

PLANNING STATEMENT OF COMMON GROUND

**AGREED BETWEEN THE APPELLANT, GPE (ST THOMAS STREET)
LIMITED, AND THE LOCAL PLANNING AUTHORITY, THE LONDON
BOROUGH OF SOUTHWARK**

**APPEAL UNDER SECTION 78 OF THE TOWN & COUNTRY PLANNING ACT
1990 (AS AMENDED)**

**APPEAL BY GPE (ST THOMAS STREET) LIMITED AGAINST THE FAILURE OF
THE LONDON BOROUGH OF SOUTHWARK TO DETERMINE APPLICATIONS
FOR PLANNING PERMISSION AND LISTED BUILDING CONSENT (REFS:
18/AP/4039 & 18/AP/4040, 21/AP/1361 & 21/AP/1364) FOR THE REDEVELOPMENT
OF NEW CITY COURT, 4-26 ST THOMAS STREET, LONDON, SE1 9RS**

15 JULY 2022

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1. INTRODUCTION

- 1.1 This Planning Statement of Common Ground ('Statement') is made in connection with appeals ('the Appeals') against the London Borough of Southwark's ('LBS') failure to determine two applications for planning permission and two related applications for listed building consent ('the Appeal Schemes' or 'the Applications') in accordance with the statutory determination timescales for the redevelopment of New City Court, 4-26 St Thomas Street, London, SE1 9RS ('the Site').
- 1.2 The first application ('the 2018 Scheme') was received by LBS on the 11th December 2018 (LBS Ref: 18/AP/4039 & 18/AP/4040), with the listed building consent application validated on 8th January 2019 and the planning application validated on 22nd January 2019.
- 1.3 The full descriptions of development for the 2018 Scheme are set out below:

18/AP/4039 (planning application):

'Redevelopment to include demolition of the 1980s office buildings and erection of a 37 storey building (plus two basement levels) of a maximum height of 144m (AOD), restoration and refurbishment of the listed terrace (nos. 4-16 St Thomas Street) and change of use of lower floors to Class A1 retail, and redevelopment of Keats House (nos. 24-26 St Thomas Street) with removal, relocation and reinstatement of the historic façade on a proposed building, to provide a total of 46,374sqm of Class B1 office floorspace, 765sqm of Class A1 retail floorspace, 1,139sqm of Class A3 retail floorspace, 615sqm of leisure floorspace (Class D2), 719sqm hub space (Class B1/D2) and a 825sqm elevated public garden within the 37-storey building, associated public realm and highways improvements, provision for a new access to the Borough High Street entrance to the Underground Station, cycling parking, car parking, service, refuse and plant areas, and all ancillary or associated works.'

18/AP/4040 (listed building consent application):

'Restoration, rebuilding and refurbishment of the listed terrace (nos. 4-16 St Thomas Street) including: Demolition of 1980s fabric across the rear elevation and demolition

of the attached 1980s office building, and reinstatement of the rear elevation of the terrace and provision of shopfronts. Rebuild the second floor, roof and chimneys of no. 16, reskin the side façade and creation of ground floor entrances. Rebuild the roof and chimneys of no. 14. Removal and replacement of roof slates with natural slate to nos. 4-12. Opening up the ground floor passageway between nos. 8 and 10 by removing 1930s door, and reinstate two adjacent door openings on front elevation. Replacement of two second floor windows on front elevation. Replacement of secondary glazing to front elevation. Alterations to the front elevation of the lower ground level and vaults beneath the pavement. Internal alterations within the terrace to rearrange the ground and lower ground levels for retail units (with new stairs between) and upper levels for office units, reinstate the plan form, internal features and providing a staircase in no.12. Cleaning the brickwork, works to repair sash windows, restore the railings and first floor balconettes.’

- 1.4 The second application (‘the 2021 Scheme’) was received by LBS on the 21st April 2021 (LBS Ref: 21/AP/1361 & 21/AP/1364). The listed building consent application was validated on 22nd April 2021 and the planning application was validated on 27th April 2021.

- 1.5 The full descriptions of development for the 2021 Scheme are set out below:

21/AP/1361 (planning application) as revised following the amendments made to the Appeal Scheme:

‘Redevelopment to include demolition of the 1980s office buildings and erection of a 26-storey building (plus mezzanine and two basement levels) of a maximum height of 108.0m AOD, restoration and refurbishment of the listed terrace (nos. 4-16 St Thomas Street), and redevelopment of Keats House (nos. 24-26 St Thomas Street) with removal, relocation and reinstatement of the historic façade on a proposed building, to provide 46,442sqm GEA of Class E(g)(i) office floorspace, 358sqm GEA flexible office E(g)(i)/retail E(a) floorspace, 450sqm GEA Class E(b) restaurant/café floorspace and a public rooftop garden, and 5,449sqm GEA of affordable workspace within the Georgian terrace, Keats House and part of the tower, associated public realm and highways improvements, provision for a new access to the Borough High Street

entrance to the Underground Station, cycling parking, car parking, service, refuse and plant areas, and all ancillary or associated works.'

21/AP/1364 (listed building consent application):

'Listed building consent for restoration, rebuilding and refurbishment of the listed terrace (nos. 4-16 St Thomas Street) including: Demolition of 1980s fabric across the rear elevation and demolition of the attached 1980s office building, reinstatement of the rear elevation of the terrace, and recladding and partial rebuilding of rear walls. Rebuild roof and chimneys, reskin the side façade and front façade at top floor level of 1980s extension. Rebuild the roof and chimneys of no. 14. Removal and replacement of roof slates with natural slate to nos. 4-16. Opening up the ground floor passageway between nos. 8 and 10 by removing 1930s door, and reinstate two adjacent door openings on front elevation. Replacement of two second floor windows on front elevation. Replacement of secondary glazing to front elevation. Alterations to the front elevation of the lower ground level and vaults beneath the pavement. Internal alterations within the terrace to reinstate the plan form and the internal features, rearrange the circulation between the lower ground and upper levels (with reinstated stairs in between) for office use. Cleaning the brickwork, repointing, works to repair sash windows, restore the railings and first floor balconettes of the north façade.'

- 1.6 The first draft of this Statement was produced by DP9 Ltd on behalf of GPE (St Thomas Street) Limited ('the Appellant') and was based on the material submitted with the Applications and on responses given by LBS and other consultees. The purpose of this Statement is to set out information upon which the parties are agreed and to identify areas where agreement has not been reached.
- 1.7 This is a working draft of the Planning Statement of Common Ground, which will continue to evolve. LBS and the Appellant intend to agree as many issues as possible prior to the commencement of the inquiry, which is the agreed approach for hearing the Appeals.

2. SITE AND SURROUNDING AREA

- 2.1 Located in the London Borough of Southwark, the Site is situated to the south of St Thomas Street and east of Borough High Street, with Guy's Hospital situated to the east and King's Head Yard to the south. The majority of the Site is occupied by the early 1980s offices of New City Court (no. 20 St. Thomas Street), which comprises a part four-storey, part five-storey office building (Class E) with a curved glazed frontage onto St Thomas Street.
- 2.2 To the immediate east of the St Thomas Street entrance of New City Court, at nos.24-26 St Thomas Street, is Keats House. The unlisted red brick and stone façade, part of its side façade, its railings and front lightwell, were constructed in the mid-late 19th Century. Behind this façade is a four-storey 1980s office building (Class E) with basement that connects with the larger office building on the Site.
- 2.3 To the west of the main entrance along St Thomas Street is a row of Grade II listed Georgian terrace buildings (4-16 St Thomas Street). The buildings were constructed in the early 19th Century and are currently in office use (Class E). Alterations made to the buildings after they were listed included connecting formerly separate buildings so that the historic plan form has been eroded. The Historic England listing details state that no internal inspection was carried out at the buildings as part of the listing process therefore the Grade II listing is based on the external appearance of the buildings.
- 2.4 The Site is located within the London Bridge, Borough and Bankside Opportunity Area, Central Activities Zone, and London Bridge District Town Centre. The Site is also situated within the Borough High Street Conservation Area and the North Southwark and Roman Roads Archaeological Priority Area. In addition to the listed buildings within the Site extent, the Site is situated within close proximity to a number of neighbouring listed buildings, including no. 2 St Thomas Street (Grade II listed), Old King's Head Public House (Grade II), Guy's Hospital main building including wings and chapel (Grade II* listed) and St Thomas' Church (Grade II* listed). Southwark Cathedral and The George Inn, both of which are Grade I listed, are also situated within the locality. The Site is within the wider setting consultation areas of two London View Management Framework views, the London Panoramas from Parliament Hill and

Kenwood. The Site is within the wider assessment area of the borough view of St Paul's Cathedral from Nunhead Cemetery.

3. PLANNING HISTORY

3.1 The following table provides a summary of the pending planning applications for redevelopment of the Site.

| Ref No. | Address | Date | Description | Decision |
|---|--|----------------------|---|-----------|
| 21/AP/2592 Supplemental listed building consent application to 21/AP/1364 and 21/AP/1361 | Conybeare And Keats House Guys Hospital 24-26 St Thomas Street London | Valid 23 Jul 2021 | Listed building consent: Works to the party wall between Keats House and Conybeare House, including: removal of link to Keats House, reinstatement of the string courses and cornice to Conybeare House and refurbishment of existing fire escape. | Pending |
| 21/AP/2591 Supplemental planning application to 21/AP/1364 and 21/AP/1361 | Conybeare And Keats House Guys Hospital 24-26 St Thomas Street London | Valid 05 Aug 2021 | Works to the party wall between Keats House (nos. 24-26 St Thomas Street) and Conybeare House, including removal of links to Keats House and the following works to Conybeare House: - Restoration of the corner and side wall of Conybeare House, exposed from the moving of Keats House west; - The cornice partially returned along the exposed side wall of Conybeare House; - Removal of the non-original existing parapet and replace with new coping; - Installation of a rendered based to the newly exposed wall; - Refurbishment of existing fire escape in Conybeare House; - Erection of a green wall on the exposed elevation of Conybeare House to screen the fire escape, in front of which is a proposed new 750mm-deep planter for creeping foliage (associated application references 21/AP/2592 (listed building consent) and 21/AP/1361 and 21/AP/1364 for New City Court). | Pending |
| 21/AP/1364 Alternative development proposal for the site, which is subject to | New City Court 4-26 St Thomas Street, London | Valid 22 Apr 2021 | Listed building consent for restoration, rebuilding and refurbishment of the listed terrace (nos. 4-16 St Thomas Street) including: Demolition of 1980s fabric across the rear elevation and demolition of the attached 1980s office building, reinstatement of the rear elevation of the | At appeal |

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| another appeal | SE1 9RS | | terrace, and recladding and partial rebuilding of rear walls. Rebuild roof and chimneys, reskin the side façade and front façade at top floor level of 1980s extension. Rebuild the roof and chimneys of no. 14. Removal and replacement of roof slates with natural slate to nos. 4-16. Opening up the ground floor passageway between nos. 8 and 10 by removing 1930s door, and reinstate two adjacent door openings on front elevation. Replacement of two second floor windows on front elevation. Replacement of secondary glazing to front elevation. Alterations to the front elevation of the lower ground level and vaults beneath the pavement. Internal alterations within the terrace to reinstate the plan form and the internal features, rearrange the circulation between the lower ground and upper levels (with reinstated stairs in between) for office use. Cleaning the brickwork, repointing, works to repair sash windows, restore the railings and first floor balconettes of the north façade. | |
| 21/AP/1361 Alternative development proposal for the site, which is subject to another appeal | New City Court 4-26 St Thomas Street, London SE1 9RS | Valid 27 Apr 2021 | Redevelopment to include demolition of the 1980s office buildings and erection of a 26-storey building (plus mezzanine and two basement levels) of a maximum height of 108.0m AOD, restoration and refurbishment of the listed terrace (nos. 4-16 St Thomas Street), and redevelopment of Keats House (nos. 24-26 St Thomas Street) with removal, relocation and reinstatement of the historic façade on a proposed building, to provide 46,442sqm GEA of Class E(g)(i) office floorspace, 358sqm GEA flexible office E(g)(i)/retail E(a) floorspace, 450sqm GEA Class E(b) restaurant/café floorspace and a public rooftop garden, and 5,449sqm GEA of affordable workspace within the Georgian terrace, Keats House and part of the tower, associated public realm and highways improvements, provision for a new access to the Borough High Street entrance to the Underground Station, cycling parking, car parking, service, | At appeal |

