

Item No. 7.1	Classification: Open	Date: 14 May 2019	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 18/AP/0900 for: Full Planning Application Address: CAPITAL HOUSE, 42-46 WESTON STREET, LONDON SE1 3QD Proposal: Redevelopment of the site to include the demolition of Capital House and 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. The application is accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.		
Ward(s) or groups affected:	London Bridge & West Bermondsey		
From:	Director of Planning		
Application Start Date 18/04/2018		Application Expiry Date 18/07/2018	
Earliest Decision Date 29/12/2018		PPA Date 29/11/2019	

RECOMMENDATION

1. That the Planning Committee grant planning permission subject to conditions, the applicant entering into an appropriate legal agreement and referral to the Mayor of London.
2. That, should planning permission be granted, it be confirmed that the environmental information has been taken into account as required by Regulation 3 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2017.
3. That following issue of the decision it be confirmed that the Director of Planning shall place a statement on the Statutory Register pursuant to Regulation 30 of the Town and Country Planning (Environmental Impact Assessments) Regulations and for the purposes of Regulation 30(1) (d) the main reasons and considerations on which the Local Planning Authority's decision is based shall be set out as in this report.
4. In the event that the requirements of paragraph 1 above are not met by 30 November 2019, the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out under paragraph 232.

BACKGROUND INFORMATION

Executive summary

5. In 2011 the Council resolved to grant planning permission to redevelop the site to provide student housing. This consent established the acceptability of student housing provision on the site and the suitability of the site for a tall building. A further planning consent from 2015 further supported the suitability of the site for a tall building.
6. The proposed development would provide new student homes in a well connected, central London location with a high level of public transport availability. The site is located within a district town centre and an Opportunity Area and as such the provision of student housing is acceptable.
7. The proposed development would provide 35% affordable housing by way of an in lieu payment. The payment would equate to £34.1 million which is significantly in excess of the maximum reasonable amount of affordable housing that the scheme can provide based on viability testing. Providing the affordable housing through an in lieu payment is supported on this site as on-site and off-site affordable housing would not optimise the level of affordable housing that could be provided.
8. The in lieu payment would be used for new affordable housing which would be Council developed and managed, which will subsequently allow greater control over rent levels and management. This could also potentially allow for local lettings, where new housing is let to local residents in priority need, enabling the council to re-let existing homes and create better mobility on estates, and provide people with appropriate housing to suit their needs.
9. There would be noticeable impacts on some neighbouring residents in terms of daylight and sunlight however these are considered to be acceptable within the context of the BRE guidelines and the surrounding townscape.
10. Eighty nine objections have been received from neighbours raising concerns primarily relating to height, design, massing and density, sunlight and daylight impacts, transport impacts, wind impacts, impacts on townscape and heritage, and failure to provide on site affordable housing. One letter of support has also been received.
11. The proposal would incorporate measures to reduce its carbon dioxide emissions, and a contribution to the Council's Carbon Off-set Green Fund would be secured through a S106 agreement. The proposal would be air quality neutral, and conditions are recommended to ensure that environmental impacts would be adequately dealt with. A range of S106 obligations would be secured, including employment and training during the course of construction. Overall, the benefits of the proposal are considered to significantly outweigh the potential harm caused, and it is recommended that planning permission be granted, subject to conditions and the signing of a S106 agreement.

Site location and description

12. The application site refers to the office building known as Capital House which is located at 42-46 Weston Street on the eastern edge of Guys Hospital and the Kings College Campus. The existing building comprises a two-storey deck with a further

eight storeys above (10 storeys in total). Capital House has frontages onto Weston Street to the west, Melior Street to the south and a principle frontage onto St Thomas Street to the north where the building is set back considerably from the street edge. The site is roughly parallelogram in shape and measures approximately 0.091 hectares.

Image – Site location plan



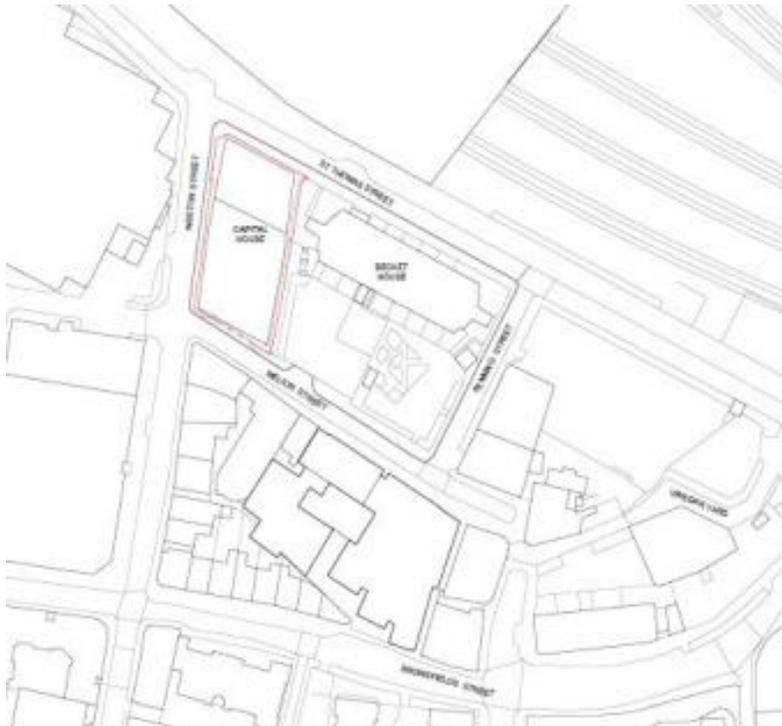
13. North of the site is London Bridge Station whilst to the north west is the 310 metre (m) tall London Bridge Tower (known as the Shard). The redevelopment of the station approved by the Council in 2012 includes a new entrance to St Thomas Street opposite the site. The new Shard Place building next to the Shard (on the former Fielden House) is currently under construction.
14. On the west side of Weston Street (opposite the application site) is the York Clinic, a five storey building, and Guy's Hospital Tower, a 34 storey building behind the York Clinic. To the southwest is Wolfson House, a 16 storey tower which is on a long-lease to Kings College for student accommodation with a swimming pool in its basement for use by Kings College students.
15. Immediately to the east of the site is 60-68 St Thomas Street (known as Beckett House), a six storey office building used by the Home Office Border and Immigration Service and beyond that is the vacant site known as Vinegar Yard which sits across Fenning Street. To the south, on Melior Street, is a seven storey residential building and adjoining two storey church.
16. With the exception of the railway arches to the north and a church to the south east, the immediate context of adjoining buildings date from 1970s to 1980s. The application site is not in a Conservation Area but the Bermondsey Street Conservation Area is adjacent to the site, to the south and south east (taking in the southern side of Melior Street); the Borough High Street Conservation Area lies some 180m to the west; and the Tooley Street Conservation Area lies to the north of London Bridge

Station (approximately 140m from the site). Nearby listed buildings include; London Bridge Station (Grade II to the north of the site); The George Inn (Grade I listed, 300m from the site to the north-west); Guys Hospital Main Building (Grade II*, 180m to the north-west); 4-16 St Thomas Street (Grade II, 280m to the north-west); 9A-13 St Thomas Street (Grade II, 270m to the north-west); 15 St Thomas Street (Grade II, 240m to the north-west); 55, 59-63 and 68-76 Bermondsey Street (all Grade II, approximately 220m to the south-east). A more recent listing is the Railway Viaduct Arches on Crucifix Lane (Grade II), which are on the northern side of St Thomas Street

Details of proposal

17. Planning consent is sought for the re-development of the site to deliver a 39 storey building rising to 137.9m AOD in height providing 905 student bedrooms and flexible retail (Class A1); Café (Class A3); and office (Class B1) floorspace.
18. The building would provide housing for 905 students (Sui Generis use) and a flexible commercial space at ground floor level for use classes A1/A3/B1. The main entrance to the student housing would be from St Thomas Street whilst the commercial units would be access from both St Thomas Street and Weston Street.
19. Student housing would be located at levels 3 through to the 36 whilst student amenity spaces would be located at levels 1 and 2 as well as levels 37 through to 39. An outdoor roof terrace would be provided at level 37 to complement the indoor amenity spaces. The student homes would be directly let through the applicant and would not be linked to a higher education institution.

Image – Proposed site plan



20. Three levels of basement would be provided that would accommodate the necessary plant equipment and laundry facilities as well as cycle storage and waste/refuse storage.
21. Servicing would take place from the rear of the site on Melior Street where there would be a semi inset lay bay immediately adjacent to the loading bay and entrance to the cycle store. Cycle parking for 453 bicycles would be provided as well as an additional 18 spaces for staff. In order to encourage cycling, 255 cycles would be provided on site as 'free to use' for resident students.
22. In terms of design the building would be formed by a base comprising built elements within a rigid structural frame formed from a series of 'V' columns. The tower would sit on the base and would be trapezoidal in form. The building would be significantly set back at level 37 in order to create a distinctive top. The façade of the tower would comprise an abstract pattern of three dimensional 'origami' modules. The base would be clad in a profiled masonry that would draw on the textures and colours of the surrounding area.
23. The scheme has been amended from the original submission to reduce the height from 46 storeys (153.03m AOD) to 39 storeys (137.9m AOD). These amendments also amended the design of the top of the building to provide a significant set back at the upper levels and the base of the building to remove the previously proposed migration museum in lieu of flexible retail and office space.

Planning history

24. The most relevant planning history on this site is the planning permission granted under ref 10/AP/2754 (on 30 March 2011) for:

Demolition of Capital House, and erection of a 21 and 31 storey building (2 basement levels plus ground and 30 upper storeys) to a maximum height of 108.788m (14,738sqm GEA) to provide 470 student accommodation units (sui generis) on floors 1-27 (13,289sqm GEA), ancillary bar, gym, library and student hub on floors 28, 30, retail/cafe units (flexible class A1, A3 use) (286sqm GEA) at ground floor level, 261 cycle parking spaces, 2 disabled car parking spaces and 1 service bay at basement level, associated refuse and recycling, and an area of public open space.
25. This consent accepted the principle of the loss of the existing office space as well as the principle of providing student accommodation. The applicant claims that this planning consent has been implemented through undertaking some drainage works on site.
26. A number of its pre-commencement conditions were submitted and approved. The pre-commencement condition relating to the drainage strategy was approved and works to the drainage were carried out, which supports the applicant's point that this permission has already been implemented. No Certificate of Lawfulness has been submitted to formally confirm this.
27. The building granted permission as part of this application was known as The Quill. This application was submitted in advance of the adoption of planning policy requiring

student housing developments to provide affordable housing and as such this consent made no provision for affordable housing.

Subsequent to the application detailed above, a further application was made in 2014 under reference 14/AP/4640 for:

Demolition of Capital House, and erection of a 21 and 31 storey building (1 basement Level plus ground and 30 upper storeys) to a maximum height 108.788m to provide 119 residential units (C3), retail/cafe units (flexible Class A1, A3 Use) at ground floor level, 199 cycle parking spaces, 2 disabled car parking spaces, associated refuse and recycling, and an area of public open space.

28. This application was approved and was essentially the same as the 2010 application save for the fact that the development would now provide general needs housing as opposed to student accommodation. The heights, scale massing and detailed design of the building (external) remained largely the same as the previous consented scheme.
29. No substantial progress was made with either of the consented schemes subsequent to planning permission being granted albeit the original permission discharged some pre-commencement conditions as set out above. The next substantial milestone in the planning history of this site was the submission of a pre-application enquiry in 2017 (17/EQ/0173) which sought a programme of pre-planning meetings to discuss the proposal to redevelop the site for student housing. The initial scheme proposed a building up to 46 storeys in height (153.03m AOD) providing 1,028 student bedrooms, a migration museum and a retail unit (Class A1).
30. Whilst officers were supportive of the proposed uses and the detailed design, there were concerns that the excessive height of the building would have a harmful impact on key local views, as well as views from the Bermondsey Street Conservation Area and the Tower of London World Heritage Site. Officers maintained these concerns once this current application was formally submitted which led to a substantial decrease in the height of the building from 46 storeys (153.03m AOD) to 39 storeys (137.9m AOD). This involved a redesign of the top and the base of the building and the loss of the proposed migration museum.
31. Prior to submitting the formal application, the applicant sought a Scoping Opinion (18/AP/0412) in order to agree the scope of topics to be included in the Environmental Impact Assessment for the subsequent planning application.

Planning history of adjoining sites

32. There is a significant amount of planning history on the adjoining sites, but those that are most relevant and recent to this application would be the major developments to London Bridge Station, the Shard and other tall buildings as summarised below.
33. London Bridge Tower (Shard of Glass) (ref 01/AP/0476): redevelopment of Southwark Towers for a 306m tower for offices, hotel, residential and public viewing areas. This development is now complete.
34. London Bridge Place (ref 07/AP/0815): the redevelopment of New London Bridge

House for an 18 storey office building. This development is now complete.

35. Guys Hospital new Cancer Building (ref: 12/AP/2062 granted January 2013):
Demolition of existing buildings on the corner of Great Maze Pond and Snowsfields and erection of a 14 storey building for a Cancer Treatment Centre (with an additional 2 storeys of roof plant) 71 metres in height and 29,000sqm floor area, with preservation in situ of a Scheduled Ancient Monument (Roman Boat), public realm works, disabled parking, cycle parking facilities and basement link to hospital campus. This development is now complete.
36. 14-16 Melior Street and Land adjoining to the rear of Our Lady of La Salle and Saint Joseph Catholic Church (ref: 13/AP/3059 granted May 2014):
Part demolition and part refurbishment / change of use of existing buildings and erection of new buildings ranging from 4-7 storeys in height to provide 37 residential units (Class C3); a community centre (Class D1) and flexible commercial space at ground floor level (Class A1/A3/B1); cycle storage, new landscaping and associated works.
37. Fielden House (ref 14/AP/1302 granted with legal Agreement on December 2014):
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. This development is now in the advanced stages of construction.

St Thomas Street East Framework

38. The application site forms the western boundary of a series of adjacent development plots that have become known as St Thomas Street East. The adjacent sites include Beckett House at 60 St Thomas Street, Vinegar Yard which occupies the plot between Fenning Street and Snowsfields and the Vinegar Warehouse which includes the vacant warehouse building as well as the buildings at 40-44 Bermondsey Street. The site at Beckett House is still part of an ongoing pre-application enquiry however the sites at Vinegar Yard and the Vinegar Warehouse are now the subject of current formal planning applications as set out below:
39. 19/AP/0404 - 40-44 Bermondsey Street Vinegar Yard warehouse 9-17 Vinegar Yard and land adjacent to 1-7 Snowsfields SE1:
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.
40. 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, SE1 3QR:

Redevelopment of the site to include the demolition of the existing buildings and the erection of a 5 to 19 storey building (plus ground and mezzanine) with a maximum height of 86.675m (AOD) and a 2 storey pavilion building (plus ground) with a maximum height of 16.680m (AOD) with 3 basement levels across the site providing a total of 30,292 sqm (GIA) of commercial floorspace comprising of use classes B1, A1, A2, A3, A4, D2 and sui generis (performance venue), cycle parking, servicing, refuse and plant areas, public realm (including soft and hard landscaping) and highway improvements and all other associated works.

41. Both of these applications are only recently valid and are still subject to assessment and public consultation.
42. As previously stated these sites together have come to be known collectively as St Thomas Street East. The various landowners have been co-operating on an informal basis about a range of issues including design, public realm, new pedestrian routes, and the management of the construction and operational phases of the proposed developments. The landowners have devised a framework document which sets out the co-operation and co-ordination on these issues between the proposed developments and this has been subject to community consultation. The framework is a tool to bring the landowners together to work collaboratively to address the main issues of the redevelopment of these sites. The framework itself is an informal document and is not a masterplan or an instrument of planning policy.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

43. The main issues to be considered in respect of this application are:
 - a) Principle of the proposed development in terms of land use;
 - b) Affordable housing and the principle of a payment in lieu;
 - c) Design issues, including scale/massing and impact of tall buildings on local and strategic views;
 - d) The impact on the historic setting of heritage assets;
 - e) Impact on the amenities of occupiers of adjoining properties;
 - f) Impact of adjoining and nearby uses on occupiers and users of the proposed development;
 - g) Flood risk;
 - h) Transport issues;
 - i) Archaeology;
 - j) Planning obligations;
 - k) Sustainable development implications;
 - l) Environmental impacts; and
 - m) All other relevant material planning considerations.

Planning policy

44. The statutory development plans for the Borough comprise the National Planning Policy Framework 2019, London Plan 2016, Southwark Core Strategy 2011, and

saved policies from The Southwark Plan (2007 - July). The site falls within the area covered by the Blackfriars Road SPD.

45. The site is located within the:
 - Air Quality Management Zone
 - Archaeological Priority Zone
 - Bankside, Borough and London Bridge Strategic Cultural Area
 - Bankside, Borough and London Bridge Opportunity Area
 - Central Activities Zone
 - London Bridge District Town Centre
 - Thames Special policy Area
46. The site has a Public Transport Accessibility Level (PTAL) of 6B which is the highest level of public transport availability.
47. The site is located within Flood Zone 3 as identified by the Environment Agency flood map, which indicates a high probability of flooding.
48. The following listed structures are close to the site:
 - Grade II listed London Bridge Station (Platforms 9-16) and railway arches on Crucifix Lane;
 - Grade II listed Guys Hospital (main building) including connecting alcove, statue of Thomas Guy and gates, piers and railings;
 - Grade II listed Telephone Kiosk outside Nos. 17 and 19 St Thomas Street;
 - Grade II listed buildings at Nos. 2, 4-8, 9 and 12-16 St Thomas Street (including railings);
 - Grade II listed building at 19A Borough High Street (Post Office).
 - Grade II listed buildings at 55, 59-63 and 68-76 Bermondsey Street.
49. The Bermondsey Street; Borough High Street; and Tooley Street Conservation Areas lie close to the site.
50. The site lies within the following viewing corridors of the London View Management Framework:
 - View 2A.1 Parliament Hill to St Paul's Cathedral
 - View 3A.1 Kenwood House gazebo to St Paul's Cathedral
 - View 4A.1 Primrose Hill to St Paul's Cathedral
 - View 6A.1 Blackheath Point to St Paul's Cathedral

National Planning Policy Framework (NPPF)

51. The revised National Planning Policy Framework ('NPPF') was published in February 2019 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental.
52. Paragraph 212 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.

Chapter 2 Achieving sustainable development
Chapter 5 Delivering a sufficient supply of homes
Chapter 6 Building a strong, competitive economy
Chapter 7 Ensuring the vitality of town centres
Chapter 8 Promoting healthy and safe communities
Chapter 9 Promoting sustainable transport
Chapter 11 Making effective use of land
Chapter 12 Achieving well-designed places
Chapter 14 Meeting the challenge of climate change, flooding and coastal change
Chapter 15 Conserving and enhancing the natural environment
Chapter 16 Conserving and enhancing the historic environment

London Plan 2016

53. The London Plan is the regional planning framework and was adopted in 2016. The relevant policies of the London Plan 2016 are:

Policy 2.5 Sub-regions
Policy 2.10 Central Activities Zone – Strategic priorities
Policy 2.11 Central Activities Zone – Strategic functions
Policy 2.13 Opportunity Areas and intensification areas
Policy 2.15 Town Centres
Policy 3.1 Ensuring equal life chances for all
Policy 3.8 Housing choice
Policy 3.9 Mixed and balanced communities
Policy 3.10 Definition of affordable housing
Policy 3.11 Affordable housing targets
Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes
Policy 3.13 Affordable housing thresholds
Policy 3.19 Education facilities
Policy 4.1 Developing London's economy
Policy 4.2 Offices
Policy 4.3 Mixed use development and offices
Policy 4.7 Retail and town centre development
Policy 4.12 Improving opportunities for all
Policy 5.1 Climate change mitigation
Policy 5.2 Minimising carbon dioxide emissions
Policy 5.3 Sustainable design and construction
Policy 5.5 Decentralised energy networks
Policy 5.6 Decentralised energy in development proposals
Policy 5.7 Renewable energy
Policy 5.9 Overheating and cooling
Policy 5.10 Urban greening
Policy 5.11 Green roofs and development site environs
Policy 5.12 Flood risk management
Policy 5.13 Sustainable drainage
Policy 5.15 Water use and supplies
Policy 5.16 Waste net self-sufficiency
Policy 5.17 Waste capacity

Policy 5.18 Construction, excavation and demolition waste
 Policy 5.21 Contaminated land
 Policy 6.1 Strategic approach (Transport)
 Policy 6.2 Providing public transport capacity and safeguarding land for transport
 Policy 6.3 Assessing effects of development on transport capacity
 Policy 6.5 Funding Crossrail
 Policy 6.6 Aviation
 Policy 6.9 Cycling
 Policy 6.10 Walking
 Policy 6.11 Smoothing traffic flow and tackling congestion
 Policy 6.12 Road network capacity
 Policy 6.13 Parking
 Policy 7.1 Building London's neighbourhoods and communities
 Policy 7.2 An inclusive environment
 Policy 7.3 Secured by design
 Policy 7.4 Local character
 Policy 7.5 Public realm
 Policy 7.6 Architecture
 Policy 7.7 Location and design of tall and large buildings
 Policy 7.8 Heritage assets and archaeology
 Policy 7.10 World heritage sites
 Policy 7.11 London View Management Framework
 Policy 7.12 Implementing the London View Management Framework
 Policy 7.14 Improving air quality
 Policy 7.15 Reducing noise and enhancing soundscapes
 Policy 7.21 Trees and woodlands
 Policy 8.2 Planning obligations
 Policy 8.3 Community infrastructure levy

Core Strategy 2011

54. The Core Strategy was adopted in 2011 providing the spatial planning strategy for the borough. The strategic policies in the Core Strategy are relevant alongside the saved Southwark Plan (2007) policies. The relevant policies of the Core Strategy 2011 are:

Strategic Targets Policy 1 - Achieving growth
 Strategic Targets Policy 2 - Improving places
 Strategic Policy 1 - Sustainable development
 Strategic Policy 2 - Sustainable transport
 Strategic Policy 3 - Shopping, leisure and entertainment
 Strategic Policy 6 - Homes for people on different incomes
 Strategic Policy 8 – Student homes
 Strategic Policy 10 - Jobs and businesses
 Strategic Policy 11 - Open spaces and wildlife
 Strategic Policy 12 - Design and conservation
 Strategic Policy 13 - High environmental standards

Southwark Plan 2007 (saved policies)

55. In 2013, the council resolved to 'save' all of the policies in the Southwark Plan 2007 unless they had been updated by the Core Strategy with the exception of Policy 1.8

(location of retail outside town centres). Paragraph 213 of the NPPF states that existing policies should not be considered out of date simply because they were adopted or made prior to publication of the Framework. Due weight should be given to them, according to their degree of consistency with the Framework. The relevant policies of the Southwark Plan 2007 are:

Policy 1.1 Access to Employment Opportunities
Policy 1.4 Employment Sites
Policy 1.7 Development within Town and Local Centres
Policy 2.5 Planning Obligations
Policy 3.1 Environmental Effects
Policy 3.2 Protection of Amenity
Policy 3.3 Sustainability Assessment
Policy 3.4 Energy Efficiency
Policy 3.6 Air Quality
Policy 3.7 Waste Reduction
Policy 3.8 Waste Reduction
Policy 3.9 Water
Policy 3.11 Efficient Use of Land
Policy 3.12 Quality in Design
Policy 3.13 Urban Design
Policy 3.14 Designing Out Crime
Policy 3.15 Conservation of the Historic Environment
Policy 3.16 Conservation Areas
Policy 3.17 Listed Buildings
Policy 3.18 Setting of Listed Buildings, Conservation Areas and World Heritage Sites
Policy 3.19 Archaeology
Policy 3.20 Tall Buildings
Policy 3.22 Important Local Views
Policy 3.28 Biodiversity
Policy 3.29 Development within the Thames Policy Area
Policy 3.31 Flood Defences
Policy 5.1 Locating Developments
Policy 5.2 Transport Impacts
Policy 5.3 Walking and Cycling
Policy 5.6 Car Parking
Policy 5.7 Parking Standards for Disabled People and the Mobility Impaired
Policy 5.8 Other Parking

LBS Supplementary Planning Documents

56. Affordable Housing SPD 2008 and draft 2011
Design and Access Statements SPD 2007
Development Viability SPD 2016
Draft Bankside, Borough and London Bridge SPD 2011
Residential Design Standards SPD (2015 update)
Section 106 Planning Obligations and CIL SPD 2015 and 2017 addendum
Sustainability Assessment 2007
Sustainable Design and Construction SPD 2009
Sustainable Transport Planning SPD 2009

Greater London Authority Supplementary Planning Documents

57. Central Activities Zone (2016)
Homes for Londoners (2017)
London View Management Framework 2012
London's World Heritage Sites SPG 2012

Emerging planning policy

Draft New London Plan

58. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2nd March 2018. Minor suggested changes to the plan were published on 13th August 2018 and an Examination in Public (EIP) began on 15th January 2019. The EIP will continue until May 2019 and until the London Plan reaches formal adoption it can only be attributed limited weight.

