

Item No. 7.3	Classification: Open	Date: 4 November 2014	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 14/AP/1302 for: Full Planning Permission Address: FIELDEN HOUSE, 28-42 LONDON BRIDGE STREET AND 21-27 ST THOMAS STREET, LONDON SE1 Proposal: Demolition of existing buildings and erection of part 26 and part 16 storeys to provide 148 apartments (118 Use Class C3 and 30 flexible use C1/C3), with 1,800sqm (gross) of flexible retail space (Classes A1, A2, A3 and A4) at St Thomas Street and London Bridge Street (Concourse) levels, service area, three levels of basement including car parking (28 spaces) and associated hard and soft landscaping, amenity spaces and alterations to existing highways adjoining.		
Ward(s) or groups affected:	Grange		
From:	Head of Development Management		
Application Start Date 29/04/2014		Application Expiry Date: 29/07/2014	
Earliest Decision Date 21/06/2014		PPA Target Decision Date: 23/12/2014	

RECOMMENDATION

- 1 That members grant planning permission subject to conditions and the applicant entering into an appropriate legal agreement by no later than 23rd December 2014. This application is referable to the Mayor.
- 2 In the event that the requirements of paragraph 1 are not met by 23rd December 2014, the Head of Development Management be authorised to refuse planning permission, if appropriate, for the reasons set out under paragraph 173 .

BACKGROUND INFORMATION

Site location and description

- 3 The development site is bound by St. Thomas Street to the south, London Bridge Street to the north, and Joiner Street to the east. The combined site of Fielden House and 21-27 St. Thomas' St is approximately 0.31 hectares in size and consists of a four storey 1970s building at 28-42 London Bridge Street known as Fielden House and a four storey 1980s building at 21-27 St. Thomas Street. The site also includes the existing service yard area located between the two buildings which is accessed from Joiner Street.
- 4 Existing uses on the site comprise circa 642 sqm of retail (Classes A1 to A4) floorspace and 3,547 sqm of office (Class B1) accommodation, of which 453 sqm of office space (within the St. Thomas Street building) is vacant. There is a level difference of approximately 7m between the two site frontages with St. Thomas Street frontage being level with Joiner Street while London Bridge Street is elevated at the level of the London Bridge Station concourse.

- 5 Between the two buildings there is car parking for 15 vehicles, accessed via Joiner Street. As Joiner Street is largely pedestrian and leads to the Underground station, the vehicle access is protected by a barrier, located at the entrance to the street.
- 6 Two rights of way exist on the site – London Underground have 24hr access to the Jubilee Line transformer rooms located in brick arches under London Bridge Street. London Bridge Hotel has a vehicular access to the courtyard behind the hotel.
- 7 To the east of the site is the 310m high landmark building 'The Shard' and beyond it London Bridge Station which is currently being re-modelled as part of the strategic upgrade of the station complex. To the west, on the upper level of London Bridge Street, is the recently completed office development, 'The Place'. Guy's Hospital lies to the south on St. Thomas Street.
- 8 The site is located within the Borough High Street Conservation Area and there are a number of listed buildings within close proximity including:
 - Guys Hospital (main building) – Grade II*
 - Guys Hospital railings – Grade II
 - Statue of Thomas Guy (within hospital courtyard) – Grade II
 - Nos. 4-8 and 12-16 and Nos. 9a (St. Thomas Church), 9, 11, 13, 15, and 19A St Thomas Street – Grade II and Grade II*

Details of proposal

- 9 It is proposed to demolish the existing buildings and redevelop the site to provide a mixed use development with circa. 1,300 sq m of flexible retail space (Classes A1 to A4), 148 residential units (Class C3), new access, car parking, public realm and landscape improvements.
- 10 The proposed development would comprise two linked predominately residential towers, of 16 and 26 storeys, with the flexible retail uses located at street and station concourse levels (i.e. up to Level 4 of the building) with 148 residential units accommodated from Level 5 upwards. Communal amenity space for future residents would be provided at various levels within the development with the majority of units provided with private amenity space in the form of winter gardens.
- 11 The proposal involves opening up of the links, both visual and physical, between the station Concourse level at London Bridge Street and the St Thomas Street level some 7m lower, with Guy's Hospital to the south, and the creation of new areas of public realm at both levels.
- 12 The proposed development removes this visual and physical barrier, providing an extensive extension to public space at concourse level, with new steps down to St Thomas Street adjoining the London Bridge Hotel. At St Thomas Street level, the existing narrow pavement is widened considerably, with the entrance to Joiner Street also set back to mirror the east side of the street.
- 13 The proposed mix of residential units comprises 56 x one bed, 73 x two bed, 16 x three bed and 3 x four bed units.
- 14 The two retail units proposed at concourse level are located to the north and south of the core.
- 15 The tower to the south facing St. Thomas Street would be 16 storeys (63.1 m AOD) high with the taller 26 storey tower (100.5 m AOD to top of roof plant) fronting London

Bridge Street. New areas of landscaped public realm would be created at street and concourse levels in addition to a new public stair.

- 16 Above this, level 4 is a transfer slab containing residents' amenities and plant, with the residential apartments commencing on level 5. As such the bulk of the building begins at level 4. The southern part of the building comprises 11 floors of apartments, with a communal roof garden at level 16. The northern part of the building rises to level 26, with a roof garden above, which serves the uppermost unit.
- 17 Amended plans were received which increased the height of the building by 1m, and also made amendments to the proposed materials, the treatment of the roof level and the addition of a roof top garden at level 27 which is to serve the top level apartment.
- 18 In terms of materials, it is proposed to clad the building in a masonry face - either in natural or reconstituted stone - set behind the outer glass skin with exposed steel columns at the base of the building.
- 19 Vehicular access would be from St. Thomas Street leading to a loading bay and car lift down to three basement levels which contain car and cycle parking in the form of stacked systems, refuse storage, and plant.
- 20 At St Thomas Street level, the development has its main access to the apartments, together with a large unit for retail/restaurant use occupying the corner with Joiner Street. The building line has however been set back further from the street to increase the width of the footway, whilst the entrance into Joiner Street has been widened. On the western boundary, a new vehicular access is proposed, for servicing and parking, and this accommodates service access to the London Bridge Hotel and for LUL, replacing the present access via Joiner Street and the yard between the existing buildings. Below this level, there are three basement levels for parking, refuse and recycling, plant and the diverted LUL vent from the Jubilee line.
- 21 At concourse level, all of the open area has been allocated as a public realm area with the built form comprising of the core, with an entrance to the retail/restaurant unit and associated outdoor customer seating above, in the form of a raised terrace, fronting onto London Bridge Street, and a small retail unit.
- 22 At St. Thomas Street level the pavement will be widened by approximately 6m. The proposal involves the enlarging of the entrance to Joiner Street by 8m and to provide a new public stair. This stair is tapered in plan and is 2.8m wide at concourse level and 5m wide on St. Thomas Street. The materials proposed are welded steel plates with stone treads.
- 23 Amended plans were submitted during the course of the application which sought to improve the quality of the public realm. This included increasing the clearance under the building by raising the height of the building by 1m, reducing the floor area of the retail units and core width, to improve pedestrian circulation and introducing a more obvious public/private space division. The open space will have external seating which will be limited to only permanent public seating which is located to the east, south and west of the main building.
- 24 The proposal includes the flexible use of up to 30 units (20%) within the scheme as either full residential or serviced apartments. Flexible consent is sought to allow a change of use between the authorised uses for up to ten years from the date of consent under the Town and Country Planning (General Permitted Development) Order 1995, Schedule 2, Part 3, Class E to meet marketing requirements in this location.

- 25 In relation to affordable housing, the current proposal is to provide 35% off-site affordable housing (equating to 188 habitable rooms) on one of 17 potential off-site locations, with the Wood Dene Site in SE15 considered the most likely location. A fallback commuted sum figure of £18.8m is proposed should the off-site housing not be delivered within the appropriate timeframe. The mechanisms of this approach will be set out within the S106 agreement.

Planning history

- 26 None relevant.

Planning history of adjoining sites

London Bridge Station

- 27 Application Reference 11-AP-1987 - Permission granted on 29 March 2012 for: Demolition of listed train shed, part of St. Thomas Street wall, 64-84 Tooley Street, and arches together with closure of Weston Street and Stainer Street in order to provide a new station layout including: construction of a new street station level, new replacement facades on Tooley Street and St. Thomas Street, new roof canopies, landscaping and other works associated with the station. Land use is to comprise station concourse, station ancillary space, operational car park, station loading bay, Class A retail uses, and leisure (Class D1 and D2 and sui generis uses). The permission has been implemented and the works are well underway.

New London Bridge House (now known as The Place/News Building), 25 London Bridge Street

- 28 Application Reference 10-AP-3515 - Permission granted on 28 February 2011 for: Amendments during construction to planning permission granted on 31 August 2010 (reference 10-AP-3515) for demolition of existing buildings and construction of a mixed use building of about 58,800 sqm (GEA) on basement, lower ground, ground and 18 upper floors to provide about 41,000 sqm net offices (B1), 1,300 sqm (net) retail and food and drink uses (A1, A3, A4 and A5) and pedestrian concourse at station level and new pedestrian concourse and entrance to London Bridge underground station at Joiner Street level (currently under construction). Amendments include: removal of lower floor basement, relocation of central plant, re-stacking of floors, re-orientation of underground ventilation shaft and minor modifications to connections with underground station and relocation of solar panels from the south facade of the roof, minor increase in height from 76.62m to 78.20m. The development is complete.

The Shard, 31 St. Thomas Street / 32 London Bridge Street

- 29 Application Reference 11-AP-3258 - Permission granted on 21 November 2011 for: Amendments during construction to planning permission granted on 18 November 2003 (reference 01-AP-0476) for demolition of the existing Southwark Towers and construction of a mixed use building totalling 124,242 sqm gross, comprising offices (Class B1), hotel (Class C1), fourteen apartments (Class C3), retail and restaurant uses (Class A1/A3), health and fitness club and associated servicing and car parking (currently under construction). Amendments include: reconfiguration of floor layouts, remodelling of ground floor elevations, new escalator exit to station concourse, revised layout to retail space and minor facade alterations. The development is complete.
- 30 Application Reference 13-AP-3322 - Permission granted on 13 February 2014 for Change of use of the fourth, fifth, and sixth floors from B1 offices to flexible use D1 (non-residential institutions) / C2 (health care facility) / B1 (offices) as well as the

provision of a new entrance and lifts on St. Thomas Street to provide access to these floors.

- 31 Application Reference 14-AP-0308 – Permission granted on 17 June 2014 for: Change of use of part of the seventeenth floor to dual use D1 (education) / B1 offices (1,129 sqm).

KEY ISSUES FOR CONSIDERATION

Summary of main issues

- 32 The main issues to be considered in respect of this application are:
- Principle of the proposed development in terms of land use and conformity with strategic policies
 - Environmental impact assessment
 - Density
 - Dwelling mix
 - Affordable housing
 - Quality of residential accommodation
 - Impact on the amenities of occupiers of adjoining properties as well as future occupiers of the proposed development
 - Design issues, including height, impact on townscape views and heritage assets
 - Landscaping
 - Transport and highway issues
 - Sustainable development implications
 - Planning obligations (S.106 undertaking or agreement)
 - Flood Risk
 - Noise and Air Quality

Planning policy

- 33 The development site is within the Central Activities Zone (CAZ), Bankside, Borough and London Bridge Opportunity Area (BBLB OA), Bankside, Borough and London Bridge Strategic Cultural Area, London Bridge District Town Centre, Borough, Bermondsey and Rivers Archaeological Priority Zone (APZ), and an Air Quality Management Area (AQMA).
- 34 The site has a Public Transport Accessibility Level (PTAL) of 6b which indicates excellent access to public transport and is within Flood Zone 3 (as identified by the Environment Agency flood map) which indicates a high probability of flooding.