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| | | | refuse and plant areas, and all ancillary or associated works. | |
| 19/AP/5520 Supplemental listed building consent application (not part of the Appeal Scheme) to make good Conybeare House once Keats House no longer supporting | Conybeare House Guys Hospital St Thomas Street London Southwark SE1 9RT | Valid 18 Oct 2019 | Works to the party wall between Keats House (nos. 24-26 St Thomas Street) and Conybeare House, including: removal of link to Keats House, reinstatement of the strong courses and cornice to Conybeare House, and refurbishment of existing fire escape. | Pending |
| 19/AP/5519 Supplemental planning application (not part of the Appeal Scheme) to make good Conybeare House once Keats House no longer supporting | Conybeare House Guys Hospital St Thomas Street London SE1 9RT | Valid 20 Sep 2019 | Works to the party wall between Keats House (nos. 24-26 St Thomas Street) and Conybeare House, including: removal of link to Keats House, reinstatement of the string courses and cornice to Conybeare House, and refurbishment of existing fire escape. (Works associated with applications ref. 18/AP/4039 and 18/AP/4040 for adjoining New City Court 4-26 St Thomas Street, SE1 9RS). | Pending |
| 18/AP/4040 The listed building application that forms part of the Appeal Scheme | New City Court 4-26 St Thomas Street, London SE1 9RS | Valid 08 Jan 2019 | Restoration, rebuilding and refurbishment of the listed terrace (nos. 4-16 St Thomas Street) including: Demolition of 1980s fabric across the rear elevation and demolition of the attached 1980s office building, and reinstatement of the rear elevation of the terrace and provision of shopfronts. Rebuild the second floor, roof and chimneys of no. 16, reskin the side façade and creation of ground floor entrances. Rebuild the roof and chimneys of no. 14. Removal and replacement of roof slates with natural slate to nos. 4-12. Opening up the ground floor passageway between nos. 8 and 10 by removing 1930s door, and reinstate two adjacent door openings on front elevation. | At appeal |

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| | | | <p>Replacement of two second floor windows on front elevation.</p> <p>Replacement of secondary glazing to front elevation. Alterations to the front elevation of the lower ground level and vaults beneath the pavement. Internal alterations within the terrace to rearrange the ground and lower ground levels for retail units (with new stairs between) and upper levels for office units, reinstate the plan form, internal features and providing a staircase in no.12. Cleaning the brickwork, works to repair sash windows, restore the railings and first floor balconettes. (Listed building consent application. Associated planning application ref. 18/AP/4039)</p> | |
| <p>18/AP/4039</p> <p>The planning application that forms part of the Appeal Scheme</p> | <p>New City Court 4-26 St Thomas Street, London SE1 9RS</p> | <p>Valid</p> <p>22 Jan 2019</p> | <p>Redevelopment to include demolition of the 1980s office buildings and erection of a 37 storey building (plus two basement levels) of a maximum height of 144m (AOD), restoration and refurbishment of the listed terrace (nos. 4-16 St Thomas Street) and change of use of lower floors to Class A1 retail, and redevelopment of Keats House (nos. 24-26 St Thomas Street) with removal, relocation and reinstatement of the historic façade on a proposed building, to provide a total of 46,374sqm of Class B1 office floorspace, 765sqm of Class A1 retail floorspace, 1,139sqm of Class A3 retail floorspace, 615sqm of leisure floorspace (Class D2), 719sqm hub space (Class B1/D2) and a 825sqm elevated public garden within the 37-storey building, associated public realm and highways improvements, provision for a new access to the Borough High Street entrance to the Underground Station, cycling parking, car parking, service, refuse and plant areas, and all ancillary or associated works. (Associated listed building consent application ref. 18/AP/4040).</p> | <p>At appeal</p> |

- 3.2 Pre-application advice was given by LBS for the Appeal Schemes and written responses issued, as summarised below.

| Ref No. | Address | Date | Description | Decision |
|--|---|-------------------------------|---|------------------------------|
| 20/EQ/0286 Pre-application advice for what became the 2021 Scheme development proposal for the site | New City Court 4-26 St Thomas Street, London SE1 9RS | Valid 16 December 2020 | Pre-application advice for redevelopment to include demolition of the 1980s office buildings and erection of an office building, restoration and refurbishment of the listed terrace and works to Keats House, provision of retail floorspace, associated public realm and highways improvements, provision for a new LUL station access, cycle parking, car parking, service, refuse and plant areas, and all ancillary or associated works. | Letter sent 17 April 2021 |
| 17/EQ/0208 Pre-application advice for what became the 2018 Scheme | New City Court 4-26 St Thomas Street, London SE1 9RS | Valid 15 August 2017 | Redevelopment of the site for construction of an office building with public terrace and retail space (including changes to listed St Thomas Street terrace to provide retail units), relocation of Keats House and associated public realm and highway works. | Letter sent 19 December 2018 |

- 3.3 An Environmental Impact Assessment scoping opinion for the 2018 Scheme was issued by LBS in October 2018.

| Ref No. | Address | Date | Description | Decision |
|---|---|----------------------------|--|---------------------------------------|
| 18/AP/2633 Scoping opinion for an alternative development proposal for the site, which is subject to | New City Court 4-26 St Thomas Street, London SE1 9RS | Valid 8 August 2018 | Request for an Environmental Impact Assessment (EIA) Scoping Opinion for the redevelopment of the site (comprising numbers 4-16, 20 and 24-26 St Thomas Street) including: Demolition of 20 St Thomas Street and construction of a new office tower building approximately 139m high (comprising double height ground floor reception and retail, 31 storeys of office space, and double height publicly accessible elevated garden and retail unit) totalling 31,200sqm of | Scoping opinion issued 4 October 2018 |

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| another appeal | | | <p>office and retail floorspace. Double basement for servicing, cycle storage, refuse storage and plant, with vehicle access from Kings Head Yard and two disabled parking spaces.</p> <p>Relocation of Keats House (24-26 St Thomas Street) facade 2m to the west in a new stand alone building.</p> <p>Alterations to and restoration of the listed terrace (8-14 St Thomas Street). Up to 1,800sqm of retail and office floorspace in the listed terrace and Keats House.</p> <p>A new access to the London Bridge Underground station.</p> <p>New ground level pedestrian routes and public realm throughout the site with hard and soft landscaping.</p> <p>Ancillary servicing, highway works and associated works.</p> | |
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3.4 Since New City Court (and Keats House behind the retained façades) were constructed in the 1980s there have been a number of planning applications for minor works. The following table provides a summary of the applications since 2000:

| Ref No. | Address | Decision Date | Description | Decision |
|------------|---|---------------|--|----------|
| 18/AP/3093 | New City Court, 20 St Thomas Street, London SE1 9RS | 01 May 2019 | Retrospective Planning application for installation of 1 x new air handling unit and 2 x new air conditioning units to flat roof at the rear of second floor of the existing building following a removal of existing one air conditioning units and relocation of existing three air conditioning units on the same roof. | Granted |
| 11/AP/3137 | New City Court, 20 St Thomas Street, London SE1 9RS | 09 Feb 2012 | Refurbishment of interior of ground and lower ground floors including installation of DDA complaint toilet at G level, male and female showers on LG, removal of some partitions, upgrading of lighting and general decorations and attach new external | Granted |

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| | | | door ironmongery. (Listed building consent) | |
| 11/AP/2696 | New City Court, 20 St Thomas Street, London SE1 9RS | 04 Oct 2011 | Installation of five shower cubicles with localised raised floor, door position adjustment and partitions to the third-floor Georgian terrace. (Listed building consent) | Granted |
| 11/AP/1729 | New City Court, 20 St Thomas Street, London SE1 9RS | 03 Aug 2011 | Removal of non-load bearing partitions, internal doors, services and fan coil enclosures and installation of new fan-coil enclosures with integrated supply extract grills and access panels on the third floor of the Georgian wing. (Listed building consent) | Granted |
| 11/AP/1417 | New City Court, 20 St Thomas Street, London SE1 9RS | 07 Jul 2011 | Replacement of existing entrance doors with a full height glass and stainless steel revolving door. | Granted |
| 09/AP/2348 | New City Court, 20 St Thomas Street, London SE1 9RS | 17 Mar 2010 | Installation of 2 floor mounted AC Units at first floor level in the light well at eastern end of site. | Granted |
| 08/AP/1499 | New City Court, 20 St Thomas Street, London SE1 9RG | 07 Aug 2008 | Installation of 4 no external air conditioning units on rear wall. | Granted |
| 08/AP/1241 | New City Court, 20 St Thomas Street, London SE1 9RG | 14 Jul 2008 | Erection of structural steelwork and installation of a new VRV condensing unit to the second-floor roof level (roof area relating to new plant is approx. 30sqm) | Granted |

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| 08/AP/1216 | New City Court, 20 St Thomas Street, London SE1 9RG | 04 Jul 2008 | First Floor: Opening being formed in existing plasterboard non-structural partition, ceiling made good where new opening formed. Installation of 3 new partitions (non-structural) and door sets. Second Floor: Internal plasterboard (non-structural) partition to be removed. Internal decoration throughout to entrance area, new partition installed and some new lighting and electrical work. (Listed building consent) | Granted |
| 07/AP/1346 | New City Court, 20 St Thomas Street, London SE1 9RS | 06 Aug 2007 | Raise new cooling tower by 300mm to facilitate pipework connections | Granted |
| 07/AP/2290 | New City Court, 20 St Thomas Street, London SE1 9RS | 13 Dec 2007 | Demolition of the external facade of the building and erection of a new facade together with ground floor extension to the front of the building | Granted |
| 07/AP/2294 | New City Court, 20 St Thomas Street, London SE1 9RS | 13 Dec 2007 | Demolition of existing facade (Conservation Area Consent for demolition) | Granted |
| 07/AP/0413 | New City Court, 20 St Thomas Street, London SE1 9RG | 06 Feb 2007 | Replacement of existing cooling tower plant & equipment at roof level. | Granted |
| 02/AP/0458 | 8 St Thomas Street SE1 | 25 Apr 2002 | Removal of internal stud & plaster partitions on ground floor to create open plan office accommodation. (Listed building consent) | Refused |

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| 01/AP/1692 | 24-26 St Thomas Street (Keats House New City Court) SE1 | 20 Dec 2001 | Conversion of basement, ground and first floor to offices. | Granted |
| 01/AP/1589 | 8 St Thomas Street, SE1 | 05 Dec 2001 | Internal alterations to offices on the first floor | Granted |
| 01/AP/0461 | 20 St. Thomas Street SE1 | 13 Jul 2001 | Display of internally illuminated free-standing sign on front forecourt. | Granted |

3.5 The following table provides a summary of the planning decisions for sites within the area that are relevant to the Appeals.