New Southwark Plan

59. For the last 5 years the council has been preparing the New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy. The council concluded consultation on the Proposed Submission version (Regulation 19) on 27 February 2018. The New Southwark Plan Proposed Submission Version: Amended Policies January 2019 is being consulted on until 17 May 2019. It is anticipated that the plan will be adopted in late 2019 following an Examination in Public (EIP). As the NSP is not yet adopted policy, it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.

Principle of development

60. The National Planning Policy Framework (NPPF) was published on 27 March 2012 and has since been updated in 2018 and 2019. At the heart of the NPPF is a presumption in favour of sustainable development. The framework sets out a number of key principles, including a focus on driving and supporting sustainable economic development to deliver homes.
61. The NPPF promotes the delivery of a wide choice of high quality homes, seeks to widen opportunities for home ownership and create sustainable, inclusive and mixed communities. It encourages the effective use of land by reusing land that has been previously developed and also promotes mixed use developments.
62. The NPPF also states that permission should be granted for proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.
63. The re-development of the site would result in the net loss of employment floorspace (Class B1) within the Central Activities Zone (CAZ). Whilst this loss has been accepted in principle by the previous two planning consents for this site, the current

building is still in use and as such needs to be addressed against current policy.

Central Activities Zone

64. The site is located within the CAZ which covers a number of central boroughs and covers London's geographic, economic, and administrative core. Strategic Targets Policy 2 – Improving Places of the Core Strategy states that development in the CAZ will support the continued success of London as a world-class city as well as protecting and meeting the more local needs of the residential neighbourhoods. It also states that within the CAZ there will be new homes, office space, shopping and cultural facilities, as well as improved streets and community facilities.

Opportunity Area

65. The London Plan designates Bankside, Borough and London Bridge as one of four Opportunity Areas in the London South Central area.
66. The London Plan notes that this area has considerable potential for intensification and scope to develop the strengths of the area for strategic office provision as well as housing, especially in the hinterland between Blackfriars and London bridges. Mixed leisure and culture related development should enhance its distinct offer as part of the South Bank Strategic Cultural Area and this should include visitor accommodation.
67. Strategic Targets Policy 2 of the Core Strategy underpins the London Plan and states that Southwark's vision for Bankside, Borough and London Bridge is to continue to provide high quality office accommodation, world-class retail, tourism, cultural and entertainment facilities including the delivery of 1900 new homes, 665 affordable homes and around 25,000 new jobs by 2026.

District Town Centre

68. The site is located within the London Bridge District Town Centre where saved policy 1.7 of the Southwark Plan states that within the centre, developments will be permitted providing a range of uses, including retail and services, leisure, entertainment and community, civic, cultural and tourism, residential and employment uses. Strategic Policy 3 of the Core Strategy advises that the network of town centres will be maintained and that at London Bridge District Town Centre, the Council will support the provision of new shopping space.

Loss of employment floorspace

69. The proposed development would result in the loss off 4,076sqm (GIA) of office space. Under saved policy 1.4 of the Southwark Plan, employment floorspace on this site would be protected by virtue of the site location meeting the following criteria:
 - I. The site fronts onto a classified road;
 - II. The site is in a public Transport Accessibility Zone;
 - III. The site is within the Central Activities Zone;
 - IV. The site is within a Strategic Cultural Area
70. The proposal does not meet any of the exceptions criteria listed within the saved

policy, as the building is occupied, and the site is suitable for continued office use. However, the principle of the loss of the existing office floorspace has been accepted on two previous consents which is a material consideration. Furthermore, there has been no material change in planning policy since these decisions were made and as such the principle of losing the office space is still considered acceptable. The London Plan does not protect office floorspace in the CAZ, it simply identifies office use as an appropriate land use in the CAZ and notes that there is capacity for 25,000 jobs in the Opportunity Area. This is further supported by the Mayoral Supplementary Planning Guidance – Central Activities Zone (2016).

Student housing

71. Saved Southwark Plan Policy 4.7 relates to 'Non Self-contained Housing for Identified User Groups' and this would encompass students. The policy states that demand for and suitability of the accommodation must be demonstrated by the applicant. The provision of student homes should not significantly impact on the amenity of neighbouring occupiers and there should be adequate infrastructure in the area to support the increase in residents. An important requirement of this policy is that a satisfactory standard of accommodation is provided with access to adequate shared facilities and amenities to support the specific needs of the occupiers including staffing, servicing and management arrangements.
72. Strategic Policy 8 of the Core Strategy focuses on 'Student Homes' and is clear that student housing will be permitted within the town centres and places with good access to public transport, provided that it does not harm the local character and 35% affordable housing is provided.
73. The Mayor of London recognises that London's Universities make a significant contribution to its economy and labour market and that it is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation. London Plan Policy 3.8 relates to 'Housing Choice' and states that Londoners should have a genuine choice of homes that they can afford and which meet their requirements and this would include student housing.
74. The principle of providing student housing on this site has been accepted by the previous 2010 consent. The applicant has demonstrated that there is demand for student housing and this aligns with the fact the Southwark is one of the four largest providers of student housing amongst London boroughs. Furthermore, the policy support for student housing in this location has been further strengthened by Strategic Policy 8 of the Southwark Core Strategy which has been adopted subsequent to the previous permission. This policy, as outlined above, makes it clear that student housing will be located within town centres and places with good access to public transport. The application site is located within the London Bridge District Town Centre and sits directly opposite London Bridge Station, thereby having the highest level of access to public transport. The provision of student housing in this area which is characterised by a mix of uses and buildings of varying scales and architectural styles would not harm the local character. As such it is considered that the provision of student housing in this location is fully supported by Strategic Policy 8. The affordable housing provision required by Strategic Policy 8 is addressed in the assessment sections below.

75. London Plan Policy 3.8 is also supportive of the provision of student housing. Whilst this policy also makes reference to affordable student accommodation, this issue will be considered further in the affordable housing section below.

Retail

76. The proposed development would include two flexible units at ground floor which could be used for Class A1/A3 or Class B1. The provision of new town centre uses such as retail is supported by saved Southwark Plan Policy 1.7 since the site lies in a the London Bridge District Town Centre. The retail units would activate the ground floor of the development, particularly along Weston Street and the new route between the application site and the adjacent site at Beckett House. The retail units would serve the proposed increase in population and contribute to the vitality and viability of the district town centre. The site previously had limited active frontage whereas the proposal would create a much more attractive and vibrant street environment. The amount and scale of provision is considered to be acceptable and would help to meet the needs of residents, workers and visitors to the area.

Office

77. The proposal includes two commercial units at ground floor level which could be used for Class B1 purposes. The site falls within the CAZ, which contains London's geographical, economic and administrative core. The London Plan does not protect office floorspace in the CAZ, it simply identifies office use as an appropriate land use in the CAZ and notes that there is capacity for 25,000 jobs in the Opportunity Area. This is further supported by the Mayoral Supplementary Planning Guidance – Central Activities Zone (2016).
78. Core Strategy Strategic Policy 10 Jobs and Businesses states that the council will increase the number of jobs in Southwark and create an environment in which businesses can thrive. The policy goes on to state that existing business floorspace would be protected and the provision of around 400,000sqm-500,000sqm of additional business floorspace would be supported over the plan period in the Bankside, Borough and London Bridge Opportunity area to help meet central London's need for office space.
79. Whilst the quantum of Class B1 office space being offered is relatively small and does not replace the existing office floorspace, it is fully supported by current policy and would be a suitable use on this site.

Environmental impact assessment

80. Applications where an Environmental Impact Assessment (EIA) is required will either be mandatory or discretionary depending on whether the proposal constitutes Schedule 1 (mandatory) or Schedule 2 (discretionary) development of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended). The proposed development falls within Schedule 2, Category 10(b) 'Urban Development Project' of the EIA Regulations and constitutes EIA development having regard to its potential for likely significant environmental effects.
81. Regulation 3 of the EIA Regulations precludes the granting of planning permission

unless the Council has first taken the 'environmental information' into consideration. The 'environmental information' means the ES, including any further information, any representations made by consultation bodies, and any other person, about the environmental effects of the development.

82. In accordance with the EIA Regulations, an Environmental Statement (ES) comprising a Non-Technical Summary, Environmental Statement and Technical Appendices accompanies the application.
83. Additional environmental information or 'further information' to support the ES was submitted in November 2018 following revisions made to the proposed development and again in March 2019 following further cumulative assessments. Two further consultation exercises were undertaken in November 2018 and March 2019 respectively in accordance with Regulation 25 of the EIA Regulations. Information on the potential environmental impacts of the scheme and mitigation (where required) is included in the various sections of this report.

Alternatives

84. The EIA Regulations requires the ES to provide information on the alternative options considered by the applicant. The 'Do Nothing' alternative would leave the application site in its current state. This scenario is considered in the ES to have no environmental benefits compared with the proposed redevelopment of the site.
85. The ES also describes the design evolution of the scheme which has been influenced by environmental factors, particularly townscape, the acoustic environment, daylight and sunlight and wind microclimate. Other key factors that have informed the design include the protected LVMF Views and how the development responds to heritage assets. As such, the final version of the scheme has been informed by testing various options and having full regard to the constraints and opportunities presented by the site as well as issues raised during the process.
86. Officers are satisfied that the ES has investigated alternatives for the site and that the proposed development maximises the development potential of the site whilst seeking to minimise environmental impacts. The site occupies a prominent central London location in the London Bridge District Town Centre and an Opportunity Area. To not develop the site would lead to a missed opportunity to secure a high quality scheme.

Cumulative impacts

87. The cumulative assessment considers three scenarios:
 - The development plus consented schemes – this is as per the November 2018 ES addendum since no significant new schemes have been approved. This is accepted.
 - The development plus consented schemes plus those submitted but not yet determined. Officers have identified five new projects in the vicinity of the scheme, which have not yet received planning permission but should be considered in the cumulative assessment.
 - The development plus consented scheme, plus submitted schemes and the pre-application scheme at Beckett House / 60 St Thomas Street.

88. In most cases the cumulative impacts of the development were limited however further consideration of the cumulative impact of the development on each topic is set out below.

Conclusions on the EIA

89. A detailed assessment of the likely potential and residual impacts of the scheme is provided in the relevant sections of this report, taking into account the ES and the material planning policy considerations. In summary, officers are satisfied that the ES is adequate to enable a fully informed assessment of the environmental effects of the proposal.

Design

Policy context

90. The NPPF at Paragraph 124 stresses the importance of good design, considering it to be a key aspect of sustainable development. Chapter 7 of the London Plan deals with design related matters. In particular, Policy 7.1 sets out the design principles required for new development and Policy 7.6 requires architecture to make a positive contribution to the public realm, streetscape and cityscape. Policy 7.8 asserts that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail.
91. The relevant Southwark design and conservation policies are Strategic Policy 12 of the Core Strategy and Saved Policies 3.12, 3.13, 3.15, 3.16, 3.17, 3.18 and 3.20 of the Southwark Plan. These policies require the highest possible standards of design for buildings and public spaces. The principles of good urban design must be taken into account in all developments including height, scale and massing, consideration of local context including historic environment, its character, and townscape strategic and local views
92. The Bankside, Borough and London Bridge Draft SPD identifies this site as being a suitable location for tall buildings, a principle that is also supported by its designation as an Opportunity Area.

Site context

93. The site is located at the southern edge of St Thomas Street at the junction with Weston Street. This is a prominent site within the CAZ. Immediately to the north is the across the road from the site is the recently opened London Bridge Station southern entrance which has ensured that this important transport hub can be accessed from the south on St Thomas Street as well as the north on Tooley Street. The existing property is not listed and is not located in a conservation area. However, the site is close to a number of heritage assets including Statutory Listed Buildings, Conservation Areas and a World Heritage Site.

Site layout and proposed development

94. The proposed building would occupy almost the entire urban block between Melior

Street, Weston Street and St Thomas Street with the western boundary formed by Beckett House at 60 St Thomas Street albeit with generous public space on the St Thomas Street frontage at ground floor level. Principal access to the flexible commercial floorspace at ground floor level would be taken from both Weston Street and St Thomas Street and the main entrance to the student accommodation which is the primary use, would be taken from St Thomas Street. Servicing and entrances to the cycle storage areas would take place from the rear of the site on Melior Street.

Image – Proposed ground floor



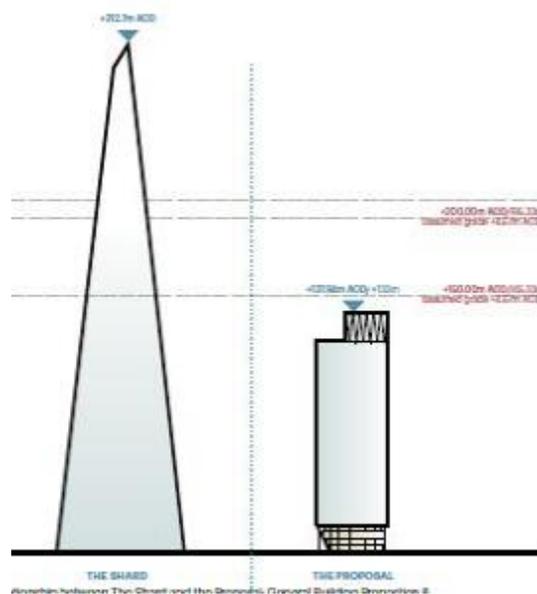
95. The proposed development is set at 137.9m AOD max with a shoulder height at 121m (AOD). It has been designed to respect the limitations of the earlier consented 'Quill' proposal and to prevent harmful impact on the settings of a number of heritage assets most notably, the Tower of London World Heritage Site (to the north of the River), the Bermondsey Street Conservation Area (which abounds the site immediately to the south), and the Grade II Listed viaduct arches on the northern edge of St Thomas Street.
96. Beyond that the proposed development is likely to impact on views of the Shard, especially from the south and east. Whilst the Shard of Glass is not a heritage asset, it is a distinctive modern feature of this part of Borough and strategic landmark in its own right. Its role in the emerging cluster around London Bridge Station has been considered and its pre-eminence in wider London view scape is enshrined in the council's policies and emerging policies.
97. In these circumstances, the council's policies echo the requirements of the NPPF and require all development to conserve or enhance the architectural and historic significance of these heritage assets and their settings and to avoid causing harm. Further, at 137.9m (AOD) in height, this proposal is considered a 'tall building' and as

such it should conform to all the requirements of saved Policy 3.20 Tall Buildings of the Southwark Plan (2007).

Urban Design, Height, Scale, Massing and Arrangement

98. As a tall building, this proposal has to conform to all aspects of saved Policy 3.20 and should be located at a point of landmark significance. Most of these aspects of the policy were considered at the time of the previously consented 'Quill' development consented at a maximum height of 118m AOD. Among other aspects of this policy, a key criterion is that every tall building should contribute positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.

Image – Height in relation to the Shard



99. In this case the main assessment will relate to the impact of this proposal on the neighbouring heritage assets especially as these have been presented in the various views, including the London-wide, wider and local views. Whilst visibility is not harmful per se, the degree of visibility and the heritage assets that are affected when viewed from various locations would give a measure of any harm caused by the proposal.

Impact on Protected Views

100. The LVMF seeks to protect and manage twenty seven views of London and some of its major landmarks as defined by the London Plan. The information submitted with the application demonstrates that the building is visible in backdrop of LVMF views 2A.1 from Parliament Hill and 3A.1 from Kenwood.
101. In respect of View 2A.1 the Mayor's London View Management Framework SPG states that: "*The form and materials of development in the backdrop of St Paul's Cathedral should preserve or enhance the clarity with which the silhouette of the Cathedral can be distinguished from its background.*"

102. The proposal is largely masked by the Shard in this strategic view and is only glimpsed to the right of the Shard in the backdrop of the Cathedral's Western Towers. Zoomed in significantly and considered together with the Shard, together with the recently implemented Fielden House and Guys Hospital Tower (all of which are in the Wider Setting Consultation Area – the background – of this Strategic Vista), the proposal forms a limited incursion into this view. It is located away from the dome of St Paul's and as such does not affect the viewer's ability to recognise and appreciate the strategic landmark of St Paul's Cathedral.
103. In respect of View 3A.1 the SPG states: "*Development behind St Paul's Cathedral that breaches the Wider Setting Consultation Area should contribute to a composition that enhances the setting of the Strategically Important Landmark, and the ability to recognise and appreciate it when seen from the Assessment Point.*"
104. In this view and zoomed in on the Strategic Landmark of St Paul's Cathedral the proposal appears briefly to the right of The Shard behind the implemented Fielden House proposal. In this view the proposal preserves the gap between the Shard and the Cathedral dome. Set behind the implemented Fielden House scheme to the left of the dome it does not affect the viewer's ability to recognise and appreciate the strategic landmark of St Paul's Cathedral.
105. As such Officers are satisfied that the proposal generally conforms to the guidance in the LVMF SPG in respect of these two Strategic Views and does not cause harm.

Impact on Tower of London World Heritage Site

106. The information submitted with the application and within the ES demonstrates that the proposal is visible from within the Tower of London environs. As a certified World Heritage Site, the Tower is a heritage asset of the highest order which benefits not just from national statutory listing but is recognised internationally as a heritage asset with Outstanding Universal Value. In these cases incursions into views from within the Tower Environs have to be carefully considered and will vary in sensitivity depending on the importance of the building or feature that is being viewed. For example, if a proposal is visible from the ramparts in a view of the wider city and the river, that view may be considered to be less sensitive than, if it is visible from the centre of the World Heritage Site near to the Tower itself.

Image – St Thomas Street



107. As a certified World Heritage Site, the Tower is a heritage asset of the highest order which benefits not just from national statutory listing but is recognised internationally as a heritage asset with Outstanding Universal Value. In these cases incursions into views from within the Tower Environs have to be carefully considered and will vary in sensitivity depending on the importance of the building or feature that is being viewed. For example, if a proposal is visible from the ramparts in a view of the wider city and the river, that view may be considered to be less sensitive than, if it is visible from the centre of the World Heritage Site nearer the Tower itself and the nearby Site of the Scaffold in the Tower of London Inner Ward.
108. In this case, the proposal is visible across the courtyard at the centre of the World Heritage Site and especially from the location where the tourist tour culminates, at the heart of the Tower complex. From this location, the Queens House, to the south of the central court, is a highly significant and important feature of the experience contributing positively to the Outstanding Universal Value of the World heritage Site. The Queens House is an L-shaped group Tudor buildings that take up the south-west corner of the central court opposite the Tower. Like the consented 'Quill' scheme the main body of this proposal would be visible over the top of the Queens House as the viewer crosses the central courtyard with only the set-back top of the building visible at the point where the tour ends. The impact of this incursion into the view is considered to be minor and neutral.
109. The information submitted with the application demonstrates that the proposal would disappear from view at the Site of the Scaffold which is the most historically significant area of the courtyard. The Shard is visible from this location but is located further to the west, was considered earlier by the Inspector, and does not impact on the Queens House itself.
110. Accordingly Officers have concluded that the proposal does not cause harm to the

setting of the Tower of London World Heritage Site and specifically the Queens House when viewed from a number of key locations in the Tower Environs as identified in the adopted Tower of London WHS Management Plan.

111. Further incursions include the visibility of the proposal over the rooftops of the Tower of London World Heritage Site when viewed from the Royal Mint. In this view the proposal will appear in the distant backdrop in the same area as the Shard but to a lesser degree. The impact of this incursion into the view is considered to be minor and neutral.
112. Historic England has been consulted on the proposed development and no longer object to the development following the reduction in the height of the building which they welcomed.
113. Accordingly Officers have concluded that the proposal does not cause harm to the setting of the Tower of London World Heritage Site and specifically the Queens House when viewed from a number of key locations in the Tower Environs as identified in the adopted Tower of London WHS Management Plan.

Impact on Bermondsey Street Conservation Area

Image – View from within Bermondsey Street Conservation Area



114. The information submitted with the application and within the ES demonstrates that this proposal is likely to be visible from a number of vantage points around the conservation area including limited visibility in Bermondsey Street itself. The design has been adjusted and shaped to reflect the height of the previously consented 'Quill' proposal which rose to a maximum 118m in height and angled down to 6/7 storeys at its southern edge - immediately adjacent to the Bermondsey Street Conservation Area. Over the course of the application the proposal has been adjusted and reduced in height to 121m at the shoulder and 134m maximum where it will have a similar impact to the previously consented proposal on the Conservation Area. The information submitted demonstrates that, like The Quill the proposal would not be visible for most of the length of Bermondsey Street. At the junction of Bermondsey Street and Tanner Street, a key location in the Conservation Area, only the crystalline

recessive top of the building would be glimpsed over the roof-tops of the conservation area and its characterful buildings.

