plan, the Core Strategy and the Development Management Policies all seek to ensure that development makes the most effective and efficient use of land.
- 8.3 The proposed scheme will play an important role at both strategic and local level. The development of the Site will deliver a substantial quantum of office, retail and leisure floorspace alongside significant public realm improvements in a high-quality development that will regenerate the Site and its surroundings, contribute invaluable towards the local employment offer, and deliver on the Council's vision for the area.
- 8.4 The proposals have been subject to a comprehensive consultation exercise involving regular pre-application meetings with officers from LBS and key consultees such as the GLA, Historic England, CABI and local residents, businesses and amenity groups. The issues raised by these groups have been considered and incorporated into the development of the final proposals, where practicable. Consultation will continue throughout the determination period.
- 8.5 The Development has been subject to detailed assessment against national, regional and local planning policy and guidance and has been found to be in general accordance with the Development Plan and other material considerations.
- 8.6 In particular, it will deliver the following policy objectives and public benefits:
- Replacement of dated 1980s office building of little architectural merit with a new office building providing 46,374 sqm of high-quality Class B1 office floorspace, resulting in an uplift of 33,611 sqm of office floorspace across the Site.
 - Delivery of approximately 3,000 permanent jobs across the Site.
 - Creation of a substantial quantum of high quality and fully accessible public realm, providing enhanced connectivity through new public routes and a new public square.
 - Provision of a publicly-accessible, double height elevated garden at fifth and sixth floor level, maintained by the building owner, activated by high-quality and varied exotic botanical planting and complemented by a café/restaurant offer to provide amenity for visitors.
 - New access to the London Bridge Underground Station, linked directly into the new public realm, providing a significantly enhanced point of arrival and departure for users of the network alongside a new permeable route to the station for pedestrians using the yards or St Thomas Street.

- Sympathetic restoration and improvement of the Grade II-listed Georgian terrace buildings along St Thomas Street, enhancing the character and appearance of the listed buildings.
- Reconstruction and improvement of unlisted Keats House as a standalone building and retention of the original façade, enhancing the character and appearance of an undesignated heritage asset.
- Creation of double fronted retail units at ground floor of the Georgian terrace to provide active retail frontages along St Thomas Street and the proposed public square, reactivating this section of St Thomas Street.
- Improvement of the setting of adjacent listed buildings, including The Old King's Head, creating greater public appreciation of this listed building in views from newly created vantage points within the proposed public realm.
- Provision of 181 sqm of the retail offer as flexible, affordable retail floorspace serving a range of small, independent retailers.
- Use of the upper floors of the Georgian terrace (1,067 sqm) as flexible, affordable office space to accommodate new start-up businesses.
- Provision of a dedicated hub space provided on levels 22 and 23 of the tower, comprising a 250-fixed seat auditorium with associated facilities and external terraces, for both office users and as an event space for the wider community.
- Indirect positive benefits, including increased local spend of users and occupiers of the site, and enhanced vibrancy for the local area.
- Significant Mayoral and Southwark Community Infrastructure Levy contributions and appropriate Section 106 contributions, providing considerable economic benefits which would assist in the provision of infrastructure and further improvement of the local area.

8.7 The impacts of the Proposed Development have been fully assessed by the Environmental Statement and other supporting application documents and mitigation measures have been identified where necessary and practicable. The Proposed Development is considered to be entirely appropriate for the Site and the surrounding area.

8.8 Overall, the Proposed Development would deliver an exemplary scheme which would have many regenerative and economic benefits. For the reasons outlined above, the principle of the development is consistent with the broad objectives of planning policy and in accordance with the Government's overarching objectives for sustainable growth.

8.9 The Proposed Development is therefore considered to be acceptable and should be granted planning permission and listed building consent.

APPENDIX 1 – PLANNING HISTORY

Ref No.	Address	Date	Description	Decision
18/AP/2633	New City Court, 20 St Thomas Street, London SE1 9RS	04 Oct 2018	Request for an Environmental Impact Assessment (EIA) Scoping Opinion for the redevelopment of the site (comprising numbers 4-16, 20 and 24-26 St Thomas Street) including: Demolition of 20 St Thomas Street and construction of a new office tower building approximately 139m high (comprising double height ground floor reception and retail, 31 storeys of office space, and double height publicly accessible elevated garden and retail unit) totalling 31,200sqm of office and retail floorspace. Double basement for servicing, cycle storage, refuse storage and plant, with vehicle access from Kings Head Yard and two disabled parking spaces. Relocation of Keats House (24-26 St Thomas Street) facade 2m to the west in a new standalone building. Alterations to and restoration of the listed terrace (8-14 St Thomas Street). Up to 1,800sqm of retail and office floorspace in the listed terrace and Keats House. A new access to the London Bridge Underground station. New ground level pedestrian routes and public realm throughout the site with hard and soft landscaping. Ancillary servicing, highway works and associated works.	Granted
18/AP/3093	New City Court, 20 St Thomas Street, London SE1 9RS	25 Sep 2018	Retrospective Planning application for installation of 1 x new air handling unit and 2 x new air conditioning units to flat roof at the rear of second floor level following a removal of existing two air conditioning units and relocation of existing two air conditioning units.	Pending