| Ref No. | Address | Date | Description | Decision |
|------------|--|---------|--|----------|
| 20/AP/3013 | Colechurch House, London Bridge Walk, London | Pending | Redevelopment of the site to include demolition of Colechurch House, pedestrian footbridge and walkway and erection of an elevated 22-storey building (+ 4-storey basement) above a public park and providing office floorspace, retail floorspace, restaurant/café floorspace, leisure floorspace (all Use Class E), theatre and a bar (Sui Generis), delivered alongside a replacement pedestrian footbridge, public realm improvements, roof gardens, cycle parking, servicing, refuse, plant areas and other associated works incidental to the development. | Pending |

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| 20/AP/0944 | Becket House, 60-68 St Thomas Street, London, SE1 3QU | 17 Nov 2021 | Redevelopment of the site to include demolition of Becket House and the erection of a 27 storey building with additional level of plant and basement levels in order to provide office use (Class B1), retail (flexible Class A1/A3), cycle parking, servicing, refuse and plant areas, public realm improvements and other associated works incidental to the development. | Granted |
| 19/AP/1649 | 1 Bank End (Site Including Railway Arches And Thames House Bounded By Stoney Street, Clink Street And Park Street) SE1 Known as Borough Yards | 30/10/19 | Variation of condition 2 (approved plans) of planning permission 15/AP/3066 for 'Redevelopment of 1 Bank End, including reuse of railway arches and rebuilding and extension of the rear of Thames House, Park Street (behind retained facade); remodelling of Wine Wharf building on Stoney Street and development of a two storey building at 16 Park Street, all to provide a development reaching a maximum height of 6 storeys (maximum building height 27.419m AOD) comprising retail units (flexible class A1 shops, A3 cafes/restaurants and A4 drinking establishments use) at ground and first floor levels, a gallery (Class D1 use) at ground floor level, office floorspace (Class B1 use) at ground up to fifth floor level, a cinema (Class D2 use) at ground floor and basement level, associated cycle parking spaces at basement, associated refuse and recycling with new public access routes and public open space' to make minor-material amendments including: Alterations to internal retail layouts dictated by an updated Fire Strategy, | Granted |

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| | | | <p>Alterations to the west elevation of Building 02,</p> <p>Alterations to the east elevation of Building 02 dictated by change of first floor use; and</p> <p>Alterations to elevations of Building 04.</p> | |
| 19/AP/0830 | <p>Landmark Court (15 and 17-33 Southwark Street), Land Bounded By Southwark Street, Redcross Way And Cross Bones Graveyard, London, SE1 1RQ</p> | 5/1/21 | <p>Mixed-use development involving the demolition of 25-33 Southwark Street, the restoration of 15 Southwark Street for residential use and the erection of new buildings comprising: a part 6/8/9-storey office (Class B1) building incorporating a single-storey basement, flexible ground floor uses (Classes A1/A2/A3/A4 and D2) and workspace units (Class B1); a 3-storey workshop building (Class B1); a marketplace with up to 9 permanent stalls (Class A1); 36 residential units in the refurbished 15 Southwark Street building and a new 8-storey block; associated areas of new public realm; hard and soft landscaping; enhancements to Crossbones Burial Ground; means of access and enclosure, and; ancillary plant and equipment.</p> | Granted (now constructed) |
| 19/AP/0405 | <p>Kings College London</p> <p>Land Rear Of 89-111 Borough High Street London SE1</p> | Pending | <p>Demolition of six existing buildings, and development of a new student residential environment (Student Village) to provide 520 sqm of commercial space at ground floor and 370 new single occupancy student bedrooms and communal kitchens and common rooms, community and commercial uses at ground floor, and new public realm and landscaping. The scheme involves the construction of four blocks consisting of a four</p> | Pending |

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| | | | storey block adjacent to The George Inn, with additional blocks being part four part seven, part five part eight and rising to a maximum height of nine stories. | |
| 19/AP/0404 | 40-44 Bermondsey Street Vinegar Yard Warehouse 9-17 Vinegar Yard And Land Adjacent To 1-7 Snowfields, London, SE1 | Pending | Demolition of existing buildings at 40-44 Bermondsey Street including partial demolition, rebuilding and refurbishment of existing Vinegar Yard Warehouse and erection of three new buildings (two linked) with up to two levels of basement and heights ranging from five storeys (24.2m AOD) to 17 storeys (67m AOD) to provide office space (Class B1); flexible retail space (Classes A1/A2/A3/A4/A5); new landscaping and public realm; reconfigured pedestrian and vehicular access; associated works to public highway; ancillary servicing; plant; storage and associated works. | Pending |
| 18/AP/4171 | Land Bounded By St Thomas Street Fenning Street Vinegar Yard And Snowfields Including Nos. 1-7 Fenning Street And No. 9 Fenning Street, London, SE1 3QR | Pending | Redevelopment of the site to include the demolition of existing buildings, retention, refurbishment and use of the warehouse as a retail and community space and the erection of a ground, mezzanine and 18 storey building (with plant at roof) and 3 basement levels, comprising new office space, a medical or research and development space, flexible retail at ground floor and affordable workspace, alongside cycle parking, servicing, refuse and plant areas, soft and hard landscaping, highway improvements and all other associated works. | Subject to Mayoral Call-in. The Mayor has resolved to grant planning permission subject to the conclusion of a s106 legal agreement. |

| | | | | |
|------------|---|-------------|--|---------------------------|
| 18/AP/0900 | Capital House, 42-46 Weston Street, London, SE1 3QD | 17 Dec 2020 | Redevelopment of the site to include the demolition of Capital House 42-46 Weston Street SE1 with the erection of a 39-storey building (3 basement levels and ground with mezzanine and 38 storeys) of a maximum height of 137.9m (AOD) to provide up to 905 student accommodation units (Sui Generis use), flexible retail/café/office floorspace (Class A1/A3/B1), cycle parking, servicing, refuse and plant areas, public realm improvements and other associated works incidental to the development. | Granted |
| 14/AP/1302 | Fielden House, 28-42 London Bridge Street and 21-27 St Thomas Street (now Shard Place) | 29/12/14 | 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. | Granted (now constructed) |
| 13/AP/1714 | 127-134 Borough High Street, SE1 1NP | 21/2/14 | The demolition of several existing structures and construction of a six storey hotel with 100 bed spaces (4,006 sqm GIA) (Use Class C1), two commercial units (576sqm GIA) (Use Classes A1 - A3), a gym (492sqm GIA) (Use Class D2). Reconfiguration of a Listed Building to provide a ground floor retail unit (Use Class A1) (55sqm GIA) with 1, two bedroom residential unit (102sqm GIA) (Use Class C3) on the upper floors; servicing, | Granted (now constructed) |

| | | | | |
|--|--|----------|--|---------------------------|
| | | | landscaping, alterations to vehicular and pedestrian accesses and associated works. | |
| 01/AP/0476 Appeal reference APP/A5840/ V/02/1095887 | London Bridge Station (now The Shard) | 18/11/03 | Demolition of the existing Southwark Towers and construction of a mixed use building, 306m high, (London Bridge Tower) totalling 124,242sq.m. 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, in accordance with application no.0100476, as amended. | Granted (now constructed) |

4. 2018 SCHEME PROPOSALS

- 4.1 The 2018 Scheme includes demolition and removal of the existing 1980s components of the Site and construction of a 37-storey building (including ground, mezzanine and two storeys of plant) extending to 144m AOD, providing office (Class B1), retail (Class A1) and leisure (Class D2) floorspace. A hub space (Class B1 / D2) will be provided at 21st and 22nd floor level with a 250-seater auditorium and outdoor terrace for both office and wider commercial use, alongside an elevated double height public garden (accessible free of charge) at fifth and sixth floor level with a café/restaurant (Class A3) and outdoor terrace. The elevated garden would have a dedicated lift access. The two basement levels would provide the gym, a service yard, plant rooms, cycle parking and shower facilities, substations and a building management office.
- 4.2 In addition, the 2018 Scheme also include the restoration, refurbishment and further alterations of the listed Georgian terrace along St Thomas Street to provide retail and office accommodation, including affordable retail and affordable workspace (office) provision. The façades of Keats House will be dismantled and relocated 2.7m to the west to form the frontage of a new standalone building, providing office and food & drink floorspace. (As noted in Section 3 of this Statement above, a standalone planning application would be required for minor works to Conybeare House once the 1980s building behind the Keats House facade is demolished (and the façade relocated). These works do not form part of the 2018 Scheme, and a further grant of planning permission would therefore be required in the event of a positive appeal decision.) A listed building consent application proposes the internal and external works to the Georgian terrace, to rebuild the rear elevation once the 1980s office has been demolished and rearrange the internal layouts of the buildings.
- 4.3 A breakdown of the proposed floorspace is provided in Table 1 below. Due to the timing of the submission of the 2018 Scheme, the use classes in force at the time remain applicable.

Table 1 – Proposed Land Uses & Floor Areas

| Use | Use Class | GIA (sqm) |
|----------------------|---------------|---------------|
| Office | Class B1 | 46,374 |
| Retail | Class A1 | 765 |
| Food and Drink | Class A3 | 1,139 |
| Gym | Class D2 | 615 |
| Public Garden Access | Class D2 | 825 |
| Hub Space | Class B1 / D2 | 719 |
| Servicing | - | 1,918 |
| Plant | - | 2,146 |
| Total | - | 54,501 |

- 4.4 The 2018 Scheme includes new public realm and pedestrian routes, providing enhanced connectivity through the provision of a new entrance to London Bridge Underground Station (subject to approval by London Underground Limited) and a new public square. The Appellant intends to enter into a Section 106 Agreement in respect of the 2018 Scheme (to which Transport for London will be a party) that will ensure that the new station entrance is provided prior to occupation of the 2018 Scheme. The square and new public routes will include landscaping, trees and street furniture.
- 4.5 The 2018 Scheme will be predominately car-free, with the exception of two blue badge car parking spaces. Cycle facilities will be provided for employees and visitors, with a total of 1,322 cycle parking spaces, 447 lockers and 70 showers.
- 4.6 The separation of Keats House from Conybeare House (the façades with a new building behind to be relocated approximately 2.7 metres to the west) will facilitate service access onto the Site from a loading bay on St Thomas Street for HGVs and refuse vehicles. LGVs and cars will access an on-site loading bay at basement level via White Hart Yard. Two vehicle lifts are proposed to be installed at the rear of the proposed tower to allow for servicing and delivery access for the smaller vehicles at lower basement level, as well as providing access for the two accessible parking spaces.

5. 2021 SCHEME PROPOSALS

- 5.1 The 2021 Scheme comprises demolition and removal of the existing 1980s components of the Site and construction of a 26-storey building (plus mezzanine and two basement levels) extending to 108 m (AOD), providing office floorspace (Class E), with flexible office/retail floorspace (Class E) at ground floor level. A publicly accessible garden with no entrance fee will be provided at roof level, with landscaping and a café and a restaurant providing food and drink floorspace (Class E). The two basement levels would accommodate plant rooms, cycle parking and shower facilities, substations and a building management office.
- 5.2 In addition, the 2021 Scheme also include the restoration, refurbishment and further alterations of the listed Georgian terrace along St Thomas Street, and the relocation of the original main and side façades of Keats House, which will be dismantled and relocated approximately 6 m to the west. The Georgian terrace units, the reconstructed Keats House and the lower floors of the proposed tower will provide affordable workspace. (As noted in Section 3 of this Statement above, a standalone planning application would be required to make good Conybeare House once Keats House is relocated. These works do not form part of the 2021 Scheme, and a further grant of planning permission would therefore be required in the event of a positive appeal decision.) A listed building consent application proposes the internal and external works to the Georgian terrace, to rebuild the rear elevation once the 1980s office has been demolished and rearrange the internal layouts of the buildings.
- 5.3 A breakdown of the proposed floorspace is provided in Table 2 below.