Core Strategy 2011

- 35 Strategic Policy 1 – Sustainable development
Strategic Policy 2 – Sustainable transport
Strategic Policy 3 – Shopping, leisure and entertainment
Strategic Policy 5 – Providing new homes
Strategic Policy 6 – Homes for people on different incomes
Strategic Policy 7 – Family homes
Strategic Policy 10 – Jobs and businesses
Strategic Policy 11 - Open spaces and wildlife
Strategic Policy 12 – Design and conservation
Strategic Policy 13 – High environmental standards
Strategic Policy 14 – Implementation and delivery

Southwark Plan 2007 (July) - saved policies

- 36 The Council's cabinet on 19th March 2013, as required by para 215 of the NPPF, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the Council satisfied itself that the policies and proposals in use were in conformity with the NPPF. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF.
- 37 Policy 1.1 Access to employment opportunities
Policy 1.7 Development within town and local centres
Policy 3.1 Environmental effects
Policy 3.2 Protection of amenity
Policy 3.3 Sustainability assessment
Policy 3.4 Energy efficiency
Policy 3.6 Air quality
Policy 3.7 Waste reduction
Policy 3.9 Water
Policy 3.11 Efficient use of land
Policy 3.12 Quality in design
Policy 3.13 Urban design
Policy 3.14 Designing out crime
Policy 3.15 Conservation of the historic environment
Policy 3.16 Conservation areas
Policy 3.18 Setting of listed buildings, conservation areas and world heritage sites
Policy 3.20 Tall buildings
Policy 3.22 Important local views
Policy 3.28 Biodiversity
Policy 4.1 Density of residential development
Policy 4.2 Quality of residential accommodation
Policy 4.3 Mix of dwellings
Policy 5.2 Transport impacts
Policy 5.3 Walking and cycling
Policy 5.6 Car parking
Policy 5.7 Parking standards for disabled people and the mobility impaired

London Plan July 2011 consolidated with revised early minor alterations October 2013

- 38 Policy 2.10 Central Activities Zone – Strategic Priorities
Policy 2.11 Central Activities Zone – Strategic Functions
Policy 2.13 Opportunity Areas and Intensification Areas
Policy 2.15 Town Centres
Policy 3.1 Ensuring Equal Life Chances For All
Policy 3.3 Increasing Housing Supply
Policy 3.4 Optimising Housing Potential
Policy 3.5 Quality and Design of Housing Developments
Policy 3.6 Children and Young People's Play and Informal Recreation Facilities
Policy 3.8 Housing Choice
Policy 3.9 Mixed and Balanced Communities
Policy 4.12 Improving Opportunities for All
Policy 5.1 Climate Change Mitigation
Policy 5.2 Minimising Carbon Dioxide Emissions
Policy 5.3 Sustainable Design and Construction
Policy 5.7 Renewable Energy
Policy 5.9 Overheating and Cooling

Policy 5.10 Urban Greening
 Policy 5.11 Green Roofs and Development Site Environs
 Policy 5.13 Sustainable Drainage
 Policy 5.14 Water Quality and Wastewater Infrastructure
 Policy 5.15 Water Use and Supplies
 Policy 6.9 Cycling
 Policy 6.10 Walking
 Policy 6.13 Parking
 Policy 7.1 Building London's Neighbourhoods and Communities
 Policy 7.2 An Inclusive Environment
 Policy 7.3 Designing out Crime
 Policy 7.4 Local Character
 Policy 7.5 Public Realm
 Policy 7.6 Architecture
 Policy 7.7 Location and Design of Tall Buildings
 Policy 7.8 Heritage Assets and Archaeology
 Policy 7.14 Improving Air Quality
 Policy 7.19 Biodiversity and Access to Nature
 Policy 7.21 Trees and Woodland

National Planning Policy Framework (NPPF)

- 39 Section 1 'Building a strong, competitive economy,
 Section 2 'Ensuring the vitality of town centres'
 Section 4 'Promoting sustainable transport'
 Section 6 'Delivering a wide choice of high quality homes'
 Section 7 'Requiring good design'
 Section 10 'Meeting the challenge of climate change, flooding and coastal change'
 Section 12 'Conserving and enhancing the historic environment'

Relevant SPD's/SPG's

- 40 Section 106 Planning Obligations SPD July 2007
 Design and Access Statements SPD September 2007
 Sustainable Transport Planning SPD September 2008
 Residential Design Standards SPD October 2011
 Affordable Housing SPD September 2008
 Draft Affordable Housing SPD June 2011
 Sustainable Design and Construction SPD February 2009
 Sustainability Assessment SPD February 2009
 Draft Bankside, Borough and London Bridge SPD February 2010
 London View Management Framework 2012 (SPG to the London Plan)
 Housing SPG 2012 (SPG to the London Plan)
 Providing for Children and Young People's Play and Informal Recreation 2008 (SPG to the London Plan)
 Town Centres SPG 2014 (SPG to the London Plan)

Principle of development

- 41 The proposal results in the loss of the existing 3,500 sq. m. of the office space within the existing buildings and its replacement with 148 residential units and 1,800 square m of retail floorspace (an uplift of 550 sq. m of retail floorspace over the existing 1250 sq. m. of the existing retail space).
- 42 The site is located within the Central Activities Zone (CAZ) and the London Bridge, Borough and Bankside Opportunity Area. London Plan Policies 2.10 and 2.11 support high quality mixed used developments that complement the strategic functions of the

CAS and its unique quarters. London Plan Policy 2.13 and Table A1.1 indicate that the opportunity area has the capacity for a minimum number of 1,900 new homes and 25,000 new jobs, and specifically refers to the intensification potential around London Bridge Station and its environs to coincide with the improvements to the public transport and interchange facilities.

- 43 London Plan policy 4.2 encourages local authorities through their local plans to enhance the offer of London's office locations and to focus new capacity where there is strategic as well as local evidence of demand.
- 44 Strategic Policy 3 of the Core Strategy (2011) seeks to maintain a network of successful town centres which have a wide range of shops, services and facilities, to help meet the needs of Southwark's population. Within the London Bridge Town Centre, the policy supports the provision of new shopping space in Bankside, Borough and London Bridge.
- 45 Strategic Policy 10 seeks to increase the number of jobs in Southwark and create an environment in which businesses can thrive. The policy seeks to protection of existing business space and supports the provision of around 400,000 sqm – 500,000 sqm of additional business floorspace over the plan period in the Bankside, Borough and London Bridge opportunity area, to help meet central London's need for office space.
- 46 The site should not be considered in isolation. It is part of a wider redevelopment focused around London Bridge station, including the new developments of The Shard and The Place (The News Building). Approximately 80,000 sq. m. of new office floorspace has been provided at The Shard and The Place but only a very limited amount of residential use. The residential use as provided in this development will meet the strategic objective of creating a mixed use area.
- 47 The proposed change of use would result in the loss of office floor space (Use Class B1) outside the preferred office and industrial location and as such Saved Policy 1.4 of the Southwark Plan (2007) is applicable in this instance.
- 48 This policy states "Development will be permitted provided that the proposal would not result in a net loss of floorspace in Class B use. An exception to this may be made where:
 - a) *The applicant can demonstrate that convincing attempts to dispose of the premises, either for continued B Class use, or for mixed uses involving B Class, including redevelopment, over a period of 24 month, have been unsuccessful; or*
 - b) *The site or buildings would be unsuitable for re-use or redevelopment for B class use or mixed uses including B class use, having regard to physical or environmental constraints; or*
 - c) *The site is located in a town or local centre, in which case in accordance with policy 1.7, suitable A class or other town centre uses will be permitted in place of B class uses.*
- 49 The applicants have not marketed the premises for B class use, and as such criteria (a) is not applicable in this instance. However the applicants have stated that that there is circa 450 sq. m. of office floorspace at basement level that is currently vacant and is currently available within 21 London Bridge Street. This accommodation has been marketed by CBRE since August 2013. However this has not been let to date, identifying the lack of demand for the type and size of accommodation within these buildings. Evidence has been submitted on to the council in relation to this in the form of a marketing brochure and a link to the CBRE website showing details of the office

unit.

- 50 In relation to criteria (b) it is noted that it would be possible to provide replacement B class use on the site but that this would come at the detriment of the public benefits of the scheme, including provision of the public realm area.
- 51 The applicants have put forward a detailed consideration of replacement office space. In order to replace the existing office accommodation the scheme would need to accommodate circa 3,500 sq. m. of office accommodation over approximately four floors of the current scheme and in summary the main reasons for the applicant not including offices in the proposals are:
- The provision of offices would require a separate entrance and core for this use, taking up a significantly greater area at concourse and ground levels, removing most of the new public space proposed. An enlarged loading dock would be required to accommodate deliveries to the office use.
 - The resulting building would fill the current site boundary resulting in small and narrow pavement widths on St. Thomas and London Bridge Street.
 - The office floors would extend the footprint of the building at upper levels, resulting in a loss of separation with The Shard.
 - The building would also need additional plant to provide air conditioning for the office use.
 - the size and configuration of the floorplans would result in non-viable office accommodation. The floorplates of these levels would be circa. 960 sq. m., which are well below the commercially viable minimum of 1,800 m net in this location, whilst the irregular shape of the floorplates further impacts on the efficiency and viability for office use.
- 52 In relation to criteria (c) the site is located within the London Bridge District Town Centre. Paragraph 17 of the NPPF states that planning policies should be positive and promote town centre environments and that plans should allocate a range of suitable sites to meet the scale and type of retail, leisure, and should recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites.
- 53 London Plan Policy 2.15 Town Centres, together with the Town Centres SPG, seek to maintain the viability and vitality of town centres and state that that development should accommodate economic and/ or housing growth through intensification and selective expansion in appropriate locations.
- 54 Strategic Policy 3 of the Core Strategy seeks to maintain a successful network of successful town centres which have a wide range of shops, services and facilities. The policy supports the provision of new shopping space with the London Bridge District Town Centre.
- 55 Saved Policy 1.7 'Town Centres' concerns development within town and local centres and identifies that most new developments for retail and other town centre uses should be accommodated within the existing town centres and local centres, including London Bridge.
- 56 Within the centres, the LPA will permit developments providing a range of uses, including retail and services, and, residential uses and sets out a range of criteria that need to be met including providing an appropriate scale and mix of uses and ensuring

that sufficient transport capacity is available. On that basis it is considered that all of the criteria as set out in saved Policy 1.7 have been met in this instance.

- 57 Overall, the benefits delivered by the scheme and the rationale for the sites development, would be lost through the provision of offices within the site. The amount of retail space will be increased as part of the development, appropriate to this town centre site, with an increase to 1,800 square meters gross delivered within the scheme.
- 58 In relation to delivering housing, the NPPF states that Local Authorities should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate. As noted above, there has been a large uplift in office accommodation in this location in recent year and as such it is not considered that there are strong economic reasons why this development is inappropriate.
- 59 In terms of housing delivery, the Further Alterations to the London Plan proposes to set Southwark's target at 2,736 additional homes per year between 2015 and 2025 and this development contributes towards that target.
- 60 Strategic Policy 5 has a target of 1,900 net new homes within the The Bankside, Borough and London Bridge Opportunity Area, within which the site lies.
- 61 In summary, the proposals for a mixed-use residential and retail development, with active ground and concourse level uses, is supported and will complement the recent office and commercial developments at The Shard and The Place, as well as the ongoing improvements to London Bridge station, and overall provide a well balanced mix of land uses around this key interchange.

Environmental impact assessment

- 62 A screening opinion was requested (Planning Ref 13/AP/2864) and it was concluded that an EIA is not required for this development [decision date 25/09/2013].

