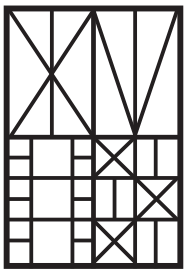




New City Court

2018 Scheme / 2021 Scheme



Rebuttal
Proof of Evidence of Simon Allford

July 2022

**ALLFORD
HALL
MONAGHAN
MORRIS**

GPE.

December 2018 Planning Application (*Appeal Reference: APP/A5840/W/22/3290473*)

December 2018 Listed Building Consent (*Appeal Reference: APP/A5840/Y/22/3290477*)

April 2021 Planning Application (*Appeal Reference: APP/A5840/W/22/3290483*)

April 2021 Listed Building Consent (*Appeal Reference: APP/A5840/Y/22/3290490*)

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1.0 Introduction

1.1 Purpose of Document

1.1.1 This document sets out my response to certain points raised in the Proof of Evidence of Elizabeth Adams (Ref: LBS/W2) undated – but received Friday 24th June 2022, in connection with GPE (St Thomas Street) Limited's joint planning appeals regarding planning application & listed building consent references APP/A5840/W/22/3290473 and APP/A5840/Y/22/3290477, APP/A5840/W/22/3290483 and APP/A5840/Y/22/32904790, for New City Court, 4-26 St Thomas Street, London, SE1 9RS.

1.2 Approach to Rebuttal

1.2.1 In this document I respond to the key points within Elizabeth Adams' Proof of Evidence (referred to as EA Proof) starting at Section 3.0 on page 17 of the Proof, restating or summarising the points where required and providing my response to each, including references to evidence already presented in the core documents and Proofs.

1.2.2 Where points raised in the Proof are issues of planning policy and heritage, I defer to my colleagues Chris Goddard & Peter Stewart and their respective Rebuttals.

1.2.3 Where points are repetitive, and a comprehensive response can be grouped, I have looked to address each point rather than necessarily each paragraph. Please note that I have not sought to rebut all areas of disagreement, and the lack of mention of other matters raised by Elizabeth Adams should not be construed as my agreement to them.

2.0 Section 3: The Appeal Site

2.1 General

2.1.1 *“Figure 6 Left: The tapering view of the Shard limits the amount of sky that is blocked to the area and to street level”.*

It is worth noting that the observation that a tapering form would have less volume than a full extrusion of equivalent height and the same footprint, is accurate. However a building of the Shard’s height is appreciable on the skyline not just in close proximity but also when observed at some distance. It should also be noted that Shard Place and the eastern extension to the Shard are both vertically glazed and adjoin the immediate public realm. As the ground level context and lower stories are omitted from the photo, the impact on street level of these existing properties is not demonstrated. However when one stands below at street level, the building’s presence is obviously noticeable.

2.1.2 *“Figure 8 Guy’s Hospital tower, the Shard and forthcoming Capital House seen from Leathermarket Gardens”.*

It is noted in the proof text that *“Capital House is currently under construction on the corner of Weston St and St Thomas St, and this will consolidate the eastwards direction of the existing cluster of tall buildings”*. As set out in my proof (Ref: APP/1/A), in section 3.9 (p34) the Capital House site is located further away from the Shard than the application site and is more remote than other existing tall buildings within the London Bridge cluster. However it is clear from the evidence EA sets out that this new tall building (Capital House) is but one of many tall building proposals expanding the existing single cluster.

2.1.3 *“Figure 9 The specific spatial character of the western end of St Thomas St comes from both sides of the street”.*

2.1.4 Whilst the materiality of the buildings is similar, save for the Keats House’s red brickwork and ornate stone detailing, and the 1980’s property of 20 St Thomas Street, the spatial character is defined by the use of the streets. This is as a high-transit corridor between London Bridge Station, the Shard, the wider Borough Area and Borough Market in particular. The area cannot be experienced without acknowledging the high-rise buildings that sit ‘cheek by jowl’. That juxtaposition between old and new resonates with the 2,000 years of organic development in this neighbourhood, as a key part of the success of the London Bridge area, in supporting London as a whole. The exact configuration of spaces is a direct result of Georgian ‘resetting’ of the previous medieval grain, to accommodate the institutional buildings of the hospital estates.

2.1.5 In point 3.3.8 of the EA Proof it is stated that one condition cannot be considered without the other (given their proximity) but I disagree with the presumption that St Thomas Street experiences the level of ‘coherence’; the huge variety of uses, and existing building typologies makes this one of the most diverse streets in London.