Table 2 – Proposed Land Uses & Floor Areas

| Use | Use Class | GIA (sqm) |
|--------------------------|-------------|-----------|
| Office | Class E | 44,141 |
| Affordable Workspace | Class E | 4,908 |
| Flexible Office / Retail | Class E | 328 |
| Food and Drink | Class E | 421 |
| Rooftop Garden Access | Sui Generis | 183 |

| | | |
|-----------------------------|---|---------------|
| Shared Facilities and Plant | - | 5,480 |
| Total | - | 55,461 |

- 5.4 The proposed public realm will provide new connections and improved permeability throughout the Site, centred around a public arcade ('the Gallery') which will link St Thomas Street to the proposed new station entrance to London Bridge Underground Station (subject to approval by London Underground Limited). The Appellant intends to enter into a Section 106 Agreement in respect of the 2021 Scheme (to which Transport for London will be a party) that will ensure that the new station entrance is provided prior to occupation of the 2021 Scheme. The proposed public realm will include landscaping, planting and street furniture.
- 5.5 The 2021 Scheme will also provide extensive cycle facilities for employees and visitors, with a total of 1,322 cycle parking spaces, 515 lockers and 79 showers. The development will be predominately car-free, with the exception of two blue badge car parking spaces provided onsite at grade.
- 5.6 With regards to servicing, the relocation of Keats House to the west will facilitate access to a dedicated ground level onsite service yard from St Thomas Street. All servicing will take place onsite, minimising impacts on the street.

6. 2018 SCHEME PRE-APPLICATION CONSULTATION

- 6.1 The Appellant undertook a full programme of consultation with LBS, statutory consultees, local residents and other key stakeholders prior to the submission of the 2018 Scheme. This section provides an overview of the measures taken to engage with these parties.

Pre-Application Discussions

- 6.2 Pre-application discussions were held with LBS and other statutory and non-statutory consultees and in the lead up to the submission of the 2018 Scheme.
- 6.3 Pre-application meetings were held with LBS officers on the following dates and LBS issued its written response on 19th December 2018:

| | | | |
|--------|------------|--------|------------|
| 6.3.1 | 27/08/2015 | 6.3.12 | 13/11/2017 |
| 6.3.2 | 17/05/2017 | 6.3.13 | 07/12/2017 |
| 6.3.3 | 23/05/2017 | 6.3.14 | 22/01/2018 |
| 6.3.4 | 19/06/2017 | 6.3.15 | 16/04/2018 |
| 6.3.5 | 03/07/2017 | 6.3.16 | 17/05/2018 |
| 6.3.6 | 17/07/2017 | 6.3.17 | 24/05/2018 |
| 6.3.7 | 25/07/2017 | 6.3.18 | 07/08/2018 |
| 6.3.8 | 31/07/2017 | 6.3.19 | 24/09/2018 |
| 6.3.9 | 14/08/2017 | 6.3.20 | 08/10/2018 |
| 6.3.10 | 24/08/2017 | 6.3.21 | 31/10/2018 |
| 6.3.11 | 11/09/2017 | 6.3.22 | 22/11/2018 |

- 6.4 Separately, the proposals were presented to the Greater London Authority (GLA) and Transport for London (TfL) on 30th August 2017. A follow-up meeting was held with the GLA on 8th February 2018. Follow-up meetings were held with TfL on 10th June 2018 and 14th August 2018.
- 6.5 The 2018 Scheme was presented to the Design Council Commission for Architecture and the Built Environment (CABE) Design Review on 16th May 2018 and 29th October

2018, with formal written responses issued by CABE on 1st June 2018 and 13th November 2018.

- 6.6 In addition, the Appellant consulted with a number of key stakeholders, including Historic England, Historic Royal Palaces, Southwark Cathedral, local amenity groups, and other local stakeholders.
- 6.7 The Appellant carried out several public consultation exercises prior to the submission of the Application which were intended to initiate a dialogue between the Appellant, key stakeholders and the local community in order to understand their objectives, aspirations and expectations.
- 6.8 The Appellant held several public exhibition events throughout 2018:
 - 6.8.1 18th July 2018: Public Exhibition at Guy's and St Thomas' Hospital;
 - 6.8.2 19th – 21st July 2018: Public Exhibition at the London Bridge Hotel;
 - 6.8.3 12th – 13th October 2018: Public Exhibition at the London Bridge Hotel;
 - 6.8.4 14th October 2018: Invite only Public Exhibition for Southwark Cathedral at The London Bridge Hotel; and
 - 6.8.5 17th October 2018: Survey at Guy's and St Thomas' Hospital.
- 6.9 In total, 43 people attended the exhibitions, all of whom were offered a feedback form to complete.
- 6.10 In addition, a website was set up displaying information about the proposals, which was updated throughout the public consultation and planning process. The application for the 2018 Scheme was submitted on 11th December 2018.
- 6.11 On 22nd October 2020 the Appellant asked (in an email) that the applications be put on hold by LBS as an alternative scheme was being progressed. The alternative scheme became the 2021 Scheme.

7. 2021 SCHEME PRE-APPLICATION CONSULTATION

- 7.1 Prior to the submission of the 2021 Scheme, the Appellant undertook a programme of consultation with LBS, statutory consultees, local residents and other key stakeholders. This section provides an overview of the measures taken to engage with these parties.

Pre-Application Discussions

- 7.2 Pre-application discussions were held with LBS and other statutory and non-statutory consultees in the lead up to the submission of the 2021 Scheme.
- 7.3 Pre-application meetings were held with LBS officers on the following dates, and LBS issued its written response on 17th April 2021:

7.3.1 15/10/2020

7.3.2 16/11/2020

7.3.3 02/12/2020

7.3.4 16/12/2020

7.3.5 07/04/2021

- 7.4 Separately, the proposals were presented to the GLA and TfL on 9th February 2021. A follow-up meeting with GLA design officers was held on 19th March 2021.
- 7.5 The proposals were not subject to a design review process before the application for planning permission was made.
- 7.6 In addition, the Appellant has consulted with a number of key stakeholders, including Historic England (18 March 2021), Historic Royal Palaces (19 March 2021), Southwark Cathedral (23 March 2021), local ward councillors (16 March 2021), and other local stakeholders between March and April 2021.
- 7.7 Owing to restrictions relating to the ongoing COVID-19 pandemic, the Appellant held a virtual public exhibition of the proposals on a dedicated consultation website from 18th March 2021 to 7th April 2021. By 13th April 2021, 185 users had visited the website in over 217 sessions since its launch in March 2021.

7.8 In addition, a newsletter advertising the website, proposals, and contact details of the project team was distributed to 1,729 local addresses on 24th March 2021. For those unable to access the internet, each newsletter included a freepost form to request physical copies of the virtual public exhibition materials, and project team telephone number, with arrangements made for recipients to participate in the consultation by their preferred means. The application for the 2021 Scheme was submitted on 21st April 2021.

8. RELEVANT PLANNING POLICY

8.1 It is agreed that the development plan for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004 comprises the following:

- 8.1.1 The London Plan (adopted March 2021); and
- 8.1.2 The Southwark Plan 2019-2036 (2022).

National Planning Policy Framework (NPPF)

8.2 Relevant National Planning Policies are contained within the National Planning Policy Framework (NPPF), published July 2021. Of most direct relevance to the Appeals are the following:

- 8.2.1 Section 2 - Achieving sustainable development
- 8.2.2 Section 6 - Building a strong, competitive economy
- 8.2.3 Section 7 - Ensuring the vitality of town centres
- 8.2.4 Section 8 - Promoting healthy and safe communities
- 8.2.5 Section 9 - Promoting sustainable transport
- 8.2.6 Section 11 - Making effective use of land
- 8.2.7 Section 12 - Achieving well-designed places
- 8.2.8 Section 14 - Meeting the challenge of climate change, flooding and coastal change
- 8.2.9 Section 15 - Conserving and enhancing the natural environment
- 8.2.10 Section 16 - Conserving and enhancing the historic environment.

Planning Practice Guidance (PPG)

8.3 The PPG sets out guidance with regards to key issues contained within the NPPF. This should be taken into account when assessing the application as a material consideration. Of most direct relevance to the Appeals are the following:

- 8.3.1 Air quality

- 8.3.2 Climate change
- 8.3.3 Community Infrastructure Levy
- 8.3.4 Design: process and tools
- 8.3.5 Effective use of land
- 8.3.6 Environmental Impact Assessment
- 8.3.7 Fire safety and high-rise residential buildings
- 8.3.8 Flood risk and coastal change
- 8.3.9 Healthy and safe communities
- 8.3.10 Historic environment
- 8.3.11 Land affected by contamination
- 8.3.12 Light pollution
- 8.3.13 Natural environment
- 8.3.14 Noise
- 8.3.15 Planning obligations
- 8.3.16 Town centres and retail
- 8.3.17 Travel plans, transport assessments and statements
- 8.3.18 Water supply, wastewater and water quality.

Regional and Local Policies

- 8.4 It is agreed that the following development plan policies are relevant to the Appeals as set out below.

8.4.1 London Plan policies:

- Policy GG1 - Building strong and inclusive communities
- Policy GG2 - Making the best use of land
- Policy GG3 - Creating a healthy city
- Policy GG5 - Growing a good economy
- Policy GG6 - Increasing efficiency and resilience
- Policy SD1 - Opportunity Areas
- Policy SD4 - The Central Activities Zone (CAZ)
- Policy SD5 - Offices, other strategic functions and residential development in the CAZ
- Policy SD6 - Town centres and high streets

- Policy SD7 - Town centres: development principles and Development Plan Documents
- Policy D1 - London's form, character and capacity for growth
- Policy D2 - Infrastructure requirements for sustainable densities
- Policy D3 - Optimising site capacity through the design-led approach
- Policy D4 - Delivering good design
- Policy D5 - Inclusive design
- Policy D8 - Public realm
- Policy D9 - Tall buildings
- Policy D10 - Basement development
- Policy D11 - Safety, security and resilience to emergency
- Policy D12 - Fire safety
- Policy D14 - Noise
- Policy S1 - Developing London's social infrastructure
- Policy S6 - Public toilets
- Policy E1 - Offices
- Policy E2 - Providing suitable business space
- Policy E3 - Affordable workspace
- Policy E8 - Sector growth opportunities and clusters
- Policy E9 - Retail, markets and hot food takeaways
- Policy E10 - Visitor infrastructure
- Policy E11 - Skills and opportunities for all
- Policy HC1 - Heritage conservation and growth
- Policy HC2 - World Heritage Sites
- Policy HC3 - Strategic and Local Views
- Policy HC4 - London View Management Framework
- Policy HC5 - Supporting London's culture and creative industries
- Policy HC6 - Supporting the night-time economy
- Policy G1 - Green Infrastructure
- Policy G4 - Open Space
- Policy G5 - Urban greening
- Policy G6 - Biodiversity and access to nature
- Policy G7 - Trees and woodlands
- Policy SI 1 - Improving air quality

- Policy SI 2 - Minimising greenhouse gas emissions
- Policy SI 3 - Energy infrastructure
- Policy SI 4 - Managing heat risk
- Policy SI 5 - Water infrastructure
- Policy SI 6 - Digital connectivity infrastructure
- Policy SI 7 - Reducing waste and supporting the circular economy
- Policy SI 10 - Aggregates
- Policy SI 12 - Flood risk management
- Policy SI 13 - Sustainable drainage
- Policy T1 - Strategic approach to transport
- Policy T2 - Healthy Streets
- Policy T3 - Transport capacity, connectivity and safeguarding
- Policy T4 - Assessing and mitigating transport impacts
- Policy T5 - Cycling
- Policy T6 - Car parking
- Policy T6.2 - Office parking
- Policy T6.3 - Retail parking
- Policy T6.5 - Non-residential disabled persons parking
- Policy T7 - Deliveries, servicing and construction
- Policy T9 - Funding transport infrastructure through planning
- Policy DF1 - Delivery of the Plan and Planning Obligations