115. The scale and degree of visibility on the Conservation Area is not considered harmful and would appear in certain locations as a layered incursion and can be mitigated. Where there may be harm the NPPF directs the local planning authority to consider if the harm is outweighed by the public benefits of the proposal. The public benefits include the re-development of the site, the public realm delivered on St Thomas Street and the route through to Melior Street as well as the affordable housing contribution provided by the application. In this case, it is considered that any harm caused to the character of the Conservation Area due to the limited visibility from Bermondsey Street is outweighed by the public benefits arising from the development. The development would have no demonstrable impact on either of the other nearby Conservation Areas at Tooley Street and Borough High Street

Tall Buildings and Architectural Quality

116. The Tall buildings policy 3.20 of the Southwark Plan requires developments to make a positive contribution to the landscape. This aspect of the policy requires developers of tall buildings to provide a proportionate public benefit to justify the substantial private gain. Normally, the landscape should be provided as public realm on the site. In this case the limitations of the site mean that it is not possible to provide a large public space at the base of the proposed tower. However, the building is raised on substantial columns leaving the ground plane largely open to public use. A small public space is proposed at the northern end of the site which includes space for tree planting and an active entrance lobby/cafe space. In this way the majority of the space at the base is devoted to active uses and public space. On the eastern flank the proposal has been adjusted and set-back from the boundary to respond to the St Thomas Street East Framework for the area which seeks to create a route through to Melior Street from St Thomas Street.

Image – East elevation



117. In respect of whether this site is located at a point of landmark significance: The

location of the development being at the entrance to the major transport interchange of London Bridge was considered at the time to be appropriate as a point of landmark significance and the confluence of a number of modes of transport. Given that the council consented the 'Quill' at 118m AOD in this location, it is considered that this site is appropriate for a tall building due to its prominent location and its proximity with the transport hub.

118. Finally, the policy requires that tall buildings should be of the highest architectural standard. The building has been designed in three parts, the commercial units at ground floor, the student accommodation in the main body of the tower, and the student communal facilities at the top. Each part of the proposal has been designed individually to give it its own distinctive character. At the same time each part has been considered in combination to ensure that it contributes positively to the composition as a whole.
119. The base is characterised by its angled structural supports which are designed to free up the space around the base of the tower and make the most of the corner with Weston Street which is also where the main entrance and cafe facilities would be. At the same time, the base has been designed to match the scale of buildings in the conservation area to the south and the railway viaduct to the north. In this way, the base tries to respond to the datum set by the context of the site. On St Thomas Street the building is well set-back and the structural supports become a colonnade.
120. The tower is designed as a simple chamfered rectangular form expressed as a crystalline glass building. In order to accommodate the needs of the student housing which, by nature is cellular, the facade has been designed in with a randomised folded metal cladding that gives each room a unique design. The folded metal cladding turns the simple glass cladding into a rippling glass and metal facade which extends for the full height of the tower.
121. The top of the tower is cut back at the north-west edge to reveal a roof-top terrace and accommodate the communal student facilities in a dynamic way. The design is elegant and well considered. A consequence of the glass and metal facade is that the building is likely to mitigate against the impact of the wind and micro climate. At the top the main communal facilities for residents have been designed as an elegant crystalline box set in from the northern edge. This striking design feature is not just a simple 'eye-catcher' but it provides a fitting 'crown' to the building. It also encloses all services and associated equipment to ensure that the top would not be further cluttered by these requirements.
122. Officers are satisfied that the design could deliver a high quality development subject to conditions. The adjusted height is welcomed and considered to not cause harm in the context of the surrounding heritage assets including the Tower of London World Heritage Site, the adjacent listed buildings including the railway arches and the Bermondsey Street Conservation Area.
123. In terms of the architectural design of the building, Officers are satisfied that the proposal exhibits the highest standards of design and the evolution of the facades as well as the detailed revisions that have taken place at ground floor level are fully supported.

Design Review Panel

124. The Southwark DRP reviewed the proposal in December 2017 at pre-application stage. At the time the proposal was at 157.5m high and significantly taller than the consented 'The Quill' proposal which the Panel were familiar with. The Panel acknowledged that a significant tower had already been consented on this site but raised significant concerns about the substantial increase in height to 1.5 times the height of the approved consent. They reiterated the importance of the Bermondsey Street Conservation Area and felt the proposal could, at 157.5m in height, have a harmful impact on the conservation area. Whilst they felt there were many merits to the proposal they challenged the designers to improve the design of the base and top of the building. They asked for a more generous public realm at the base and a distinguished top or 'crown'.
125. Since the review in 2017 the proposal has been significantly changed to address all the comments and concerns of the DRP. The tower has been reduced in height to 121m at the 'shoulder' and 134m overall; the public realm around the base has been redesigned and enlarged; the entrance relocated to the northern end; and the top of the building completely redesigned. Most significantly the reduction in height has addressed the most substantive comments from the Panel and avoided causing harm to the Bermondsey Street Conservation Area. In this respect the Applicant has addressed all the points raised by the Southwark DRP and although the proposal has not been reviewed again by the Panel, Officers are satisfied that their detailed concerns have been met.

Affordable Housing

Policy context

126. The applicant proposes to meet the affordable housing requirement for this site through an in lieu payment of £34.1 million. The proposed development would have the equivalent of 973 habitable rooms and as such the affordable housing requirement would be 341 affordable habitable rooms. In line with the SPD requirement of £100,000 per habitable room, the £34.1 million payment would equate to 35%. This is discussed in more detail below.

National policy

127. The NPPF, updated in February 2019 states that local planning authorities should set policies for affordable housing need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.

Regional

128. The regional policies and guidance relating to affordable housing are set out in the London Plan and the Mayor's Homes for Londoners SPG 2017. The key relevant policies within the London Plan in relation to affordable housing are:

129. Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes:

Part A of the policy requires that the maximum reasonable amount of affordable housing should be sought with regard to a number of factors including:

- current and future requirements for affordable housing
- the need to encourage rather than restrain development
- the need to promote mixed and balanced communities
- the specific circumstances of individual sites
- resources available to fund affordable housing, to maximise affordable housing output and the investment criteria set by the Mayor
- the priority to be accorded to provision of affordable family housing

130. Part B of the policy sets out that negotiation on sites should take account of their individual circumstances including development viability.

131. Part C of the policy sets out that affordable housing should normally be provided on-site. In exceptional cases where it can be demonstrated robustly that this is not appropriate in terms of the policies in this Plan, it may be provided off-site. A cash in lieu contribution should only be accepted where this would have demonstrable benefits in furthering the affordable housing and other policies in this Plan and should be ring-fenced and, if appropriate, pooled to secure additional affordable housing either on identified sites elsewhere or as part of an agreed programme for provision of affordable housing.

132. The supporting text in paragraph 3.74 repeats part C of the policy setting out that in exceptional circumstances an off-site or payment in lieu contribution may be accepted. Where a payment in lieu contribution is acceptable the text sets out that it should be ring fenced, and if appropriate 'pooled', to secure efficient delivery of additional affordable housing on identified sites elsewhere. These exceptional circumstances include those where, it would be possible to:

- secure a higher level of provision
- better address priority needs, especially for affordable family housing
- secure a more balanced community
- better sustain strategically important clusters of economic activities, especially in parts of CAZ.

Local

133. The local policies are saved Southwark Plan Policy 4.4 Affordable housing, Core Strategy Strategic Policy 6 – Homes for people on different incomes and Strategic Policy 9 – Student homes. Further guidance on how to implement the policies is contained within the Council's adopted Affordable Housing SPD 2008 and draft Affordable Housing SPD 2011.
134. Core Strategy Strategic Policy 6 'Homes for people on different incomes' requires as much "affordable housing on developments of 10 or more units as is financially viable". It also sets a minimum target of 8,558 net affordable homes between 2011 and 2026. It requires a minimum of 35% of affordable housing on developments with

10 or more units.

135. Saved Southwark Plan Policy 4.4: Affordable housing is used alongside the overarching Core Strategy policy 6. Parts iv) and vi) of the policy require that:

- I. The affordable housing provided must be an appropriate mix of dwelling type and size to meet the identified needs of the borough.
- II. A tenure mix of 70:30 social rented: intermediate housing ratio for the Central Activities Zone.

136. The Council's adopted Affordable Housing SPD 2008 (Section 3.6) together with the draft Affordable Housing SPD 2011 (section 6.3) clarifies the Southwark Plan and Core Strategy policy framework and sets out the approach in relation to securing the maximum level of affordable housing from developments. Specifically, it sets out the sequential tests relating to the delivery of affordable housing as:

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

137. It is therefore expected that the applicant show that the steps as set out above are followed in order to demonstrate that exceptional circumstances exist sufficient to justify the provision of an in lieu payment. The SPDs make it clear that a financial appraisal must be submitted to justify any off-site provision or in lieu contribution. As set out in paragraph 6.3.9 of the draft 2011 SPD the appraisal must justify that at least as much affordable housing is being provided as would have been provided if the minimum 35% affordable housing requirement were achieved on-site. The requirement for a financial appraisal for any application which would have a requirement for affordable housing is further established under the 2016 Development Viability SPD.

138. In line with the SPD, a financial appraisal was submitted to allow an assessment of the maximum level of affordable housing that could be supported by the development. The appraisal was reviewed by Avison Young on behalf of the Council. Following the review of the appraisal Officers have concluded the most beneficial approach for this particular development would be to accept a payment in lieu. This is discussed in detail below.

On site provision

139. Southwark is one of the top four London Boroughs in terms of the provision of student housing. It is noted that London Plan policy specifically requires affordable student accommodation as part of any development for student housing and the GLA have raised this as an issue in their Stage I response. Officers consider that whilst there would be benefits to providing affordable student housing this would be significantly

outweighed by Southwark's pressing need for traditional general needs affordable housing and that that this should take priority over the provision of affordable student accommodation particularly given that Southwark has provided such a large number of student homes and has contributed significantly to London's student housing needs.

140. As such the applicant has investigated the potential to provide general needs affordable housing on site as part of the proposed development. Provision of on site affordable housing would require an additional core to independently service and access the affordable homes. This would lead to significant inefficiencies within the lower levels of the building and would limit the ability to provide active frontages at ground floor level as the space would be taken up by lift cores and separate entrances/lobbies for the student housing and affordable housing. In order to limit the inefficiencies, the affordable housing would need to be provided at the lower levels in order to remove the need to take a second core up the entire height of the building. This would lead to poorer quality accommodation and given the layout of the site and building as well as the need to provide cores centrally within the building, it would result in a high proportion of single aspect units as well as a majority of one and two bedroom units with limited scope to provide larger family homes.
141. Delivering on site provision would therefore be less advantageous and would not maximise the amount of affordable housing that could be delivered. It is considered that the New Homes Building Programme would enable the delivery of more affordable housing, and also more family affordable housing, which would better meet the housing needs of the borough's residents.

Off site Provision

142. The applicant has undertaken a site search in conjunction with CBRE consultants. This site search identified approximately 80 sites and the developer entered into discussions to deliver three of the sites. The sites the developer identified for delivery included the sites at Albion Civic Centre, Albion Primary School and the extension to the Guinness Trust buildings on Snowfields. Subsequent to the developers initial discussions on these sites the Council have now decided to deliver these two Albion schemes independently. Currently, although a number of sites have been investigated by the developer, no suitable sites have been firmly identified as available and deliverable, or secured by the applicant.
143. Delivering off-site affordable housing is therefore considered to be very challenging, as there are few sites likely to come forward that are not within the Council's control. This has certainly been the experience in relation to other schemes that included off-site affordable housing such as the Neo Bankside development. Sites are either not for sale or have recently been sold and are therefore not available for the purpose of off-site affordable housing. Bringing forward off-site affordable housing in the immediate vicinity of the application site would limit the number of new homes that could be provided given the significant land costs and development values. Delivery of offsite affordable housing through securing sites on the open market would not maximise delivery of affordable housing and would impact on the number of new affordable homes that could be delivered.

Justification for an In Lieu Payment

144. The Core Strategy requires as much affordable housing as is financially viable and the London Plan requires the maximum reasonable amount. The in lieu payment proposed by the applicants, as justified through the financial appraisal, meets both of these criteria.
145. The NPPF, London Plan and local policies all set out that in exceptional circumstances (the local policy refers to “very exceptional” circumstances) a commuted sum may be acceptable in lieu of on-site or off-site affordable housing. In the case of this application, a commuted sum is the preferred approach as this will deliver the maximum amount of affordable housing to help meet local need. This will help deliver the aspirations of the London Plan, Core Strategy and saved Southwark Plan. The key aspirations and policy requirements that it will help deliver are as follows:
- It would deliver more affordable housing to help meet housing need. This is in accordance of bullet point 1 of paragraph 3.74 of the London Plan which sets out that a commuted sum may be acceptable if it would “secure a higher level of provision”. It will also help deliver the aspirations of Core Strategy policy 6.
146. It is proposed that the money would be used for new affordable housing which would be Council developed and managed, which will subsequently allow greater control over rent levels and management. This could also potentially allow for local lettings, where new housing is let to local residents in priority need, enabling the council to re-let existing homes and create better mobility on estates, and provide people with appropriate housing to suit their needs. It is also proposed that the provision of specialist housing such as accessible, or wheelchair adapted homes, be delivered through Council’s New Homes Building Programme.
- Maximising resources available to fund affordable housing. London Plan policy 3.12 requires consideration of resources available to fund affordable housing to maximise affordable housing. Accepting an in lieu payment would help to maximise affordable housing provision. The £34.1 million payment could therefore deliver up to 129 new homes. This is considerably in excess of what could be provided on site.
147. The money secured through the commuted sum would be used to deliver more affordable housing through the Council’s directly funded New Homes Building Programme. The Council’s Cabinet initially pledged to build 1,000 new council homes by 2020. A further commitment has also now been made to build a further 10,000 council homes (therefore 11,000 in total) over the next 30 years. The in lieu payment secured as part of this application would be paid into the council’s Affordable Housing Fund, effectively ring fencing the money so that it can only be used to deliver new affordable homes. Money from this fund will be used to deliver the directly funded New Homes Building Programme. At least 81 sites have been identified for development under this programme of which 18 have been competed. The remaining 63 sites are in various stages of planning including application stage, pre-application stage and feasibility studies. Further work is currently being carried out to work up these schemes and to identify further schemes. Whilst an applicant is limited to finding sites on the open market, this programme provides the Council with the opportunity to provide housing on sites within its ownership or within existing estates which are not appropriate to dispose of on the open market. It provides a coherent strategy for

delivering new council homes at affordable social rents to help meet the council's housing need.

148. Following the negotiations with the Council's consultants Avison Young and Council Officers, the applicant has offered to make a commuted payment of £34.1 million in lieu of providing any affordable housing either on or off site. The scheme would provide the equivalent of 973 habitable rooms which would have an affordable housing requirement of 341 habitable rooms. Based on the SPD figure of £100,000 per affordable habitable room, the £34.1 million payment would equate to a 35% provision.
149. In the review of the applicants Financial Viability Assessment, the Councils appointed consultants Avison Young determined that there would be a scheme surplus of £6.96 million that could be used to fund affordable housing and this would equate to a 7% affordable housing provision. The applicants offer of £34.1 million equates to a 35% provision based on the £100,000 figure per habitable room as set out in the SPD and would exceed the maximum amount available as set out in the viability assessment and confirmed by Avison Young by approximately £27.1 million.
150. It is important to note that the proposed in lieu payment exceeds the maximum reasonable amount of affordable housing that the development can provide by a significant margin. Given the fact that the proposed affordable offer of £27.1 million above the figure that the Council's consultants consider that the scheme can viably sustain, Officers are satisfied that the proposed approach to affordable housing is acceptable and would maximise provision of affordable housing.
151. Ordinarily, developments would be subject to review mechanisms within the S106 agreement in order to revisit developments once the later stages of construction have been reached in order to capture any uplift in values and enhance the affordable housing provision. In this instance, given that the scheme exceeds the maximum reasonable amount of affordable housing by such a significant margin, officers are satisfied that the development should proceed without being subject to any late stage review mechanisms. An early stage (implementation based review) will still be secured in order to expedite delivery of the scheme.

Conclusion on Affordable Housing

152. Policies in the London Plan, saved Southwark Plan and Core Strategy seek to maximise reasonable and financially viable amount of affordable housing. The NPPF acknowledges that there may be circumstances where an in lieu payment can be justified.
153. Policy at National, Regional and Local levels allow for a commuted sum in exceptional circumstances (the Local policy refers to "very exceptional"). As per London Plan policy, it is clear where the approach would deliver more and more appropriate affordable housing it is acceptable. The New Homes Building Programme delivering affordable housing using the contribution money would mean more affordable housing, more family affordable housing, and is within an agreed programme which the council are committed to delivering.
154. The in lieu payment of £34.1 million is very substantial and could deliver a substantial

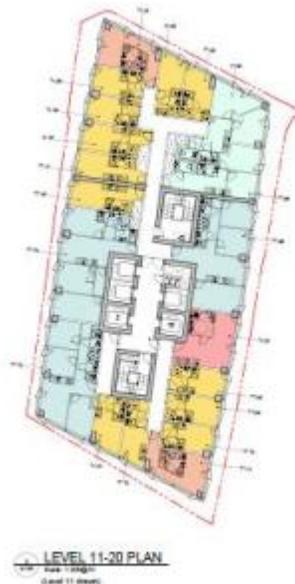
number of new affordable homes which would be considerably in excess of what could be provided on site. Accordingly, the acceptability of an in lieu payment is based on the specific merits of this proposal taking account of all the material considerations highlighted above.

155. Given the above, it is considered that the New Homes Building Programme is the most effective way to provide truly affordable housing ensuring mixed and balanced communities, to the extent that any departure from what is normally required by the NPPF, London and Southwark Plan is justified for the above reasons based on the specific merits of this proposal and taking account of all the matters set out above

Housing

156. There are no specific housing standards for student housing and given the different needs to student housing in comparison to general needs student housing it would not be appropriate to impose the Council's adopted Residential Design Standards to student housing. However, in terms of quality of accommodation, officers consider that the student homes would be well lit and well ventilated with an acceptable standard of outlook. All rooms would be suitably sized and would offer a high standard of student accommodation. At least 5% of the student rooms being proposed would be suitable for wheelchair users and this is in line with the previously consented scheme.

Image – Typical student floor layout



157. The development would offer high quality amenities for student residents, including extensive shared amenity spaces and lounges at 2nd floor level and levels 37-39 (inclusive), including an external terrace. This is considered to offer a wide choice of high quality shared amenity spaces for student residents.

Impact of proposed development on amenity of adjoining occupiers and

surrounding area

158. Strategic Policy 13 of the Core Strategy sets high environmental standards and requires developments to avoid amenity and environmental problems that affect how we enjoy the environment. Saved Policy 3.2 of the Southwark Plan states that planning permission for development will not be granted where it would cause a loss of amenity, including disturbance from noise, to present and future occupiers in the surrounding area or on the application site. Furthermore, there is a requirement in Saved Policy 3.1 to ensure that development proposals will not cause material adverse effects on the environment and quality of life.
159. A development of the size and scale proposed will clearly have potential significant impacts on the amenities and quality of life of occupiers of properties both adjoining and in the vicinity of the site. The proposal is accompanied by an Environmental Impact Assessment in order to ascertain the likely associated environmental impacts and how these impacts can be mitigated. The accompanying Environmental Statement (ES) and Addendum deals with the substantive environmental issues. An assessment then needs to be made as to whether the residual impacts, following mitigation, would amount to such significant harm as to justify the refusal of planning permission.

Overlooking

160. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear. The closest residential properties are located directly opposite the site to the south across Melior Street and the separation distance at its closest point would be 15 metres which achieves the standard set out in the SPD and as such will ensure that there is no harmful overlooking.

Daylight

161. A daylight and sunlight report has been submitted as part of the Environmental Statement. The report assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
162. The BRE Guidance provides a technical reference for the assessment of amenity relating to daylight, sunlight and overshadowing. The guidance within it is not mandatory and the advice within the guide should not be seen as an instrument of planning policy. The guidance notes that within an area of modern high rise buildings, a higher degree of obstruction may be unavoidable to match the height and proportion of existing buildings. This area has been identified as an area where tall buildings are appropriate and there are existing tall buildings in close proximity such as The Shard, Fielden House (currently under construction) and Guys Hospital Tower.
163. The BRE sets out three detailed daylight tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted. This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight

and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by about 20% of the original value before the loss is noticeable. In terms of the ES, the level of impact on loss of VSC is quantified as follows;

Reduction in VSC	Level of Impact
0- - 20%	Negligible
20.1% – 30%	Minor
30.1% – 40%	Moderate
40.1% +	Major

164. The second method is the No Sky Line (NSL) method which assesses daylight distribution, the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of 20% in the area of sky visibility, daylight may be affected

165. The ES considers the impact on the following neighbouring buildings:

- Wolfson House (student accommodation)
- Melior Street Nos. 14 and 16
- 62 West Street
- Margaret House (patient relatives accommodation)
- Weston Street Nos. 70 and 75
- Bridgeway Heights
- The Rose Public House
- Snowfields No.s 8-20, 38, 39, 40, 41, 42, 43, 147
- Snowfields Yard
- Guinness Court (Blocks A, B and C)
- The Glasshouse
- The Horseshoe Public House
- Printworks House
- More Cooper House

166. The daylight report has considered a large number of rooms around the site. It assessed 1000 windows serving 627 rooms. Of the 1000 windows assessed 758 (75.8%) would satisfy the BRE recommended levels for VSC.