2.1.6 In point 3.4.1 of the EA Proof this is described as *“a complex urban condition”*. I

2.1.7 In point 3.4.5 of the EA Proof that richness in the variety of scale, character, solidity and heroic engineered structures is acknowledged.

2.1.8 In paragraph 3.3.4 of the EA Proof it should be clarified that the current occupier, Runway East, is a co-working business and the reference to ‘shared facilities’ means shared between office users,

rather than shared with members of the public, i.e. they are all private facilities. It should be noted that the sunken courtyard is extensively hard landscaped, set above a labyrinthine network of service tunnels, with soft landscaping limited to raised planters, with shade-tolerant plant species. The sunken courtyard is inaccessible to the general public.

2.1.9 In paragraph 3.3.5 it is stated *“the height of the roof terrace is low enough for the viewer to be immersed in the view rather than looking down at it (...) There is access to wide views of the sky on all sides from this relative low height of four storeys”* this describes the relative benefit of appreciating the local context from this height. This includes the appreciation of the tall buildings within the London Bridge cluster. However later in paragraph 5.4.8 the value of the 2018 Scheme’s Elevated Garden, proposed 2 levels higher than the existing roof terrace, is advised as only delivering *“some views across the local area, although the views to the north will be restricted by the tall buildings of the London Bridge Cluster”*. My view is that as per EA initial summary, the elevated garden would enjoy wide ranging, immersive views of all of the surrounding context.

2.1.10 In Figure 15 of the EA Proof the colour-coded markup of the existing buildings and the site is entirely inaccurate. The markup includes areas of public highway that are not within the site ownership, adjoining both King’s Head Yard (south) and St. Thomas Street (north) respectively.

Key:

■	Public open space (ground level)	63 m²	—	Title boundary
■	Public open space (basement level)	148 m²		
■	Private open space (ground level)	174 m²		
■	Private open space (basement level)	274 m²		