8.4.2 The Southwark Plan

- The Site is within the London Bridge Area Vision, AV.11. The strategic vision and strategic policies of the Southwark Plan set targets for the CAZ and Opportunity Area:
- ST1 Southwark's Development Targets
- ST2 Southwark's Places
- SP2 Southwark Together
- SP3 Great start in life
- SP4 Green and inclusive economy
- SP5 Thriving neighbourhoods and tackling health inequalities
- SP6 Climate emergency

- P13 Design of places
- P14 Design quality
- P16 Designing out crime
- P17 Tall buildings
- P18 Efficient use of land
- P19 Listed buildings and structures
- P20 Conservation areas
- P21 Conservation of the historic environment and natural heritage
- P22 Borough views
- P23 Archaeology
- P24 World Heritage Sites
- P26 Local list
- P28 Access to employment and training
- P30 Office and business development
- P31 Affordable workspace
- P32 Small shops
- P33 Business relocation
- P35 Town and local centres
- P39 Shop fronts
- P44 Broadband and digital infrastructure
- P45 Healthy developments
- P46 Leisure, arts and culture
- P47 Community uses
- P49 Public transport
- P50 Highway impacts
- P51 Walking
- P53 Cycling
- P54 Car parking
- P55 Parking standards for disabled people and the physically impaired
- P56 Protection of amenity
- P59 Green infrastructure
- P60 Biodiversity
- P61 Trees
- P62 Reducing waste

- P64 Contaminated land and hazardous substances
- P65 Improving air quality
- P66 Reducing noise pollution and enhancing soundscapes
- P67 Reducing water use
- P68 Reducing flood risk
- P69 Sustainability standards
- P70 Energy
- IP1 Infrastructure
- IP2 Transport infrastructure
- IP3 Community infrastructure levy (CIL) and Section 106 planning obligations
- IP6 Monitoring development.

Other Material Considerations

8.5 Other material considerations include the following:

8.5.1 London Plan Supplementary Planning Guidance (SPGs):

- Accessible London: Achieving an Inclusive Environment (October 2014)
- Character and Context (June 2014)
- London View Management Framework (March 2012)
- London World Heritage Sites (March 2012)
- Energy Assessment Guidance (updated June 2022)
- Circular Economy Statements LPG - (March 2022)
- Whole-life Carbon Assessments LPG - (March 2022)
- Urban Greening Factor LPG - consultation draft (September 2021)
- Been Seen Energy Monitoring LPG (September 2021)
- Air quality neutral LPG – consultation draft (November 2021)
- Fire Safety LPG – consultation draft (February 2022)
- Optimising site capacity: A design-led approach LPG – consultation draft (February 2022)
- Sustainable transport, walking and cycling LPG – consultation draft (September 2021)

8.5.2 Southwark Supplementary Planning Documents (SPDs):

- Design and Access Statements (2007);
- Sustainable Design and Construction (2009);
- Section 106 Planning Obligations and CIL (Updated 2020);
- Heritage (2021);
- 2015 Technical Update to the Residential Design Standards (2011) Supplementary Planning Document
- Draft Bankside, Borough and London Bridge Supplementary Planning Document (2009).

8.5.3 Southwark Conservation Area Appraisals:

- Borough High Street Conservation Area Appraisal (June 2006).

8.5.4 Historic England advice:

- Good Practice Advice 2 - Managing Significance in Decision-Taking in the Historic Environment, July 2015
- Good Practice Advice 3 – The Setting of Heritage Assets (2nd Edition), December 2017
- Advice Note 2 - Making Changes to Heritage Assets (February 2016)
- Advice Note 4 – Tall Buildings (March 2022)

8.5.5 Tower of London World Heritage Site Management Plan, Historic Royal Palaces (2016).

Site Designations

8.6 The Site is subject to the following designations, as identified in the LBS adopted Policies Map:

- 8.6.1 Central Activities Zone (CAZ);
- 8.6.2 London Bridge District Town Centre;
- 8.6.3 Bankside, Borough and London Bridge Opportunity Area;
- 8.6.4 South Bank Strategic Cultural Quarter;
- 8.6.5 North Southwark and Roman Roads Archaeological Priority Area;
- 8.6.6 Borough High Street Conservation Area;
- 8.6.7 Air Quality Management Area; and

8.6.8 Flood Zone 3.

- 8.7 The Site benefits from the highest Public Transport Accessibility Level (PTAL) rating of 6b, largely attributed to its close proximity to London Bridge Station mainline and London Underground.
- 8.8 The Site is within the wider setting consultation areas of two London View Management Framework views, the London Panoramas from Parliament Hill and Kenwood. The Site is within the wider assessment area of the borough view of St Paul's Cathedral from Nunhead Cemetery.
- 8.9 It is within an area where the Southwark Plan vision for the London Bridge area (AV.11) seeks to harness the expertise and infrastructure from Kings College London, Guy's Hospital and other medical and science facilities to develop a strong, dynamic and specialised local economy that will attract new specialised services and research and promote health and wellbeing in the local environment.

9 MATTERS AGREED BETWEEN THE PARTIES

- 9.1 This section summarises the matters which are agreed between LBS and the Appellant in relation to both Appeal Schemes (unless otherwise stated). Matters relating to townscape, heritage and servicing are dealt with in separate topic-specific statements of common ground.

Submitted Plans and Application Documents

- 9.2 The documents submitted to LBS (as listed at Annex A of this Statement) and the drawings listed at Annex B are those for which any grant of planning permission and listed building consent would relate.
- 9.3 The Appeal Schemes constitute EIA development and an ES was submitted in support of each of the Applications.

Principles of Development

Demolition

- 9.4 It is agreed that the principle of demolition and redevelopment of the existing 1980s element of the Site is acceptable.

Land Use

- 9.5 It is agreed that intensification of office use is acceptable and welcomed in this location within the Central Activities Zone and Opportunity Area.
- 9.6 The proposed introduction of retail floorspace and leisure floorspace (as a gym only in the 2018 Scheme) is supported.
- 9.7 It is agreed that the provision of 10% affordable workspace to be delivered onsite is required under the development plan in relation to each Application, with further details of the discounted market rent(s) for 30 years, the operator(s), marketing requirements,

fit out specification, facilities and eligibility for future occupiers needing to be agreed. This is to be secured by way of a planning obligation.

Tall Building

- 9.8 It is agreed that the Site is located in an area in which LBS expects tall buildings to be located, but the Site itself has not been allocated in the development plan for a tall building. It is agreed that the suitability of any individual site within the area for a proposed tall building therefore falls to be assessed on its individual merits by reference to the criteria in Southwark Plan policy P17 and London Plan policy D9.

Public Realm and Landscaping

- 9.9 The proposed landscaping strategies for both the public realm and public garden spaces should be secured by planning conditions and obligations regarding the planting, materials, wind mitigation, free public access, and the management and maintenance of the spaces.
- 9.10 The Appellant provided a revised urban greening factor calculation for the 2018 Scheme on 21 June 2022 which concludes it has a proposed urban greening factor score of 0.28. A planning condition would be required to detail the additional measures required to achieve the policy requirement of 0.3. The Appellant provided a Biodiversity Net Gain Assessment report for the 2018 scheme on 16 June 2022 which concludes the scheme currently represents a net gain of 41.93%. The Council is currently assessing these recently submitted documents.
- 9.11 The 2021 Scheme has a proposed urban greening factor score of 0.44 which exceeds the policy target score and a biodiversity net gain of 433.32%.

Neighbouring Amenity

- 9.12 It is agreed that the Appeal Schemes would cause reductions in daylight and sunlight to neighbouring properties, as summarised below:

- 9.12.1 **2018 Scheme:** In terms of daylight, this comprises long term, local, insignificant effect to 8 properties; minor adverse effect to 5 properties; and moderate adverse effect to 5 properties. In terms of sunlight, this comprises long term, local, insignificant effect to 14 properties; and moderate adverse effect to 2 properties.
- 9.12.2 **2021 Scheme:** In terms of daylight, the proposals would result in negligible impacts to 4 properties; local, long term minor adverse effects to 9 properties; moderate adverse to 8 properties; and moderate to major adverse to 1 property. With regards to sunlight, the proposals would result in negligible impacts to 19 properties; local, long term and minor adverse impacts to 1 property; and moderate adverse effects to 3 properties.
- 9.13 It is agreed that the harm identified above will need to be considered in the planning balance.
- 9.14 It is agreed that sufficient distance is retained between the subject building and neighbouring buildings as to not result in an undue level of overlooking or loss of privacy or outlook. In order to prevent an undue loss of privacy from the 2021 Scheme, the windows in the south-western corner of the tower may require obscuring or screening to prevent views into the facing residential properties. A condition has been agreed to ensure that the Council approves the final design in this respect.

Transport

- 9.15 The proposed new entrance to London Bridge Underground Station, is supported by LBS and would be a public benefit of the Appeal Schemes if secured and delivered. The Appellant intends to secure this by means of a legal agreement.
- 9.16 The estimated increase in trip generation in both Appeal Schemes would not have a significant adverse effect on the operation of local transport facilities, subject to appropriate financial contributions being made to improve Legible London and cycle hire facilities in the area. It is agreed that such contributions should be secured by planning obligations. A travel plan is agreed to be required to encourage sustainable modes and that this should be secured as a further planning obligation.

- 9.17 The proposed quantum of accessible car parking is agreed with LBS.
- 9.18 It is agreed that the proposed cycle provision for the Appeal Schemes broadly complies with planning policy requirements and is therefore accepted, subject to securing further details by way of planning conditions, and planning obligations for the highway works to provide the on-street cycle parking, and financial contribution towards cycle hire facilities in the area.

Energy and Sustainability

- 9.19 With regards to the 2018 Scheme, it is agreed that the proposals would achieve an overall reduction of 32% in carbon emissions, which would be increased through a revised energy strategy (secured by planning obligation) to achieve the minimum 40% on-site reduction policy requirement.
- 9.20 With regards to the 2021 Scheme, it is agreed that the proposals would achieve an overall on-site reduction of 49% in regulated carbon emissions, which exceeds the 40% minimum on-site requirement and includes a 31% carbon emissions improvement over the baseline with passive design measures only.
- 9.21 A carbon offset contribution will be secured via legal agreement to mitigate the zero-carbon shortfall of each scheme, alongside the on-going monitoring requirements of the “Be Seen” element of the London Plan policy.
- 9.22 The submitted Sustainability Strategy for each scheme demonstrates that a BREEAM Excellent rating would be targeted for the new build element of both Appeal Schemes, which complies with the minimum policy requirement of the Southwark Plan. The Appellant provided revised BREEAM pre-assessments for the new build elements of both Appeal schemes on 14 June 2022 which indicate how it considers the BREEAM Outstanding target can be met.
- 9.23 The submitted Sustainability Strategy for each scheme demonstrates that a BREEAM Very Good rating would be targeted for the Georgian terrace, which is below the minimum policy requirement of the Southwark Plan. The Appellant has suggested that

a BREEAM Excellent rating cannot be achieved but LBS does not consider that the documentation submitted is sufficient to show why this cannot be achieved.

- 9.24 The requirement to provide a Whole-Life Cycle Carbon Assessment and Circular Economy Statement for the pre-commencement and completion stages would be secured by condition on any permission relating to the 2018 Scheme.
- 9.25 For the 2021 Scheme, submitted documents regarding whole-life carbon and circular economy have addressed London Plan policy requirements for this initial planning stage. These documents would need to be developed further to ensure policy compliance, secured by conditions, for the pre-commencement and completion stages.