167. Of the 627 rooms assessed, 610 (97%) would meet the BRE standards for NSL. The tables below outline the general results in terms of the loss of VSC and NSL that would be experienced by the remaining buildings and a more localised assessment of the affected properties is detailed below;

Existing baseline V. Proposed Vertical Sky Component and cumulative 2 ()

Property	No. of windows tested	No. retaining at least 80% of their baseline	No. with minor adverse impact of up to 29.9%	No. with moderate adverse impact of between 30%-	No. with substantial adverse impact of over 40% reduction

		value	reduction in VSC	39.9% reduction in VSC	in VSC
Wolfson House	225	46 (68)	40 (52)	81 (83)	58 (22)
16 Melior Street	66	26 (22)	3 (0)	6 (4)	31 (40)
62 Weston Street	12	5 (4)	7 (1)	0 (7)	0 (0)
Margaret House	24	24 (23)	0 (1)	0 (0)	0 (0)
75 Weston Street	28	28 (28)	0 (0)	0 (0)	0 (0)
70 Weston Street	5	5 (5)	0 (0)	0 (0)	0 (0)
Bridgeway Heights	40	40 (40)	0 (0)	0 (0)	0 (0)
The Rose (PH)	14	14 (14)	0 (0)	0 (0)	0 (0)
43 Snowsfields	6	6 (4)	0 (2)	0 (0)	0 (0)
42 Snowsfields	13	8 (8)	3 (3)	2 (2)	0 (0)
41 Snowsfields	13	12 (11)	1 (2)	0 (0)	0 (0)
Guinness Court Block C	65	65 (65)	0 (0)	0 (0)	0 (0)
40 Snowsfields	18	14 (11)	4 (5)	0 (2)	0 (0)
14 Melior Street	9	7 (0)	2 (2)	0 (0)	0 (7)
39 Snowsfields	18	17 (12)	1 (5)	0 (1)	0 (0)
38 Snowsfields	5	5 (3)	0 (2)	0 (0)	0 (0)
Snowsfields Yard	97	94 (73)	1 (3)	2 (1)	0 (20)
Guinness Court Block B	21	21 (21)	0 (0)	0 (0)	0 (0)
Guinness Court Block A	20	20 (20)	0 (0)	0 (0)	0 (0)
The Glasshouse	16	16 (13)	0 (2)	0 (0)	0 (1)
The	17	17	0	0	0

Horseshoe (PH)		(16)	(1)	(0)	(0)
8-20 Snowfields	57	57 (45)	0 (4)	0 (0)	0 (8)
147 Snowfields	83	83 (83)	0 (0)	0 (0)	0 (0)
Printworks House	53	53 (53)	0 (0)	0 (0)	0 (0)
More Copper House	75	75 (75)	0 (0)	0 (0)	0 (0)
Total	1000	758 (717)	62 (85)	91 (100)	89 (98)

Existing baseline V. Proposed Daylight Distribution and cumulative 2 ()

Property	No. of rooms tested	No. retaining at least 80% of their baseline NSL value	No. with minor adverse impact of up to 29% reduction in NS:	No. with moderate adverse impact of between 30%-39.9% reduction in NSL	No. with substantial adverse impact of over 40% reduction in VSC
Wolfson House	165	157 (159)	4 (2)	4 (4)	0 (0)
16 Melior Street	18	18 (6)	0 (0)	0 (1)	0 (11)
62 Weston Street	12	10 (8)	1 (3)	1 (0)	0 (1)
Margaret House	9	9 (6)	0 (2)	0 (1)	0 (0)
75 Weston Street	6	6 (6)	0 (0)	0 (0)	0 (0)
70 Weston Street	4	4 (4)	0 (0)	0 (0)	0 (0)
Bridgeway Heights	16	16 (16)	0 (0)	0 (0)	0 (0)
The Rose (PH)	6	6 (6)	0 (0)	0 (0)	0 (0)
43 Snowfields	6	5 (5)	1 (1)	0 (0)	0 (0)
42 Snowfields	13	13 (13)	0 (0)	0 (0)	0 (0)
41 Snowfields	13	13 (12)	0 (1)	0 (0)	0 (0)
Guinness Court Block C	48	45 (45)	1 (1)	2 (2)	0 (0)
40	14	14	0	0	0

Snowsfields		(14)	(0)	(0)	(0)
14 Melior Street	6	6 (4)	0 (2)	0 (0)	0 (0)
39 Snowsfields	14	13 (13)	1 (1)	0 (0)	0 (0)
38 Snowsfields	5	5 (5)	0 (0)	0 (0)	0 (0)
Snowsfields Yard	60	60 (57)	0 (3)	0 (0)	0 (0)
Guinness Court Block B	20	19 (19)	1 (1)	0 (0)	0 (0)
Guinness Court Block A	20	20 (14)	0 (4)	0 (2)	0 (0)
The Glasshouse	6	5 (4)	1 (1)	0 (0)	0 (1)
The Horseshoe (PH)	7	7 (7)	0 (0)	0 (0)	0 (0)
8-20 Snowsfields	50	50 (25)	0 (9)	0 (6)	0 (10)
147 Snowsfields	30	30 (30)	0 (0)	0 (0)	0 (0)
Printworks House	33	33 (33)	0 (0)	0 (0)	0 (0)
More Copper House	46	46 (46)	0 (0)	0 (0)	0 (0)
Total	627	610 (557)	10 (31)	7 (16)	0 (23)

168. The following properties will continue to receive fully compliant VSC and NSL in line with BRE Guidelines:

- Margaret House
- 75 Weston Street
- 70 Weston Street
- Bridgewalk Heights
- The Rose (PH)
- 38 Snowsfields
- Guinness Court Block A
- The Horseshoe (PH)
- 8-20 Snowsfields
- 147 Snowsfields
- Printworks House
- More Copper House

169. The remaining properties will see some impacts on either VSC, NSL or both and will be considered in turn below:

Wolfson House

170. Wolfson House provides student accommodation and as such is transiently occupied. Whilst there would be some impacts on VSC, the losses are considered to be moderate to major adverse in terms of loss of VSC with the most affected windows being located on the lower levels. However, in terms of NSL, of the 165 rooms assessed, 157 would retain BRE compliant daylight distribution with the eight rooms that would see losses beyond the BRE guidelines having impacts that would be considered as minor to moderate in significance. Given the high proportion of rooms that would continue to see BRE compliant daylight distribution (955) as well as the temporary and transient nature of the accommodation, the impact of the development on daylight and sunlight to this building is considered acceptable.

16 Melior Street

171. 16 Melior Street lies to the south of the application site and has 66 windows serving 18 rooms. Whilst it is noted that there would be some impacts in terms of VSC. However, with the exception of six bedrooms, all of the other rooms are served by windows that would continue to receive BRE compliant VSC. Whilst bedrooms are considered less sensitive to daylight loss it should be noted that all rooms at 16 Melior Street would continue to achieve BRE compliant daylight distribution. Overall the impact of the development on Melior Street is considered acceptable and would be classified as being of minor significance.

14 Melior Street

172. Nine windows have been tested for VSC at 14 Melior Street and seven would remain fully compliant with the BRE. The two affected windows would see minor reductions of less than 29% whilst all rooms tested for NSL would remain fully compliant. The impact on this property is therefore acceptable.

62 Weston Street

173. 12 windows and 10 rooms have been assessed at this property for VSC and NSL respectively. Five of the windows would continue to receive BRE compliant VSC and seven would see reductions of less than 29% which is considered to be of negligible significance. Two of the ten rooms would see reductions in daylight distribution however this is considered to be acceptable given the high compliance rate (80%) alongside the limited impact on VSC. As such the impacts on this property are considered acceptable.

43 Snowfields

174. This property would achieve 100% compliance with the BRE in terms of VSC. Only one room of five tested would see a reduction in daylight distribution however the loss would be less than 29% and would be considered as a minor impact.

42 Snowfields

175. The property at 42 Snowfields would see five of 13 windows affected in terms of a

loss of VSC however three of these windows would see reductions of less than 29% VSC and two would see reductions of between 30% and 39% VSC. In terms of NSL, all rooms assessed would continue to receive BRE compliant daylight distribution which is considered acceptable.

41 Snowfields

176. The property at 41 Snowfields would see a single window out of 13 windows tested for VSC experience a loss beyond the BRE guide and the reduction would be less than 29%. In terms of NSL, all rooms assessed would continue to receive BRE compliant daylight distribution which is considered acceptable.

40 Snowfields

177. Of the 18 windows tested for VSC, 14 would remain compliant with the BRE guide whilst four windows would see minor reductions in VSC of less than 29%. All rooms tested for NSL would remain fully compliant with the BRE.

39 Snowfields

178. 18 windows have been tested for VSC with 17 remaining fully compliant and the single affected window would experience a minor loss of VSC of less than 29%. Furthermore, of the 14 rooms tested for NSL, only one would experience a loss of VSC beyond the BRE guide and the loss in this instance would be less than 29% which is considered to be of minor significance.

Snowfields Yard

179. 97 windows have been tested for VSC at Snowfields Yard and 94 would remain fully compliant with the BRE which equates to 97% compliance. This property would be unaffected in terms of NSL with all rooms tested achieving BRE compliant daylight distribution.

The Glasshouse

180. The Glasshouse would remain fully compliant in terms of VSC which is positive. In terms of NSL, only one of the six rooms assessed would see a loss of daylight distribution and this loss would be less than 29% which is considered to be of minor significance.

Guinness Court Blocks B and C

181. Guinness Court Blocks B and C would remain fully compliant with the BRE in terms of the impact on VSC. In terms of NSL, 68 rooms have been assessed between these two properties and only four would see losses beyond the BRE which is a compliance rate of 95%. The losses of NSL are minor to moderate in significance but taken together with the fully compliant VSC, the impact on this property is considered to be negligible.

Sunlight

182. In considering the impact upon sunlight to residential properties, the test is based upon a calculation of annual probable sunlight hours (APSH) for all window faces within 90 degree of due south. BRE guidelines require that a window should receive a minimum of 25% of the annual probable sunlight hours, of which, 5% should be received in winter months. Where window sunlight levels fall below this recommendation, the window should not lose more than a 20% loss of its former value. There are 176 residential rooms that face within 90 degrees of due south and as such have been assessed for impacts on sunlight availability. All properties assessed in terms of sunlight would remain fully compliant with the BRE guide.

Overshadowing of amenity spaces

183. The closest and most directly affected amenity space is the open space/garden area located on Melior Street close to the junction with Fenning Street. The applicant's transient overshadowing study demonstrates that, given the position of the existing buildings and the proposed development, the majority of overshadowing would take place to the north with only minor overshadowing of the open space on Melior Street occurring later in the day.

Cumulative Daylight and Sunlight Impacts

184. The applicant has completed a cumulative assessment to assess the impact of the development alongside those schemes that have approval, are currently being assessed and those which are currently at pre-application stage. The applicants assessment takes forward future baseline scenarios as described below:
- Cumulative Baseline 1, which includes the application schemes at Vinegar Yard, Three Ten Bermondsey and 2-4 Melior Place; and
 - Cumulative Baseline 2, which is the same as Cumulative Baseline 1 but also includes the pre-application scheme at Beckett House, 60 St Thomas Street.
185. For each scenario, the potential effects of the proposed development have been calculated relative to (a) the existing site massing and (b) the 2015 consented massing ("the Quill"). The other cumulative projects shown in Figure 2.1 of March 2019 ES Addendum are considered to be too far away or too small to be of relevance. The detail of the cumulative assessment reviewed by officers focuses on Cumulative Scenario 2 as a worst case scenario.
186. The submitted assessments for Cumulative Scenario 2 demonstrate that in this future baseline, 223 fewer windows (180 No.) and 101 fewer rooms (330 No.) would enjoy BRE-recommended daylight levels than in the existing baseline. The further reduction in daylight levels is a consequence of the introduction of Beckett House, 60 St Thomas Street. The level of adherence to the BRE daylight impact guidelines would be slightly worse than Cumulative Scenario 1 (71.7% VSC adherence and 88.8% NSL adherence) and the sunlight impacts would still be 100% BRE adherent.
187. The overall significance of the daylight, sunlight and overshadowing effects of the amended proposed development in this scenario would change from that stated in the November 2018 ES Addendum for the following properties:
- 14 Melior Street – increases from minor adverse to minor-to-moderate adverse

- 16 Melior Street – increases from minor adverse to moderate-to-major adverse
- 62 Weston Street – increases from minor adverse to minor-to-moderate adverse
- Margaret House – increases from negligible to minor adverse
- Snowfields Yard – increases from minor adverse to minor-to-moderate adverse
- Guinness Court Block A Street – increases from negligible to minor adverse
- Horseshoe Public House – increases from negligible to minor adverse
- 8-20 Snowfields – increases from negligible to minor adverse

Solar Glare

188. Solar Glare has been examined as part of the ES and the outcome shows that this is limited to travel on the railway line from both the south east and north west where the impacts from solar glare would be considered as minor adverse in significance.

Conclusions on Daylight and Sunlight

189. The proposed development would have a very limited impact on the daylight and sunlight to adjacent occupiers and would not result in any detrimental overshadowing to the Melior Street amenity space. The daylight report demonstrates that 75.8% of all assessed windows would continue to meet BRE guidance and those that would not meet the BRE would not be affected to a significantly adverse degree. This is supported by the fact that of the 627 rooms assessed for daylight distribution, 610 (97%) would meet the BRE standards. Officers therefore conclude that the impact of the development on daylight and sunlight would be limited and is considered acceptable.

Wind

190. An assessment of the wind implications of the Development has been undertaken as part of the ES. The assessment focused on those locations likely to result in the highest exposure for pedestrians such as building entrances, amenity spaces and public realm areas. 124 different locations were tested for wind environment, 114 of which were at ground level. The wind assessment indicated that current conditions around the site were benign albeit with higher wind speeds recorded closer to the Shard.
191. The wind assessment considers the impact of wind on pedestrian comfort and the potential to cause distress using well established wind speed criteria known as the Lawson Comfort Criteria that relate wind speeds to particular uses and activities, such as sitting and standing, leisure walking and business walking. A number of locations were identified whereby the wind conditions would exceed the relevant comfort and safety criteria. Applying mitigation locally to these affected areas which successfully mitigated any wind impacts.
192. With appropriate mitigation in place, the predicted pedestrian level wind environment in and around the completed development is rated as suitable, in terms of safety, for all users throughout the year. In terms of wind comfort, all locations on the ground and elevated levels are predicted to have wind conditions that would be suitable for the

intended uses. Based on the results of the tests on the final design it has been established that the wind conditions within and around the Development would be appropriate given the uses proposed. The effects on the wind microclimate would therefore be of negligible significance.

Noise and vibration

193. Noise and vibration impacts have been considered as part of the ES (and as part of the cumulative assessment) taking into account both the demolition/construction phase and impacts from the completed development itself. The noise and vibration impacts from the site would be highest during the demolition of the existing buildings and substructure works (which would include excavation and piling works) and lowest during the internal fit out and landscaping. The construction of the basement, formation of foundations and piling are likely to be the most significant noise and vibration sources although these impacts would be temporary. There would also be a degree of disturbance from increased vehicle movements during the construction phase. And this is likely to result in increased noise levels along local roads and streets. A Demolition/Construction Environmental Management Plan (CEMP) would be secured as part of the legal agreement to reduce excessive noise as far as is possible. The noise impacts from demolition and construction would be temporary in nature and it is not envisaged that any long term disturbance would be caused.
194. In terms of the completed development, noise from plant can be controlled by condition. The development itself is not anticipated to result in a detrimental increase in traffic once the development is complete and operational and impacts are expected to be negligible in significance.
195. The development would result in a significant increase in the number of residents (students) as a result of the new student accommodation. However, it is not anticipated that there would be any demonstrable harm caused to existing residential amenities from their comings and goings. The site is located within a busy major town centre environment and adjacent to a busy transport node where some noise should be expected.

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

196. The application site is located in a Central London location characterised by a range of uses and there is not anticipated to be any conflict of use that would be detrimental to amenity.

Transport issues

197. The NPPF states that planning decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (para. 34).
198. Core Strategy Strategic Policy 2 encourages walking, cycling and the use of public transport rather than travel by car. Saved Policy 5.1 of the Southwark Plan states that major developments generating a significant number of trips should be located near

transport nodes. Saved Policy 5.2 advises that planning permission will be granted for development unless there is an adverse impact on transport networks; and/or adequate provision has not been made for servicing, circulation and access; and /or consideration has not been given to impacts of the development on the bus priority network and the Transport for London (TfL) road network.

199. An assessment of the likely significant environmental impacts of the development on transport is included within the ES. A Framework Travel Plan has also been submitted.

Site context

200. The application site lies immediately adjacent to the southern entrance to London Bridge Station on St Thomas Street which is a classified road. The site has a PTAL rating of 6B which represents the highest level of access to public transport availability. The site also sits within the London Bridge Controlled Parking Zone.

Site layout

201. The main entrance to the student accommodation, which is the primary use, would be gained from St Thomas Street. Further entrances to the flexible commercial units would be obtained from both St Thomas Street and Weston Street. Access to the cycle stores would be from Melior Street. Servicing would take place from Melior Street as well in the form of a semi on street lay by which would provide direct access to the loading bay.

Traffic Impact

202. This proposed development is in an area with excellent PTAL of 6B and directly opposite the new entrance to London Bridge Station on St Thomas Street as well as being close to the bus routes on Tooley Street and the riverboat service on River Thames. Concerning the vehicle movements ensuing from this development proposal, the Council Transport Team's interrogation of comparable sites' travel surveys within the TRICS travel database has revealed that this development proposal in its entirety would produce 14 and 27 two-way vehicle movements in the morning and evening peak hours respectively, which when compared to the 21 two-way vehicle movements in the morning or evening peak hours that are estimated for the existing building on this site, means that it would create 7 less two-way vehicle movements in the morning peak hour and 6 additional two-way vehicle movements during the evening peak hour and it is considered that the development would not have any noticeable adverse impact on the existing vehicular traffic on the adjoining roads.
203. The applicant has proposed few travel plan measures encompassing provision of bicycles for students and cycle parking facilities for staff/residents/patrons as well as public transport information. It is also estimated that 15 delivery vehicles and an additional 15 motor/pedal cycles would service this development per day. Subject to the provision of a Service Management Plan as part of the S106 agreement, the proposed development is considered acceptable in terms of impact on local traffic and servicing.

Car Parking

204. The proposed development would be car free which is fully supported and future residents and staff would be made exempt from obtaining parking permits. The S106 agreement will secure the provision of a car club bay and a disabled parking bay within the immediate vicinity of the development.

Cycle Parking

205. The applicant has proposed 507 long stay cycle parking spaces comprising 64 folding bike spaces, 140 double-stack spaces and 15 Sheffield cycle racks containing 30 cycle parking spaces as well as 255 fully equipped cycle hire bike spaces in the basement for use by student. Moreover, 18 of the cycle parking spaces would be provided on the ground floor and a further 18 cycle parking spaces would be provided in the basement for staff. The proposed development is considered to be acceptable in terms of cycle parking provision.

Walking and Cycling

206. The footways next to this site on St Thomas Street/Weston Street connect well with London Bridge tube/train station opposite this site via a signalised pedestrian crossing on the adjoining St Thomas Street and, southerly with the pedestrian routes running through the neighbouring Guy Street Park and Leathermarket Community Park. In the northbound direction, these footways link with the riverside walk/riverboat service along River Thames and the walking route on Potters Field plus the bus routes on the nearby Tooley Street
207. This site also links with various cycle routes in this locality including the Cycle Superhighway and the results of the Cycling Level of Service assessment that was carried out by the applicant's consultants have indicated that this area has adequate and suitable cycle routes. The applicant has proposed the setting back of this development from St Thomas Street/Weston Street/Melior Street to create space for pedestrian movement that would supplement the adjacent footways, especially to address the problems of narrow footways on Melior Street/Weston Street.

Cycle Hire

208. As well as providing facilities on site for student cycle hire, the proposed development will be required to make a contribution to extending London Cycle Hire Scheme facilities on St Thomas Street and this will be secured as part of the S106 Agreement.

Public Transport

209. The proposed development is not considered to have any adverse impacts on the public transport availability within the immediate area given its location within a high PTAL area immediately adjacent to London Bridge Station. A contribution towards the improvement of bus routes will be secured as part of the S106 Agreement in order to mitigate any potential increase in demand.

Construction

210. It is acknowledged that construction within Central London can lead to noise and

disturbance to adjacent properties and occupiers. This will be particularly important on this site given the close proximity to Guys Hospital and London Bridge Station. As such a Construction Logistics Plan and a Demolition/Construction Environmental Management Plan will be secured as part of the S106 Agreement and both Networks Rail and Guys Hospital will be consulted on the detail of those plans at the time of submission,

Environmental Impacts

211. Transport has been considered as part of the Environmental Statement. It notes that during construction, environmental impacts would be temporary, short term and of negligible/minor adverse significance. It also concludes that the impact of the development on London Underground, National Rail and bus services would be negligible. Further consideration has been given to traffic generation, pedestrian and cycle impacts all of which are considered to have residual effects of negligible significance. In terms of cumulative impacts, with appropriate mitigation taken into account, the impacts of the development would generally be negligible to minor in significance.

Archaeology

212. The site lies within the 'Borough, Bermondsey and Rivers' Archaeological Priority Zone (APZ). Saved Policy 3.19 of the Southwark Plan (2007) requires that applications for development in APZs should be accompanied by an archaeological desk-based assessment (DBA) and an evaluation report. The site has the potential to contain significant archaeological remains which should be appropriately managed. The archaeological potential of the general area is assessed as high, particularly with regard to medieval and post-medieval settlement and water management regimes - as well as high-status Roman deposits, structures and finds from nearby sites. However, this site appears to be located on a low-lying gravel eyot which may have not been as intensively utilised in the Roman period, but nevertheless, has high potential for paleo-environmental remains and deposits dated from the early medieval period onwards. It is also possible that Roman deposits may survive within the alluvial sequence at depth.
213. As high archaeological potential is recognised across the site this endorses the need for further information to properly understand the nature and significance of the buried remains. On present evidence it is reasonable to expect that the site will contain archaeological remains which will inform recognised national and Greater London archaeological research objectives - that is non-designated heritage assets of archaeological interest in NPPF terminology.
214. The applicants have submitted an archaeological Desk Based Assessment (DBA) by Museum of London Archaeology (MoLA) and dated March 2018. The desk based assessment is sufficient to fulfil the requirement for a DBA, but does fail to mention the nearby scheduled ancient monument of the 1st century Roman boat found and preserved in situ under the new Guy's Cancer Centre. The applicants have not carried out an archaeological evaluation for this application, although a very small scale evaluation was carried out on this site by PCA in 2010 to support an earlier application. The site has also been subject to impacts from previous developments, which will have compromised the archaeological deposits on the site.

215. Archaeology has been fully considered as part of the ES which determines that the development would have a major impact on any surviving remains however, when taking the proposed mitigation into account the residual effects on archaeology and buried heritage assets would be negligible. The Council's Archaeologist has reviewed the submission and is satisfied that the development would not cause significant harm to the buried heritage subject to conditions being imposed.

Ecology

216. The site currently has limited biodiversity and ecological value. As such landscaping, tree planting and provision of green walls and green roofs has the ability to make improvements to the site. And on that basis appropriate conditions will be imposed on any consent issued. The ES indicates that the potential for bat roosting is low. The ES also concludes that the removal of the existing building and the loss/change of the existing habitats outside of the site itself would be of negligible significance and that there would be no effects on any nationally or internationally designated habitats or SINC's. Appropriate mitigation by way of conditions to manage the construction process would result in residual effects of negligible significance in all scenarios.

Impact on trees

217. The proposed development would result in the loss of the three existing trees which are located within a large planter on St Thomas Street. The principle of the loss of these trees was accepted on the previous two consents for this site and is considered acceptable subject to the applicants proposed planting with three new replacement trees on St Thomas Street. Appropriate conditions will be imposed to secure replanting, landscaping and green wall/roofs.

Water resources and flood risk

218. The application site sits within a Flood Risk Zone and has been reviewed by both the Environment Agency and the Council's Flood and Drainage Team. No objections have been raised subject to conditions which will be imposed on any consent issued.
219. In terms of assessment as part of the ES, as part of the existing versus proposed and existing versus proposed/cumulative, the effects of the development in terms of water resources and flood risk is considered to be acceptable and of negligible significance.