11/AP/3137	New City Court, 20 St Thomas Street, London SE1 9RS	09 Feb 2012	Refurbishment of interior of ground and lower ground floors including installation of DDA complaint toilet at G level, male and female showers on LG, removal of some partitions, upgrading of lighting and general decorations and attach new external door ironmongery.	Granted
11/AP/2696	New City Court, 20 St Thomas Street, London SE1 9RS	04 Oct 2011	Installation of five shower cubicles with localised raised floor, door position adjustment and partitions to the third-floor Georgian terrace.	Granted
11/AP/1729	New City Court, 20 St Thomas Street, London SE1 9RS	03 Aug 2011	Removal of non-load bearing partitions, internal doors, services and fan coil enclosures and installation of new fan-coil enclosures with integrated supply extract grills and access panels on the third floor of the Georgian wing.	Granted
11/AP/1417	New City Court, 20 St Thomas Street, London SE1 9RS	07 Jul 2011	Replacement of existing entrance doors with a full height glass and stainless steel revolving door.	Granted
09/AP/2348	New City Court, 20 St Thomas Street, London SE1 9RS	17 Mar 2010	Installation of 2 floor mounted AC Units at first floor level in the light well at eastern end of site.	Granted
08/AP/1499	New City Court, 20 St Thomas Street, London SE1 9RG	07 Aug 2008	Installation of 4 no external air conditioning units on rear wall.	Granted
08/AP/1241	New City Court, 20 St Thomas Street, London SE1 9RG	14 Jul 2008	Erection of structural steelwork and installation of a new VRV condensing unit to the second-floor roof level (roof area relating to new plant is approx. 30sqm)	Granted
08/AP/1216	New City Court, 20 St Thomas Street, London SE1 9RG	04 Jul 2008	First Floor: Opening being formed in existing plasterboard non-structural partition, ceiling made good where new opening formed. Installation of 3 new partitions (non-structural) and door sets. Second Floor: Internal plasterboard (non-structural) partition to be removed. Internal decoration throughout to entrance area, new partition installed and some new lighting and electrical work.	Granted

07/AP/1346	New City Court, 20 St Thomas Street, London SE1 9RS	12 Jun 2007	Raise new cooling tower by 300mm to facilitate pipework connections	Granted
07/AP/2290	New City Court, 20 St Thomas Street, London SE1 9RS	13 Dec 2007	Demolition of the external facade of the building and erection of a new facade together with ground floor extension to the front of the building	Granted
07/AP/2294	New City Court, 20 St Thomas Street, London SE1 9RS	13 Dec 2007	Demolition of existing facade (Conservation Area Consent for Demolition)	Granted
07/AP/2290	New City Court, 20 St Thomas Street, London SE1 9RG	13 Dec 2007	Demolition of the external façade of the building and erection of a new façade together with ground floor extension to the front of the building.	Granted
06/FP/01206	New City Court, 20 St Thomas Street, London SE1 9RS	17 Oct 2006	Installation of air conditioning units in identified offices in basement, ground & first floors.	Granted
02/AP/0458	8 St Thomas Street SE1	25 Apr 2002	Removal of internal stud & plaster partitions on ground floor to create open plan office accommodation.	Granted
01/AP/1692	24-26 St Thomas Street (Keats House New City Court) SE1	20 Dec 2001	Conversion of basement, ground and first floor to offices.	Granted
01/AP/1589	8 St Thomas Street, SE1	05 Oct 2001	Internal alterations to offices on the first floor	Granted
01/AP/0461	20 St. Thomas Street SE1	13 Jul 2001	Display of internally illuminated free-standing sign on front forecourt.	Granted
98/AP/1163	20 St Thomas Street, SE1 (New City Court)	27 Aug 1998	Install new external AC condenser units adjacent to 3No existing units on 2nd floor roof balcony 500 x 300mm.	Granted

97/AP/0337	4-8 & 12-16 St Thomas Street, SE1	20 May 1997	Removal of internal non-structural partitions	Granted
96/AP/0184	New City Court, 20 St Thomas Street, London SE1 9RG	08 Mar 1996	Installation of air conditioning condenser on roof top at second floor level.	Granted
96/AP/0050	New City Court, 20 St Thomas Street, London SE1 9RG	27 Feb 1996	Installation of air conditioning condenser on roof top of premises at second floor level.	Granted
94/FP/0875	2nd Floor New City Court 4 / 16 St Thomas Street SE1	16 Nov 1994	Partitions removal & refurbishment.	Granted