Noise

- 9.26 It is agreed that the proposals are acceptable in terms of noise impacts, subject to mitigation secured by planning conditions.

Basement Extension

- 9.27 It is agreed that the proposed basement is acceptable, subject to securing compliance with an updated Basement Impact Assessment by way of a planning condition.
- 9.28 It is agreed that the proposals are acceptable in terms of archaeological impacts, subject to mitigation secured by planning conditions and planning obligation.

Flood Risk, Drainage and Water

- 9.29 It is agreed that there are no concerns with regards to flood risk, subject to inclusion of a planning condition to ensure that the flood barriers and defence systems are installed in accordance with the submitted details. Further details of the sustainable drainage system would be required by a planning condition.
- 9.30 Thames Water has identified that the water network infrastructure is unable to accommodate the demands of the Appeal Schemes. It is agreed that a condition will be

required in order to secure the necessary network upgrade, and to protect water infrastructure during construction.

Contamination

- 9.31 The Appeal Schemes comply with the relevant development plan policies in respect of contamination and are therefore agreed, subject to the imposition of planning conditions.

Microclimate

- 9.32 It is agreed that the wind impacts resulting from the Appeal Schemes are generally acceptable and any minor issues could be overcome by way of tree planting in the ground level public realm, screening to the terraces and balconies, and further testing of these to demonstrate suitability and safety shall be subject to planning conditions and a planning obligation.

Fire Safety and Security

- 9.33 No fire safety information was provided with the application for the 2018 Scheme, and planning conditions to require a fire statement and fire evacuation lifts would be necessary on any permission to address the development plan policy.
- 9.34 The proposed fire safety strategy submitted with the application for the 2021 Scheme complies with the development plan and is therefore agreed. Compliance with the submitted strategy would be secured by planning condition, alongside other conditions relating to provision of fire evacuation lifts.
- 9.35 It is agreed that the Appeal Schemes have been designed using Secured by Design principles and details of the further security measures for the buildings and public realm would be required by planning conditions.

Solar Glare

- 9.36 It is agreed that the Appeal Schemes are acceptable in terms of solar glare impacts and that the final material selection will seek to reduce solar glare (as secured by a planning condition).

Air Quality

- 9.37 It is agreed that the Appeal Schemes are Air Quality Neutral and that mitigation measures are required during demolition and construction stages.

Telecommunications, TV and Radio Reception

- 9.38 It is agreed that the Appeal Schemes do not raise telecommunications or radio reception impacts. A mitigation plan for any properties that experience TV reception impacts would be secured by a condition.

Aviation Safety

- 9.39 It is agreed that the Appeal Schemes do not raise aviation safety concerns, and details of the crane lighting would be included in the construction management plan.

10 PUBLIC BENEFITS

- 10.1 The following table provides a summary of the public benefits to be delivered by the Appeal Schemes which has agreed between parties:

The 2018 Scheme

- 10.1.1 Provision of 46,374 sqm of Grade A office accommodation, resulting in an uplift of 33,611 sqm of office floorspace across the Site (7.2% of Southwark's net additional office floorspace target with the total minimum based on the Canada Water Masterplan or 4.7% of Southwark's net additional office floorspace target with the total maximum based on Canada Water Masterplan as set out in Table A of the Southwark Plan 2022).
- 10.1.2 Provision of 9.7% of the office floorspace as flexible, affordable workspace space, designed to meet the needs of a range of occupiers, including small local businesses and start-ups, and a payment in lieu for the on-site shortfall.
- 10.1.3 Provision of 181sqm of affordable retail space.
- 10.1.4 A Business hub space at 21st and 22nd floor level providing business support functions for office tenants, but by making it available to the wider surrounding community, with an opportunity to host public events throughout the year would be of public benefit.
- 10.1.5 Provision of 1,904 sqm of retail floorspace/food and drink floorspace and 615 sqm of leisure floorspace, contributing towards the vitality of London Bridge town centre and activating the proposed public realm.
- 10.1.6 Provision of construction jobs on site throughout the demolition and construction period. The Appellant estimates 225 full time equivalent construction jobs throughout the demolition and construction period resulting in a total local expenditure of circa. £3.4m over the construction period¹.
- 10.1.7 Provision of a net increase of jobs across the Site during operation, supporting an increase in local expenditure. The Appellant estimates the

¹ To note that a revised socio-economic report is being prepared as part of the Appellant's evidence and as such these figures may be updated.

development to support an uplift of approximately 1,905 full time equivalent jobs, supporting an increase in local expenditure of circa. £3.5m each year².

- 10.1.8 New access to the London Bridge Underground Station (subject to London Underground approval), providing an enhanced point of arrival and departure for users of the network alongside a new permeable route through the Site to the station for pedestrians using St Thomas Street, alleviating pressure at the current station exit point on the east side of Borough High Street and improving pedestrian comfort levels on the pavement.
- 10.1.9 Creation of fully accessible, public realm, providing enhanced connectivity through new public routes and public spaces.
- 10.1.10 Provision of a publicly accessible office entrance space at ground floor level.
- 10.1.11 Provision of a free-to-access public garden at fifth floor level, maintained by the building owner, activated by landscaping, a café/restaurant offer, public toilet and rest facilities to provide amenity for visitors.
- 10.1.12 Sympathetic restoration and improvement of the Grade II-listed Georgian terrace buildings along St Thomas Street, which overall would enhance the character and appearance of the listed buildings. LBS's position is that although the introduction of shopfronts at the rear represents a small degree of harm, that would be outweighed by the wider package of benefits proposed in the listed building consent proposal.
- 10.1.13 Delivery of a development which incorporates a range of zero carbon measures, with commitment to deliver an onsite reduction in regulated carbon emissions of at least 40% across the Site, whilst targeting BREEAM 'Outstanding' for the office building.
- 10.1.14 Provision of visible urban greening of public realm and amenity spaces and a biodiversity net gain across the Site, contributing towards London's green infrastructure and biodiverse urban fabric. The Appellant provided a Biodiversity Net Gain Assessment report for the 2018 scheme on 16 June 2022 which concludes the scheme currently represents a net gain of 0.04 habitat units (41.93%).

² As above

- 10.1.15 Significant Mayoral and Southwark Community Infrastructure Levy (CIL) and section 106 contributions to assist in the provision of infrastructure improvements.

The 2021 Scheme

- 10.1.16 Provision of 49,049 sqm of Grade A office accommodation, resulting in an uplift of 36,286 sqm of office floorspace across the Site (7.7% of Southwark's net additional office floorspace target with the total minimum based on the Canada Water Masterplan or 5.2% of Southwark's net additional office floorspace target with the total maximum based on Canada Water Masterplan as set out in Table A of the Southwark Plan 2022).
- 10.1.17 Provision of 10% of the office floorspace as flexible, affordable workspace space, designed to meet the needs of a range of occupiers, including small local businesses and start-ups.
- 10.1.18 Provision of 749 sqm of flexible office/retail floorspace, and food and drink floorspace, contributing towards the vitality of London Bridge town centre and activating the proposed public realm.
- 10.1.19 Provision of construction jobs on site throughout the demolition and construction period. The Appellant estimates 270 full time equivalent construction jobs throughout the demolition and construction period resulting in a total local expenditure of circa. £4.0m over the construction period³.
- 10.1.20 Provision of a net increase of jobs across the Site during operation, supporting an increase in local expenditure. The Appellant estimates the development to support an uplift of approximately 2,690 full time equivalent jobs, supporting an increase in local expenditure of circa. £5.8m⁴ each year.
- 10.1.21 New access to the London Bridge Underground Station (subject to London Underground approval), providing an enhanced point of arrival and departure for users of the network alongside a new permeable route though the Site to the station for pedestrians using St Thomas Street, alleviating pressure at the

³ As above

⁴ As above

current station exit point on the east side of Borough High Street and improving pedestrian comfort levels on the pavement.

- 10.1.22 Creation of fully accessible, public realm, providing enhanced connectivity through new public routes and public spaces.
- 10.1.23 Provision of a free-to-access public garden at roof level, maintained by the building owner, activated by landscaping, a café/restaurant offer, public toilet and rest facilities to provide amenity for visitors.
- 10.1.24 Sympathetic restoration and improvement of the Grade II-listed Georgian terrace buildings along St Thomas Street, enhancing the character and appearance of the listed buildings.
- 10.1.25 Delivery of a development which incorporates a range of zero carbon measures, with commitment to deliver an onsite reduction in regulated carbon emissions of at least 40% across the Site, whilst targeting BREEAM 'Outstanding' for the office building.
- 10.1.26 Provision of visible urban greening of public realm and amenity spaces and a biodiversity net gain across the Site of 0.43 habitat units (433.32%), contributing towards London's green infrastructure and biodiverse urban fabric.
- 10.1.27 Significant Mayoral and Southwark Community Infrastructure Levy (CIL) and section 106 contributions to assist in the provision of infrastructure improvements.

11 CONDITIONS AND PLANNING OBLIGATIONS

Proposed Planning Conditions

- 11.1 A schedule of conditions will be agreed between LBS and the Appellant and time is expected to be included in the inquiry timetable to discuss and finalise these.

Planning Obligations

- 11.2 Both parties will seek to ensure that the final draft Section 106 legal agreement for both Appeal Schemes is submitted to the Planning Inspectorate as early as possible and in accordance with the appeal timetable.

12 MATTERS NOT AGREED

12.6 At present, the following matters are not agreed between the Appellant and LBS in relation to the 2018 Scheme:

12.6.1 The degree of harm to the significance of heritage assets and whether the public benefits of the proposals outweigh this;

12.6.2 Whether the scale and design of the proposed development is acceptable and appropriate for the site and its surrounding context, having regard to the impact on the townscape, local character, heritage assets and strategic views, especially due to the proposed tall building, its design and massing;

12.6.3 Whether the proposed servicing arrangements are acceptable; and

12.6.4 The absence of a planning agreement to secure the mitigation and policy compliance on matters including affordable workspace, carbon off-set, transport mitigation and Underground entrance.

12.7 At present, the following is not agreed between the Appellant and LBS in relation to the 2021 Scheme:

12.7.1 The degree of harm to the significance of heritage assets and whether the public benefits of the proposals outweigh this;

12.7.2 Whether the scale and design of the proposed development is acceptable and appropriate for the site and its surrounding context, having regard to the impact on the townscape, local character, heritage assets and strategic views, especially due to the proposed tall building, its design and massing; and

12.7.3 The absence of a planning agreement to secure the mitigation and policy compliance on matters including affordable workspace, carbon off-set, transport mitigation and Underground entrance.

12.8 The parties will work together to agree as many of these issues in advance of the inquiry.

David Shiels

15 July 2022

Signed and dated on behalf of the Appellant
DP9 Ltd

A handwritten signature in black ink, appearing to read 'C. W. D. G.', followed by a period.