Affordable housing

- 63 The current proposal is to provide off-site affordable housing on one of 17 potential off-site locations, with the Wood Dene Site in SE15 considered the most likely site. A fallback commuted sum figure of £18.8m is proposed should the off-site housing not be delivered within the appropriate timeframe. The mechanisms of this approach will be set out within the S106 agreement.
- 64 The NPPF adopted in March 2012 states that local planning authorities should set policies for affordable housing need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.
- 65 The regional policies and guidance relating to affordable housing are set out in the London Plan and the Mayor's housing supplementary planning guidance (2012). The London Plan forms part of the development plan for Southwark. The key relevant policies within the London Plan in relation to this aspect of the application are:
- 66 Policy 3.8 Housing choice

The policy requires boroughs to take account of housing requirements and identify the range of needs likely to arise. It sets out a number of factors to take into account including to ensure that:

- new developments offer a range of housing choices
- provision of affordable family housing

- 67 Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes.
- 68 Part A of the policy requires that the maximum reasonable amount of affordable housing should be sought with regard to a number of factors including:
- current and future requirements for affordable housing
 - the need to encourage rather than restrain development
 - the need to promote mixed and balanced communities
 - the specific circumstances of individual sites
 - resources available to fund affordable housing, to maximise affordable housing output and the investment criteria set by the Mayor
 - the priority to be accorded to provision of affordable family housing
- 69 Part B of the policy sets out that negotiations on sites should take account of their individual circumstances including development viability.
- 70 The supporting text in Paragraph 3.74 sets out that affordable housing should normally be provided on-site. In exceptional cases where it can be demonstrated robustly that this is not appropriate in terms of the policies in this Plan, it may be provided off-site. A cash in lieu contribution should only be accepted where this would have demonstrable benefits in furthering the affordable housing and other policies in this Plan and should be ring-fenced and, if appropriate, pooled to secure additional affordable housing either on identified sites elsewhere or as part of an agreed programme for provision of affordable housing.
- 71 The Mayor's Housing Supplementary Planning Guidance (2012) provides further guidance on implementing the London Plan housing policies.
- 72 The local policies are saved Southwark Plan Policy 4.4 Affordable housing, and Core Strategy Strategic Policy 6 – Homes for people on different incomes. Further guidance on how to implement the policies is contained within the Council's adopted Affordable Housing SPD 2008 and draft Affordable Housing SPD 2011.
- 73 Core Strategy Strategic Policy 6 'Homes for people on different incomes' requires as much "affordable housing on developments of 10 or more units as is financially viable". It also sets a minimum target of 8,558 net affordable homes between 2011 and 2026. It requires a minimum of 35% of affordable housing on developments with 10 or more units.
- 74 Saved Southwark Plan Policy 4.4: Affordable housing, is used alongside the overarching Core Strategy policy 6. Parts 4 and 6 of the policy require that:
- iv. the affordable housing provided must be an appropriate mix of dwelling type and size to meet the identified needs of the borough.
 - vi. A tenure mix of 70:30 social rented: intermediate housing ratio for the Central Activities Zone.
- 75 The Council's adopted Affordable Housing SPD 2008 (Section 3.6) together with the draft Affordable Housing SPD 2011 (section 6.3) clarifies the Southwark Plan and Core Strategy policy framework and sets out the approach in relation to securing the maximum level of affordable housing from developments. Specifically, it sets out the

sequential tests relating to the delivery of affordable housing, firstly relating to securing on site provision, secondly off site provision and thirdly an in lieu payment.

76 This sequential test, is summarised below.

- On site provision: All housing, including affordable housing should be located on the development site.
- Off site provision: In exceptional circumstances, where affordable housing cannot be provided on site or where it can be demonstrated that significant benefits will be gained by providing units in a different location in the local area, the affordable housing can be provided on another site.
- In lieu payment: In very exceptional circumstances where it is accepted that affordable housing cannot be provided on-site or off-site, a payment towards the delivery of affordable housing will be required.

77 Affordable Housing Requirement

In total there are 536 habitable rooms in the scheme (those habitable rooms over 27.5 are counted as two), 35% of which equates to 188 habitable rooms. This is the required affordable housing provision.

78 On site provision

The Affordable Housing Statement submitted with the application considers on-site provision. This statement concludes that it is not feasible to provide affordable housing on site due to affordability criteria (shared ownership), specifically the high income level required to purchase shared ownership units due to the high value of the units (indicative value of £800,000 per unit). This would exceed the income levels set by the council. In relation to providing affordable rent on the site, a key constraint is the necessity to provide an additional core within the building, as required by registered housing providers, resulting in a larger, bulkier building with the loss of the public realm benefits of the proposal. Other constraints to on-site affordable rent provision are the expected high service charge costs and the overall impact on the financial viability of the proposed development. It is agreed that the provision of on-site affordable is not feasible due to the issues as outlined above.

79 Delivering on site provision would therefore be less advantageous and would not maximise the amount of affordable housing that could be delivered.

Off-site provision

80 The Affordable Housing SPD states that, in very exceptional cases where it is justified and accepted that affordable housing can not be built on-site as part of a development, the off-site provision is required to be built on another site near the development. The off-site affordable housing should be built and ready for occupation at the same time as the on-site market housing. The off-site affordable housing is additional to the affordable housing that would need to be provided on the identified site in any case. For off-site provision, planning permission should have been granted for the development of housing on the site/sites identified for the off-site affordable housing or a planning application submitted for the off-site affordable housing provision at the same time as the application for the facilitating development.

81 The applicants have submitted 2 site search reports (Sep 2014 and Oct 2014). This report provides a current day analysis of potential donor sites that might be secured for affordable housing. Sites have been considered that on the following criteria:

- sites that can be brought forward in an appropriate timescale (due to the occupation requirements above)
- sites located in areas where Shared Ownership can be provided to households

within the income levels contained within the Southwark Affordable Housing Supplementary Planning Document.

- Sites that can provide a meaningful quantum of units
- Sites that can be delivered in isolation; and
- Sites that can facilitate additional affordable housing whilst maintaining a sustainable tenure mix.

- 82 After initial identification of 84 sites, a shortlist of 17 potential sites are identified. Each of these sites is considered in detail and it is concluded that the Wood Dene Site is considered the most feasible location for off-site affordable housing. This site is owned by Notting Hill Housing who have submitted a letter of support stating that they have agreed to work with the developer to secure off-site affordable housing. In this letter Notting Hill have also stated that Manor Place and the Aylesbury Estate may also be a suitable site for this off-site provision, but no additional details have been provided in relation to this. However, these two sites may provide additional options in further site search reports.
- 83 The Wood Dene site is located to the east of Peckham Town Centre. The consented development on this site is a mix of 333 residential units (75% private and 35% affordable). This equates to 117 affordable housing units (54 social rented and 63 shared ownership, a ratio of 47:53). The site search report notes that Sellar and Notting Hill Housing are in active discussion to convert a number of the market homes to affordable housing, in order to provide the required number of habitable rooms (188) as affordable housing.
- 84 In terms of the acceptability of the above site, it is noted that it does not meet the requirement of being located close to the application site. However regard is had to the criteria as set out in paragraph 86 above, which are considered reasonable. Applying these criteria to the site search has limited the number of sites that are considered realistic possibilities. In particular, applying the affordability criteria has meant that only sites that are located further south in the borough can accommodate shared ownership units. The Wood Dene site does however meet the requirement of having an existing consent on the site. In addition to this, the active support of Notting Hill housing in delivering the off-site provision is noted. The site search report also recommends continuing discussions in relation to other sites identified should the site identified above not be taken forward.
- 85 The mechanisms to secure the delivery of off-site affordable housing will be set out in the S106 agreement with a fallback commuted sum figure should the off-site affordable housing not be delivered within a certain timeframe.

Commuted sum payment

- 86 In the event of off-site not being delivered there will be a requirement for a commuted sum payment. The Core Strategy requires as much affordable housing as is financially viable and the London Plan requires the maximum reasonable amount.
- 87 The NPPF, London Plan and local policies all set out that in exceptional circumstances (the local policy refers to “very exceptional” circumstances) a commuted sum may be acceptable in lieu of on-site or off-site affordable housing.
- 88 If a commuted sum payment is acceptable, having followed the sequential test as required by policy, the contribution would be used for new affordable housing.
- 89 The London Plan sets out that a commuted sum should only be accepted where this would have demonstrable benefits in furthering the affordable housing and other policies in the London Plan as well as being pooled to secure additional affordable

housing either on identified sites elsewhere or as part of an agreed programme for the provision of affordable housing. Further guidance in the Mayor's Housing SPG (paragraph 4.4.19) also sets out that commuted sums should be ring fenced to enable more additional, or more appropriate provision either off-site or as part of an agreed programme. It is possible that any commuted sum could help towards the council's direct delivery program, although this would require further exploration should it be required.

- 90 The adopted Affordable Housing SPD (2008) sets out three 'value areas' in the borough, for the purposes of negotiating commuted sums. This site is located in Value Area 2 which requires a sum of £100,000 for each habitable room not being provided on site). The draft (June 2011) Affordable Housing SPD does not include the concept of value 'bands', but indicates that a minimum of £100,000 per habitable room will be required, with a viability assessment carried out to determine the exact required amount (above £100,000). However this draft SPD has not been formally adopted as yet and does not carry significant weight. The proposed fallback £18.8m payment equates to £100,000 per habitable room.
- 91 In conclusion, the proposal is providing a policy compliant off-site housing provision of 188 habitable rooms. Officers are confident that the partnership with Notting Hill will see the delivery of this much needed affordable housing. However should this not be delivered within an appropriate timeframe, a commuted sum payment is required that will secure the delivery of affordable housing within the borough through an agreed program, most likely the council's direct delivery program.

Design issues including impacts on local and strategic views

- 92 The proposal seeks to re-develop two sites that span between London Bridge Street and St Thomas Street at their junction with Joiner Street. These two sites are separated by a narrow alleyway that runs along the back of the properties on each street. In addition, the two frontages have a substantial level difference with St Thomas Street being level with Joiner Street while London Bridge Street is elevated at the level of the terminating concourse of the station.
- 93 The site is currently occupied by Fielden House, a 4/5-storey 1970s building on London Bridge Street whilst on St Thomas Street the site has a 4-storey 1980s building. To the east of the site is the landmark site of the Shard of Glass and beyond it London Bridge Station – currently being remodelled - and across the way on the upper level of London Bridge Street is the recently completed The Place.
- 94 This proposal has been crafted by the design team that delivered both the Shard and The Place in this important location. In both of these projects the designers have sought to re-imagine these sites at the street level; the Shard reinvented the terminating station and the transition to Guy's Hospital and The Place has re-defined the bus station and London Bridge Plaza.
- 95 The existing buildings on site are of no particular historic value – neither are listed. However, both are located within the Borough High Street Conservation Area. Whilst their loss is not resisted and would be considered less than substantial harm any proposal that seeks to replace them should comply with paragraph 134 of the NPPF which states that *"this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use."*
- 96 Most importantly however, the site is located on one of Southwark's most significant historic streets. St Thomas Street includes a number of listed buildings including the Grade II* Listed: St Thomas Church at No 9a, numbers 9, 11 and 13 St Thomas Street and Guys Hospital main building including wings and chapel. Additionally, on the

same street are the Grade II listed Mary Sheridan House, the statue of St Thomas and the railings to Guy's Hospital as well as numbers 4-8 and 12-16 St Thomas Street. This proposal is therefore being introduced into the sensitive setting of a highly significant cluster of nationally important historic buildings which it should conserve or enhance.

- 97 This proposal seeks to enhance its historic setting by elevating the accommodation above the adjacent buildings, offering the majority of its footprint to the public realm and reducing its imposition on the street scene to the minimum. As a consequence, this proposal devotes the lower part of the scheme to reconciling the significant change in level across the site and providing a fitting entrance to Joiner street to match that of the Shard. The result is a building of significant scale – over 100m in height – which can only be justified when we weigh the private gain of that scale against the public benefits that it can deliver.
- 98 As a new application on this site the proposal will need to be considered against all the requirements of Saved Policy 3.20 which requires that all tall buildings should:
- i. Makes a positive contribution to the landscape; and
 - ii. Is located at a point of landmark significance; and
 - iii. Is of the highest architectural standard; and
 - iv. Relates well to its surroundings, particularly at street level; and
 - v. Contributes positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.
- 99 Taking each of these in turn:
- i) Makes a positive contribution to the landscape**
- The contribution of any tall building proposal to the public realm is a important element of the public benefit attributable to the scheme. As a key consideration for any proposal it is important to balance the private gain of building height against the public benefit to the built environment and the landscape is an important part of that public benefit. This is not simply a measure of the quantum of landscape but also the quality of that space and its sense of purpose.
- 100 The public realm is split between the two levels. It offers a widened western approach to Joiner Street on St Thomas Street and an opportunity to move around the building's core on the upper level. Both offer the opportunity for some additional landscape and in particular the space on St Thomas Street which is proposed to include some mature planting.
- 101 At the upper level the head-room below the building is significant and exceeds 7m in height. The landscape proposals for the upper level offer some interest and define a route around the core of the building. The proposal has been developed significantly during the application stage with the core reduced to the minimum on the upper level and the public realm designed as a meaningful, landscaped south-facing space at the level of the bus garage. This proposal seek to create a well-designed landscaped space separate from the station forecourt and bus garage which includes mature planting, public seating and a space from which one can look down onto the Guy's Hospital Quad.
- 102 At this busy transport interchange it is imperative to ensure that new development enables the pedestrian to find their way to their destination but also the opportunity to enjoy the public realm. At the lower level the head-room below the building is substantial matching that of the Shard next door. The building line is set-back to the line of the historic buildings on St Thomas Street and the splayed arrangement improves visibility and creates a fitting approach to Joiner Street from the west. The proposal seeks to minimise the impact of servicing and includes a landscaped edge to the building and a substantially widened footway which includes the columns of the

building overhead.