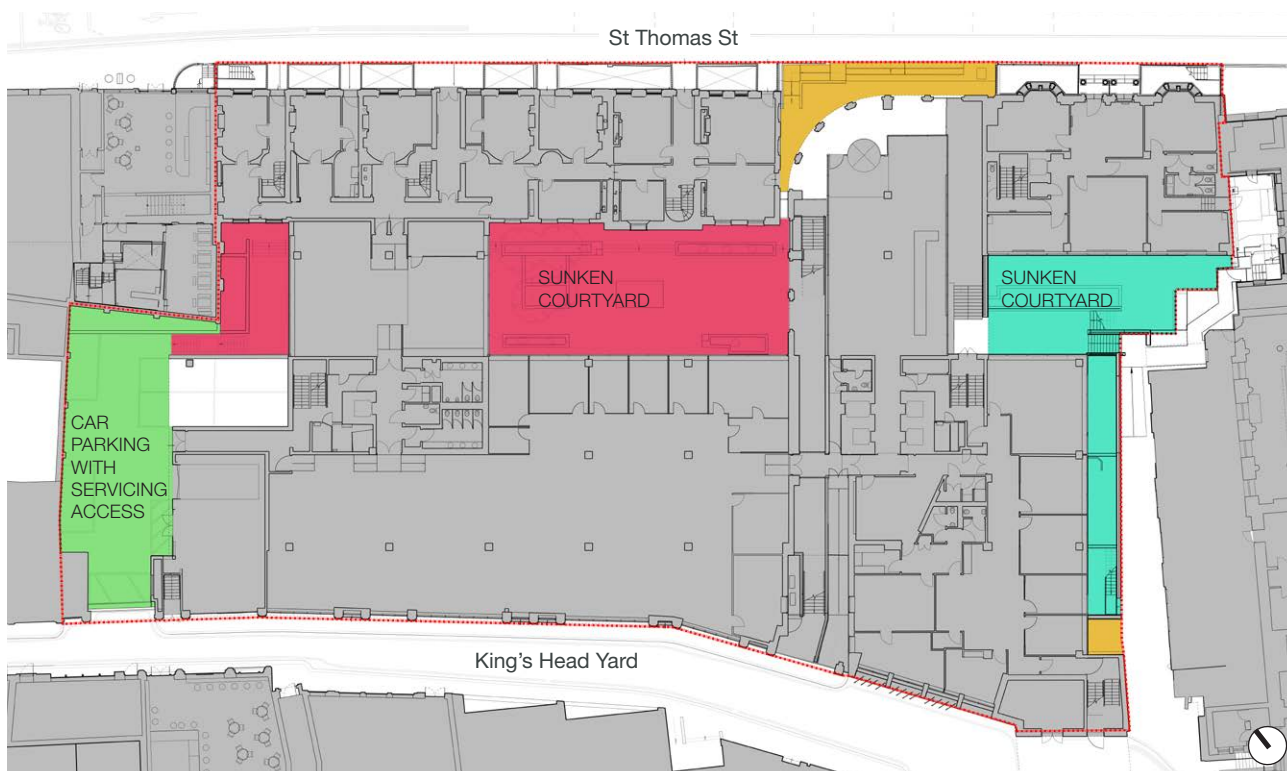


Fig. 1: Existing space at ground and lower ground



Fig. 2: Small area of at grade space, unpaved, located to the south east corner of the site (coloured orange on Fig 1).



Fig. 3: View looking down into B1 level sunken lightwell / fire escape from existing buildings located to the south eastern corner of the site (coloured dark green on Fig 1).

2.1.11 Figure 15 of the EA Proof also includes areas of private ownership of the adjoining hospital estate (far east) which are neither part of the site ownership nor within the planning red line boundary.

2.1.12 It includes the area of private car park and servicing yard at the far west of the plan.

2.1.13 It includes the private basement-level courtyard space to the centre of the plan and the access to it. There are also areas of basement-level paved space set below the at-grade pavements to the west, which provide lightwells and means of escape. An accurate representation of the existing site is illustrated in Figure 1 (p.7) of this document. Some photos of the site are also provided in Figures 2-7 (p.8-9) illustrating the nature of these spaces.

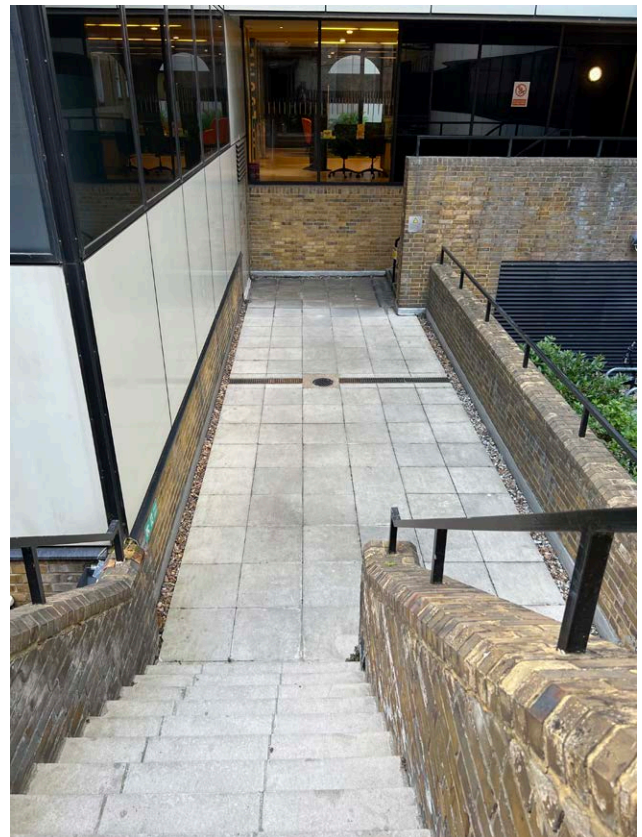


Fig. 4: View of the sunken fire escape routes to the north eastern edge of the site, set behind Keats House (coloured dark green on Fig 1).



Fig. 5: View of the existing at-grade car parking / servicing vehicle access looking towards King's Head Yard located to the western edge of the site (coloured light green on Fig 1).



Fig. 6: View of the existing private sunken courtyard at B1 level, within the centre of the site (coloured red on Fig 1).



Fig. 7: View of the existing public realm adjoining the back of the public highway on St Thomas Street, leading to the main building entrance and located to the north of the site (colour coded orange on Fig 1).

2.1.14 In paragraph 3.4.8 three of the existing properties in the London Bridge cluster are described as a 'coherent group'. It should be noted that all three properties (The Shard, Shard Place and the News Building) were designed by the same architectural practice Renzo Piano Building Workshop (RPBW), for the Sellar development group. This international style is not unique to London Bridge cluster and can also be found in the Paddington Square project in London (same developer and Architect) as well as represented by other international projects by RPBW in China, Taiwan and the US. Whilst the programme of each building is quite different (office, residential and full mixed-use) the character is broadly consistent. It is quite unusual to have three buildings so similar in appearance and given the greater diversity of architects and developers working on other sites around the London Bridge cluster, the emerging schemes will ultimately be more varied.