15 July 2022

Signed and dated on behalf of the Council

ANNEX A

2018 SCHEME - LIST OF APPLICATION DOCUMENTS

| Doc No. | Document Title | Author |
|--|---|--|
| Planning Submission Documents – December 2018 | | |
| 1 | Cover Letter | DP9 |
| 2 | Basement Impact Assessment | AKT II |
| 3 | CIL Additional Information Form | DP9 |
| 4 | Construction Management Plan | Gardiner & Theobald |
| 5 | Delivery, Servicing and Waste Management Plan | TPP |
| 6 | Design and Access Statement | AHMM |
| 7 | Drainage Strategy | AKT II |
| 8 | Economic & Health Report | Volterra Partners |
| 9 | Energy Statement | Chapman BDSP |
| 10 | Environmental Statement Part 1: Main Text | Waterman |
| 11 | Environmental Statement Part 2: Figures | Waterman |
| 12 | Environmental Statement Part 3: Townscape, Visual Impact and Built Heritage Assessment | Peter Stewart Consultancy & Millerhare |
| 13 | Environmental Statement Part 4: Appendices | Waterman |
| 14 | Environmental Statement Part 5: Non-Technical Summary | Waterman |
| 15 | Existing and Proposed Drawings (see Annex B) | AHMM |
| 16 | Flood Risk Assessment | AKT II |
| 17 | Full Planning Permission and Listed Building Consent Application Forms and Ownership Certificates | DP9 |
| 18 | Heritage Statement | Peter Stewart Consultancy |
| 19 | Keats House Façade Survey and Reconstruction Methodology | PAYE |
| 20 | Landscape Strategy | MRG Studio |
| 21 | Listed Building Consent Detailed Study | AHMM |
| 22 | Listed Building Heritage Statement | KMHeritage |
| 23 | Pedestrian Forecast and Landscape Assessment | Space Syntax |
| 24 | Planning Statement (including draft s106 Heads of Terms) | DP9 |
| 25 | Preliminary Ecological Appraisal | Waterman |
| 26 | Social Value Strategy | Greengage |
| 27 | Statement of Community Involvement | Kanda |
| 28 | Structural Statement | AKT II |

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| 29 | Sustainability Strategy (including BREEAM Pre-Assessment) | Chapman BDSP |
| 30 | Telecommunication Network Impact Assessment | G Tech |
| 31 | Television and Radio Reception Impact Assessment | G Tech |
| 32 | Transport Assessment (including Travel Plan) | TPP |
| 33 | Ventilation & Extraction Statement | Chapman BDSP |
| Additional Submission Information (February 2019 – March 2020) | | |
| 34 | Additional page on human comfort for Section 7 of the Landscape Strategy (February 2019) | MRG |
| 35 | Active frontage and fire escape boundary treatment (April 2019) | DP9 |
| 36 | Urban Greening Factor Assessment (3 April 2019) | MRG |
| 37 | Daylight and Sunlight – Guys Chapel (April 2019) | GIA |
| 38 | Gross External Areas (May 2019) | Alinea |
| 39 | Energy Statement (June 2019) | Chapman BDSP |
| 40 | Ventilation and Extraction Statement (June 2019) | Chapman BDSP |
| 41 | Draft Response to March 2019 LUC ES Review Report (August 2019) | Waterman |
| 42 | Daylight and Sunlight Overshadowing Assessment (June 2019) | GIA |
| 43 | New City Court & Southwark Cathedral – Daylight and Sunlight (May 2019) | GIA |
| 44 | Draft Townscape Night View Addendum | Peter Stewart Consultancy |
| 45 | New City Court - Marketing Report (January 2020) | Volterra |
| 46 | The effect of the proposed development on the significance of stained-glass windows in the Chapel of Guy's Hospital (February 2020) | KM Heritage |
| 47 | Updated Response to November 2019 LUC ES Review Report (March 2020) | Waterman |
| 48 | Environmental Statement Clarification Document and ES Addendum (March 2020) and its appendices A-K | Waterman |
| Responses to Consultation Comments (April 2020) | | |
| 49 | Consolidation of deliveries: Independent review undertaken by Davies & Robson (January 2020) | TPP / Davies & Robson |
| 50 | New City Court – Daylight, Sunlight and Overshadowing and Borough Market (27 June 2019) | GIA |
| 51 | Consultation Responses – Comments relating to Drainage (April 2020) | AKT II |
| 52 | AHMM Consultation Response Document (April 2020) | AHMM |
| 53 | New City Court Travel Plan (March 2020) | TPP |

| Submission of ES Addendum (July 2020) | | |
|--|---|----------|
| 54 | Environmental Statement Addendum (June 2020) and appendices A to J | Waterman |
| 55 | Environmental Statement Non-Technical Summary | Waterman |
| 56 | Covering letter | DP9 |
| 57 | Schedule of Additional & Revised Information Submitted to London Borough of Southwark | DP9 |
| 58 | Response to public consultation responses (September 2020) | DP9 |

2021 SCHEME - LIST OF APPLICATION DOCUMENTS

| Doc No. | Document Title | Author |
|---|--|--|
| Planning Submission Documents – April 2021 | | |
| 1 | Cover Letter | DP9 |
| 2 | Basement Impact Assessment | AKT II |
| 3 | Biodiversity Net Gain Report | Waterman |
| 4 | Circular Economy and Whole Life-Cycle Carbon Assessment | Chapman BDSP |
| 5 | CIL Additional Information Form | DP9 |
| 6 | Construction Management Plan | Gardiner & Theobald |
| 7 | Delivery, Servicing and Waste Management Plan | TPP |
| 8 | Design and Access Statement | AHMM |
| 9 | Energy Statement | Chapman BDSP |
| 10 | Fire Statement | Chapman BDSP |
| 11 | Health Impact Assessment | Volterra |
| 12 | Environmental Statement Part 1: Main Text | Waterman |
| 13 | Environmental Statement Part 2: Figures | Waterman |
| 14 | Environmental Statement Part 3: Townscape, Visual Impact and Built Heritage Assessment | Peter Stewart Consultancy & Millerhare |
| 15 | Environmental Statement Part 4: Appendices | Waterman |
| 16 | Environmental Statement Part 5: Non-Technical Summary | Waterman |
| 17 | Existing and Proposed Drawings (see Annex B) | AHMM |
| 18 | Landscape Strategy | MRG Studio |
| 19 | Listed Building Consent Detailed Study | AHMM |
| 20 | Marketing Strategy | Volterra |
| 21 | Pedestrian Forecast and Landscape Assessment | Space Syntax |
| 22 | Planning Application Forms and Ownership Certificate | DP9 |

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| 23 | Planning Statement (including draft s106 Heads of Terms) | DP9 |
| 24 | Statement of Community Involvement | Kanda |
| 25 | Structural Statement | AKT II |
| 26 | Sustainability Statement | Chapman BDSP |
| 27 | Telecommunication Network Impact Assessment | G Tech |
| 28 | Television and Radio Reception Impact Assessment | G Tech |
| 29 | Transport Assessment | TPP |
| 30 | Travel Plan | TPP |
| 31 | Ventilation & Extraction Statement | Chapman BDSP |
| 32 | GLA Whole Life-Cycle Carbon Assessment template | |
| Additional Submission Information - April 2021 to July 2021 | | |
| 33 | Area Schedule Rev A | Alinea |
| 34 | Development Consultation Charter Engagement Summary (Standalone Document) | Kanda |
| 35 | Drainage Plan issued to Thames Water | AKT II |
| 36 | Updated Circular Economy and Whole Life-Cycle Carbon Assessment | Chapman BDSP |
| Planning Amendments – July 2021 | | |
| 37 | Air Quality Neutral Assessment Update | Waterman |
| 38 | Basement Impact Assessment Update | AKT II |
| 39 | Biodiversity Net Gain Report Update | Waterman |
| 40 | Circular Economy and Whole Life Carbon Statement Update | Chapman BDSP |
| 41 | Delivery Servicing and Waste Management Plan Addendum | TPP |
| 42 | Design and Access Statement Addendum | AHMM |
| 43 | Environmental Statement Part 4: Appendix 11.2 Drainage Strategy Update | AKT II |
| 44 | EIA Statement of Conformity | Waterman |
| 45 | Energy Statement Update | Chapman BDSP |
| 46 | Environmental Statement Part 4: Appendix 11.1 Flood Risk Assessment Update | AKT II |
| 47 | GLA Carbon Emission Reporting Spreadsheet | Chapman BDSP |
| 48 | GLA Stage 1 Energy Response Schedule | Chapman BDSP |
| 49 | GLA WLC Assessment Template | Chapman BDSP |
| 50 | Guys Chapel Heritage Report | KM Heritage |
| 51 | Interim Travel Plan Addendum | TPP |
| 52 | July 2021 Cover Letter | DP9 |
| 53 | Landscape Strategy Addendum | MRG Studio |
| 54 | Structural Statement Update | AKT II |

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| 55 | Sustainability Statement Update | Chapman BDSP |
| 56 | Transport Assessment Addendum | TPP |
| 57 | Environmental Statement Part 3: Townscape, Visual Impact and Built Heritage Assessment Addendum | Peter Stewart Consultancy |
| Consultation Responses – September 2021 | | |
| 58 | Area Schedule July 2021 | Alinea |
| 59 | Daylight and Sunlight Images September 2021 Update | GIA |
| 60 | Development Consultation Charter Engagement Summary - September 2021 Update | Kanda |
| 61 | Draft Heads of Terms September 2021 | DP9 |
| 62 | Environmental Statement Chapter 3 – September 2021 Update | Waterman |
| 63 | Environmental Statement Appendix 13.2 – Daylight and Sunlight September 2021 Update | Waterman |
| 64 | Fire Statement September 2021 Update | Chapman BDSP |
| 65 | LBS Response Schedule 15.09.2021 | DP9 |
| 66 | LUC ES Review Response table dated 28 September 2021 | LUC/Waterman |
| 67 | Marketing Strategy September 2021 Update | Volterra |
| | Pedestrian Forecast and Landscape Assessment September 2021 Update | Space Syntax |
| 68 | Response to Transport Comments | TPP |
| 69 | Landscape design responses to concerns raised by Urban Forester | MRG Studio |
| 70 | Statement of Community Involvement September 2021 Update | Kanda |
| 71 | Response to lead local flood authority comments | DP9 email |
| 72 | London Sustainable Drainage Proforma | AKT II |
| 73 | Drainage peak rates and attenuation volumes | AKT II |
| Consultation Responses – October 2021 | | |
| 74 | Delivery, Servicing and Waste Management Plan Update | TPP |
| 75 | Environmental Statement Part 4: Appendix 11.2 Drainage Strategy Update | AKT II |
| 76 | LUC ES Review Response - Annexes 1, 2 and 3 Wind | Wirth |
| 77 | LUC ES Review Response - Annex 4 DS2 NSL Results | GIA |
| 78 | LUC ES Review Response – BH7 (Built Heritage) (October 2021) | LUC and Peter Stewart Consultancy |

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| 79 | ES Review Response – Table BH7 October 2021 | Peter Stewart Consultancy |
| 80 | Environmental Statement Non-Technical Summary October 2021 Update | Waterman |
| 81 | Pedestrian Forecast and Landscape Assessment Update | Space Syntax |
| 82 | Updated NSL Contours for Shard Place | GIA |
| 83 | Updated Environmental Statement Table 13.8 - Effects to VSC and NSL to Surrounding Sensitive Receptors | GIA |
| 84 | ZVI and Heritage Map October 2021 Update | Peter Stewart Consultancy |
| Response to RPS (Shard Quarter) Objection – November 2021 | | |
| 85 | Daylight and Sunlight Response | GIA |
| 86 | Townscape and Built Heritage Response | Peter Stewart Consultancy (The Townscape Consultancy) |
| 87 | Transport Response | TPP |