- 103 The final piece of the public realm is a new public stair case which aligns with the axis through the historic Guys Hospital quad. As such it offers the opportunity to complete the sequence of spaces that starts at the southern end of the Guys campus around the war memorial. The proposal introduces a grand stair on the line of this key axis to link the two levels across the site. This is welcomed and compliments the historic setting. The stair is not accessible, however there is already a wheelchair-accessible lift at the base of the Shard which is nearby.
- 104 **ii) Is located at a point of landmark significance**
The designation of this point of landmark significance was the subject of extensive discussion at the Public Inquiry relating to the Shard of Glass when the Inspector agreed that this was an appropriate location for that tall building. The regenerative implications of the Shard and the substantial reinvention of the area around the station forecourt and the Joiner Street entrance have demonstrated how these buildings have helped to shape the modern city in a positive way as envisaged by CABE and English Heritage in their Tall Buildings guidance.
- 105 A point of landmark significance is defined in the saved policies of the Southwark Plan (2007) and is defined as "*where a number of important routes converge, where there is a concentration of activity and which is or will be the focus of views from several directions.*" This location fits that definition. It is located at a significant river crossing and at the confluence of different modes of transport, where a proposal of exceptional quality could be considered if it substantially exceeds its context.
- 106 In the context of buildings of significant scale including the Shard, London Bridge Place and the Guys Hospital tower, and located over a major transport interchange - overground, underground and busses - suggests that this site could be judged to be of landmark significance. In contrast to its substantial neighbours, the site is located within the Borough High Street conservation area where tall buildings could be questioned. At the same time, the site is at the very edge of the conservation area, it is located in an area which has been subjected to substantial change, and the current buildings on the site are considered to be negative contributors to the conservation area which would suggest that their demolition and replacement would be supported for a proposal of exceptional quality of design.
- 107 Finally, the site presents the unique opportunity to complete the group around the station forecourt and to cement the cluster of tall buildings around the Shard of Glass. Officers are satisfied that this is a point of landmark significance and that the council's policies in respect of conservation areas can support a proposal that conserves the significance of the conservation area whilst at the same time delivering substantial enhancements to this historic area and its setting.
- 108 **iii) Is of the highest architectural standard**
The design is divided into two crystalline forms that appear to slide across each other both in plan and in section across a deeply recessed connecting piece. This gives the scheme a dynamic quality that reflects the stepped nature of the site and the distinct characters of the two street frontages. In addition, the stepped arrangement also gives the design a highly modulated silhouette and breaks down its form into two highly articulated parts with large glazed facets overlayed on to the highly articulated plan form. At the same time, the faceted glazed design links it to the design of its neighbours, The Shard of Glass and The Place which is fitting in this context.
- 109 Internal space standards are an important aspect of any tall building proposal and this is no exception. Units should not just meet the minimum standards set out in the adopted Residential Design Standards SPD, but exceed them significantly. The

restricted footprint of the proposal and the highly articulated plan form allows for a maximum of units to benefit from a dual aspect (118) with a large number of triple aspect units (91). None of the 27 single-aspect units face north.

- 110 Communal amenity is an important aspect of a tall building where a community takes up residence in such a 'vertical city'. This proposal includes an indoor and an outdoor communal amenity at the top of the lower block. The internal space is large enough to accommodate a children's play space for door-step play whilst the outdoor rooftop space is proposed to be landscaped with mature planting. This will not only offer residents a much needed amenity but also soften the roof-top of the lower block.
- 111 In the main, the private amenity for the residential units in the tower is provided by a number of winter gardens. These are proposed as indoor/outdoor spaces with single-glazed openable units which allow this space to be used flexibly regardless of the weather. A key aspect of this proposal is the quality of design of the winter gardens and how these will be appreciated in the round. They should give the facade greater depth and will need to be reserved by condition to ensure that these spaces are designed as distinctive features of the scheme.
- 112 The proposal is to clad the building with a part masonry face - either in natural or reconstituted stone - set behind the outer glass skin with exposed steel columns at the base of the building. This offers a complex layered facade treatment that will give the proposal a sharp crystalline appearance. Given that the site is located within a conservation area – one that is characterised by its traditional brick-built Georgian heritage and even Tudor architecture, the use of masonry will be congruous with these traditional materials and complement this historic setting. At the same time, whilst the glass outer skin suggests that it will be similar to the neighbouring Shard of Glass and London Bridge Place the inclusion of masonry structure will distinguish it as a residential tower of merit.
- 113 Tall buildings of this stature have varying contexts to which they need to respond. These relate to their distinct parts; the base which responds directly with the streets around it; the middle which concerns itself with its relationship to the tall buildings around it in the local views; and the top where such a tower forms part of London's emerging skyline in the wider and strategic views. This proposal has a well-defined base, middle and top. It was criticised at DRP for its 'cropped' appearance in elevation. The current proposal has been developed further since it was reviewed by the Panel, especially through the highly articulated plan and roof-top gardens, to give the skyline added interest, variety and delight when viewed against the sky.
- 114 In conclusion, this is a substantial new proposal and an opportunity to complete the group. It reconciles its relationship with its historic neighbours by stepping back considerably on St Thomas Street and London Bridge Place, responding to the central axis of the Guys Hospital quad and raising itself above these important buildings. It cements the cluster of tall buildings around the Shard of Glass and articulates the crescendo of buildings at the northern end of Great Maze Pond.
- 115 **iv) Relates well to its surroundings, particularly at street level**

This proposal has a direct relationship with its context which is rich in heritage. The unique character of St Thomas Street is defined by the diagonal set-back facades of the Georgian buildings with their traditional front gardens on the north side of the street. This key diagonal starts from the facade of the church and continues until it meets the 'bookend' on the immediately adjacent site. This diagonal is continued on this site where the building is set back to create a widened footway and splayed entrance to Joiner Street. The diagonal axis continues up to the massing of the building above and splits the form into two stepped parts.

- 116 Next the building responds to the north-south axis which runs through the Guys Hospital quad and its historic buildings and creates a new stepped route linking St Thomas Street to the Station forecourt. This route is a civic space, part of the public realm and immediately recognisable as a continuation of this important civic axis. In this way the proposal reflects these important defining lines and establishes a ground plane that responds to its historic context. This point is disputed by Guys who have made representations stating that the proposal does not respect the setting of the listed building.
- 117 Finally, there is a significant change in levels across the site which this proposal reconciles by creating two different but equally important public faces at street level. The design establishes a primarily commercial face at the Station forecourt and locates the residential entrance at St Thomas Street and lines the entrance to Joiner Street with active retail frontages. The public space available on these two levels has been maximised by keeping the residential lift and stair core to the minimum and minimising the impact of services on the public spaces.
- 118 The main service entrance is tucked behind the 'bookend' building in the neighbouring site. It is flanked by the new public staircase to minimise the impact of servicing on the public spaces and ensure that the scheme responds to its context appropriately.
- 119 **v. Contributes positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views**

It is noted that a number of concerns, in relation to impacts on views and the setting of the Tower of London, have been raised in submissions from Statutory Consultees. (from the London Borough of Camden, the City of London, Royal Borough of Greenwich, The Council for British Archaeology and Historic Royal Palaces). These concerns are considered below.

- 120 The application was accompanied by a comprehensive Townscape Visual Impact Assessment which includes local and wider views. The principle London-wide view of this scheme is the LVMF View 12B.1 from Southwark Bridge. This is an important view of the London Bridge area and includes the Strategic Landmark of the Grade I listed Southwark Cathedral. The guidance in the LVMF notes that: *"The view of Southwark Cathedral, set between the tall buildings in the London Bridge cluster, is of significance. Assessment Point 12B.1 is located at the position where this is experienced. The cluster is currently being re-ordered, including the Shard. This will alter the current backdrop condition of the cathedral."*
- 121 The views submitted with the application demonstrate that from this location, only the taller of the two parts of the proposal is visible, with the lower portion of the building hidden behind the spire. The scheme has been designed to respond to the significance of this view. This has included the architect's choice of materials as well as the profile of the building which has been adjusted to reflect the proportions of the spire in this view. The LVMF pre-empts such a change and the application view demonstrates that it does not affect the viewer's ability to recognise and appreciate the Strategic Landmark of Southwark Cathedral in this view and can make a positive contribution to this view which is experienced in a dynamic way as the viewer crosses the river.
- 122 Further, the application views suggest that the scheme has limited visibility from the Tower of London environs i.e. the inner part of the Tower of London around the base of the White Tower itself. Also visible from these locations are buildings in the City and Tower Hamlets including Guys Tower, The Shard and More London in Southwark. The views submitted with the application demonstrate that the scheme will be visible

for a short distance of around 8m from the Waterloo Barracks at the furthest edge of the Tower environs but will be completely invisible at the Stone which marks the traditional end of the Tower tour.

- 123 In the local views the scheme will have a significant impact. Its highly articulated form and especially its stepped profile will make it a distinctive landmark in the area, part of a family of buildings but distinguished in its own right. Care will have to be taken over the choice of materials especially at the lower part of the building and even the soffit of the oversailing building. Therefore, if the council is minded to approve this proposal the choice of materials and the architectural detailing should be reserved by condition to ensure that the quality of design is carried through to the constructed scheme.
- 124 Aside from its historic neighbours, this scheme's most important visual relationship is with the group which includes The Shard and The Place. This has been the subject of great scrutiny to ensure that this proposal does not interfere with views of the Shard of Glass and complements its setting in the skyline. The designers have responded to this challenge and ensured that the building angles away when viewed from certain locations like St Thomas Street or Great Maze Pond to reveal the Shard's most significant features in their entirety.
- 125 The scheme was reviewed by the DRP on two occasions in November 2013 and January 2014 at the pre-application stage. The Panel were greatly encouraged by the way the scheme had been developed with their involvement and they endorsed the height and scale of the proposal. They felt the scheme could benefit from further refinement in relation to the public realm and the detailed design of its silhouette and skyline and they expressed their confidence in the design team.
- 126 Since the review the application scheme has benefited from further refinement of the public realm which has resulted in considerable improvement of the space and its landscaping. Again this is a view contested by Guys who consider the relationship to the public realm to be poor. Furthermore, the roof profile and material finishes have been developed further to give its greater articulation at the roof and its facades and the scheme adjusted to ensure that key views of the Shard are preserved.
- 127 In conclusion, officers are satisfied that this is a high quality scheme, meeting the requirements of Policy 3.20. It is an exceptional and iconic piece of architectural design that will complement its historic and civic setting. It is matched by a well designed and integrated public realm that responds to this complex transport interchange context.

Density

- 128 Strategic Policy 5 'Providing new homes' of the Core Strategy describes the density range that development is expected to fall within in different parts of the borough. This is also described in saved policy 4.1 'Density of residential development' in the Southwark Plan. This development site is located within the 'Central Activities Zone'. Developments in this zone are expected to be between 350-1,100 habitable rooms per hectare. Within the opportunity areas and within the action area cores the maximum densities may be exceeded provided developments are of an exemplary design. The density of the submitted scheme is approx 1,731hr/ha. This is significantly above the density range. Tall residential buildings by their nature have a high density by virtue of the limited site area on which they site. However as noted above such high densities require a high quality design and an exemplary standard of the accommodation. This has been achieved in this instance (see relevant sections for further discussion on these issues). It is also noted that the site is in an area of high public transport accessibility.

Residential quality

- 129 As the scheme exceeds the density standards for the area, an exemplary standard of design and living environment is required.

Internal flat sizes and layouts

- 130 A detailed schedule of accommodation has been provided with the application and this demonstrates that all the proposed units significantly exceed the overall minimum internal space standards for each flat type which is a positive aspect of the scheme.
- 131 The proposed layouts are acceptable and provide a good standard of accommodation for future occupiers. The layouts of these units is acceptable, having regard to the usability of the space and the minimum room sizes have either been met or exceeded.