2.1.15 Figures 5 and 6 (p.35 and 36) of the EA Proof illustrate the relative proximity of the News Building to the pavement line of St. Thomas Street. The News Building can be seen in the immediate backdrop of the Georgian properties to the north side of St Thomas Street. However, this does not illustrate the relationship between Shard Place and the buildings shaded red. Shard Place is set 4m away from the historical buildings and of greater height than the News Building at AOD +101.5m.

2.1.16 In paragraph 3.4.10 it is erroneously stated that station environs constitute the public realm for the Shard. As noted in RPBW DAS for Shard Place p.15 "A criticism of The Shard during the public inquiry was that the scheme did not go far enough in terms of public realm improvements".

2.1.17 In paragraph 3.4.10 it is stated that *"views of it [the Shard] are seen from across the city but always against a backdrop of clear sky"*. As illustrated in the TVBHIA documents for both schemes, there are a number of locations, including LVMF views, where the Shard is partially or fully obscured in the existing condition, and will be further obscured when considering future developments in cumulative assessments.

2.1.18 In paragraph 3.4.10 reference is made to Figure 20 and the 'coherent form' of the Shard. It should be noted that the top most section of the Shard is missing in the photo, but early lay person criticism of the Shard was 'is it finished' with regard to the top most sections, suggesting a lack of coherence. In fact the name 'The Shard' (a corporate name that is a shortening of the original architectural name of the 'Shard of Glass') is reference to the separate fragments of the skin, with the 'fractures' or gaps between elements as a part of the design language, and that lack of coherence was a deliberate design choice. Given the photograph in Figure 20 does not illustrate the base of the buildings, it is unclear how EA has arrived at this conclusion. If the assumption is that a set-back lower series of levels at the Shard and Shard Place mitigates their impact on the conservation area, then the design of both New City Court proposals are similar in that they do not terminate directly on the 'street line' and have a unique condition for the bottom 4 levels.

2.1.19 In paragraph 3.4.12 it is stated that the historic significance of London Bridge is as a gateway to south London. The situation is in truth reversed, which is that the significance of the location of London Bridge was as access to the settlement of London from all the areas lying south of the Thames, given the historic settlement of London was located on the North side of the Thames. The position of London Bridge in plan, has varied over time, with the location of the bridge set further east until its demolition and replacement in 1832.

3.0 Section 4: The Proposals

3.1 2018 Scheme

3.1.1 It should be noted that Figure 31 includes the original image of the 2021 Scheme from the TVBHIA and not the amended design as included in the 2021 Planning Addendum (CDB.43).

3.1.2 *“Figure 32 Visualisation of proposal looking west along St Thomas Street. This diagram has been produced for this proof with an addition to the cropped view in the TVBHIA of the line drawing to show the full building height”.*

Whilst the original TVBHIA view follows the established methodology of selecting an appropriate camera lens to portray an approximation of real-world perception, in some views a taller building will inevitably be cropped where it is outside of the camera’s field of view. However the hybrid image does not follow that same rigour in its production. From my review the model shown does not appear to be consistent with the design of the building as submitted for planning, given there is no curvature shown to the north façade, save for a curved outline drawn appended on top. Given the design is not representative of the scheme and the method of production does not align with standard practice I would advise against any reliance on the accuracy of this information. During the course of the planning application process and scoping of TVBHIA views, no request to vary this view was made.

3.1.3 In paragraph 4.3.1.2 the curvature of the north façade is discussed by EA. As outlined in my proof (Ref: APP/1/A) section 5.2.8 the massing generally and the articulation of the north façade were discussed in detail with the Council, with the agreed preferred approach for the gentle curvature.

3.1.4 *“Figure 36 East elevation demonstrating the limited impact on the width of the tower of cutting back the corners”.*

It should be noted that references to ‘width’ are with reference to the north or south facing elevations. i.e. the erosion of the corners means that the visible part of the north elevation is reduced when seen in the views. There is also further benefit in views of the eastern and western elevations, given a building is not typically experienced in true elevation.

3.1.5 In paragraph 4.3.1.6 it is stated the that *“this kind of warehouse typology is typically found in local low-rise areas closer to the river”*. The image reference is but one of the many examples included in the AHMM Photo Book (Appendix B of respective DAS’), with the Hop Exchange and 51-53 Southwark Street being two examples of fine warehouses, which are present within the TVBHIA view set. As noted later in the EA Proof it is not the intention to be slavish to and mimic a particular reference, but to draw inspiration from it and apply appropriate lessons as to why the design of these buildings remains relevant and desirable.