Waste

220. The development makes provision for waste storage and collection. This includes a storage area within the loading bay for collection days after which the bins will be returned to their location within the basement store. The principle of this arrangement is acceptable and will be secured in the S106 agreement as part of the required Service Management Plan.
221. In terms of the ES, the development would generate demolition, construction and excavation waste. The quantities involved, in comparison to the baseline, would have an effect of minor adverse significance however this would be short term and temporary in nature and could be adequately mitigated by way of the

Demolition/Construction Environmental Management Plan that would be secured as part of the ES.

Socio-economics

222. As the development would result in the loss of the existing employment floorspace a payment of £114,599 will be secured as part of the S106 agreement to offset this loss. Additional obligations have been agreed in order to secure employment and training during the course of construction.
223. In terms of economic benefits to the area, the provision of 905 student bedrooms would result in additional patronage to local shops, bars and restaurants. The development itself would provide 92 full time jobs and 33.5 part time jobs. Whilst beneficial, these effects are likely to be negligible in significance. The increase in demand for primary healthcare facilities is expected to result in a residual minor adverse effect however the development would be subject to the Southwark Community Infrastructure Levy which would mitigate these impacts somewhat.

Air quality

224. The application site is located within an Air Quality Management Zone. Air quality could be compromised by demolition and construction, the use of a CHP boiler as part of the centralised plant being proposed for the development and further impacts from servicing traffic. Subject to mitigation, the impacts from demolition and construction would have a negligible impact on air quality and would be temporary. Impacts from the CHP scheme would be of negligible to minor adverse in significance. The Council's Environmental Protection Team has recommended conditions to minimise impacts of the CHP on local air quality and these will be attached to any consent issued.

TV and Radio reception

225. Tall buildings have the ability to affect radio and TV reception by blocking signals to surrounding buildings. In the case of Capital House this would be a result of signal shadowing in a north/north west direction of the site. These are classified in the ES (including in the cumulative assessment) to be of minor adverse significance with effects on satellite signals likely to be of negligible significance. A condition is therefore recommended in order to identify any interference and put appropriate mitigation measures in place.

Aviation

226. The proposed development is of a height that could interfere with radar signals. This can however be mitigated through modifications to the radar system and NATS have therefore advised that two aviation conditions should be imposed on any grant of planning permission to secure details of a Radar Mitigation Scheme (RMS). The relevant conditions will be attached to any consent issued.

Soil and Ground Contamination

227. An assessment of soil environment and ground conditions has been undertaken in as

part of the ES in order to establish the potential for past contamination to exist at the site. The ES advises that there is little evidence of potentially contaminative uses on the site in the past. Moreover, the redevelopment of the site for the proposed building would involve extensive basement excavation which is likely to remove potential contamination. The Council's Environmental Protection Team has recommended a range of conditions regarding land contamination and appropriate remediation works. Further protection from impacts during construction can be achieved through the requirement for the applicant to submit a Construction and Environmental Management Plan. With appropriate mitigation in place, the impacts are considered to be negligible.

Planning obligations (S.106 undertaking or agreement)

228. Saved Policy 2.5 of the Southwark Plan and Policy 8.2 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. Saved Policy 2.5 of the Southwark Plan is reinforced by the recently adopted Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. Strategic Policy 14 'Implementation and delivery' of the Core Strategy states that planning obligations will be sought to reduce or mitigate the impact of developments. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development

229. Following the adoption of Southwark's Community Infrastructure Levy (SCIL) on 1 April 2015, much of the historical toolkit obligations such as Education and Strategic Transport have been replaced by SCIL. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight

Planning Obligation	Mitigation	Applicant Position
Affordable Housing In Lieu Payment	£34,100,000	Agreed
Archaeology	£11,171	Agreed
Car Club	Secure the provision of at least one disabled car parking space and one car club space for approval.	Agreed
Carbon Offset – Green Fund	£155,839	Agreed
Employment During Construction	77 sustained jobs to unemployed Southwark residents 77 residents trained in pre/post employment short courses. 19 new apprenticeships.	Agreed

	Or a payment of £371,150	
Employment Floorspace Offset	£114,599	Agreed
Pedestrian Route Improvements	£14,200	Agreed
Transport Improvements	£288,000	Agreed
Transport for London	Cycle hire docking station - £75,000 and £10,000 towards Legible London wayfinding signage	Agreed
Trees	Not specifically required unless unforeseen issues prevent trees from being planted or they die within five years of completion of the development in which case a contribution will be sought - £6,000 per tree.	Agreed
Admin Charge (2%)	£19,460.	Agreed

S106 provisions

230. The legal agreement will also secure an Estate Management Plan; Demolition and Construction Environmental Management Plan; Construction Logistics Plan, Site Wide Energy Strategy, Service Management Plan; Student Housing Management Strategy; Wind Mitigation Plan; Energy Strategy; car club bay and disabled parking bay; and a Landscaping Plan. Additional transport details will be secured under the legal agreement to secure details of the 507 long stay cycle parking spaces including 64 folding bike spaces, 140 double-stack spaces, 15 Sheffield cycle racks containing 30 cycle parking spaces, 255 fully equipped cycle hire bike spaces plus 18 staff cycle parking spaces.
231. The legal agreement will also secure the following S.278 Highways works:
- Construction of a raised table across the segment of Weston Street abutting this development;
 - Creating a raised entry treatment at the junctions of Weston Street with Melior Street and St Thomas Street;
 - Resurfacing of the road section adjoining this site on Weston Road;
 - Reconstruction of the footways flanking this site on Weston Street, Melior Street and St Thomas Street including raised kerb lines on Weston Street/Melior Street.
 - Repave the footway including new kerbing fronting the development on Melior Street and Weston Street using materials in accordance with Southwark's Streetscape Design Manual.
 - Resurface the carriageway including new road markings fronting the development on Melior Street and Weston Street using materials in accordance with Southwark's Streetscape Design Manual.
 - Construct the proposed layby on Melior Street using materials in accordance

with Southwark's Streetscape Design Manual.

- Upgrade current crossing points on Weston Street (junction with Melior Street) and St Thomas Street (junction with Weston Street) to SSDM standards.
- Relocate existing lamp columns on Melior Street and Weston Street. Street lighting relocation will require approval from the Street Lighting department.

232. In the event that an agreement has not been completed by 30th November 2019, the Committee is asked to authorise the Director of Planning to refuse permission, if appropriate, for the following reason:

In the absence of a signed S106 legal agreement there is no mechanism in place to secure adequate provision of affordable housing and mitigation against the adverse impacts of the development through contributions and it would therefore be contrary to Saved Policy 2.5 Planning Obligations of the Southwark Plan 2007, Strategic Policy 14 Delivery and Implementation of the Core Strategy (2011) Policy 8.2 Planning Obligations of the London Plan (2016) and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015).

Community Infrastructure Levy (CIL)

233. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material 'local financial consideration' in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport invests in London as a whole, primarily Crossrail. While Southwark's CIL will provide for infrastructure that supports growth in Southwark. In this instance an estimated Mayoral CIL payment of £4,982,504 and a Southwark CIL payment of £26,570,760 are due.

Energy and Sustainability

234. The London Plan Policy 5.2 sets out that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy Be lean: use less energy; Be clean: supply energy efficiently; Be green: use renewable energy. This policy requires development to have a carbon dioxide improvement of 35% beyond Building Regulations Part L 2013 as specified in Mayor's Sustainable Design and Construction SPG
235. Policy 5.3 states that developments should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process. LP5.7 Within the framework of the energy hierarchy major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.
236. Strategic Policy 13 of Core Strategy states that development will help us live and work in a way that respects the limits of the planet's natural resources, reduces pollution and damage to the environment and helps us adapt to climate change.
237. The applicants have submitted an energy strategy and a sustainability assessment for

the proposed development which seek to demonstrate compliance with the above policy.

Energy

238. An energy statement has been submitted which provides an initial assessment of the energy demand and carbon dioxide (CO₂) emissions from a baseline building and estimates the expected energy and CO₂ emissions savings associated with the proposed development. The applicant proposes to use a range of 'be lean, be clean and be green' measures in order to achieve an appropriate carbon reduction.

Be Lean

239. The measures proposed include:

- Building envelope will act as an important climatic modifier, with a well-designed façade significantly reducing the building's energy demand and U-Values that exceed the minimum standards;
- Façade optimisation of the glazing for balancing cooling loads against daylighting to ensure good daylight without unwanted solar gain and heat loss. This will also allow the accommodation to be naturally ventilated;
- Natural Ventilation and Cooling;
- The building form and massing will provide passive control of solar gains to ensure that solar gains are maximised in winter months and minimised in summer;
- Building orientation, percentage of glass and shading devices on the façade have been designed with the aim to minimise solar heat gains entering the building;
- Reduced water usage through use of low flow water outlets for all water outlets in the building. The student residential units will be designed to achieve a water consumption of 105 litres per person or less per day;
- The energy required to heat or cool the incoming fresh air supply to the buildings will be significantly reduced by using an efficient heat recovery system. The heat recovery systems will utilise the thermal properties of the return air to transfer 'free' heat/cooling to the incoming fresh air supply;
- Presence detection and daylight dimming within spaces which have access to daylight will reduce the lighting levels for times when the required lighting levels are available via natural daylight. Furthermore LED lighting will be required to achieve desired lighting levels;
- Mechanical cooling will be only required for the retail and the amenity areas in the student accommodation plus the staff areas. The intention is to provide a local systems using high-efficiency air-source variable refrigerant flow (VRF) heat pumps together with ceiling-mounted fan coil units to serve these parts of the development, with the system designed to optimise performance in line with the differing load profiles.

Be Clean

240. The measures proposed include:

- The development will utilise an on site gas fired Combined Heat and Power unit (CHP), in the absence of any ability to connect to an existing district heating network it is proposed that a central community heating system with high-efficiency CHP units and low NOx emissions is installed on the site to serve the base space heating and domestic water demand. The basement plant space has also been designed to allow for future connection to a district CHP should one be brought forward in the area.

Be Green

241. The application site has limited ability to provide renewable energy. However, it is considered that the use of Photovoltaic panels on the roof of the building could be utilised to maximise carbon savings.

Conclusions on Energy and Sustainability

242. Taken together, the Be Lean, Be Clean and Be Green measures would achieve a total carbon reduction of 17.6% over the 2013 building regs. It is noted that this is significantly below the 35% required by policy however as set out in Section 106 Planning Obligations and Community Infrastructure Levy (CIL) Supplementary Planning Document (SPD) a financial contribution to the carbon offset fund can be secured on schemes which do not meet the 35% target in CO2 reductions. These contributions would be placed in a green fund and used to reduce carbon dioxide emissions in projects elsewhere in the borough. This has benefits in that the fund can be used to reduce carbon emissions from buildings that are much older and much less energy efficient than modern buildings which have many passive design features that lower emissions. On that basis the applicant is proposing a contribution of £155,839 and this is considered acceptable as it will bring the 17.6% on site reduction to the required 35% reduction overall. A condition will be imposed to secure BREEAM excellent rating.

Community Engagement

243. The developer has undertaken consultation events linked to the proposed development and the wider St Thomas Street East Framework. The consultation exercise has included:
- Presentation to representatives of Guy's and St Thomas' NHS Trust;
 - Presentation to representatives of Team London Bridge BID;
 - 2,630 letters sent to local residents and businesses, providing information on the proposed development and an invitation to a public consultation exhibition;
 - A public consultation exhibition;
 - Provision of feedback forms at the exhibition, enabling residents and businesses to provide feedback.

Conclusion on planning issues

244. The proposed redevelopment of the site would provide a high density, mixed use development with student homes and a flexible Class A1/A3B1 space. The development would make a significant contribution to London's student housing needs and it is acknowledged that students and educational establishments make a positive

contribution to London's economy. In addition the proposed development would result in improved public realm within the district town centre and Opportunity Area.

245. The development would make a significant and substantial financial contribution towards affordable housing which would equate to a 35% provision and would significantly exceed the maximum reasonable amount of affordable housing that the scheme could provide based on viability testing. Given the fact that the proposed affordable offer of approximately £27.1 million above the figure that the Council's consultants consider that the scheme can viably sustain, Officers are satisfied that the proposed approach to affordable housing is acceptable and would maximise provision of affordable housing.
246. The development is in an appropriate location for a tall building being located within a district town centre, the CAZ and an Opportunity Area. Furthermore the principle of a tall building in this location has already been established by two previous consents. Officers are satisfied that the proposal is of the highest architectural standard and would provide high quality student homes. The proposal provides an appropriate response to context and would not harm the character or setting of the nearby heritage assets including the Bermondsey Street Conservation Area. Careful consideration has been given to the impact of the proposal on townscape views including LVMF views and views from within the Tower of London World Heritage Site. Officers consider that the development would not cause any substantial harm to these views, despite being visible from a number of vantage points. The GLA are also supportive of the development and do not consider that the proposal would harm strategic views.
247. Developments of this size and nature have the potential for significant environmental impacts and therefore an Environmental Statement has been submitted. Officer have fully assessed the Environmental Statement and have taken the view that whilst there would be some impacts in terms of daylight and sunlight; wind; townscape and heritage; and transport, the level of impact would not be so significant to warrant refusal of the application and in many instances, appropriate mitigation would reduce impacts to a negligible level. Following mitigation measures, there are likely to be some adverse impacts association with the demolition and construction phases but these impacts would be short term.
248. Officers consider the development to offer a range of significant benefits including student housing, commercial floorspace including retail and some office space and an improved public realm. The development would make a substantial contribution to affordable housing provision which would enable to the Council to maximise delivery of affordable housing through the New Homes Building Programme. Having regards to the development plan and national, regional and local guidance, officers recommend that planning permission be granted, subject to conditions, completion of a legal agreement and referral to the Mayor of London.

Consultations

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

Consultation replies

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

Summary of consultation responses

251. Following neighbour consultation, a total of 89 objections have been received in response to the proposed development. The main points of objection have been summarised and addressed below.

252. Objection – The proposed development is excessive in height, scale and massing.

Response – The principle of a tall building in this location has been accepted by the two previous consents. Furthermore, the proposed height is not considered to be harmful when viewed from within important local and strategic view vantage points. The proposed height is considered appropriate for this site given its location within the CAZ, an Opportunity Area, a district town centre and taking into account the surrounding cityscape.

253. Objection – The proposed building would be over dominant within its surroundings and would be an oppressive form of development.

Response – Whilst the proposed building would be a significant increase over both the existing building and the previously consented schemes the building is not considered to be oppressive within its surroundings which is a zone of transition from low rise buildings to the south to buildings of a more city scale to the north and west.

254. Objection – The proposal would fail to provide affordable housing on site.

Response – No onsite affordable housing is being provided as an in lieu payment is considered to be the best way to maximize the delivery of affordable housing to meet the Council's strategic objectives and pressing need for affordable housing.

255. Objection – There are plans to redevelop other sites on St Thomas Street which adjoin this application site and as such there is a critical need to understand the wider development plans for the area and the impacts they may have. The development plan for Capital House needs to be assessed in the context of the development plans for the adjoining sites.

Response – Each site will be assessed on its own merits however cumulative impacts will be taken into account within the Environmental Statements for each application. The adjoining sites on St Thomas Street have been developed with a high level of collaboration between the respective landowners.

256. Objection - The local infrastructure cannot support such a large scale, high density development. The roads in the immediate area are small and narrow and are already struggling to cope with the volume of van and lorry usage. Increasing this volume to support a building with hundreds of occupants would not be feasible and would create constant traffic and maneuvering problems.

Response – The council's transport team has reviewed the submission and consider the transport arrangements to be acceptable. The ES indicated that there would be no significant adverse impacts and there would be no significant impacts on traffic generation. Various management plans for servicing, construction logistics and environmental management plans will be secured as part of the legal agreement and these will ensure that going forward impacts will be minimized and mitigated.

257. Objection – The proposal fails to provide on-site affordable housing. The documents refer to off-site affordable housing but do not make any formal commitments.
Response – the applicants investigated the provision of off-site affordable housing however it was considered that an in lieu payment would be the optimum way to secure the maximum amount of affordable housing. In this instance the payment of £34.1 million will allow the Council to deliver affordable housing as part of the New Homes Building Programme.
258. Objection – On-site provision of social housing should take priority and should not be forgone as a result of the migration museum.
Response – The migration museum has now been removed from the proposal.
259. Objection - The proposed development would have an unacceptable impact on a number of views including protected views from Tower Bridge, views from Parliament Hill, and those from within the Bermondsey Street Conservation Area, all of which would be adversely affected to an unacceptable extent.
Response – The views set out above have all been reviewed as part of the ES and have also been scrutinised by the Council's Design and Conservation Team. In all cases it is considered that the proposed development would not result in any harmful impacts.
260. Objection – The proposed development would have an unacceptable impact on surrounding streets in terms of wind tunneling which is already a significant problem on St Thomas Street. The environmental impact submitted states that the building would have a moderate adverse or a moderate beneficial impact. An environmental impact assessment that cannot come to a conclusion on the impact of the proposed building is therefore simply unacceptable.
Response – Wind has been reviewed in the ES. With appropriate mitigation in place, the predicted pedestrian level wind environment in and around the completed development is rated as suitable, in terms of safety, for all users throughout the year. In terms of wind comfort, all locations on the ground and elevated levels are predicted to have wind conditions that would be suitable for the intended uses. Based on the results of the tests on the final design it has been established that the wind conditions within and around the Development would be appropriate given the uses proposed. The effects on the wind microclimate would therefore be of negligible significance.
261. Objection – The development provides very few on-site amenities and fails to address the lack of local amenities to support the occupants. Local infrastructure cannot cope with such an increase in people.
Response – The development would be subject to the Community Infrastructure Levy which would contribute towards infrastructure improvements within the area and would help to mitigate any impacts.
262. Objection - The community consultation and involvement has been inadequate. It was poorly publicized and attracted few responses and involved a set of questions that were generally framed to the advantage of the developer and even then, the majority of respondents either generally or somewhat disagreed with the proposed design. The Executive Summary submitted in the proposal makes no reference to this majority disagreement with the design which is disappointing. The views of local people have been ignored.

Response – The developer has undertaken consultation events linked to the proposed development and the wider St Thomas Street East Framework. The consultation exercise has included:

- Presentation to representatives of Guy's and St Thomas' NHS Trust;
- Presentation to representatives of Team London Bridge BID;
- 2,630 letters sent to local residents and businesses, providing information on the proposed development and an invitation to a public consultation exhibition;
- A public consultation exhibition;
- Provision of feedback forms at the exhibition, enabling residents and businesses to provide feedback.

263. Furthermore, the Council has undertaken three rounds of consultation each including advertisement in the local press, posting of site notices and letters sent to local residents.

264. Objection – The proposed building is of a very poor design and will result in a low quality, high density development.

Response – The proposed design is considered to be of the highest standard and would be visually appealing. Conditions will be imposed to secure high quality finishes and materials and in design terms the building is considered to be a positive addition to the borough.

265. Objection – Should the development proceed then there should be a significant proportion of affordable housing made available for local staff, including Guys Hospital, rather than just students.

Response – Southwark Council is one of the top four London Boroughs in terms of the provision of student housing. It is noted that London Plan policy specifically requires affordable student accommodation as part of any development for student housing and the GLA have raised this as an issue in their Stage I response. Officers consider that whilst there would be benefits to providing affordable student housing this would be significantly outweighed by Southwark's pressing need for traditional general needs affordable housing and that that this should take priority over the provision of affordable student accommodation particularly given that Southwark has provided such a large number of student homes and has contributed significantly to London's student housing needs.

266. Objection - The size of this student accommodation is oversized for the area and the number of students likely to require accommodation.

Response – The applicant has demonstrated that there is demand for student housing and this is supported by the London Plan.

267. Objection – Any proposal to mitigate wind impacts through the use of trees is not long term or infallible. The wind survey is flawed as it suggests there are four trees on Guys land at the corner of Weston and St Thomas St when there are only two rather poor specimens that have compromised canopies because of their proximity to Guy's building.

Response – The error with the trees has been rectified by the later wind study and the impacts were not considered to be significant. A Wind mitigation Strategy will be secured as part of the S106 Agreement to ensure the appropriate mitigation is secured and implemented.

268. Objection - The three trees proposed for St Thomas Street will need to go into planters as there are existing services and new basement below ground. Obviously the planters would need to be substantial if they are to support these large trees however planters would form a substantial barrier to pedestrian movement.
Response – The Council’s Urban Forester has reviewed the updated plans and considers that the tree pits are feasible and appropriate. As such trees will not need to be placed in planters.
269. Objection - Trees in planters here would set a very poor precedent for delivering the vision in the St Thomas St Framework for new, long-living trees all the way down the south side of the street. Delivery of this aspect of the vision seems to be at risk because of the services below the pavement, the north facing aspect and very narrow setback of the building line.
Response – As set out above the Council’s Urban Forester has reviewed the updated plans and considers that the tree pits are feasible and appropriate. As such trees will not need to be placed in planters.
270. Objection – There is inconsistency between the location of trees proposed for mitigation and the locations of the trees shown on the proposal plans. The RWDI model has positioned the three proposed trees required for mitigation close together at the western corner of the building façade. Whilst the development plans show the trees spaced evenly across the frontage.
Response – The tree locations have been rectified by the updated wind study. Nevertheless, appropriate mitigation will be secured as part of the Wind Mitigation Strategy that will be an obligation within the S106 Agreement.
271. Objection – The development would result in excessive noise and disturbance to local residents.
Response – Whilst there would be some noise and disturbance during demolition and construction phases it is not considered that the completed development would result in any significant disturbance to adjoining occupiers.
272. Objection - The consultation events undertaken by the developers were vague and misleading with plans that were only shown on a model at ground level and did not show the impact on the local conservation area. The council needs to consult properly with local community and general public.
Response – The developers have undertaken consultation events and the Council has undertaken three comprehensive consultation exercises with the local community. As such the level of consultation undertaken for this application is considered to be appropriate.
273. Objection – The reduction in the building height does very little to overcome the serious impact of the development on the Bermondsey Street Conservation Area or the Tower of London World Heritage Site due to its overbearing heights, massing, design and appearance.
Response – The proposed development, whilst visible from Bermondsey Street Conservation Area and the Tower of London, is not considered to have a harmful impact on these views, particularly now that the building height has been reduced.
274. Objection – The height of the building would be excessive on St Thomas Street and

Weston Street and would result in an excessive height and scale of development on what is a very small footprint.

Response - The principle of a tall building in this location has been accepted by the two previous consents. Officers do not consider the height or quantum of development to be excessive or harmful. Nor would it have an adverse impact on views along St Thomas Street and Weston Street.

275. Objection – Such an excessive development will cause overshadowing, wind-tunnel and noise-canyon issues that will have a significant negative affect on residents, businesses and pedestrians on St. St. Thomas, Weston St and Melior Street.

Response – All of these issues have been considered as part of the assessment of the application and within the ES and in all cases officers have concluded that there would be no significant adverse impacts.

276. Objection – The developers have not shown models of the tower that demonstrate the proposal in true context and relation to the local area. The plans also don't show how this will create a wall of glass between the conservation area and the listed railway arches and the plans do not show how the building will sit with the wider local framework plans proposed.