ANNEX B

2018 SCHEME - LIST OF APPLICATION DRAWINGS⁵

| Drawing Number | Drawing Title | Rev |
|-------------------|--|-----|
| 14032_G_(00)_P119 | Georgian Townhouses Proposed Lower Ground Floor Plan | P01 |
| 14032_G_(00)_P120 | Georgian Townhouses Proposed Ground Floor Plan | P01 |
| 14032_G_(00)_P121 | Georgian Townhouses Proposed First Floor Plan | P01 |
| 14032_G_(00)_P122 | Georgian Townhouses Proposed Second Floor Plan | P01 |
| 14032_G_(00)_P123 | Georgian Townhouses Proposed Third Floor Plan | P01 |
| 14032_G_(00)_P125 | Georgian Townhouses Proposed Roof Floor Plan | P01 |
| 14032_G_(00)_P201 | Georgian Townhouses Proposed North Elevation | P01 |
| 14032_G_(00)_P202 | Georgian Townhouses Proposed East Elevation | P01 |
| 14032_G_(00)_P203 | Georgian Townhouses Proposed South Elevation | P01 |
| 14032_G_(00)_P301 | Georgian Townhouses Proposed Section A-A | P01 |
| 14032_G_(00)_P302 | Georgian Townhouses Proposed Section B-B | P01 |
| 14032_G_(00)_P304 | Georgian Townhouses Proposed Section DD - no.16 | P01 |
| 14032_G_(00)_P305 | Georgian Townhouses Proposed Section EE - no.14 | P01 |
| 14032_G_(00)_P306 | Georgian Townhouses Proposed Section FF - no.10 | P01 |
| 14032_G_(00)_P307 | Georgian Townhouses Proposed Section GG - no.4 | P01 |
| 14032_G_(00)_P308 | Georgian Townhouses Proposed Section HH - no.4 | P01 |
| 14032_G_(00)_P309 | Georgian Townhouses Proposed Section JJ - no.12 | P01 |
| 14032_G_(00)_P401 | Georgian Townhouses Proposed Vault | P01 |
| 14032_G_(01)_P119 | Georgian Townhouses Existing Lower Ground Floor Plan | P01 |
| 14032_G_(01)_P120 | Georgian Townhouses Existing Ground Floor Plan | P01 |
| 14032_G_(01)_P121 | Georgian Townhouses Existing First Floor Plan | P01 |
| 14032_G_(01)_P122 | Georgian Townhouses Existing Second Floor Plan | P01 |
| 14032_G_(01)_P123 | Georgian Townhouses Existing Third Floor Plan | P01 |
| 14032_G_(01)_P125 | Georgian Townhouses Existing Roof Floor Plan | P01 |
| 14032_G_(01)_P201 | Georgian Townhouses Existing North Elevation | P01 |
| 14032_G_(01)_P202 | Georgian Townhouses Existing East Elevation | P01 |
| 14032_G_(01)_P203 | Georgian Townhouses Existing South Elevation | P01 |
| 14032_G_(01)_P204 | Georgian Townhouses Existing Vault Elevation | P01 |
| 14032_G_(01)_P301 | Georgian Townhouses Existing Section A-A | P01 |
| 14032_G_(01)_P302 | Georgian Townhouses Existing Section B-B | P01 |
| 14032_G_(01)_P304 | Georgian Townhouses Existing Section DD - no.16 | P01 |
| 14032_G_(01)_P305 | Georgian Townhouses Existing Section EE - no.14 | P01 |
| 14032_G_(01)_P306 | Georgian Townhouses Existing Section FF - no.10 | P01 |
| 14032_G_(01)_P307 | Georgian Townhouses Existing Section GG - no.4 | P01 |
| 14032_G_(01)_P308 | Georgian Townhouses Existing Section HH - no.4 | P01 |
| 14032_G_(01)_P309 | Georgian Townhouses Existing Section JJ - no.12 | P01 |

⁵ The listed revision number shows the current version of the drawings that the Inspector is asked to consider. All other versions have been superseded. For the purposes of the Appeal, a consolidated pack of drawings has been prepared (and submitted with the Appeal) that can be printed in A3 for ease of reference at the inquiry.

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|--------------------|--|-----|
| 14032_G_(12)_P119 | Georgian Townhouses Lower Ground Floor Demolition Plan | P01 |
| 14032_G_(12)_P120 | Georgian Townhouses Ground Floor Demolition Plan | P01 |
| 14032_G_(12)_P121 | Georgian Townhouses First Floor Demolition Plan | P01 |
| 14032_G_(12)_P122 | Georgian Townhouses Second Floor Demolition Plan | P01 |
| 14032_G_(12)_P123 | Georgian Townhouses Third Floor Demolition Plan | P01 |
| 14032_G_(12)_P125 | Georgian Townhouses Roof Floor Demolition Plan | P01 |
| 14032_G_(12)_P201 | Georgian Townhouses North Elevation Demolition | P01 |
| 14032_G_(12)_P202 | Georgian Townhouses East Elevation Demolition | P01 |
| 14032_G_(12)_P203 | Georgian Townhouses South Elevation Demolition | P01 |
| 14032_G_(12)_P401 | Georgian Townhouses Vaults Demolition | P01 |
| 14032_K_(00)_P119 | Keats House - GA Plan Level B1 - Proposed | P01 |
| 14032_K_(00)_P120 | Keats House - GA Plan Level 00 - Proposed | P01 |
| 14032_K_(00)_P121 | Keats House - GA Plan Level 01 - Proposed | P01 |
| 14032_K_(00)_P122 | Keats House - GA Plan Level 02 - Proposed | P01 |
| 14032_K_(00)_P123 | Keats House - GA Plan Level 03 - Proposed | P01 |
| 14032_K_(00)_P124 | Keats House - GA Plan Roof - Proposed | P01 |
| 14032_K_(00)_P201 | Keats House - GA Elevation North Elevation - Proposed | P01 |
| 14032_K_(00)_P202 | Keats House - GA Elevation West Elevation - Proposed | P01 |
| 14032_K_(00)_P203 | Keats House - GA Elevation South Elevation - Proposed | P01 |
| 14032_K_(00)_P204 | Keats House - GA Elevation East Elevation - Proposed | P01 |
| 14032_K_(00)_P205 | North Elevation Full Tower Proposed | P01 |
| 14032_K_(00)_P301 | Keats House - GA Section AA - Proposed | P01 |
| 14032_K_(00)_P302 | Keats House - GA Section BB | P01 |
| 14032_K_(00)_P303 | Keats House - GA Section CC | P01 |
| 14032_X_(00)_P001 | Location Plan – Existing | P01 |
| 14032_X_(00)_P002 | Location Plan – Proposed | P01 |
| 14032_X_(00)_P118 | Tower TN03 GA Plans - Level B2 | P01 |
| 14032_X_(00)_P119 | Tower TN03 GA Plans - Level B1 | P01 |
| 14032_X_(00)_P120 | Tower TN03 GA Plans - Level G | P01 |
| 14032_X_(00)_P120M | Tower TN03 GA Plans - Level GM | P01 |
| 14032_X_(00)_P121 | Tower TN03 GA Plans - Level 01 | P01 |
| 14032_X_(00)_P122 | Tower TN03 GA Plans - Level 02 | P01 |
| 14032_X_(00)_P123 | Tower TN03 GA Plans - Level 03 | P01 |
| 14032_X_(00)_P124 | Tower TN03 GA Plans - Level 04 | P01 |
| 14032_X_(00)_P125 | Tower TN03 GA Plans - Level 05 | P01 |
| 14032_X_(00)_P126 | Tower TN03 GA Plans - Level 06 | P01 |
| 14032_X_(00)_P127 | Tower TN03 GA Plans - Level 07 | P01 |
| 14032_X_(00)_P128 | Tower TN03 GA Plans - Level 08 | P01 |
| 14032_X_(00)_P129 | Tower TN03 GA Plans - Level 09 | P01 |
| 14032_X_(00)_P130 | Tower TN03 GA Plans - Level 10 | P01 |
| 14032_X_(00)_P131 | Tower TN03 GA Plans - Level 11 | P01 |
| 14032_X_(00)_P132 | Tower TN03 GA Plans - Level 12 | P01 |
| 14032_X_(00)_P133 | Tower TN03 GA Plans - Level 13 | P01 |
| 14032_X_(00)_P134 | Tower TN03 GA Plans - Level 14 | P01 |

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|-------------------|--------------------------------------|-----|
| 14032_X_(00)_P135 | Tower TN03 GA Plans - Level 15 | P01 |
| 14032_X_(00)_P136 | Tower TN03 GA Plans - Level 16 | P01 |
| 14032_X_(00)_P137 | Tower TN03 GA Plans - Level 17 | P01 |
| 14032_X_(00)_P138 | Tower TN03 GA Plans - Level 18 | P01 |
| 14032_X_(00)_P139 | Tower TN03 GA Plans - Level 19 | P01 |
| 14032_X_(00)_P140 | Tower TN03 GA Plans - Level 20 | P01 |
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| 14032_X_(00)_P203 | East Elevation Proposed | P01 |
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| 14032_X_(01)_P120 | Survey Drawing Existing Level 00 | P01 |
| 14032_X_(01)_P121 | Survey Drawing Existing Level 01 | P01 |
| 14032_X_(01)_P122 | Survey Drawing Existing Level 02 | P01 |
| 14032_X_(01)_P123 | Survey Drawing Existing Level 03 | P01 |
| 14032_X_(01)_P124 | Survey Drawing Existing Level 04 | P01 |
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| 14032_X_(01)_P202 | Survey Drawing Existing Elevation 02 | P01 |
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| 14032_X_(01)_P205 | Survey Drawing Existing Elevation 05 | P01 |
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| 20065_G_(00)_P302 | Georgian Townhouses Proposed Section B-B | P01 |
| 20065_G_(00)_P304 | Georgian Townhouses Proposed Section DD - no.16 | P02 |

⁶ The listed revision number shows the current version of the drawings that the Inspector is asked to consider. All other versions have been superseded. For the purposes of the Appeal, a consolidated pack of drawings has been prepared (and submitted with the Appeal) that can be printed in A3 for ease of reference at the inquiry.

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| 20065_G_(00)_P305 | Georgian Townhouses Proposed Section EE - no.14 | P02 |
| 20065_G_(00)_P306 | Georgian Townhouses Proposed Section FF - no.10 | P02 |
| 20065_G_(00)_P307 | Georgian Townhouses Proposed Section GG - no.4 | P02 |
| 20065_G_(00)_P308 | Georgian Townhouses Proposed Section HH - no.4 | P02 |
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| 20065_G_(01)_P202 | Georgian Townhouses Existing East Elevation | P01 |
| 20065_G_(01)_P203 | Georgian Townhouses Existing South Elevation | P01 |
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| 20065_G_(01)_P305 | Georgian Townhouses Existing Section EE - no.14 | P01 |
| 20065_G_(01)_P306 | Georgian Townhouses Existing Section FF - no.10 | P01 |
| 20065_G_(01)_P307 | Georgian Townhouses Existing Section GG - no.4 | P01 |
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| 20065_G_(12)_P120 | Georgian Townhouses Ground Floor Demolition Plan | P01 |
| 20065_G_(12)_P121 | Georgian Townhouses First Floor Demolition Plan | P01 |
| 20065_G_(12)_P122 | Georgian Townhouses Second Floor Demolition Plan | P01 |
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| 20065_G_(12)_P201 | Georgian Townhouses North Elevation Demolition | P01 |
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| 20065_X_(01)_P122 | Survey Drawing Existing Level 02 | P01 |
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| 20065_X_(01)_P124 | Survey Drawing Existing Level 04 | P01 |
| 20065_X_(01)_P125 | Survey Drawing Existing Lower Roof | P01 |
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| 20065_X_(01)_P201 | Survey Drawing Existing Elevation 01 | P01 |
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| 20065_X_(01)_P203 | Survey Drawing Existing Elevation 03 | P01 |
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| 166-NCC2-GA02 | General Arrangement Level 03 Terrace, Balconies and Level 01 Green Roof | 01 |
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| 166-NCC2-GA04 | General Arrangement Level 26 Terrace | 01 |
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| 166-NCC2-GS03 | General Sections Level 24 & Level 26 | 01 |