3.1.6 In paragraph 4.3.1.7 it is questioned why the AHMM Photo Book (Appendix B of respective DAS’) does not include detailed study of the Shard’s façade design. Given that façade is both predominantly and consistently glazed and is contained within the majority of the TVBHIA view set, its appearance is substantially documented. I also have my own extensive expertise in delivering buildings with modern and highly varied façade designs appropriate to their context and their functional requirements. I am therefore aware, that the specification of the glass is a key consideration in their appearance relative to other tall buildings in London.

3.1.7 To clarify the question raised in paragraph 4.3.1.9 regarding the ‘smooth view’, *“it is not clear whether this intention is for the upwards view from the New Yard passage or from neighbouring view such as those from St Thomas Street”*, the short answer is both. The inclusion of some vertical, but shallow articulation of the frame behind was agreed with the Council team (as stated in section 5.3.5.2b). of my proof, see APP/1/A).

3.1.8 In paragraph 4.3.1.11 reference is made to the existing basement level of the Georgian properties, which are set substantially below grade. Given the rear of the Georgian properties were almost entirely reconstructed in the 1980’s, the original design of the lower levels is an unknown, i.e. it is not known if the properties originally extended below grade to their rear.

3.1.9 In paragraph 4.3.1.15 reference is made to the DAS (Core Document Ref: CDA.06) and the summary provided, regarding the available local public amenity spaces in the local area, and the relative shortage of such spaces around the London Bridge area. The specific examples are public parks and we have not made any claims that we would be providing space that is directly comparable, either in scale (as the smallest park is larger than the total site area) or character. However the comparison diagram in Elizabeth Adams’ proof is useful, in defining how much of the site is being provided as public open space. In my proof we have also compared the proposed public space with the typical provision within a dense central London environment, using published data from the neighbouring City of London (Ref: APP/1/A, 10.1.13, p.199).

3.2 2021 Scheme

3.2.1 In paragraph 4.4.2 it is stated that the total area of new public realm would be less than 1000 sqm. The total area at grade as advised to the Council is 1,136 sqm. Figure 47 also does not show the public realm provided via the eastern route (Beak Alley). In paragraph 4.4.9 the quantum of public realm is again understated at 941 sqm.

3.2.2 *“Figure 45 (repeated as Figure 73) Diagram looking west along St. Thomas Street showing the Tower emerging from behind Keats House and the Georgian terrace”.*

The modelling of Keats House shown in this illustration is inaccurate, as it shows both the existing 1980’s building and proposed Keats House. This view is taken from an aerial position with Shard Place omitted from the foreground of the view, i.e. this is neither a realistic vantage point, nor how the relationship between buildings would be experienced.

3.2.3 In paragraph 4.4.5 the relationship with the Georgian Terrace is described as *“the abruptness of the juxtaposition of new and old is jarring.”* The definition of juxtaposition is “two things being seen or placed close together with contrasting effect” and I would suggest that in London close placement of contrasting architectural styles is a celebrated feature of the built environment, as demonstrated in my Proof of Evidence (Ref: APP/1/A, 1.3.4, 1.3.8 and 1.3.14, p8-10). The façades are purposefully designed to provide contrast, but be of no less material quality, with comparable attention to fine detailing.

3.2.4 Contrary to the assumptions stated in paragraph 4.4.9 of the EA Proof, in designing the public 'Gallery' inclusion of access to daylight and visibility of sky were considered, to ensure that the space was not solely artificially lit. This included raising the level significantly higher than existing parapets of the Georgian Terrace to create a clear-story. The design is described in the DAS (See Core Document Ref: CDB.08, p.107).

3.2.5 In paragraph 4.4.10 reference is made to the landscape architects diagram demonstrating the desire lines across the site. The more detailed Space Syntax analysis (See Core Document Ref: CDB.08) shows the relative intensity of use during peak times. It is worth noting that this does not mean that all of the space shaded would be occupied all of the time. Given that the space proposed is 7m in width minimum, this is wider than parts of the adjacent King's Head Yard (pavements and road) and of far greater capacity than the pavements of St. Thomas Street or Borough High Street. Therefore, whilst it is intended that these become well used public routes, there will be plenty of space for activity other than pedestrian movement.

4.0 Section 5: Likely Reasons For Refusal

4.0.1 Please read in conjunction with Peter Stewart's Rebuttal of Elizabeth Adam's Proof for issues relating to Townscape.