Response – The ES contains plans that show the context of the site with the other proposed developments in place. Each development will be considered on its own merits as well as cumulatively.

277. Objection - The proposed development, owing to its design and excessive height would not be in keeping with the surrounding area which is predominantly low rise buildings and warehouse conversions. As a result the proposed development would result in significant damage to the character of the area, particularly the adjacent conservation areas. This is of key importance given the warehouse heritage and low rise neighbourhood feel of the area where most residents and local businesses are located. The proposed design does not seem in keeping with the values of current local residents.

Response - Whilst the proposed building would be a significant increase over both the existing building and the previously consented schemes the building is not considered to be oppressive within the immediate vicinity which is a zone of transition from low rise buildings to the south to buildings of a more city scale to the north and west. Officers consider that the scale and quantum of development is appropriate in terms of the application site and its immediate surroundings.

278. Objection - Development of this scale would obstruct light to other buildings in the area to an unacceptable level. Any open space would be significantly overshadowed by the proposed development.

Response – The daylight and sunlight assessment demonstrates that the proposed building would have a limited impact on daylight to surrounding properties with 97% of rooms that have been assessed remaining compliant with the BRE guidance. The closest and most directly affected amenity space is the open space/garden area located on Melior Street close to the junction with Fenning Street. The applicant's transient overshadowing study demonstrates that, given the position of the existing buildings and the proposed development, the majority of overshadowing would take place to the north with only minor overshadowing of the open space on Melior Street occurring later in the day.

279. Objection - The proposal does not discuss what the compound (cumulative) wind effects would be.
Response – Cumulative wind impacts have been fully assessed and reviewed as part of the ES.
280. Objection - The significant increase in population in such a small area, and so close to a major rail hub, would have a significant detrimental impact on foot and vehicle traffic in the area, which is characterised by narrow roads and one-way streets. This has not been adequately addressed in the plans. Any businesses would require goods deliveries and vehicles stopping would block access routes entirely given the narrow space of the streets.
Response - The council's transport team has reviewed the submission and consider the transport arrangements to be acceptable. The ES indicated that there would be no significant adverse impacts and there would be no significant impacts on traffic generation. Various management plans for servicing, construction logistics and environmental management plans will be secured as part of the legal agreement and these will ensure that going forward impacts will be minimized and mitigated.
281. Objection - The development gives nothing to the local area, it will not provide additional amenities such as housing, shops, or medical facilities, or provide meaningful improvements to communal or green spaces. However, the development will consume existing local amenities. Any additional contribution seems to benefit workers stopping by, rather than residents who live in the area.
Response – The proposed development would provide additional commercial floorspace for Class A1/A3/B1 purposes. The development would also be subject to the Community Infrastructure Levy which would contribute towards infrastructure improvements within the area and would help to mitigate any impacts.
282. Objection - The transient nature of student living is such that the development and its residents would not be able to contribute to the local community in a meaningful way.
Response – Students will be living within the block for the academic year and will be able to integrate within the local community using local shops, bars and restaurants as well as local services.
283. Objection – Given the shortage of housing in London (particularly affordable housing), it is inappropriate to provide such a large amount of designated student accommodation in this area, particularly given the potential impacts of Brexit on international student numbers without including true affordable housing for locals remaining long term in this area rather than re-located elsewhere in the borough.
Response – The development would not be able to provide on-site affordable housing to the quantum and standard that the Council require. As such the developer is making a payment to the Council's New Homes Building programme which will maximize the provision of affordable housing which is a strategic objective of the borough.
284. Objection - There is insufficient vehicle and cycle parking in the area and local amenities will not be able to cope with the increase in the number of people.
Response – The proposed development would be car free and the developer would make a contribution to the London Cycle Hire scheme to extend cycle hire facilities in the area.

285. Objection – The demolition and construction process will be very disruptive to local residents and businesses.
Response – Demolition and construction can cause disturbance however this will be short term and temporary and will be mitigated by environmental management plans secured in the legal agreement.
286. Objection – The consultation on the proposed development has been insufficient and poorly handled. With the timing of the consultation and the manner of summarisation, it feels as if the council is colluding in the development rather than acting on behalf of the borough to undertake a fair consultation and an even handed decision.
Response – The developer has undertaken their own consultation both in advance and subsequent to the submission of the application. The Council has also undertaken three rounds of comprehensive consultation. The consultation process for this application is considered to be extensive, appropriate, transparent and robust.
287. Objection – The proposed development would threaten employment in the area.
Response – The loss of employment space has been accepted on this site on two previous occasions and is considered acceptable as part of the current application. The current occupiers, Kings College, would be displaced from the site however the existing building is in use as ancillary education support for the wider campus. In addition, the uses currently occupying the building are to be redistributed to other premises on the adjacent Guys and St Thomas' Campus
288. Objection - The development is inconsistent with the proposed new Southward Local Plan which advocates the primacy of The Shard as a tall building in the area, as well as any new development being sensitive to the surrounding context, and sustaining and enhancing the adjoining Conservation Area. The Local Plan also states that any planning approval should be subject to the impact on the existing character, heritage and townscape of the area. This development would detract from The Shard's primacy, and also clash with the character of the surrounding buildings.
Response – The proposed building is significantly smaller than the Shard and is located a sufficient distance from the Shard to ensure that it will not challenge the Shard in terms of views or primacy.
289. Objection - The proposed height of this development would impact the protected view of St Paul's Cathedral and other protected views.
Response – The proposed building would be visible but not harmful. This has been quantified in the ES and reviewed by the Design and Conservation Team.
290. Objection – The proposed development would result in a significant increase in traffic to the area which will negatively impact on the local roads, streets and pedestrians.
Response – The development would not result in a significant increase in traffic to the area. The development would create seven less two-way vehicle movements in the morning peak hour and six additional two-way vehicle movements during the evening peak hour and it is considered that the development would not have any noticeable adverse impact on the existing vehicular traffic on the adjoining roads.
291. Objection - The information submitted on public realm and vehicular movement is inaccurate and unacceptable. The new scheme will make the existing problems considerably worse by proposing building closer than the current to the site boundary and justifying this by incorrect information. Large vehicles struggle to maneuver

around the narrow streets and tight corners and there have been several collisions with buildings and balconies over the years. The plans around boundary lines and highways layout are inaccurate and large vehicles would need to undertake complex maneuvers which could risk accidents and collisions.

Response – The Council's Transport Team has reviewed the application and do not consider that the proposed building would result in any significant issues with regards to vehicle maneuvering. A Construction Logistics Plan will manage vehicle movements during the construction phase and a Service Management Plan will be secured as part of the S106 Agreement and this can specify the size and type of vehicle that can be used to service the development, thereby minimising the risk of any impacts.

292. Objection - Proposals for permeable paving and 'sustainable' tree pits are not deliverable and should not be presented as part of the public realm benefits.

Response – The tree pits and drainage have been reviewed by officers and are considered feasible and deliverable.

293. Objection – The submission states that there would be a public garden to the rear of the Beckett House site however this is not within the applicants control and cannot be guaranteed for delivery. This area would also be subject to severe wind impacts which would threaten its use as a garden/public space.

Response – The Beckett House site is currently the subject of pre-application discussions however the current iteration of the plans for the Beckett House site shows a public open space on Melior Street. Wind impacts to this space could be mitigated through design measures and this will be considered when an application is submitted for that site.

294. Objection – The local junctions are unsafe for existing vehicles, pedestrians and cyclists and are not a suitable entry point for vehicles servicing the development.

Response - The Council's Transport Team have reviewed the application and do not consider that the proposed building would result in any significant issues with regards to vehicle maneuvering or pedestrian safety and measures will be secured in a S.278 agreement that would enhance pedestrian safety. A Construction Logistics Plan will manage vehicle movements during the construction phase and a Service Management Plan will be secured as part of the S106 Agreement and this can specify the size and type of vehicle that can be used to service the development, thereby minimising the risk of any impacts.

295. Objection - The Capital House proposals should not be approved ahead of resolution of the St Thomas St masterplan. The plan also needs further consultation, development and detail.

Response - The various landowners have been co-operating on an informal basis about a range of issues including design, public realm, new pedestrian routes, and the management of the construction and operational phases of the proposed developments. The landowners have devised a framework document which sets out the co-operation and co-ordination on these issues between the proposed developments and this has been subject to community consultation. The framework is a tool to bring the landowners together to work collaboratively to address the main issues of the redevelopment of these sites. The framework itself is an informal document and is not a masterplan or an instrument of planning policy.

296. Objection – Wind mitigation should not rely on trees nor should it rely on trees and

landscaping on other sites.

Response – Trees within an application site can be used as wind mitigation. A Wind Mitigation Strategy will be secured as part of the S106 Agreement to ensure that any residual wind impacts will be suitable mitigation with appropriate and deliverable mitigation.

297. Objection – No consideration has been given to the welfare of students. Mental health issues amongst first year students has increased significantly and moving 905 students into small rooms in a tower block will not help to build community cohesion, and being without the traditional on-site welfare services offered by university-based accommodation is an unconscionable risk to their wellbeing.

Response – The development includes on site amenities for students

298. Objection – No thought has been given to move in and move out dates for students. These events are likely to result in significant congestion on local streets, roads and public transport.

Response - Move in and move out events would be staggered and will be managed through a Student Housing Management Strategy, secured as part of the S106 Agreement.

299. Objection – The proposed payment towards affordable housing does not guarantee social housing.

Response – The payment towards the Council's New Homes Building Programme will be ring fenced and would only be used for the development of affordable housing.

300. Objection – The provision of a tower in this location is the result of a secret masterplan which completely disregards public consultation and makes further consultation on the masterplan meaningless.

Response – There is no masterplan for the site nor have plans been developed in secret. The St Thomas Street Framework sets out the co-operation and co-ordination on issues between the proposed developments and this has been subject to community consultation. The framework is a tool to bring the landowners together to work collaboratively to address the main issues of the redevelopment of these sites. The framework itself is an informal document and is not a masterplan or an instrument of planning policy. The Council has also undertaken three rounds of consultation in addition to that undertaken by the developer. Consultation has been meaningful and transparent.

301. Objection - Drilling and piling on a building of this height is likely to have a dramatic effect on local buildings, including damage. How will this be managed and how will the developer make good any damage.

Response – Issues relating to construction will be mitigated through the Demolition and Construction Management plans secure in the legal agreement. The developer would be obligated to make good any damage caused to adjacent buildings that occurs as a direct result of construction work on the proposed development.

302. Objection – The New Southwark Plan designates this site as suitable for tall buildings however for this site (listed within NSP52) it suggests a density of 50% of the land area and an average height of 18 storeys (65m). These are sensible densities and volumes. This current proposal totally ignores those suggestions and therefore makes a complete mockery of the NSP guidelines.

Response – The site sites within part of the New Southwark Plan Proposal Site 52. Whilst the designation makes reference to the uses that should be included on future development of the whole site it does not specify an appropriate height. The site has been identified as suitable for tall buildings and this has been established by the two previous consents.

303. Objection – The NSP recommends a sloping down of heights from the West to the East - namely from Guys Hospital Tower at 120m down to the strictly enforced limit on Bermondsey Street of 20m. Virtually all developers, planners and the entire local community alike are all agreed on the importance of heights sloping downwards from Guys down to Bermondsey Street. The current proposal does not step down significantly enough and as such impacts on Bermondsey Street.

Response – The proposed building meets this requirement, stepping down significantly from the height of the Shard and also stepping down from the height of Guys Hospital Tower. The height of the proposed development is considered acceptable within the local context.

304. Objection – The development will result in significant overlooking to residents on Melior Street and Snowfields.

Response – The separation distances specified in the Residential Design Standards SPD would all be met comfortably and as such there would be no adverse impacts in terms of overlooking.

305. Objection - The promise of off-site affordable housing is simply not equivalence in this case - for the cost to the council of acquiring the lease back from GS Quill (£12 million for the proposed off-site housing) the existing building could be renovated and repurposed as affordable housing, providing much needed homes in a city in the midst of housing crisis.

Response – The proposed in lieu payment of £34.1 million is significantly in excess of the financial surplus generated by the scheme to provide affordable housing which works out at £6.96 million. This is considered to maximize the provision of affordable housing and would provide more affordable housing than could be provided on site within the proposed development or within a refurbished and re-purposed Capital House.

306. Objection – The change in plan to forgo the museum for a café/shop does not seem to have been well thought out and it seems to lack any conceptual idea or consideration to the area and local community. There are sufficient cafes and shops in the area.

Response – The proposed commercial floorspace at ground floor is not of a size that would challenge any local businesses and the location of the site beside London Bridge Station on a principle thoroughfare will ensure that there is enough foot fall to make any commercial operation viable.

307. Objection – The proposed trees would block the pavement and would not receive enough light to thrive.

Response – The ground and first floor of the proposed building are set back significantly from the pavement and the proposed trees ensuring that there will be sufficient room for pedestrian movement as well as ability for the trees to mature.

308. Objection – The proposal does not provide enough cycle parking to satisfy either the Southwark Plan or the London Plan and the provision of such a high proportion of

folding bike storage should be resisted. Furthermore, is it not a policy requirement that at least 50% of the cycle parking is in the form of Sheffield Stands as opposed to double stackers that are not as accessible for all people.

Response – The quantum of cycle parking is considered acceptable. Final details of the type of cycle parking will be secured by condition.

309. Objection - The Mayors Transport Strategy states that cycle parking for the public will need to be provided in addition to that required for the occupants and visitors to the building, particularly where it is located next to transport hubs, in town centres and in key destinations. The locality of the site next to London Bridge station falls within this policy, and the scheme should therefore make a significant provision for cycle parking for the public.

Response – The development will make a financial contribution to extend cycle hire facilities in the area in line with the request from Transport for London.

310. Objection - There is a suggestion that the Quill planning permission has been implemented, which is questionable. The building is still fully occupied and there has been no material development.

Response - A number of pre-commencement conditions were submitted and approved. The pre-commencement condition relating to the drainage strategy was approved and works to the drainage were carried out, which supports the applicant's point that this permission has already been implemented. No Certificate of Lawfulness has been submitted to formally confirm this.

311. Objection – The Council's pre-application advice was very clear that the proposal was excessive and yet the developer appears to have ignored this advice. It is unclear why the application is now being recommended for approval.

Response – The pre-application advice was based on a building of 46 storeys in height which had significant impacts on important views. The building has been reduced in height as part of this application and officers are now satisfied that the height is acceptable and would not lead to any significant adverse impacts on any important views.

312. Objection - To house 1,028 students on the site is a density of 11,422 per hectare, which is over 10 times the Council's maximum habitable rooms per hectare guidance and the average room size appears to be 27.1 sq m per student, which is significantly below any design standard.

Response – There are no prescribed standards for student housing and it would be inappropriate to assess it on the same standard as traditional homes. Officers consider that the proposed student units would be well lit, well ventilated and suitably sized for student needs.

313. Objection – The applicants Financial Viability Assessment figures are inaccurate and do not maximise affordable housing provision.

Response – The proposed affordable housing payment is £34.1 million which is approximately £27.1million more than the £6.96 million that is considered to be the maximum that the scheme could sustain. This has been reviewed by the Council's consultants Avison Young who conclude that the proposed offer exceeds the maximum reasonable amount of affordable housing.

314. Objection - There should be a covenant stipulating that any development can only be

used as student accommodation and not sold as private flats.

Response – The student housing would be secured as such within the S106 legal agreement.

315. Objection - There was a previous regulation specifically designed to prohibit the overtaking of the area by inappropriate development and to maintain the character of the area. This regulation included the prohibition of buildings taller than 6 stories. This is almost 8 times taller.

Response – The principle of a tall building in this location has been accepted on the two previous consents and as part of the draft SPD.

316. Objection - There are already problems with the existing student accommodation on Weston Street, where students spill out on to the street during fire drills. There is no room for students to gather on site and in the event of fire on the Melior Street side of the building it is not clear how the fire services would be able to access the building with the necessary fire equipment for a tall building given the narrowness of Melior Street.

Response – The building would be fitted with dry risers and a sprinkler system and there is sufficient room around the building to allow emergency services to service the development. The operator of the student homes will assign a muster point for students to gather in the event of an evacuation.

317. Objection – Construction work will inevitably lead to disruption and restricted access along Melior Street which would be unacceptable, particularly to those with mobility issues.

Response - The Council's Transport Team have reviewed the application and do not consider that the proposed building would result in any significant issues with regards to pedestrian safety or mobility issues and a Construction Environmental Management Plan will be secured in the legal agreement and through this the Council will ensure that safe and appropriate pedestrian routes including for the mobility impaired, will be maintained during the construction process.

Objections – The proposed development fails to provide any public realm improvements that would benefit the area, visitors or residents.

Response – The proposed development will create an improved public realm at ground floor level as well as a new retail offering within the flexible commercial space at the base of the building.

318. Objection – The surrounding streets are unsafe as many buildings have built right up to their site boundaries and this would be the case with Capital House. This is likely to impact on public safety and could result in collisions between large vehicles and buildings.

Response – The council's transport team has reviewed the submission and consider the transport arrangements to be acceptable. The ES indicated that there would be no significant adverse impacts and there would be no significant impacts on traffic generation. Officers consider that there would be no safety issues subject to appropriate mitigation. As such various management plans for servicing, construction logistics and environmental management plans will be secured as part of the legal agreement and these will ensure that going forward impacts will be minimized and mitigated.

319. Objection – At the public exhibition, the servicing strategy showed vehicles reversing onto Melior Street from Weston Street and this would be both unsafe and unacceptable.

Response – This is no longer the case as the vehicle loading bay has been removed from the plans in lieu of a semi inset lay by which is fully supported by the Council's Transport Team and would avoid transport conflicts caused by reversing vehicles.

320. Objection – The proposed development is too close to the corner of Weston Street and St Thomas Street given the significant increase in people who are accessing the station.

Response – Suitable pavement widths are being provided for pedestrian use, particularly at the corner of Weston Street and St Thomas Street.

321. Objection - The transition from tall commercial buildings near the station to the low-rise hinterland of Bermondsey must be handled sensitively and be less precipitous.

Response – As discussed above, the application site sits at a zone of transition between taller buildings to the north and west and lower rise to the south and east. The proposed building would step down from the tallest buildings at the Shard and Guys Hospital Tower and Officers consider that this transition is handled appropriately.

322. Objection – There should be no reduction in the size of the Melior Street garden. The garden is a rare moment of openness and calm within a densely built up area. It makes a vital contribution to the public realm and any reduction in the size of the existing space will greatly diminish the benefit of that contribution.

Response – The proposed development does not make any changes to the Melior Street garden.

323. Objection – The proposed development would result in solar glare that would be a nuisance to residents and visitors alike.

Response – Solar Glare has been examined as part of the ES and the outcome shows that this is limited to travel on the railway line from both the south east and north west where the impacts from solar glare would be considered as minor adverse in significance.

324. Objection – The proposal does not include any on-site affordable student housing which is not compliant with policy.

Response - Southwark is one of the top four London Boroughs in terms of the provision of student housing. It is noted that London Plan policy specifically requires affordable student accommodation as part of any development for student housing and the GLA have raised this as an issue in their Stage I response. Officers consider that whilst there would be benefits to providing affordable student housing this would be significantly outweighed by Southwark's pressing need for traditional general needs affordable housing and that that this should take priority over the provision of affordable student accommodation particularly given that Southwark has provided such a large number of student homes and has contributed significantly to London's student housing needs.

Responses from Local Groups

Team London Bridge

325. TLB welcome the changes from the extant planning permission which respond to earlier feedback. These include the provision of more active frontages, an increase in the public realm around the building, important views through the route running along the eastern side and the addition of green walls.
326. There are concerns that the proposals are being brought forward ahead of a further iteration of the St Thomas Street East Framework. The Framework elicited a significant response and the issues raised need to be resolved before consideration of planning applications for any of the individual sites.
327. Team London Bridge believes there is only incremental capacity to accommodate additional residential development in the area. London Bridge is located in the Central Activities Zone as both a retail cluster and a specialist cluster because of its arts, cultural and creative businesses and activities. The success of these roles requires a careful balance to be struck and we believe a clear priority needs to exist for commercial office, retail and leisure uses over residential. This is consistent with the London Bridge Area Vision (New Southwark Plan AV10.2, 10.3) which supports growth in "office provision, shops, leisure, culture, science and medical facilities" over residential development. Policy SD5 C of the draft London Plan also states "Offices and other CAZ strategic functions are to be given greater weight relative to new residential development in other core commercial areas of the CAZ." These other areas include London Bridge because of its dual role as a cluster and as an Opportunity Area. The current proposals take land use in the opposite direction, replacing significant B1 office space with largely student accommodation. This is a significant increase of student accommodation from the extant Quill planning permission, and represents a loss of c4,000 sq m of commercial space from the existing Capital House building.
328. The site's location as a key arrival point from London Bridge station means it plays a critical role for the whole of the St Thomas St area and as a gateway into the London Borough of Southwark. This requires it to be of the highest design quality and also to provide significant high quality public realm and a diverse range of uses, including a strong town centre offer. The Framework proposals will bring approximately 10,000 new people to the area with needs to be served outside working hours, at lunch time and at weekends. The site is at the heart of a 7-day space and this needs to be recognised in the range of retail and cultural provision. The previous planning application made a much stronger town centre offer through the Migration Museum, and the loss of this - or any comparative - offer, is a serious setback, resulting in the latest proposals presenting a much weaker proposition.
329. There is a lack of clarity over how the new development will be serviced and how it will address the significant existing problems with large vehicles in Melior Street where buildings are regularly damaged by vehicle strikes. This redevelopment provides an opportunity to address this issue and we are disappointed that the plans do not appear to have been amended in response to feedback.
330. Team London Bridge has a number of concerns regarding the proposal that relate to this development's ability to deliver the objectives of the St Thomas Street Boulevard and wider Framework. We look forward to continuing to work with the landowners and prospective developers of the main sites along and around St Thomas Street to help

deliver shared ambitions for this critical part of the London Bridge area.

Guys Hospital

331.
 - The proposed development will take several years to complete and will result in substantial noise, dust, vibration and traffic;
 - The close proximity of the hospital to the development site is such that there is a need to ensure sufficient control of the demolition and construction processes to enable the hospital to continue to perform its vital functions unhindered;
 - Vehicle and pedestrian access to the hospital is critical and these movements should not be impeded by the servicing of the construction site;
 - The hospital critically relies on a high level of supply from public utilities and communication networks and these should be maintained at all times;
 - If consent is granted then a legally binding agreement should be entered into between the trust and the applicant in order to ensure the operations of the hospital are unhindered and to ensure that there is sufficient control of the demolition and construction process.
 - Comments have also been made about relocating the Florence Nightingale Museum into the building.
332. **Response** – It is acknowledged that demolition and construction works can lead to disturbance. For this reason the construction phase of the development will need to be appropriately managed. As such a Construction Logistics Plan and a Demolition/Construction Environmental Management Plan would be secured as part of the S106 Agreement and Guys Hospital would be consulted on this document to ensure potential impacts are mitigated appropriately.