132

Unit Type	Size Range	No.	%
1 bed	63-73	56	37.8%
2 bed	90-117	73	49.3%
3 bed	134-149	16	10.9%
4 bed	130-591	3	2%
Total		148	100%

Aspect and outlook

- 133 All new developments should maximise the amount of dual aspect flats in order to ensure improved outlook and opportunities for cross-ventilation. North facing single aspect flats should be avoided. The majority of the units are at least dual aspect (118 units/79%) with a large number of triple aspect units (91). None of the 27 single-aspect units face north. The scheme is therefore fully compliant in this respect.

Privacy and overlooking

- 134 While there are residential units located within the Shard building, these are located on the upper floors and will not overlook the proposed residential units and will not be overlooked by the proposed development. There are no other residential units adjacent to the proposed development.
- 135 In terms of internal overlooking, the building will include elements of opaque cladding and fins on the facades to ensure there is no mutual overlooking from within main habitable windows.

Amenity Space

- 136 Standards for amenity space are set out within the Residential Design Standards SPD (2011). All flat developments must meet the following minimum standards and seek to exceed these where possible:
- 137
- 50 sq m communal amenity space per development
 - For units containing three or more bedrooms, 10 sq m of private amenity space
 - For units containing two or less bedrooms, 10 sq m of private amenity space should ideally be provided. Where it is not possible to provide 10 sq m of private amenity space, as much space as possible should be provided as private amenity space, with the remaining amount added towards the communal amenity space requirement.
 - Balconies, terraces and roof gardens must be a minimum of 3 sq m to count towards private amenity space.
- 138 In this proposal, private amenity space for 86 of the 148 of units (58% of the units) is

provided through the proposed winter gardens. All of the 3 bed and 4 bed units have access to a minimum of 10 sq. m. of private amenity space in the form of winter gardens. Of the 73 two bed units, 35 do not have private amenity space, and of the 56 one beds, 23 do not have private amenity space.

- 139 In terms of communal space, there is a space of 510 sq. m. located on level 4, within the transfer structure, 140 sq. m on level 16 and 112 sq. m on level 17. Having regard to the minimum requirement of 50 sq. m. per development, this is a generous level of community space provision and adds significantly to the amenity of the proposed units.
- 140 While private amenity space cannot be provided to all of the units, it is noted that the quality of the units is very high and generally exceed the minimum standards. The units will also benefit from the large communal areas located within the development.
- 141 In terms of child playspace, required standards are set out in the Mayors 'Shaping Neighbourhoods – Play and Informal recreation' Supplementary Planning Guidance (2012). Applying the standards set out in this document there is a requirement to provide 130 sq. m. of playspace. This equates to 13 children, predominately in the under 5 category. The playspace is located on level 16 and is divided between the outside and inside, to take advantage of the communal garden. Although there are some details of play areas provided on the drawings and within the Design and Access Statement, this is not sufficient to determine if the proposal has sufficient dedicated playspace to comply with the standard set out above. Additional details of the playspace should be required by way of condition and this should set out further details of the type of play provision that is being provided.

Internal Daylight/Sunlight

- 142 A daylight and sunlight report has been submitted with the application. This considers internal daylight levels within the development. The reports states that 380 out of 409 rooms (93%) meet the daylight criteria as set out in the BRE Guidelines and 346 out of 509 rooms (68%) meet the sunlight criteria. An addendum to the report was received during the course of the application. This considers daylight and sunlight to the four kitchen areas C1 to C4 on level 16. These achieve ADF levels of 2.2%, 1.5%, 1.9% and 3.1% with the upper levels achieving the same if not greater daylight levels. While two of the kitchens fall slightly under the BRE guidelines of 2%, the shortfall is not considered to be significant. The kitchens achieve good daylight levels which exceed BRE guidelines.

Daylight

- 143 For living rooms an Average Daylight Factor (ADF) of 1.5% is recommended and for bedrooms an ADF of 1% is recommended.
- 144 On floors 5-11, rooms R1 (living room), R2 and R3 (bedrooms) do not meet the criteria for each room type. R1 achieves a minimum ADF of 0.45 and R2 and R3 achieve a minimum ADF of 0.14 and 0.72 respectively. On floors 12-14, rooms R1 (living) and R2 (bedroom) do not achieve the criteria. R1 has an ADF value of 0.83 and R2 has an ADF of 0.23. The relatively low values achieved in these rooms are as a result of the form of the building, the aspect of the rooms and the Shard building located relatively close to the proposed development. Room R3 on each level between floors 5 to 15 is part of a two-bed unit where the other rooms meet the ADF criteria and the unit as a whole will be relatively well lit, particularly on the upper floors.

Sunlight

- 145 The test of sunlight is calculated for each main south facing window to habitable room with greater importance placed on living rooms. The BRE Guidelines state that any south facing window may potentially receive up to 1486 hours of sunlight per year on average, representing 100% of the annual probable sunlight hours (APSH). Each main window to a main habitable room may be adversely affected if it has less than 25% of the total APSH across the whole year or less than 5% APSH during the winter months.
- 146 As noted above, 346 out of 509 rooms (68%) meet the sunlight criteria. It is noted that the form of the building and the proximity to the Shard has given rise to the very low values achieved to some of the units (in the worst cases 0% for a living room is reported) with low values reported for other living rooms on all floors. The form of the building, in conjunction with the dense urban location and presence of The Shard immediately adjacent, has compromised sunlight to the units. It is those windows that are located in closest proximity to the Shard which report the lowest sunlight levels. The BRE Guidelines acknowledge that some flexibility should be employed in such dense urban locations. Taken in the context of the large size of the units and overall quality of accommodation achieved, it is concluded that the occupants will still benefit from a high standard of accommodation, notwithstanding the compromises resulting from the form of the building and its urban location.
- 147 Overall the standard of accommodation provided by these units is high, with the majority of the units exceeding the minimum space standards by a significant margin. There is a large number of dual and triple aspect units and generous areas of communal amenity space.

Transport issues

Car parking

- 148 The site has a PTAL of 6b and is located in a highly accessible location. The standard for parking for disabled residents is one space for every 10 residential units. The proposed development includes 28 double stacked car parking spaces at Basement Levels 2 and 3. While not all of the wheelchair spaces have been identified on the plan, the applicant has stated that 15 wheelchair spaces will be provided, and a condition will be imposed requiring this level of provision. There will be 13 standard spaces remaining. Including the wheelchair spaces, this is a rate of 0.19 spaces per residential unit (i.e. 1 car parking space for every 5 units). Any car parking proposed which is additional to the required 10% disabled provision needs to be supported by very robust justification given the site's excellent public transport accessibility.
- 149 During the course of the application, a reduction in car parking was requested by officers and the GLA. However, the applicants have submitted that, for developments of this nature, occupants of the units do not regularly use their cars at peak hours and request parking spaces primarily as a form of car storage. It is also submitted that non-provision of car parking spaces will impact on the viability of the project and the applicant has provided evidence of this within a viability assessment and addendum letter.
- 150 It is noted that the level of car parking provided in this instance is less than that provided on the recently consented schemes on the Samson and Ludgate site (Ref 12/AP/3940) and on the 1-16 Blackfriars site (Ref 12/AP/1784). These sites also had a PTAL level of 6b and car parking was provided at a rate of 0.4 spaces per unit on both of these sites.
- 151 It is accepted that in this instance, due to the nature of the scheme and the potential impact on the viability of the project, that this level of car-parking is justified. The level of parking is lower than that consented on similarly accessible sites. The rights of

residents or any members of staff to apply for CPZ permits should be removed however in order to alleviate any pressure on on-street parking. A car park management plan will also be required by way of condition.

152 Wheelchair accessible parking

The proposal provides 15 wheelchair accessible car parking spaces. These will operate as per the standard car parking spaces and will be concierge controlled. A condition will be imposed restricting these spaces to wheelchair users and a car parking management plan will be required. At least 20% of the parking spaces should have electric vehicle charging points and a further 20% passive provision. This will be imposed by way of condition.

Cycle Parking

- 153 The proposal provides a total of 220 cycle parking spaces, 165 for residents and 47 for employees and visitors. This in line with London Plan and Southwark Standards. These are provided within the basement area. The parking at basement level will be concierge operated and will be accessible via the car lift. The provision of cycle spaces at concourse level was not considered to be desirable in this instance due to the impact on the proposed public realm, and the likelihood that such spaces would be used by users of London Bridge station which is in very close proximity. However 8 visitor parking spaces have been provided at Joiner St level, with the remainder provided internally, and accessed via the concierge service. While this is not ideal, the constraints of the site are recognised and it is considered acceptable in this instance.

- 154 The Council's preference is for Sheffield stands as these are considered to be the most accessible for all users whereas the proposal includes 200 spaces as double stacked with only 20 as single stacked parking. However it is recognised that the site is constrained in terms of footprint limiting the area needed to provide a higher number of Sheffield stands. Additional space could be achieved by the removal of the car parking but this would impact on the viability of the scheme as noted above. A mitigating fact in this instance is the concierge service which would overcome the difficulty some users have in operating the double stacked stands. Therefore in this instance this type of provision is acceptable.

Servicing

- 155 The applicant has submitted a site waste management strategy. Refuse storage is at basement level. Prior to collection management would move the waste to street level for collection.
- 156 Servicing of the development is proposed to take place on-site via a new access onto St. Thomas Street. The new access will also provide service access to the adjacent existing hotel on London Bridge Street and for London Underground to access vent shafts. The plans show that there is capacity on site for service vehicles to enter and exit in forward gear. Details of the number of trips, types of vehicles and management procedures will be required as part of a delivery and service management plan.

Other issues

- 157 Conditions will be required in relation to a Construction Logistics Plan, a full Travel Plan, a car park management plan, Construction Management Plan.

Housing Issues

Dwelling mix

- 158 Strategic Policy 7 of the Core Strategy requires major developments at London Bridge to include 60% as 2 bedrooms or larger and at least 10% of the units to have 3 or

more bedrooms. No more than 5% of the units should be studios.

- 159 The mix of units is as follows:

Unit Type	No.	%	
1 bed	56	37.8%	
2 bed	73	49.3%	62.2%
3 bed	16	10.9%	
4 bed	3	2%	
Total	148	100%	

- 160 The accommodation accords with policy mix requirements and to that extent will create a range of housing sizes and types, particularly with the inclusion of duplex style units. A positive aspect of the scheme is that the large size of the units allows for the maximum number of people to be accommodated within that unit type (for example 6 persons for the 3-bed units).
- 161 Saved policy 4.3 of the Southwark Plan requires at least 10% of habitable rooms or units to be wheelchair accessible. In this instance the applicants have stated that a large number of the units are capable of being adapted if a purchaser requires this. However this is not a policy complaint strategy and the applicant has now agreed that a condition be imposed, requiring 10% of the units to be fitted out to south-eastern design guideline standards. As such officers are satisfied that a policy compliant provision will be made.

Impact of proposed development on amenity of adjoining occupiers and surrounding area

Daylight and Sunlight

- 162 It is noted that there are no residential properties impacted as a result of the proposal and the surrounding uses are for the most part commercial. It is noted an objection has been received on behalf of Guys Hospital to the south who have stated that no assessment of the impact of the proposal on the proposals on the open space at Guys Quad has been carried out. This is a non-residential use situated due south of the proposed scheme. It is not considered this use will be adversely impacted as a result of this proposal.

Wind

- 163 A wind impact report has been submitted. This considers the impact of the building on wind conditions in the immediate area and the impact on pedestrians. The design of the building has been influenced by initial wind studies. The underside of the building acts as a canopy itself against down drafts from the building above. However other mitigation measures are proposed also to minimise wind impacts including but not limited to the use of canopies on north and south elevations. The report concludes that wind comfort conditions are similar before and after the proposed development.

Impact of adjoining and nearby uses on occupiers and users of proposed development

- 164 The surrounding area is a mix of office, commercial and transport uses and it is not considered that the users of the retail and residential uses of this development will be adversely impacted upon.

Noise and Vibration

- 165 The applicant has submitted a revised noise impact report following initial comments from the Environmental Protection Team. This considers the impact of the surrounding uses including the plant at Guys and the rail noise as well as potential vibration

impacts resulting from the underground line. In summary it is concluded that the noise impacts within the units will be within acceptable limits with mitigation measures in place and all vibration criteria are met. Mitigation measures in relation to noise include the provision of acoustic insulated glazing and the provision of whole house ventilation units within each unit. In terms of the winter gardens and other internal amenity space the noise criteria will be met with the windows partially open. It was found that the noise criteria may not be met on the external spaces. However, overall it is accepted that noise and vibration impacts are within acceptable limits.