4.1 General

4.1.1 In paragraph 5.2.1, 5.2.2, 5.2.3 points are raised relative to policy requirements for tall buildings. This points are covered in detail in my proof, please see sections, 5.2.3.2, 5.2.8, 7.1.6.1 (Ref: APP/1/A).

4.1.2 In paragraph 5.2.6 it is stated that there was no CABE review for the 2021 Scheme. In this case, the project design team, policy background, site constraints, context, and general programme are all consistent between the two projects. On that basis the project has already benefited from two detailed CABE reviews and a series of comments and observations which were equally relevant to the development of the 2021 Scheme.

4.1.3 In paragraph 5.2.7 it is stated that *"In neither of the proposed schemes does the DAS describe or reproduce the client's original brief and I am not aware of a submission document that provides a schedule of accommodation or a categoric brief for the development provided by the client team"*. It should be noted that it is not a formal requirement in *The Town and Country Planning (Development Management Procedure) (England) (Amendment) Order 2013* to include such details. The building proposed is a reflection of the 8 years of input from the Council and other consultees, in the shaping of what might be termed the output brief and schedule of accommodation. The stated use classes and areas of accommodation are all included in the planning description of the respective projects, as submitted. We would also strongly support the statement made by EA saying that *"the outcome is determined by the design process and considerations of the site and surrounding area, rather than by the client brief alone"*.

4.2 2018 Scheme

4.2.1 In section 5.2.13 a short and incomplete summary of the design process is provided. I would refer you to our consultation chapter for respective schemes section 5.0 and section 8.0 (Ref: APP/1/A).

4.2.2 In Figures 49 and 50 EA makes the suggestion that the summary illustrations of respective iterations of the design proposal were the ‘means’ by which the design evolved. This is incorrect, and these are but an extreme shorthand to demonstrate that examination of the site and a design proposal took place over a protracted period, with many different schemes considered. In every instance, the building proposal started with hand drawn concept sketches, was developed using three dimensional scale models examined within the setting of detailed context models. Early wirelines, sketches and computer-generated images were produced for all key views identified for the site from the outset, considering the townscape and immediate context, eventually extending to 65 assessed views in the planning submission. The design of the built form was always informed by (and in many ways drove) the development of the building above, with early landscape and public realm ideas conceived prior to the detailed analysis of a taller building. Were all of that information to be reproduced verbatim it would easily extend to over 10,000 pages. The Council were intrinsically involved in that process as demonstrated in my proof (Ref: APP/1/A). Many of these design summary documents and design studies were present at workshops with the Council, GLA and at the CABE design reviews and were informed by feedback from respective consultees.

4.2.3 In paragraph 5.3.4.5 it is stated that the area *“is already characterful and interesting”*. This is not denied by the project team, however that does not mean that it can not be enhanced and varied in a positive fashion by addition. This can address observations stated within the conservation area appraisal as to where positive change is needed and desirable.

4.2.4 In paragraph 5.3.4.6 it is stated that the *“visual connection with the railway will become tenuous”* regarding the expressed vertical bracing structures. The local character is unique in London given the intertwined nature of historic warehouses and Georgian town houses, with the overlaid routes of the railway, the presence of which is manifested via a variety of ornate bridge designs, both old and new, and which will be visible alongside the proposed building. In many ways it is this iconic reference point that is one of the attractors to visitors of the local area.

4.2.5 In paragraph 5.3.5.1 it should be clarified that the new typology of ‘super slender’ towers described are exclusively super prime residential towers, which is not a class of use preferred in this location. It should be noted that the upper levels of the Shard described are also super prime residential, with the office ‘capped’ at level 28. Therefore the term ‘slender’ should be considered in the context of the office typology.

4.2.6 There are a number of points raised, including 5.3.9.9, stating that the site is significantly separated from other tall buildings clustered around the Shard, and that the relative scale of the proposed 2018 Scheme would affect the primacy of the Shard. These points are covered in detail in my proof in section 7.1.8-10 and 10.1.8-10 (Ref: APP/1/A).

4.3 2021 Scheme

4.3.1 In paragraph 5.5.2.5 it is stated that the urban conditions of the site are not identical to that of the Flat Iron building. This fact is not denied and as with any precedent the important lessons are then subject to further interpretation. In this instance, it was:

- the strength of the axial approach (which is more legible where it rises above its lower context, and the refinement of the curved corners),
- the notion of a consistent and more masonry façade (i.e. an articulated but arguably monolithic and recognisable form),
- the strength, emphasis and definition of the top – in this case heavier than the middle and base,
- and that the base addresses its urban condition (i.e. is active of varying character for the lower 4 storeys).