Summary of responses from external and statutory consultees

333. Environment Agency – No objections subject to an Informative regarding an evacuation plan.
Response – Noted and agreed, the relevant informative will be added to any consent issued.
334. Greater London Authority – The GLA have raised the following points in relation to the proposed development:
- **Principle of development:** the principle of redeveloping this highly accessible site within the London Bridge and Bankside Opportunity Area and the Central Activities Zone (CAZ) to deliver student accommodation and a new museum within a tall building is established by the extant and implemented planning consent and is supported by London Plan policies 2.11, 2.13, 3.8, 4.5 and 4.6, and policies GG1, SD1, SD4, H17 and HC5 of the draft London Plan.
 - **Student accommodation:** to demonstrate that the development is meeting an identified need and to ensure that it will be supporting London's higher education institutions, the majority of the bedrooms should be subject to a nominations agreement for one or more specified higher education institutions and this should be secured prior to occupation. The applicant should open up the northern end of corridors at each level to provide views, daylight and

ventilation to the core and avoid long and enclosed corridor spaces, and to improve the quality of overall of accommodation in line with Policy D4 of the draft London Plan.

- **Affordable housing:** the applicant proposes to make a contribution of circa £14m towards the offsite delivery of conventional affordable housing. No affordable student accommodation is proposed which does not comply with London Plan and draft London Plan policy and is not acceptable. The applicant must therefore test both strategic and local policy scenarios to demonstrate the maximum level of either traditional affordable housing, and/or affordable student accommodation that could be delivered in each case for comparison and further assessment. GLA officers will work with the Council to robustly scrutinise the viability to ensure that the maximum contribution towards the delivery of genuinely affordable housing and affordable student accommodation is secured.
 - **Design:** the scheme is generally supported in strategic design terms and will deliver an elegant building of a high architectural quality that does not raise any strategic concerns with regards to strategically protected views identified in the LVMF and will deliver an improved public realm experience at street level that improves upon the implemented scheme. The applicant is strongly encouraged to continue to positively engage with the adjacent land owners in order to develop an appropriate form and layout across the three key sites that will make the most efficient use of land and optimise development capacity, and to ensure that that a consistent quality of open space and public amenity is delivered, in accordance with the good design principles set out in policies D1 and D2 of the draft London Plan.
 - **Energy:** the current scheme would fall short of the minimum onsite carbon reduction targets set within London Plan Policy 5.2 and Policy S12 of the draft London Plan and the applicant should consider the scope for additional measures to achieve further carbon reductions. Furthermore, the proposed space heating system for the student accommodation does not comply with London Plan and draft London Plan policy and is not acceptable.
 - **Transport:** given the development's reliance on other transport modes it will be important to consider and enhance where appropriate the public transport network, as well as the local cycling and walking network and facilities. In this respect, a section 278 agreement is required to secure proposed public realm works and financial contributions are sought towards public realm improvements, improved signage and cycle hire expansion. The proposed servicing strategy is not supported and must be revised. Travel plans and construction logistics plans should also be secured by planning condition.
335. **Response** – Officers note that the principle of the development as well as the design, height/scale/massing and impact on LVMF views is accepted by the GLA. In terms of demand for student housing, officers consider that the applicant has satisfactorily demonstrated that there is sufficient demand for student housing in London and this is supported by both the Core Strategy and the London Plan and as such the principle of providing student housing in a district town centre and such a well connected location is supported.
336. Southwark is one of the top four London Boroughs in terms of the provision of student housing. It is noted that London Plan policy specifically requires affordable student accommodation as part of any development for student housing and the GLA have raised this as an issue in their Stage I response. Officers consider that whilst there

would be benefits to providing affordable student housing this would be significantly outweighed by Southwark's pressing need for traditional general needs affordable housing and that that this should take priority over the provision of affordable student accommodation particularly given that Southwark has provided such a large number of student homes and has contributed significantly to London's student housing needs. The minimum in lieu payment of £34.1 million is very substantial and could deliver a substantial number of new affordable homes which would be considerably in excess of what could be provided on site. Accordingly, the acceptability of an in lieu payment is based on the specific merits of this proposal taking account of all the material considerations highlighted above.

337. Taken together, the Be Lean, Be Clean and Be Green measures would achieve a total carbon reduction of 17.6% over the 2013 building regs. It is noted that this is significantly below the 35% required by policy however as set out in Section 106 Planning Obligations and Community Infrastructure Levy (CIL) Supplementary Planning Document (SPD) a financial contribution to the carbon offset fund can be secured on schemes which do not meet the 35% target in CO2 reductions. These contributions would be placed in a green fund and used to reduce carbon dioxide emissions in projects elsewhere in the borough. This has benefits in that the fund can be used to reduce carbon emissions from buildings that are much older and much less energy efficient than modern buildings which have many passive design features that lower emissions. On that basis the applicant is proposing a contribution of £155,839 and this is considered acceptable as it will bring the 17.6% on site reduction to the required 35% reduction overall.
338. Historic England – The reduction in height is welcomed and the principle issue raised in the initial Historic England response has been resolved. The proposed reduced-height building is no longer visible above the roofline of the Queen's House in the view from the Inner Ward of the Tower of London at the Scaffold Site Memorial. It does, however, appear in other views from the Inner Ward (View 12, north of the White Tower), increasing the visual presence of modern London to within the historic confines of the Tower, and causing some harm to its significance.
Response – Noted and agreed. Officers consider that whilst the development is visible from within the inner ward, the impact is less than substantial harm.
339. London Underground – No comments/no objections.
Response – Noted.
340. London Underground – No comments/no objections.
Response – Noted.
341. NATS – No objection subject to conditions to secure a radar mitigation scheme.
Response – Noted and agreed, the relevant conditions will be added to any consent issued.
342. Natural England – No comments/objections.
Response – Noted.
343. Network Rail – No clear objections subject to provisions to ensure that Network Rail operations are not affected by construction or by the completed development including issues related to vehicle incursions; lighting; noise and vibration; fencing; piling;

scaffolding; plant and materials; and maintenance. During construction and once completed, the development should not protect Network Rail operations and not:

- affect the safety, operation or integrity of the company's railway and its infrastructure
- undermine its support zone
- damage the company's infrastructure
- place additional load on cuttings
- adversely affect any railway land or structure
- over-sail or encroach upon the air-space of any Network Rail land
- cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future

Response – Noted and agreed, the developer will be required to contact AssetProtectionKent@networkrail.co.uk prior to any works commencing on site, and also to agree an Asset Protection Agreement with us to enable approval of detailed works. More information can also be obtained from our website at <https://www.networkrail.co.uk/communities/lineside-neighbours/working-by-the-railway/>

344. Thames Water – No objections subject to conditions.

Response – Noted, the relevant conditions will be attached to any consent issued.

345. Transport for London – TfL has raised queries about the type of cycle parking and the provision of folding cycle lockers within student bedrooms. Additional concerns have been raised about the proposed servicing arrangements, particularly the lack of on site servicing and the lack of a minimum footway width behind the columns on Melior Street of 2 metres.

Response – The type of cycle parking will be confirmed by condition. Whilst concerns have been raised about the provision of folding bike lockers within student bedrooms, Officers accept this as a suitable response to cycle parking for this development of student housing. TfL have also raised concerns about the proposed servicing arrangements, particularly the lack of on site servicing and the lack of a minimum footway width behind the columns on Melior Street of 2 metres. Given site constraints, Officers consider that the proposed 1.8 metre wide footway to supplement the footway on Melior Street is considered satisfactory. Additionally, as this site cannot offer adequate space for servicing vehicles to enter and exit it in a forward gear, the proposed servicing arrangement forms an acceptable compromise. Contributions towards wayfinding and cycle hire would be secured as part of the Legal Agreement in line with the request from TfL. Further issues raised by TfL including Travel Plan, Construction Logistics Plan and a Service Management Plan will also be secured in the S106 agreement.

Community impact statement / Equalities Assessment

346. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three “needs” which are central to the aims of the Act:

- The need to eliminate discrimination, harassment, victimisation and any other

conduct prohibited by the Act

- The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
 - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
 - Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
 - Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low
 - The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.
347. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
348. The Council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
349. The proposed development would undoubtedly result in a significant change to the site. The public sector equality duty does not prevent change, but it is important that the Council consider the acceptability of the change with a careful eye on the equality implications of that change given its duty under s.149 of the Equality Act 2010. The Council's duty is to have due regard to the objectives identified above when making its decision. In the present context, this means focussing carefully on how the proposed change would affect those with protected characteristics, and ensuring that their interests are protected and equality objectives promoted as far as possible.
350. The current occupiers, Kings College, would be displaced from the site however the existing building is in use as ancillary education support for the wider campus. In addition, the uses currently occupying the building are to be redistributed to other premises on the adjacent Guys and St Thomas' Campus. In addition to the specific businesses affected the proposed development would provide a wider range benefits including public realm improvements, student housing provision, new retail provision and a significant contribution towards affordable housing which would have a positive equalities impact.
351. The Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.

Human rights implications

352. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.

353. This application has the legitimate aim of providing student housing and commercial floorspace. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/214-40 Application file: 18/AP/0900 Southwark Local Development Framework and Development Plan Documents	Place and Wellbeing Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5365 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Recommendation

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Terence McLellan, Team Leader	
Version	Final	
Dated	01 May 2019	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance & Governance	No	No
Strategic Director, Environment and Social Regeneration	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team		02 May 2019

APPENDIX 1

Consultation undertaken

Site notice date: 03/12/2018

Press notice date: 21/03/2019

Case officer site visit date: 23/05/2018

Neighbour consultation letters sent: 25/04/2018

Internal services consulted:

Ecology Officer
Economic Development Team
Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]
Flood and Drainage Team
HIGHWAY LICENSING
Highway Development Management
Waste Management

Statutory and non-statutory organisations consulted:

Dept. for Communities & Local Government [for all types of casework in Annex A of Chief Planner's letter 10 March 2011 - see details on Xdrive]
EDF Energy
Environment Agency
Greater London Authority
Historic England
Historic Royal Palaces (Tower of London)
London Fire & Emergency Planning Authority
London Underground Limited
Metropolitan Police Service (Designing out Crime)
Natural England - London Region & South East Region
Network Rail (Planning)
Thames Water - Development Planning
Transport for London (referable & non-referable app notifications and pre-apps)

Neighbour and local groups consulted:

53 Guinness Court Snowsfields SE1 3SX
52 Guinness Court Snowsfields SE1 3SX
54 Guinness Court Snowsfields SE1 3SX
56 Guinness Court Snowsfields SE1 3SX
55 Guinness Court Snowsfields SE1 3SX
51 Guinness Court Snowsfields SE1 3SX
48 Guinness Court Snowsfields SE1 3SX
47 Guinness Court Snowsfields SE1 3SX
49 Guinness Court Snowsfields SE1 3SX

Unit 12 52 Bermondsey Street SE1 3UD
Swimming Pool Wolfson House SE1 3RB
Flat 3 54 Weston Street SE1 3QJ
Flat 2 54 Weston Street SE1 3QJ
Flat 4 54 Weston Street SE1 3QJ
Student Accommodation Wolfson House SE1 3RB
Ground Floor 47 Bermondsey Street SE1 3XF
Unit 14 52 Bermondsey Street SE1 3UD
Unit 11 54 Bermondsey Street SE1 3UD

50 Guinness Court Snowsfields SE1 3SX
 5 Guinness Court Snowsfields SE1 3SX
 57 Guinness Court Snowsfields SE1 3SX
 100 Guinness Court Snowsfields SE1 3TA
 9 Guinness Court Snowsfields SE1 3SX
 101 Guinness Court Snowsfields SE1 3TA
 103 Guinness Court Snowsfields SE1 3TA
 102 Guinness Court Snowsfields SE1 3TA
 8 Guinness Court Snowsfields SE1 3SX
 59 Guinness Court Snowsfields SE1 3SX
 58 Guinness Court Snowsfields SE1 3SX

 6 Guinness Court Snowsfields SE1 3SX

 7 Guinness Court Snowsfields SE1 3SX
 60 Guinness Court Snowsfields SE1 3SX

 32 Guinness Court Snowsfields SE1 3SX
 31 Guinness Court Snowsfields SE1 3SX
 33 Guinness Court Snowsfields SE1 3SX
 35 Guinness Court Snowsfields SE1 3SX
 34 Guinness Court Snowsfields SE1 3SX
 30 Guinness Court Snowsfields SE1 3SX
 27 Guinness Court Snowsfields SE1 3SX
 26 Guinness Court Snowsfields SE1 3SX
 28 Guinness Court Snowsfields SE1 3SX
 3 Guinness Court Snowsfields SE1 3SX
 29 Guinness Court Snowsfields SE1 3SX

 36 Guinness Court Snowsfields SE1 3SX
 43 Guinness Court Snowsfields SE1 3SX
 42 Guinness Court Snowsfields SE1 3SX

 44 Guinness Court Snowsfields SE1 3SX
 46 Guinness Court Snowsfields SE1 3SX
 45 Guinness Court Snowsfields SE1 3SX
 41 Guinness Court Snowsfields SE1 3SX

 38 Guinness Court Snowsfields SE1 3SX

 37 Guinness Court Snowsfields SE1 3SX
 39 Guinness Court Snowsfields SE1 3SX
 40 Guinness Court Snowsfields SE1 3SX
 4 Guinness Court Snowsfields SE1 3SX
 75 Guinness Court Snowsfields SE1 3TA
 74 Guinness Court Snowsfields SE1 3TA
 76 Guinness Court Snowsfields SE1 3TA
 78 Guinness Court Snowsfields SE1 3TA
 77 Guinness Court Snowsfields SE1 3TA
 73 Guinness Court Snowsfields SE1 3TA
 69 Guinness Court Snowsfields SE1 3TA
 68 Guinness Court Snowsfields SE1 3TA
 70 Guinness Court Snowsfields SE1 3TA
 72 Guinness Court Snowsfields SE1 3TA
 71 Guinness Court Snowsfields SE1 3TA
 79 Guinness Court Snowsfields SE1 3TA
 87 Guinness Court Snowsfields SE1 3TA
 86 Guinness Court Snowsfields SE1 3TA
 88 Guinness Court Snowsfields SE1 3TA
 90 Guinness Court Snowsfields SE1 3TA

 89 Guinness Court Snowsfields SE1 3TA
 85 Guinness Court Snowsfields SE1 3TA
 81 Guinness Court Snowsfields SE1 3TA
 80 Guinness Court Snowsfields SE1 3TA
 82 Guinness Court Snowsfields SE1 3TA
 84 Guinness Court Snowsfields SE1 3TA
 83 Guinness Court Snowsfields SE1 3TA
 111 Guinness Court Snowsfields SE1 3TA

 Unit 1 54 Bermondsey Street SE1 3UD
 Unit 21 54 Bermondsey Street SE1 3UD
 Unit 11 56 Bermondsey Street SE1 3UD
 Unit 31 54 Bermondsey Street SE1 3UD
 Unit 33 52 Bermondsey Street SE1 3UD
 Unit 21 52 Bermondsey Street SE1 3UD
 Unit 15 52 Bermondsey Street SE1 3UD
 Unit 23 52 Bermondsey Street SE1 3UD
 Unit 25 52 Bermondsey Street SE1 3UD
 Unit 24 52 Bermondsey Street SE1 3UD
 Rooms 2 To 6 Second Floor 3-5 Hardwidge Street SE1 3SY
 Meeting Room 1 Fourth Floor 39-45 Bermondsey Street SE1 3XF
 Flat The Old Miller Of Mansfield SE1 3SS
 Railway Arches 895 And 896 Holyrood Street SE1 2EL
 Third Floor 40 Bermondsey Street SE1 3UD
 Ground Floor 40 Bermondsey Street SE1 3UD
 Second Floor 40 Bermondsey Street SE1 3UD
 First Floor 40 Bermondsey Street SE1 3UD
 33 Bermondsey Street London SE1 2EG
 52 Weston Street London SE1 3QJ
 Flat 1 54 Weston Street SE1 3QJ
 58 Bermondsey Street London SE1 3UD
 Flat 3 Globe House SE1 3JW
 Part First Floor 75 Weston Street SE1 3RS
 Part Ground And First Floor 73 Weston Street SE1 3RS
 Flat 2 Crucifix Lane SE1 3JW
 Part Fourth Floor 39-45 Bermondsey Street SE1 3XF
 Part Ground And First Floor 75 Weston Street SE1 3RS
 Site Office The Shard SE1 9SG
 Unit 31 56 Bermondsey Street SE1 3UD
 Unit 21 56 Bermondsey Street SE1 3UD
 Medical School Borough Wing And Tabard Wing
 Guys Hospital SE1 9TN
 Rooms 1 Second Floor 3-5 Hardwidge Street SE1 3SY
 Medical School Tower Wing Guys Hospital SE1 9TN
 29 Weston Street London SE1 3RR
 Living Accommodation Horseshoe SE1 3QP
 Living Accommodation 88 Tooley Street SE1 2TF
 Flat 2 Counting House Guys Hospital SE1 9TN
 Ground Floor Room 4 77 Weston Street SE1 3RS
 11 Raquel Court 147 Snowsfields SE1 3TE
 10 Raquel Court 147 Snowsfields SE1 3TE
 5 Raquel Court 147 Snowsfields SE1 3TE
 Ground Floor Left 3-5 Hardwidge Street SE1 3SY
 Ground Floor Right 3-5 Hardwidge Street SE1 3SY
 9 Raquel Court 147 Snowsfields SE1 3TE
 4 Raquel Court 147 Snowsfields SE1 3TE
 3 Raquel Court 147 Snowsfields SE1 3TE
 6 Raquel Court 147 Snowsfields SE1 3TE
 8 Raquel Court 147 Snowsfields SE1 3TE
 7 Raquel Court 147 Snowsfields SE1 3TE
 Bermondsey Village Hall Kirby Grove SE1 3TD
 Flat 2 Globe House SE1 3JW
 Part Basement And Part Ground Floor 46-50 Bermondsey Street SE1 3UD
 Ground Floor 1-7 Fenning Street SE1 3QR
 First Floor 1-7 Fenning Street SE1 3QR
 3a Bridgewalk Heights 80 Weston Street SE1 3QZ
 2 Raquel Court 147 Snowsfields SE1 3TE
 1 Raquel Court 147 Snowsfields SE1 3TE
 Unit 1 72 Weston Street SE1 3QH
 14 Ship And Mermaid Row London SE1 3QN
 Basement To Third Floor 37-37a Snowsfields SE1 3SU

110 Guinness Court Snowsfields SE1 3TA
 112 Guinness Court Snowsfields SE1 3TA
 114 Guinness Court Snowsfields SE1 3TA
 113 Guinness Court Snowsfields SE1 3TA
 109 Guinness Court Snowsfields SE1 3TA
 105 Guinness Court Snowsfields SE1 3TA
 104 Guinness Court Snowsfields SE1 3TA
 106 Guinness Court Snowsfields SE1 3TA
 108 Guinness Court Snowsfields SE1 3TA
 107 Guinness Court Snowsfields SE1 3TA
 115 Guinness Court Snowsfields SE1 3TA
 64 Guinness Court Snowsfields SE1 3TA
 63 Guinness Court Snowsfields SE1 3TA
 65 Guinness Court Snowsfields SE1 3TA
 67 Guinness Court Snowsfields SE1 3TA
 66 Guinness Court Snowsfields SE1 3TA
 62 Guinness Court Snowsfields SE1 3TA
 117 Guinness Court Snowsfields SE1 3TA
 116 Guinness Court Snowsfields SE1 3TA
 118 Guinness Court Snowsfields SE1 3TA
 61 Guinness Court Snowsfields SE1 3TA
 119 Guinness Court Snowsfields SE1 3TA
 25 Guinness Court Snowsfields SE1 3SX
 4 Hamilton Square Kipling Street SE1 3SB
 39 Hamilton Square Kipling Street SE1 3SB
 40 Hamilton Square Kipling Street SE1 3SB
 5 Hamilton Square Kipling Street SE1 3SB
 41 Hamilton Square Kipling Street SE1 3SB
 38 Hamilton Square Kipling Street SE1 3SB
 34 Hamilton Square Kipling Street SE1 3SB
 33 Hamilton Square Kipling Street SE1 3SB
 35 Hamilton Square Kipling Street SE1 3SB
 37 Hamilton Square Kipling Street SE1 3SB
 36 Hamilton Square Kipling Street SE1 3SB
 6 Hamilton Square Kipling Street SE1 3SB
 10-11 Snowsfields London SE1 3SU
 The Old Miller Of Mansfield 96-101 Snowsfields SE1 3SS
 Flat Above 10-11 Snowsfields SE1 3SU
 14 Snowsfields London SE1 3SU
 12 Snowsfields London SE1 3SU
 95 Snowsfields London SE1 3SS
 8 Hamilton Square Kipling Street SE1 3SB
 7 Hamilton Square Kipling Street SE1 3SB
 9 Hamilton Square Kipling Street SE1 3SB
 94 Snowsfields London SE1 3SS
 93 Snowsfields London SE1 3SS
 19 Hamilton Square Kipling Street SE1 3SB
 18 Hamilton Square Kipling Street SE1 3SB
 2 Hamilton Square Kipling Street SE1 3SB
 21 Hamilton Square Kipling Street SE1 3SB
 20 Hamilton Square Kipling Street SE1 3SB
 17 Hamilton Square Kipling Street SE1 3SB
 13 Hamilton Square Kipling Street SE1 3SB
 12 Hamilton Square Kipling Street SE1 3SB
 14 Hamilton Square Kipling Street SE1 3SB
 16 Hamilton Square Kipling Street SE1 3SB
 15 Hamilton Square Kipling Street SE1 3SB
 22 Hamilton Square Kipling Street SE1 3SB
 3 Hamilton Square Kipling Street SE1 3SB
 29 Hamilton Square Kipling Street SE1 3SB
 30 Hamilton Square Kipling Street SE1 3SB
 32 Hamilton Square Kipling Street SE1 3SB
 Sixth Floor And Seventh Floor Capital House SE1 3QD
 Second To Fifth Floors Capital House SE1 3QD
 Munro Clinic Snowsfields SE1 3SS
 Ground Floor Raquel Court SE1 3TE
 Montessori 7-13 Melior Street SE1 3QP
 First Floor And Second Floor Shiva The Tannery SE1 3XH
 Basement And Ground Floor Shiva The Tannery SE1 3XH
 Ground Floor Rooms 2 And 3 77 Weston Street SE1 3RS
 81 Weston Street London SE1 3RS
 The Wine And Spirit Trade Association Ltd 39-45 Bermondsey Street SE1 3XF
 Third Floor Shiva The Tannery SE1 3XH
 The Hide Bar 39-45 Bermondsey Street SE1 3XF
 Part Fifth Floor 39-45 Bermondsey Street SE1 3XF
 First Floor To Third Floor Part Fourth And Part Fifth Floor 39-45 Bermondsey Street SE1 3XF
 Ground Floor Room 1 77 Weston Street SE1 3RS
 Fourth Floor Part 39-45 Bermondsey Street SE1 3XF
 Sati The Tanneries SE1 3XN
 Fourth Floor Shiva The Tannery SE1 3XH
 Ganesh The Tanneries SE1 3XF
 Fifth Floor Part 39-45 Bermondsey Street SE1 3XF
 Flat 5 16 Melior Street SE1 3QQ
 Flat 4 16 Melior Street SE1 3QQ
 Flat 6 16 Melior Street SE1 3QQ
 Flat 3 16 Melior Street SE1 3QQ
 Flat 2 16 Melior Street SE1 3QQ
 Flat 1 16 Melior Street SE1 3QQ
 Arthurs Mission Hall Snowsfields SE1 3SU
 15 Hardwidge Street London SE1 3SY
 Ground Floor 48-50 Weston Street SE1 3QU
 Atrium 2 Guys Hospital SE1 9TN
 Part Ground Floor 17 Hardwidge Street SE1 3SY
 17 Hardwidge Street London SE1 3SY
 Apartment 8 8 Melior Street SE1 3QP
 Apartment 7 8 Melior Street SE1 3QP
 Apartment 9 8 Melior Street SE1 3QP
 Apartment 10 8 Melior Street SE1 3QP
 Apartment 6 8 Melior Street SE1 3QP
 Apartment 2 8 Melior Street SE1 3QP
 Unit 1 8 Melior Street SE1 3QP
 Apartment 3 8 Melior Street SE1 3QP
 Apartment 5 8 Melior Street SE1 3QP
 Apartment 4 8 Melior Street SE1 3QP
 Unit Su 58 London Bridge Station SE1 3QX
 Amt Coffee Ltd Guys Hospital Courtyard SE1 9RT
 Unit 2 7-13 Melior Street SE1 3QP
 12 Melior Street London SE1 3QP
 Amt Coffee Ltd Guys Hospital Cancer Centre SE1 9RT
 Unit Su 39 London Bridge Station SE1 3QX
 Guys Hospital Cancer Centre Great Maze Pond SE1 9RT
 Apartment 17 36 Snowsfields SE1 3SU
 Apartment 16 36 Snowsfields SE1 3SU
 Apartment 18 36 Snowsfields SE1 3SU
 Apartment 20 36 Snowsfields SE1 3SU
 Apartment 19 36 Snowsfields SE1 3SU
 Apartment 15 36 Snowsfields SE1 3SU
 Apartment 11 36 Snowsfields SE1 3SU
 Apartment 10 36 Snowsfields SE1 3SU
 Apartment 12 36 Snowsfields SE1 3SU
 Apartment 14 36 Snowsfields SE1 3SU
 Apartment 13 36 Snowsfields SE1 3SU
 Apartment 21 36 Snowsfields SE1 3SU
 Apartment 29 36 Snowsfields SE1 3SU