Air Quality

- 166 The applicant has submitted an quality assessment, as well as a memo to address initial concerns raised by the Environmental Protection Team. This considers the impact of the surrounding uses on the air quality on future occupiers of the unit. It is concluded that, with mitigation measures, the impact is acceptable. Mitigation measures include the provision of whole house ventilation systems for each unit. Environmental protection had raised queries regarding the ventilation system proposed as well as noting that no mechanical ventilation was proposed for the commercial units. The applicant's memo responds to these concerns and states that the ventilation system proposed is effective and note that air quality standards do not apply to commercial uses. No further objections were raised by the Environmental Protection Team and as such it is accepted by officers that air quality within the units will be within acceptable levels.

S106

- 167 Saved policy 2.5 of the Southwark Plan advises that planning obligations should be secured to overcome the negative impacts of a generally acceptable proposal. Saved policy 2.5 of the Southwark Plan is reinforced by the Supplementary Planning Document (SPD) on Section 106 Planning Obligations, which sets out in detail the type of development that qualifies for planning obligations, and Circular 05/05, which advises that every planning application will be judged on its merits against relevant policy, guidance and other material considerations when assessing planning obligations.

Planning Obligation	Amount of planning gain calculated by toolkit (£)	Amount of planning gain agreed by applicant (£)
Education	136,845	136,845
Employment in the Development	28,539	28,539
Employment During Construction	143533	143533
Employment During Construction Mgmt Fee	10,864	10,864
Public Open Space	63,704	63,704
Children's Play Equipment	18,614	18,614
Sports Development	155,456	155,456
Transport (Strategic)	97,451	97,451
Transport (Site Specific)	101,000	101,000
Transport for London	-	£187,000 cycle hire docking station
Public Realm	138,000	To be provided in lieu
Health	172,950	172,950
Archaeology	5,471	5,471

Admin Fee	25,119	25,119
Total	1,121,420	1,172,420

- 168 The applicants have proposed to provide the public realm payments in lieu in the form of an area of public realm provided at concourse level and a new stair link between St. Thomas Street and London Bridge Street. The applicants have submitted a cost plan indicating the estimated cost of provision. Provision in lieu is considered appropriate in this instance.
- 169 The applicant is providing sufficient contributions in this instance and is in line with the toolkit within the S106 SPD. Other measures within the S106 include the requirement to provide a Full Travel Plan, 3 years car club membership to each eligible adult occupier of the development.
- 170 In accordance with the recommendation, if the S106 Agreement is not signed by 26th December 2014, the Head of Development Management is authorised to refuse planning permission, if appropriate, for the reason below:
- 171 'In the absence of a signed Section 106 Agreement, there is no mechanism in place to avoid or mitigate the impact of the proposed development on affordable housing, public realm, public open space, sports facilities, education, health, affordable housing, the transport network, community facilities and employment and the proposal would therefore be contrary to Saved Policy 2.5 'Planning Obligations' of the Southwark Plan and Strategic Policy 14 – 'Implementation and delivery' of the Southwark Core Strategy, the Southwark Supplementary Planning Document 'Section 106 Planning Obligations' 2007, and Policy 8.2 Planning obligations of the London Plan 2011'

Mayoral CIL

- 172 This development is subject to the Mayoral CIL and the charge is calculated according to the amount of additional floor space the new development will produce. Existing floor space (gross) within a red line of a site can be deducted from the chargeable floor space calculation. Existing floor space can only be considered where it has been in continuous lawful use for at least six months in the 12 months prior to the development being permitted. The applicant have submitted the relevant CIL form and the draft CIL liability is calculated at £718,237.

Sustainable development implications

- 173 The National Planning Policy Framework (NPPF) sets out that the purpose of the planning system is to contribute towards the achievement of sustainable development. Sustainable development is described as consisting of three broad dimensions, economic, social and environmental. In relation to environmental implications of development, section 10 'Meeting the challenge of climate change, flooding and coastal change' describes the key role that planning has in securing radical reductions in greenhouse emissions, providing resilience to the impacts of climate change and supporting the delivery of renewable and low carbon energy and associated infrastructure.
- 174 An examination in public (EiP) of the Draft Further Alterations to the London Plan took place in September 2014. Adopted and proposed revisions to energy policies are set out within this document. In accordance with policy 5.2 in the London Plan 2011, all major development proposals should include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction outlined above are to be met within the framework of the energy hierarchy. This policy also sets out required carbon reductions over 2010 building regulations (currently 40% carbon

reduction is required, over the 2010 building regulations).

- 175 Policy 5.7 'Renewable Energy' expects that all development proposals will seek to reduce carbon dioxide emissions by at least 20 per cent through on-site renewable energy generation, wherever feasible.
- 176 In relation to on-site renewable energy, there is a presumption that major development proposals will seek to reduce carbon dioxide emissions through the use of such energy sources. Development should also support innovative energy technologies such as electric vehicles (by providing charging points).
- 177 The Council's Supplementary Planning Document on Sustainable Design and Construction provides guidance that should be taken into consideration and Strategic Policy 13 in the Core Strategy 2011 provides targets that development should meet.
- 178 Strategic policy 13 'High environmental standards' of the Core Strategy 2011 requires developments to meet the highest possible environmental standards, including targets based on the Code for Sustainable Homes and BREEAM (Building Research Establishment Environmental Assessment Method) standards. This includes requiring residential development to achieve a minimum of Code for Sustainable Homes Level 4, and other non-residential development to achieve at least a BREEAM 'excellent' except community uses which should achieve a minimum BREEAM level of 'very good'.
- 179 A Sustainability Statement and Energy Statement have been submitted with the application. The residential units will achieve Code Level 4 and the commercial units will achieve BREEAM excellent. A combined heat and power system will be used, green roofs are to be provided as winter garden. It is also noted that the proposed development is located within an area with excellent public transport accessibility.
- 180 The energy strategy adopts the 'lean, clean, green' hierarchy. Overall, the proposal will reduce carbon emissions by 41% against Part L 2010, meeting the London Plan target. In terms of being 'lean', the building envelope has been carefully designed to take maximum advantage of the sun for heating in the winter but to allow the apartments to be shaded and protected in summer. A CO₂ saving of 9% over 2010 building regulations has been achieved with energy efficient built form.
- 181 As noted, a proposed CHP system is to serve residential and commercial units. It was considered impractical to connect to other heat generating plant close by due to large numbers of utilities under Joiner Street. A CO₂ reduction of 35% will be achieved through these 'clean' measures.
- 182 There are limited options for on-site renewable energy technology on a building such as this one, given the limited usable space for such technologies. As such none are proposed in this instance.

Ecology

- 183 The applicants have submitted an ecological appraisal with the application. This states that The buildings, vault and station entrance on Site all have some, albeit limited, potential to support common and widespread nesting birds. All active bird nests are protected from damage and destruction under the Wildlife and Countryside Act 1981 (as amended). It is recommended that the buildings are cleared and works to the tunnel and station entrance are completed outside of bird breeding season, or if this is not possible, a check for active nests occurs immediately before clearance to confirm the absence of nests, or ensure that if present nests can be adequately protected until they are no longer active.

- 184 The site is considered to have negligible potential to support roosting bats and is located in an area currently subject to after dark lighting.
- 185 In accordance with local and national planning policy (NPPF, 2012), it is recommended that where possible ecological enhancements are designed into the scheme. Suitable enhancement measures for consideration include the provision of bird nesting opportunities (for example swift bricks), installation of an extensive green roof and lower level native planting such as street trees or shrubbery. These mitigation measures can be ensured by way of condition.

Archaeology

- 186 Fielden House is located within the Borough, Bermondsey and Rivers Archaeological Priority Zone. The site is in the core area of Roman Southwark and located at the east extent of the Roman north Island. At present, it is generally assumed, that the defences of the Alfredian-period burgh must align to Joiner Street and probably to the historic line of St Thomas Street, so the site would be located in the area where most evidence of early medieval settlement has been identified. The site is also located within the parish boundary of St Thomas's Hospital.
- 187 There is therefore the possibility of Roman, early medieval remains, medieval and post-medieval remains from St Thomas' Hospital and within this area there is also significant evidence of prehistoric activity in the immediate area. As part of the remains from St Thomas' Hospital the site is highly likely to contain burials from the hospital.
- 188 The applicants have submitted a desk-based assessment and have undertaken an archaeological borehole due to the lack of available land in the immediate area of the site to undertake an archaeological evaluation and the need to maintain access to the underground station. The results of the borehole indicated that there are 4.5m of archaeological deposits on site. The character of these deposits, admittedly from a borehole so it is difficult to interpret, indicate this material is post medieval in date. Therefore it is most likely to relate to a deep pit or a well; it is difficult to see how the evidence of such deep post-medieval material can be characterised as the archaeology across the whole site, certainly work at adjacent sites have indicated likely deposits to be in the area of 2m in depth, at a maximum. The historic map sequence contained within the desk-based assessment would appear to indicate that the area of the borehole had been maintained as open ground.
- 189 The proposal for this site will not result in the preservation of archaeological remains in situ, but will totally remove all archaeology from the site area. To these ends the National Planning Policy Framework requires developments that will result in the total loss of archaeological significance from the site to deliver substantial public benefits. The ability to record the archaeology that is to be lost cannot be considered, on its own, a suitable level of public benefit to mitigate the loss of archaeological significance. Towards these ends the necessary archaeological work - archaeological evaluation, archaeological monitoring of all site investigation works and depending upon the results from these works the archaeological excavation of the site - will require a level of public involvement. The applicants should provide suitable windows in their hoarding to enable the public to view the excavations. Details of the archaeological site work should be included on the hoarding of the site and a viewing platform should be constructed within the hoarding to enable controlled access to the site to show the general public what works are being undertaken. The site is immediately adjacent to large scale Roman stone buildings that have been excavated on the site of The Place, just to the north of London Bridge Street. Should suitable remains be identified consideration should be made for their display or incorporated

into the landscaping of the site. Remains from St Thomas' Hospital may well be present in the excavation area. The development of the hospital from the 13th century onwards, and its incorporation of standing Roman remains into the structure has been documented at sites on Borough High Street and significant elements from the medieval or post-medieval buildings may be present on site. Again consideration of the display of remains on site will need to be made and for their incorporation into any landscaping scheme. Should the burgh ditch be present in the excavations then, as part of the landscaping scheme, laying out the course of the ditch, or defence line across the site. These proposals including those to secure the archaeological work should be secured by suitable conditions. Any archaeologically excavated material that is displayed will need to have a suitable maintenance programme agreed as part of any landscaping works.

- 190 Suitable conditions have been recommended to secure the archaeological evaluation works, any mitigation works, the preservation and display of suitable archaeological remains, should they be identified, the extent and nature of groundworks and the submission of a timely report with details of publication proposals and archiving.

Flood risk

- 191 The site is located within Flood Zone 3 which is deemed to be 'high risk'. It is within an area benefiting from the River Thames barrier defences. The applicants have submitted a Flood Risk Assessment (FRA). The Environment Agency and the Flood and Drainage Team have raised no objection to the proposal.

Conclusion on planning issues

- 192 The proposal is a high quality scheme and it is an exceptional and iconic piece of architectural design that will complement its historic and civic setting. It is matched by a well designed and integrated public realm that responds to this complex transport interchange context. A policy compliant provision of off-site affordable housing will be secured by a S106 agreement, with a fall back position of a commuted sum, should this not be delivered with an appropriate timeframe. The level of car parking, when combined with restrictions on securing parking permits, will mean that the impacts on the highway will be limited.
- 193 The quality and mix of accommodation is acceptable, and will provide good quality housing for future residents. The impact of the new accommodation on local infrastructure and services is adequately mitigated through S106 contributions.
- 194 As such, the recommendation is to grant permission, subject to the completion of a legal agreement.

Community impact statement

- 195 In line with the Council's Community Impact Statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process.
- 196 a) The impact on local people is set out above.
- 197 b) The following issues relevant to particular communities/groups likely to be affected by the proposal have been identified as
- 198 c) The likely adverse or less good implications for any particular communities/groups

have been also been discussed above.

Consultations

- 199 Details of consultation and any re-consultation undertaken in respect of this application are set out in Appendix 1.