4.3.2 In paragraph 5.5.2.8 it is stated that the site is in an area that does not require “*further drama and interest*”. I would contend that given a tall building proposal should be of exemplary quality, being of interest is a minimum requirement.

4.3.3 In paragraph 5.5.2.9 comment is made on the significance and size of the site, these are points addressed in my proof (Ref: APP/1/A, p19-38).

4.3.4 In 5.5.3.2 the overall description of the proposal is described as “*monolithic*”, suggesting that it is made or apparently made of just a single material. It is noted that the listing entry of the Georgian Terrace describes a consistency between the buildings – and it is this sense of consistency and rhythm that informs the external appearance, one that is clearly made of both masonry elements and punctuated by glazing. Subtle shifts in glazing-to-solid ratio occur across the building elevations reducing the relative solidity with height.

4.3.5 Contrary to the statements in 5.5.4.1 / 5.5.4.2 / 5.5.4.3, the local area clearly demonstrates that successful and thriving public spaces can exist in locations that provide shelter and are under cover. Whilst the condition would be ‘different’ to the existing private sunken courtyard, it would be far more beneficial to the wider public.

4.3.6 In paragraph 5.5.4.4 it is stated that the proposal does not align with the London Plan Policy D9. The building provides a clear delineation of the lower 4 storeys of the building, with a scale, articulation, landscaping design and activity of a human and pedestrian nature. The building volume is set back to enhance amenity of adjacent buildings relative to the existing conditions.

4.3.7 In paragraph 5.5.4.5 it is stated that the omission of the access to a car park / service yard (which is an existing open space adjoining the yards), and the removal of areas of heavily louvred UKPN transformer rooms, are critical to the townscape value of the area, see Figure 8. I would suggest that the following will be of substantial benefit, encouraging the use and enjoyment of these otherwise under-utilised areas of central London:

- creating additional publicly accessible open space,
- opening up new pedestrian routes,
- enhancing the local setting for listed buildings,
- introducing active retail,
- a building / landscaped of high quality architectural design and materials.

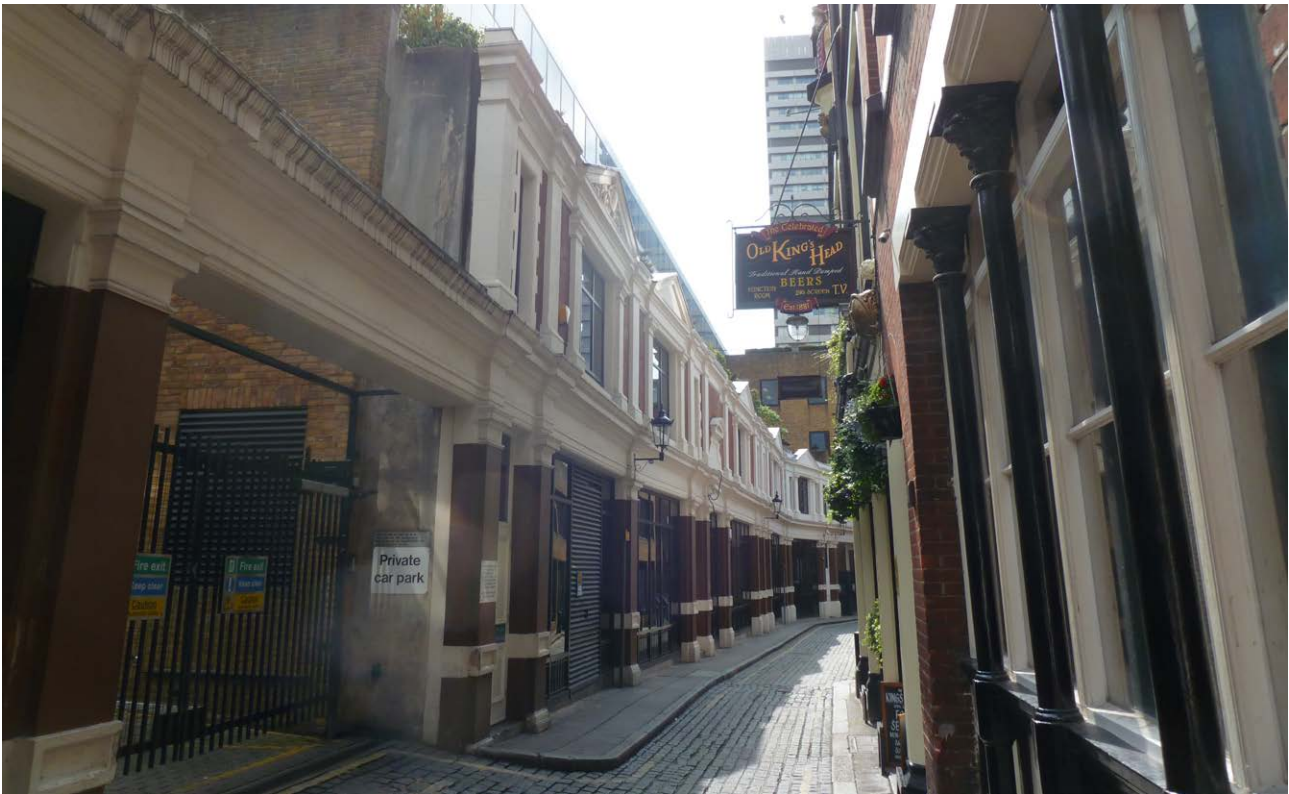


Fig. 8: View of the existing open car park / servicing access and adjacent UKPN transformer room / with louvred façades.

4.3.8 Figure 73 hybrid image is misleading and the scale inaccurate, given the original CGI is a one point perspective, and the drawing is a true elevation. Given the width restriction of St. Thomas Street and the human field of vision, the building could not be experienced as shown (similarly to a scenario described in paragraph 3.1.2).

4.3.9 Figure 75 is the original submitted image for the 2021 Scheme and not the amended view contained within the 2021 Planning Addendum (Core Document Ref: CDB.43).

4.3.10 In paragraph 5.5.5.6 there is a suggestion that the façade design is a direct copy of a façade typology present on the existing buildings. Many iterations of the building design confirmed variations in form, massing, material palette, solidity, depth, scale of elevations design and integration of urban greening, external space and building-integrated energy systems. These subjects were always considered from multiple view points and at different distances from the proposal. Whilst I have reached a conclusion as to a building language that is most appropriate – as a holistic undertaking – it bears no direct ‘mimicking’ of elements of the site but serves as a calm, unique counterpoint.

4.3.11 In paragraph 5.5.7.1 it is suggested that the Georgian terrace would now form a podium. These buildings remain entirely separate from the building behind and the public Gallery provides generous separation, with the main building supports clearly free-standing from the structure of the Georgian terrace. Given the way the existing 1980’s buildings are directly ‘plugged in’ to the existing Georgian terrace’s rear and side elevations, this will be a clear improvement over the existing condition.

5.0 Conclusion

5.1 Conclusion

5.1.1 To summarise the detailed rebuttal points made on Elizabeth Adams' proof:

- a). There is an oversimplification of the urban typology for the London Bridge area, with a denial of the strength of the complex interrelationships between contrasting and juxtaposed built form, portrayed through highly selective imagery;
- b). No justification is provided by Ms Adams, as to why the site is not of landmark significance or a scale that supports a tall building proposal;
- c). Ms Adams Proof fails to account for the complex and expansive design process undertaken with the LBS Council, GLA and consultees, to evolve the designs over an extended period. Including the assertion that the building form was developed entirely divorced from the context;
- d). The EA Proof rests on an incorrect assumption that public realm can only be of the scale and character of a conventional public park to have any value, This presumption is not reflective of the local area, or London more generally;
- e). Misinterpretation of the generous scale of public space being provided, capable of accommodating both pedestrian movement and activity in addition to space to pause;
- f). Failure to recognise the significance of the Shard and that its position as a Global Icon of London is not limited to a single viewpoint;
- g). The evidence does not provide full details of the London Bridge cluster history, consented and cumulative schemes;
- h). Ms Adams appears to disagree that the character and quality of space can be enhanced through positive intervention;
- i). Underestimates the abilities of a lay person to appreciate contextual references;
- j). Fails to understand the rigour that has been (and needs to be) applied to the process and production of the TVBHIA, with 'hybrid' images incorrectly portrayed as accurate representations;
- k). Misreports the qualities of the existing buildings, particularly the nature of 'open' space forming part of the application site;
- l). Under-reports the quantum of proposed new public realm and spaces 'open' to sky;
- m). Uses superseded imagery, failing to include and reference the latest information forming the 2021 Planning Addendum (CDB.43);
- n). Fails to demonstrate that the design is not of exemplary quality;
- o). Makes frequent assertions of opinion which I do not agree with.

5.1.2 As such I believe the Proof and its conclusions to be incorrect, and have rebutted these arguments within this document accordingly.

6.0 List of Figures

Fig. 1: Existing space at ground and lower ground 7

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