Consultation replies

- 200 Details of consultation responses received are set out in Appendix 2.

Summary of consultation responses

- 201 Objection received from Kings College London in relation to impact on day to day operations of Guys and Kings; impact on the setting of listed buildings; traffic impacts; site not considered by the daylight and sunlight assessment;

An additional objection was received on the 22/10/2014. This raises three issues:

- Consultation process; States Guy's and Kings were not consulted on the amended plans (although acknowledges Guy's and King's were consulted on the original plans)
- amended plans of greater concern and disregard the setting of the listed buildings and the spatial context of the Georgian Square as well as a lack of townscape context. Repositioning of the steps, changes to the public realm, service area entrance, location of the entrance to the apartments.
- mitigation should be sought via the S106 agreement

Officer response

The construction phase will be controlled by a construction management plan to minimise disruption to surrounding sites. It is not considered the operation phase will result in disruption or adverse traffic impacts. The impact on the setting of the listed buildings is considered in the report as is the issue of daylight and sunlight impacts.

All of the original consultees were reconsulted on the amended plans and letters were issued on the 01/09/2014. In terms of S106 contributions the proposal is delivering a toolkit compliant contribution with the high quality public realm being provided in lieu. This will be a significant public benefit resulting from the proposal. Other issues raised in the additional objection (design) are considered within the relevant section of the report.

Objection received in relation to impact on daylight sunlight levels to a commercial unit in the Shard.

Officer response

BRE guidelines only considers the impact on residential units and as such the it is not considered that this objection can be upheld.

A number of concerns, in relation to impacts on views and the setting of the Tower of London, have been raised in submissions from Statutory Consultees. (from the London Borough of Camden, the City of London, Royal Borough of Greenwich, The Council for British Archaeology and Historic Royal Palaces).

Officer response

These concerns are considered in the main body of the report.

Human rights implications

- 202 This planning application engages certain human rights under the Human Rights Act

2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.

- 203 This application has the legitimate aim of providing a mixed-use retail and residential building with associated public realm. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/3-28 Application file: 14/AP/1302 Southwark Local Development Framework and Development Plan Documents	Chief executive's department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone:: 020 7525 5420 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Neighbour Consultee List for Application Reg. No. 14/AP/1302
Appendix 4	Recommendation

AUDIT TRAIL

Lead Officer	Gary Rice Head of Development Management		
Report Author	Rónán O'Connor		
Version	Final		
Dated	21 November 2014		
Key Decision	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title	Comments sought	Comments included	
Strategic director, finance & corporate services	No	No	
Strategic director, environment and leisure	No	No	
Strategic director, housing and community services	No	No	
Director of regeneration	No	No	
Date final report sent to Constitutional Team			23 November 2014

APPENDIX 1

Consultation undertaken

Site notice date: 19/05/2014

Press notice date: 22/05/2014

Case officer site visit date: 19/05/2014

Neighbour consultation letters sent: 22/05/2014

Internal services consulted:

Design and Conservation Team
Archaeology Officer
Ecology Officer
Environmental Protection Team [Noise / Air Quality / Land Contamination / Ventilation]
Planning Policy
Transport Planning Team
Urban Forester

Statutory and non-statutory organisations consulted:

English Heritage
Environment Agency
Greater London Authority
Network Rail (Planning)
Network Rail (Thameslink)
Transport for London (referable & non-referable app notifications and pre-apps)
London Underground Limited
Metropolitan Police Service
Thames Water - Development Planning
Public Realm - Project Design Team
City of London
London Borough of Camden
London Borough of Haringey
London Borough of Islington
London Borough of Lambeth
City of Westminster
Royal Borough of Greenwich
London Borough of Lewisham
The Georgian Group
The Victorian Society
Council for British Archaeology
Historic Royal Palaces, Hampton Court
London Fire & Emergency Planning Authority

Neighbours and local groups consulted:

As per Appendix 3

Re-consultation:

01/09/2014

APPENDIX 2

Consultation responses received

Internal services

Design and Conservation Team – support proposals

Archaeology Officer - recommends conditions

Ecology Officer – recommend conditions

Environmental Protection Team [Noise / Air Quality / Land Contamination / Ventilation]
– requires further info (which has been submitted)

Planning Policy – require additional justification for loss of office space

Transport Planning Team – require justification for car parking levels; concern over double stack cycle storage spaces and access to these spaces; require travel plan; concern over use of Joiner st for construction; car club membership to be provided and additional S106 contributions secured.; recommend conditions

Highways – require additional info and recommend conditions

Statutory and non-statutory organisations

English Heritage - No objection raised in consultation response. Have submitted a copy of the pre-application advice that states that a case can be made to demonstrate that the public benefits of the proposals outweigh on the historic environment.

Environment Agency – No objection subject to conditions

Greater London Authority – application broadly complies with the London Plan but the following issues should be addressed:

- Significant concern that no affordable housing or cash in-lieu payment can be provided
- TFL to be a signatory to S106 agreement to safeguard operational interests
- Communications strategy to be agreed with TFL
- Construction management plan to be agreed with TFL
- Reduction in car parking
- Visitor cycle parking provision
- Cycle hire contribution/travel plan within the S106
- Delivery and servicing plan/car park and taxi drop-off management plan
- Provision of a shelter at Bus Stop D
- Wayfinding strategy

Network Rail (Planning) No objection following receipt of additional information relating to glare. Recommend conditions.

Network Rail (Thameslink)

Transport for London (referable & non-referable app notifications and pre-apps) – number of areas need to be addressed as noted in the GLA response above.

London Underground Limited – recommend conditions

Metropolitan Police Service – seeks a secure by design condition

Thames Water - Development Planning – recommend conditions and informative

Public Realm - Project Design Team

City of London – notes potential impacts on views

London Borough of Camden – Object to application due impact on the views of the dome and peristyle of St Paul's Cathedral in both of the London Panoramas from Parliament Hill and Kenwood

London Borough of Haringey- No formal response

London Borough of Islington- No formal response

London Borough of Lambeth- No formal response

City of Westminster- Does not wish to comment on the proposals.

Royal Borough of Greenwich – queried impacts on views

London Borough of Lewisham - No formal response

The Georgian Group - No formal response

The Victorian Society - No formal response

Council for British Archaeology – objects to the proposal due to impact on heritage adjacent heritage assets.

Historic Royal Palaces, Hampton Court – concerned about impacts on views/accuracy of dwgs/setting of the Tower of London World Heritage Site –seek a reduction in height

London Fire & Emergency Planning Authority – no objections or comments

Neighbours and local groups

Objection received from Kings College London in relation to impact on day to day operations of Guys and Kings; impact on the setting of listed buildings; traffic impacts; site not considered by the daylight and sunlight assessment;

An additional objection was recieved on the 22/10/2014. This raises three issues:

- Consultation process; States Guy's and Kings were not consulted on the amended plans (although acknowledges Guy's and King's were consulted on the original plans)
- amended plans of greater concern and disregard the setting of the listed buildings and the spatial context of the Georgian Square as well as a lack of townscape context. Repositioning of the steps, changes to the public realm, service area entrance, location of the entrance to the apartments.
- mitigation should be sought via the S106 agreement

Officer response

The construction phase will be controlled by a construction management plan to minimise disruption to surrounding sites. It is not considered the operation phase will result in disruption or adverse traffic impacts. The impact on the setting of the listed buildings is considered in the report as is the issue of daylight and sunlight impacts.

All of the original consultees were reconsulted on the amended plans and letters were issued on the 01/09/2014. In terms of S106 contributions the proposal is delivering a toolkit compliant contribution with the high quality public realm being provided in lieu. This will be a significant public benefit resulting from the proposal. Other issues raised in the additional objection (design) are considered within the relevant section of the report. Objection received in relation to impact on daylight sunlight levels to a commercial unit in the Shard.

Officer response

BRE guidelines only considers the impact on residential units and as such the it is not considered that this objection can be upheld.

A number of concerns, in relation to impacts on views and the setting of the Tower of London, have been raised in submissions from Statutory Consultees. (from the London Borough of Camden, the City of London, Royal Borough of Greenwich, The Council for British Archaeology and Historic Royal Palaces).

Officer response

These concerns are considered in the main body of the report

APPENDIX 3

Neighbour Consultee List for Application Reg. No. 14/AP/1302

TP No	TP/3-28	Site	FIELDEN HOUSE, 28-42 LONDON BRIDGE STREET AND 21-27 ST THOMAS STREET, LONDON SE1
App. Type	Full Planning Permission		

Date Printed	Address
22/05/2014	LEVEL 16 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 15 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 14 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 17 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 20 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 19 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 18 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 13 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 8 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 7 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 6 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 9 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 12 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 11 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 10 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 21 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 33 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 31 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 30 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	ARCH W962 LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 2QN
22/05/2014	GUYS HOSPITAL ST THOMAS STREET LONDON SE1 9RT
22/05/2014	LONDON BRIDGE UNDERGROUND STATION 21 DUKE STREET HILL LONDON SE1 2SW
22/05/2014	LEVEL 29 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 24 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 23 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 22 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 25 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 28 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 27 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 26 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 5 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	VIEWING GALLERY THE SHARD JOINER STREET LONDON SE1 9EX
22/05/2014	RESTAURANTS THE SHARD 27 ST THOMAS STREET LONDON SE1 9RY
22/05/2014	BLOOMFIELD CLINIC GUYS HOSPITAL ST THOMAS STREET LONDON SE1 9RT
22/05/2014	KIOSK ADJACENT TO VAULTS JOINER STREET LONDON SE1 9SP
22/05/2014	BASEMENT TO THIRD FLOORS 19 BOROUGH HIGH STREET LONDON SE1 9SE
22/05/2014	SERVICE ENTRANCE THE SHARD 31 ST THOMAS STREET LONDON SE1 9RY
22/05/2014	ROOM 307 GUYS HOSPITAL GREAT MAZE POND LONDON SE1 9TN
22/05/2014	FLAT 9 4 LONDON BRIDGE STREET LONDON SE1 9SG
22/05/2014	FLAT 7 4 LONDON BRIDGE STREET LONDON SE1 9SG
22/05/2014	SECOND FLOOR NEW CITY COURT GUYS HOSPITAL ST THOMAS STREET LONDON SE1 9RT
22/05/2014	SHANGRI LA HOTEL THE SHARD 31 ST THOMAS STREET LONDON SE1 9RY
22/05/2014	1 LONDON BRIDGE STREET LONDON SE1 9SG
22/05/2014	APARTMENT 1 THE SHARD 31 ST THOMAS STREET LONDON SE1 9RY
22/05/2014	LEVEL 3 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SG
22/05/2014	SAINSBURY OUTPATIENT PHARMACY SOLOMON CENTRE GUYS HOSPITAL ST THOMAS STREET LONDON SE1 9RT
22/05/2014	APARTMENT 10 THE SHARD 31 ST THOMAS STREET LONDON SE1 9RY
22/05/2014	LEVEL 32 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 4 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 2 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	LEVEL 1 THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SY
22/05/2014	APARTMENT 9 THE SHARD 31 ST THOMAS STREET LONDON SE1 9RY
22/05/2014	APARTMENT 4 THE SHARD 31 ST THOMAS STREET LONDON SE1 9RY
22/05/2014	APARTMENT 3 THE SHARD 31 ST THOMAS STREET LONDON SE1 9RY
22/05/2014	APARTMENT 2 THE SHARD 31 ST THOMAS STREET LONDON SE1 9RY
22/05/2014	APARTMENT 5 THE SHARD 31 ST THOMAS STREET LONDON SE1 9RY
22/05/2014	APARTMENT 8 THE SHARD 31 ST THOMAS STREET LONDON SE1 9RY
22/05/2014	APARTMENT 7 THE SHARD 31 ST THOMAS STREET LONDON SE1 9RY
22/05/2014	APARTMENT 6 THE SHARD 31 ST THOMAS STREET LONDON SE1 9RY
22/05/2014	OLD HOSPITAL BLOCK 8A LONDON BRIDGE STREET LONDON SE1 9SG

22/05/2014 43 RAILWAY APPROACH LONDON SE1 9SS
22/05/2014 SECOND FLOOR FIELDEN HOUSE 28-42 LONDON BRIDGE STREET LONDON SE1 9SG
22/05/2014 BASEMENT ST THOMAS HOUSE ST THOMAS STREET LONDON SE1 9RY
22/05/2014 ST THOMAS HOUSE FIRST FLOOR NEW CITY COURT ST THOMAS STREET LONDON SE1 9RS
22/05/2014 ST THOMAS HOUSE NORTH EAST WING FIRST FLOOR NEW CITY COURT ST THOMAS STREET LONDON SE1 9RS
22/05/2014 GROUND FLOOR AND PART FIRST FLOOR KEATS HOUSE ST THOMAS STREET LONDON SE1 9RS
22/05/2014 FIRST FLOOR FIELDEN HOUSE 28-42 LONDON BRIDGE STREET LONDON SE1 9SG
22/05/2014 BASEMENT AND PART GROUND FLOOR 21 BOROUGH HIGH STREET LONDON SE1 9SE
22/05/2014 FLAT 1 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RY
22/05/2014 FIRST FLOOR FLAT 4 LONDON BRIDGE STREET LONDON SE1 9SG
22/05/2014 FIRST FLOOR SECOND FLOOR AND THIRD FLOOR 21 BOROUGH HIGH STREET LONDON SE1 9SE
22/05/2014 GROUND FLOOR FIELDEN HOUSE 28-42 LONDON BRIDGE STREET LONDON SE1 9SG
22/05/2014 ALL BAR ONE FIELDEN HOUSE 28-40 LONDON BRIDGE STREET LONDON SE1 9SG
22/05/2014 SUB BASEMENT AND BASEMENT AND GROUND FLOOR 4-6 LONDON BRIDGE STREET LONDON SE1 9SG
22/05/2014 ST THOMAS HOUSE GROUND FLOOR NEW CITY COURT ST THOMAS STREET LONDON SE1 9RS
22/05/2014 4-8 STAINER STREET LONDON SE1 9RL
22/05/2014 3-5 STAINER STREET LONDON SE1 9RL
22/05/2014 ST THOMAS HOUSE PITNEY BOWES FINANCE NEW CITY COURT ST THOMAS STREET LONDON SE1 9RS
22/05/2014 10-20 STAINER STREET LONDON SE1 9RL
22/05/2014 ST THOMAS HOUSE PART FOURTH FLOOR NEW CITY COURT ST THOMAS STREET LONDON SE1 9RR
22/05/2014 ST THOMAS HOUSE THIRD FLOOR AND PART FOURTH FLOOR NEW CITY COURT ST THOMAS STREET LONDON SE1 9RR
22/05/2014 ST THOMAS HOUSE LOWER GROUND FLOOR NEW CITY COURT ST THOMAS STREET LONDON SE1 9RS
22/05/2014 PART BASEMENT 21 ST THOMAS STREET LONDON SE1 9RY
22/05/2014 FIRST FLOOR 21 ST THOMAS STREET LONDON SE1 9RY
22/05/2014 UNIT 1 21 ST THOMAS STREET LONDON SE1 9RY
22/05/2014 PART GROUND FLOOR 21 ST THOMAS STREET LONDON SE1 9RY
22/05/2014 WOLFSON HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 34 RAILWAY APPROACH LONDON SE1 9SS
22/05/2014 UNIT 9 LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
22/05/2014 8-18 LONDON BRIDGE STREET LONDON SE1 9SG
22/05/2014 UNIT 12 LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
22/05/2014 UNIT 5 LONDON BRIDGE STATION RAILWAY APPROACH LONDON SE1 9SP
22/05/2014 19A BOROUGH HIGH STREET LONDON SE1 9SE
22/05/2014 BUNCH OF GRAPES 2 ST THOMAS STREET LONDON SE1 9RS
22/05/2014 UNIT 2 LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
22/05/2014 UNIT 2 21 ST THOMAS STREET LONDON SE1 9RY
22/05/2014 11-15 ST THOMAS STREET LONDON SE1 9RY
22/05/2014 1-7 ST THOMAS STREET LONDON SE1 9RY
22/05/2014 33 RAILWAY APPROACH LONDON SE1 9SR
22/05/2014 30 LONDON BRIDGE STREET LONDON SE1 9SG
22/05/2014 20-26 LONDON BRIDGE STREET LONDON SE1 9SG
22/05/2014 UNIT 5 21 ST THOMAS STREET LONDON SE1 9RY
22/05/2014 9 ST THOMAS STREET LONDON SE1 9RY
22/05/2014 ST THOMAS CHURCH 9A ST THOMAS STREET LONDON SE1 9RY
22/05/2014 UNIT 4 21 ST THOMAS STREET LONDON SE1 9RY
22/05/2014 UNIT 3 21 ST THOMAS STREET LONDON SE1 9RY
22/05/2014 8 ST THOMAS STREET LONDON SE1 9RS
22/05/2014 ROOM 8 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 7 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 6 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 9 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 12 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 11 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 10 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 5 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ST THOMAS HOUSE PART FIRST FLOOR LANDLORD AREA NEW CITY COURT ST THOMAS STREET LONDON SE1 9RS
22/05/2014 ST THOMAS HOUSE PART FIRST FLOOR NEW CITY COURT ST THOMAS STREET LONDON SE1 9RS
22/05/2014 KIOSK STARBUCKS JOINER STREET LONDON SE1 9RU
22/05/2014 ROOM 1 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 4 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 3 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 2 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 13 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 24 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 23 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 22 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 25 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 28 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 27 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 26 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 21 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 16 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 15 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 14 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 17 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 20 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 19 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
22/05/2014 ROOM 18 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT

22/05/2014 KIOSK 9 THE VAULTS LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
 22/05/2014 WEST WING NURSES HOME GUYS HOSPITAL GREAT MAZE POND LONDON SE1 9TN
 22/05/2014 KIOSK WEST CORNWALL PASTY COMPANY JOINER STREET LONDON SE1 9SP
 22/05/2014 FOURTH FLOOR 4 LONDON BRIDGE STREET LONDON SE1 9SG
 22/05/2014 WHISTLESTOP LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
 22/05/2014 LTE FORECOURT LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
 22/05/2014 GARFUNKELS LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
 22/05/2014 PART GROUND FLOOR BOLAND HOUSE GREAT MAZE POND LONDON SE1 9RT
 22/05/2014 MILLIES COOKIES LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
 22/05/2014 UNIT 8 LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
 22/05/2014 THE BODY SHOP LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
 22/05/2014 KIOSKS ON PLATFORMS 3 AND 4 LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
 22/05/2014 KIOSK BAGEL FACTORY JOINER STREET LONDON SE1 9SP
 22/05/2014 KIOSK 3 THE VAULTS LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
 22/05/2014 KIOSK 2 THE VAULTS LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
 22/05/2014 KIOSK 1 THE VAULTS LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
 22/05/2014 KIOSK 4 THE VAULTS LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
 22/05/2014 BURGER KING LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
 22/05/2014 KIOSK 6 THE VAULTS LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
 22/05/2014 KIOSK 5 THE VAULTS LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
 22/05/2014 BASEMENT AND GROUND FLOOR 8 LONDON BRIDGE STREET LONDON SE1 9SG
 22/05/2014 14 ST THOMAS STREET LONDON SE1 9RS
 22/05/2014 FIRST FLOOR NEW CITY COURT 20 ST THOMAS STREET LONDON SE1 9RS
 22/05/2014 2 RAILWAY APPROACH LONDON SE1 9SL
 22/05/2014 BOROUGH BAR LONDON BRIDGE STREET LONDON SE1 9SG
 22/05/2014 SEVENTH FLOOR EAST NEW LONDON BRIDGE HOUSE LONDON BRIDGE STREET LONDON SE1 9SG
 22/05/2014 ROOM 29 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
 22/05/2014 KIOSK 7 THE VAULTS LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
 22/05/2014 STAFF ACCOMMODATION BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
 22/05/2014 KIOSK 8 THE VAULTS LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
 22/05/2014 GROUND FLOOR TO SECOND FLOOR 5 LONDON BRIDGE STREET LONDON SE1 9SG
 22/05/2014 COUNTING HOUSE GUYS HOSPITAL GREAT MAZE POND LONDON SE1 9TN
 22/05/2014 ROOM 309 WEST WING NURSES HOME GUYS HOSPITAL GREAT MAZE POND LONDON SE1 9TN
 22/05/2014 BAGEL FACTORY KIOSK THE VAULTS LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
 22/05/2014 CAFE ON PLATFORM 5 AND 6 LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
 22/05/2014 RETAIL UNIT PLATFORM 1 AND 2 LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
 22/05/2014 SITE OFFICE THE SHARD 32 LONDON BRIDGE STREET LONDON SE1 9SG
 22/05/2014 KIOSK SWEET EXPRESS LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
 22/05/2014 PRODUCT BRAND KIOSK THE VAULTS LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
 22/05/2014 KIOSK MILLIES COOKIES JOINER STREET LONDON SE1 9RU
 22/05/2014 KIOSK KRISPY KREME JOINER STREET LONDON SE1 9RU
 22/05/2014 AMT KIOSK THE VAULTS LONDON BRIDGE RAILWAY STATION RAILWAY APPROACH LONDON SE1 9SP
 22/05/2014 KIOSK UPPER CRUST JOINER STREET LONDON SE1 9RU
 22/05/2014 KIOSK BANGER BROS JOINER STREET LONDON SE1 9RU
 22/05/2014 THIRD FLOOR 28 LONDON BRIDGE STREET LONDON SE1 9SG
 22/05/2014 LIVING ACCOMMODATION BUNCH OF GRAPES 2 ST THOMAS STREET LONDON SE1 9RS
 22/05/2014 FOURTH FLOOR 28 LONDON BRIDGE STREET LONDON SE1 9SG
 22/05/2014 THIRD FLOOR 21 ST THOMAS STREET LONDON SE1 9RY
 22/05/2014 FOURTH FLOOR 21 ST THOMAS STREET LONDON SE1 9RY
 22/05/2014 ROOM 30 BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
 22/05/2014 SECOND FLOOR 21 ST THOMAS STREET LONDON SE1 9RY
 22/05/2014 SECOND FLOOR SOUTH EAST AND WEST WING NEW CITY COURT 20 ST THOMAS STREET LONDON SE1 9SD
 22/05/2014 SECOND FLOOR NORTH EAST GEORGIAN WING NEW CITY COURT 20 ST THOMAS STREET LONDON SE1 9SD
 22/05/2014 ARCH 12 JOINER STREET LONDON SE1 9RX
 22/05/2014 FLAT 4 WEST WING NURSES HOME GUYS HOSPITAL GREAT MAZE POND LONDON SE1 9TN
 22/05/2014 MEDICAL SCHOOL SOUTHWARK WING GUYS HOSPITAL GREAT MAZE POND LONDON SE1 9TN
 22/05/2014 FLAT 3 COUNTING HOUSE GUYS HOSPITAL GREAT MAZE POND LONDON SE1 9TN
 22/05/2014 GUYS HOSPITAL MEDICAL SCHOOL BOLAND HOUSE ST THOMAS STREET LONDON SE1 9RT
 22/05/2014 ROOM 205 WEST WING NURSES HOME GUYS HOSPITAL GREAT MAZE POND LONDON SE1 9TN
 22/05/2014 5 JOINER STREET LONDON SE1 9RU
 22/05/2014 ROOM 306 WEST WING NURSES HOME GUYS HOSPITAL GREAT MAZE POND LONDON SE1 9TN
 22/05/2014 FLAT 2 4 LONDON BRIDGE STREET LONDON SE1 9SG
 22/05/2014 FLAT 3 4 LONDON BRIDGE STREET LONDON SE1 9SG
 22/05/2014 ROOM 301 WEST WING NURSES HOME GUYS HOSPITAL GREAT MAZE POND LONDON SE1 9TN
 22/05/2014 ROOM 206 WEST WING NURSES HOME GUYS HOSPITAL GREAT MAZE POND LONDON SE1 9TN
 22/05/2014 ROOM 318 GUYS HOSPITAL GREAT MAZE POND LONDON SE1 9TN
 22/05/2014 Metal Work Block K 175 Bermondsey Street London SE1 3UW
 22/05/2014 106-108 Bermondsey Street London SE1 3TX
 22/05/2014 Globe House 37 Bermondsey Street London SE1 3XF
 22/05/2014 via email x
 22/05/2014 London Bridge London SE1 9DA
 20/06/1837 Athene Place 66 Shoe Lane London EC4A 3BQ
 20/06/1837