31 Hamilton Square Kipling Street SE1 3SB
28 Hamilton Square Kipling Street SE1 3SB
24 Hamilton Square Kipling Street SE1 3SB
23 Hamilton Square Kipling Street SE1 3SB
25 Hamilton Square Kipling Street SE1 3SB
27 Hamilton Square Kipling Street SE1 3SB
26 Hamilton Square Kipling Street SE1 3SB
10 Guinness Court Snowsfields SE1 3SX
1 Guinness Court Snowsfields SE1 3SX
11 Guinness Court Snowsfields SE1 3SX
13 Guinness Court Snowsfields SE1 3SX
12 Guinness Court Snowsfields SE1 3SX
Flat 8 40 Snowsfields SE1 3SU
Flat 5 40 Snowsfields SE1 3SU
Flat 4 42 Snowsfields SE1 3SU
Flat 5 42 Snowsfields SE1 3SU
Flat 7 40 Snowsfields SE1 3SU
Flat 6 40 Snowsfields SE1 3SU
14 Guinness Court Snowsfields SE1 3SX
21 Guinness Court Snowsfields SE1 3SX
20 Guinness Court Snowsfields SE1 3SX
22 Guinness Court Snowsfields SE1 3SX
24 Guinness Court Snowsfields SE1 3SX
23 Guinness Court Snowsfields SE1 3SX
2 Guinness Court Snowsfields SE1 3SX
16 Guinness Court Snowsfields SE1 3SX
15 Guinness Court Snowsfields SE1 3SX
17 Guinness Court Snowsfields SE1 3SX
19 Guinness Court Snowsfields SE1 3SX
18 Guinness Court Snowsfields SE1 3SX
39 Snowsfields London SE1 3SU
38 Snowsfields London SE1 3SU
41 Snowsfields London SE1 3SU
62-64 Weston Street London SE1 3QJ
43 Snowsfields London SE1 3SU
16 Snowsfields London SE1 3SU
15 Snowsfields London SE1 3SU
17 Snowsfields London SE1 3SU
20 Snowsfields London SE1 3SU
18 Snowsfields London SE1 3SU
56 Bermondsey Street London SE1 3UD
Flat 2 42 Snowsfields SE1 3SU
Flat 2 40 Snowsfields SE1 3SU
Flat 3 40 Snowsfields SE1 3SU
Flat 4 40 Snowsfields SE1 3SU
Flat 3 42 Snowsfields SE1 3SU
Flat 1 42 Snowsfields SE1 3SU
Flat 2 92a Snowsfields SE1 3SS
Flat 1 92a Snowsfields SE1 3SS
Flat 3 92a Snowsfields SE1 3SS
Flat 1 40 Snowsfields SE1 3SU
Flat 4 92a Snowsfields SE1 3SS
Flat 20 70 Weston Street SE1 3HJ
Flat 19 70 Weston Street SE1 3HJ
Flat 18 70 Weston Street SE1 3HJ
Flat 14 70 Weston Street SE1 3HJ
Flat 12 70 Weston Street SE1 3HJ
Flat 15 70 Weston Street SE1 3HJ
Flat 17 70 Weston Street SE1 3HJ
Flat 16 70 Weston Street SE1 3HJ
Flat 1 38 Snowsfields SE1 3SU
Flat 1 Globe House SE1 3JW
Flat 12 64 Weston Street SE1 3QJ
Flat 3 38 Snowsfields SE1 3SU
Flat 2 38 Snowsfields SE1 3SU
First Floor Flat The Glasshouse SE1 3SZ
14 Melior Street London SE1 3QP
19 Snowsfields London SE1 3SU
13 Snowsfields London SE1 3SU
Flat 3 72 Weston Street SE1 3QG

Apartment 28 36 Snowsfields SE1 3SU
Apartment 30 36 Snowsfields SE1 3SU
Apartment 31 36 Snowsfields SE1 3SU
Apartment 27 36 Snowsfields SE1 3SU
Apartment 23 36 Snowsfields SE1 3SU
Apartment 22 36 Snowsfields SE1 3SU
Apartment 24 36 Snowsfields SE1 3SU
Apartment 26 36 Snowsfields SE1 3SU
Apartment 25 36 Snowsfields SE1 3SU
Flat 1 64 Weston Street SE1 3QJ
Flat 1 62 Weston Street SE1 3QJ
Flat 2 62 Weston Street SE1 3QJ
Flat 3 62 Weston Street SE1 3QJ
Flat 2 64 Weston Street SE1 3QJ
Flat 11 64 Weston Street SE1 3QJ
92 Crosby Row London SE1 3PU
90 Crosby Row London SE1 3PU
66 Weston Street London SE1 3QJ
Flat 10 64 Weston Street SE1 3QJ
79 Weston Street London SE1 3RS
Flat 3 64 Weston Street SE1 3QJ
Flat 9 64 Weston Street SE1 3QJ
10 Hamilton Square Kipling Street SE1 3SB
1 Hamilton Square Kipling Street SE1 3SB
Flat 8 64 Weston Street SE1 3QJ
Flat 4 64 Weston Street SE1 3QJ
Flat 4 62 Weston Street SE1 3QJ
Flat 5 64 Weston Street SE1 3QJ
Flat 7 64 Weston Street SE1 3QJ
Flat 6 64 Weston Street SE1 3QJ
56-58 Weston Street London SE1 3QJ
14 Bermondsey Street London SE1 2EG
Unit Su 59 London Bridge Station SE1 3QX
Apartment 1 88a Tooley Street SE1 2TF
60a Weston Street London SE1 3QJ
Apartment 2 88a Tooley Street SE1 2TF
Apartment 4 88a Tooley Street SE1 2TF
Apartment 3 88a Tooley Street SE1 2TF
47 Bermondsey Street London SE1 3XT
84 Crosby Row London SE1 3PU
88 Crosby Row London SE1 3PU
86 Crosby Row London SE1 3PU
1 Melior Place London SE1 3SZ
Shipwrights Arms 88 Tooley Street SE1 2TF
Apartment 9 36 Snowsfields SE1 3SU
Level 8 The Shard SE1 9SY
Level 7 The Shard SE1 9SY
Level 9 The Shard SE1 9SY
Level 11 The Shard SE1 9SY
Level 10 The Shard SE1 9SY
Level 6 The Shard SE1 9SY
Level 1 The Shard SE1 9SY
Restaurant Level 32 The Shard SE1 9SY
Level 2 The Shard SE1 9SY
Level 5 The Shard SE1 9SY
Level 4 The Shard SE1 9SY
Level 12 The Shard SE1 9SY
Level 21 The Shard SE1 9SY
Level 20 The Shard SE1 9SY
Level 22 The Shard SE1 9SY
Level 24 The Shard SE1 9SY
Level 23 The Shard SE1 9SY
Level 19 The Shard SE1 9SY
Level 14 The Shard SE1 9SY
Level 13 The Shard SE1 9SY
Level 15 The Shard SE1 9SY
Level 18 The Shard SE1 9SY
Level 16 The Shard SE1 9SY
Unit 4b Arch 887 Railway Arches 888 SE1 2EL
The View From The Shard The Shard SE1 9SG

First Floor 77 Weston Street SE1 3SD
Flat 4 72 Weston Street SE1 3QG

Flat 6 72 Weston Street SE1 3QG
Flat 5 72 Weston Street SE1 3QG
30 Snowfields London SE1 3SU
The York Clinic 47 Weston Street SE1 3RR
Flat 7 72 Weston Street SE1 3QG
Flat 8 70 Weston Street SE1 3HJ
Flat 7 70 Weston Street SE1 3HJ
Flat 9 70 Weston Street SE1 3HJ
Flat 11 70 Weston Street SE1 3HJ
Flat 10 70 Weston Street SE1 3HJ
Flat 6 70 Weston Street SE1 3HJ
16 Hardwidge Street London SE1 3SY
Flat 8 72 Weston Street SE1 3QG
Flat 2 72 Weston Street SE1 3QG
Flat 5 70 Weston Street SE1 3HJ
73a Weston Street London SE1 3RS
Unit 1 The Grain Stores SE1 3HJ
Second Floor 60 Weston Street SE1 3QJ
Unit 2 The Grain Stores SE1 3QH
Basement 77 Weston Street SE1 3RS
Units 3 And 4 The Grain Stores SE1 3HJ
First Floor 60 Weston Street SE1 3QJ
Part Ground Floor And Eighth Floor Capital House SE1 3QD
Part Ground Floor And First Floor Capital House SE1 3QD
Part Ground Floor And Ninth Floor Capital House SE1 3QD
Ground Floor 60 Weston Street SE1 3QJ
Basement 60 Weston Street SE1 3QJ

Second Floor 77 Weston Street SE1 3SD
The Greenwood Theatre 55 Weston Street SE1 3RA
The Glasshouse 3 Melior Place SE1 3QP
14a The Grain Store 70 Weston Street SE1 3HJ
6 Bridgewalk Heights 80 Weston Street SE1 3QZ
Railway Arch 22 Bermondsey Street SE1 3XG
Third Floor Flat 75 Weston Street SE1 3RS
Flat 5 38 Snowfields SE1 3SU
Flat 4 38 Snowfields SE1 3SU
Flat 6 38 Snowfields SE1 3SU
Flat 8 38 Snowfields SE1 3SU
Flat 7 38 Snowfields SE1 3SU
Railway Arches 6 To 11 Crucifix Lane SE1 3JW
Block K 106 Guinness Buildings SE1 3TA
80-82 St Thomas Street London SE1 3QU
42-42a Snowfields London SE1 3SU
Second Floor 3-5 Hardwidge Street SE1 3SY
First Floor 3-5 Hardwidge Street SE1 3SY
Railway Arch 899 Holyrood Street SE1 2EL
40-40a Snowfields London SE1 3SU
141 Guinness Court Snowfields SE1 3TB
140 Guinness Court Snowfields SE1 3TB
142 Guinness Court Snowfields SE1 3TB
144 Guinness Court Snowfields SE1 3TB
143 Guinness Court Snowfields SE1 3TB
139 Guinness Court Snowfields SE1 3TB
135 Guinness Court Snowfields SE1 3TB
134 Guinness Court Snowfields SE1 3TB
136 Guinness Court Snowfields SE1 3TB
138 Guinness Court Snowfields SE1 3TB
137 Guinness Court Snowfields SE1 3TB
145 Guinness Court Snowfields SE1 3TB
9 Fenning Street London SE1 3QR
Margret House 111 Snowfields SE1 3SS
Horseshoe 26 Melior Street SE1 3QP
147 Guinness Court Snowfields SE1 3TB
146 Guinness Court Snowfields SE1 3TB
2 Crucifix Lane London SE1 3JW

Ground Floor Flat 52 Weston Street SE1 3QJ
First To Third And Part Fourth And Fifth Floors And
Meeting Room One On Fourth F 39-45 Bermondsey
Street SE1 3XF
Shangri La Hotel The Shard SE1 9RY
Restaurant Levels 31 And 33 The Shard SE1 9RY
Service Entrance The Shard SE1 9RY
Apartment 1 The Shard SE1 9RY
Apartment 9 The Shard SE1 9RY
Apartment 8 The Shard SE1 9RY
Apartment 10 The Shard SE1 9RY
Level 3 The Shard SE1 9SG
82 St Thomas Street London SE1 3QU
Apartment 7 The Shard SE1 9RY
Apartment 3 The Shard SE1 9RY
Apartment 2 The Shard SE1 9RY
Apartment 4 The Shard SE1 9RY
Apartment 6 The Shard SE1 9RY
Apartment 5 The Shard SE1 9RY
Level 17a The Shard SE1 9RY
Level 14b The Shard SE1 9RY
Level 17b The Shard SE1 9RY
Part Ground Floor 7-13 Melior Street SE1 3QP
Part 7-13 Melior Street SE1 3QP
Level 14a The Shard SE1 9RY
Flat 3 85 Weston Street SE1 3RS
Flat 2 85 Weston Street SE1 3RS
87 Weston Street London SE1 3RS
Arch 5 Crucifix Lane SE1 3JW
Level 72 The Shard SE1 9SG
Part First And Second Floors 7-13 Melior Street SE1
3QP
Apartment 5 36 Snowfields SE1 3SU
Apartment 4 36 Snowfields SE1 3SU
Apartment 6 36 Snowfields SE1 3SU
Apartment 8 36 Snowfields SE1 3SU
Apartment 7 36 Snowfields SE1 3SU
Unit 3 36 Snowfields SE1 3SU
Hca Outpatients And Diagnostics The Shard SE1 9SP
Ground Floor 58 Bermondsey Street SE1 3UD
36 Snowfields London SE1 3SU
Unit 2 36 Snowfields SE1 3SU
Unit 1 36 Snowfields SE1 3SU
Flat 5 54 Weston Street SE1 3QJ
123 Snowfields London SE1 3ST
Flat 2 123 Snowfields SE1 3ST
Flat 1 123 Snowfields SE1 3ST
Level 30 The Shard SE1 9SY
Level 26 The Shard SE1 9SY
Level 25 The Shard SE1 9SY
Level 27a The Shard SE1 9SY
Level 29 The Shard SE1 9SY
Level 28 The Shard SE1 9SY
Flat 3 123 Snowfields SE1 3ST
Flat 4 83 Weston Street SE1 3RS
Flat 3 83 Weston Street SE1 3RS
Flat 5 83 Weston Street SE1 3RS
Flat 1 85 Weston Street SE1 3RS
Flat 2 83 Weston Street SE1 3RS
Flat 5 123 Snowfields SE1 3ST
Flat 4 123 Snowfields SE1 3ST
Snowfield Yard 6-16 Melior Street SE1 3QQ
Flat 1 83 Weston Street SE1 3RS
Globe House 37 Bermondsey Street SE1 3XF
Globe House 37 Bermondsey Street SE1 3XF
37 Guinness Court(Block E) Snowfields SE1 3SX
Maltings Place 169 Tower Bridge Rd SE13LJ
Flat 20, 9 Bell Yard Mews SE1 3UY
13 Grange Walk SE1 3DT
51 Whites Grounds Se13jz

6 Melior Street London SE1 3QP
Snowsfields Primary School Kirby Grove SE1 3TD
98 Guinness Court Snowsfields SE1 3TA
97 Guinness Court Snowsfields SE1 3TA
99 Guinness Court Snowsfields SE1 3TA
121 Guinness Court Snowsfields SE1 3TB
120 Guinness Court Snowsfields SE1 3TB
96 Guinness Court Snowsfields SE1 3TA
92 Guinness Court Snowsfields SE1 3TA
91 Guinness Court Snowsfields SE1 3TA
93 Guinness Court Snowsfields SE1 3TA
95 Guinness Court Snowsfields SE1 3TA
94 Guinness Court Snowsfields SE1 3TA
122 Guinness Court Snowsfields SE1 3TB
130 Guinness Court Snowsfields SE1 3TB
129 Guinness Court Snowsfields SE1 3TB
131 Guinness Court Snowsfields SE1 3TB
133 Guinness Court Snowsfields SE1 3TB
132 Guinness Court Snowsfields SE1 3TB
128 Guinness Court Snowsfields SE1 3TB
124 Guinness Court Snowsfields SE1 3TB
123 Guinness Court Snowsfields SE1 3TB
125 Guinness Court Snowsfields SE1 3TB
127 Guinness Court Snowsfields SE1 3TB
126 Guinness Court Snowsfields SE1 3TB

25 Bridgeway Heights 80 Weston Street SE1 3QZ
23a Bridgeway Heights 80 Weston Street SE1 3QZ
26 Bridgeway Heights 80 Weston Street SE1 3QZ
28 Bridgeway Heights 80 Weston Street SE1 3QZ
27 Bridgeway Heights 80 Weston Street SE1 3QZ
23 Bridgeway Heights 80 Weston Street SE1 3QZ
19 Bridgeway Heights 80 Weston Street SE1 3QZ
18 Bridgeway Heights 80 Weston Street SE1 3QZ

20 Bridgeway Heights 80 Weston Street SE1 3QZ
22 Bridgeway Heights 80 Weston Street SE1 3QZ
21 Bridgeway Heights 80 Weston Street SE1 3QZ
29 Bridgeway Heights 80 Weston Street SE1 3QZ
42-44 Bermondsey Street London SE1 3UD
51-57 St Thomas Street London SE1 3QX
35 Bridgeway Heights 80 Weston Street SE1 3QZ
31 Bridgeway Heights 80 Weston Street SE1 3QZ
30 Bridgeway Heights 80 Weston Street SE1 3QZ
32 Bridgeway Heights 80 Weston Street SE1 3QZ
33a Bridgeway Heights 80 Weston Street SE1 3QZ
33 Bridgeway Heights 80 Weston Street SE1 3QZ
75-79 St Thomas Street London SE1 3QX
Beckett House 60-68 St Thomas Street SE1 3QU
1 Bridgeway Heights 80 Weston Street SE1 3QZ
3 Bridgeway Heights 80 Weston Street SE1 3QZ

2 Bridgeway Heights 80 Weston Street SE1 3QZ
92 Snowsfields London SE1 3SS
61 St Thomas Street London SE1 3QX
1-7 Snowsfields London SE1 3SU
8-9 Snowsfields London SE1 3SU
5 Bridgeway Heights 80 Weston Street SE1 3QZ
13a Bridgeway Heights 80 Weston Street SE1 3QZ
12a Bridgeway Heights 80 Weston Street SE1 3QZ
15 Bridgeway Heights 80 Weston Street SE1 3QZ
17 Bridgeway Heights 80 Weston Street SE1 3QZ
16 Bridgeway Heights 80 Weston Street SE1 3QZ
12 Bridgeway Heights 80 Weston Street SE1 3QZ
8 Bridgeway Heights 80 Weston Street SE1 3QZ
7 Bridgeway Heights 80 Weston Street SE1 3QZ
9 Bridgeway Heights 80 Weston Street SE1 3QZ
11 Bridgeway Heights 80 Weston Street SE1 3QZ
10 Bridgeway Heights 80 Weston Street SE1 3QZ
11 Hamilton Square Kipling Street SE1 3SB

Flat 4, 37 Tanner Street London SE1 3LF
4 Tanner Street Flat 1 SE1 3LD
208 Hestia House Citywalk Se13es
Winstanley Rd London SW11 2DL
Flat 23 36 Snowsfields SE1 3SU
Flat 23 36 Snowsfields SE1 3SU
C/O 10 Tanner House Tanner Street SE1 3LL
62e Trinity Church Square London SE14HT
Apartment 9 36 Snowsfields SE1 3SU
Apartment 9 36 Snowsfields SE1 3SU
Flat 8 8 Bluelion Place SE1 4PU
36 Snowsfields London SE1 3SU
Apartment 10 36 Snowsfields SE13SU
Flat 18 36 Snowsfields Se1 3su
Flat 8, 36 Snowsfields London SE1 3SU
36 Leathermarket Court London SE1 3HS
36 Snowfields London SE1 3SU
36 Snowsfields Flat 23 SE1 3SU
21 Guinness Court Snowsfields se1 3sx
Apt 25 36, Snowsfields SE1 3SU
Apartment 20 36 Snowsfields SE1 3SU
9, 230 Long Lane London Se14qa
9, 230 Long Lane London Se14qa
53 Whitesgrounds Estate White Grounds SE1 3JZ
Flat 12, 100 Building Alaska 61 Grange Road Se1
3ba
Flat 25 Lion Court 12 Shand Street SE1 2EP
2 Eynsford House Crosby Row SE1 3YB
145 Bermondsey Street London SE1 3UW
56 Maltings Place London SE1 3LJ
45 St. Olaves Estate Druid Street SE1 2EX
Flat 4 1 Leathermarket Street SE1 3HN
1 Leathermarket Street London Se1 3hn
Flat 4, The Morocco Store 1 Leathermarket Street
SE1 3HN
9 Comyn Road London SW11 1QB
69 Weston St London SE1 3RT
12 Elm Court Royal Oak Yard SE1 3TP
66 Pennard Road London W12 8DS
14 Manor Road West Wickham BR4 9PS
16 Crucifix Lane London SE13JW
Flat 2 2 Whites Grounds SE1 3LA
City Road London EC1v 2PD
145 Bermondsey Street London SE1 3UW
16b Muschamp Road Peckham SE15 4EF
Flat 54 239 Long Lane SE1 4PT
207 Vesta Court London SE1 3BP
Flat 34 197 Long Lane SE14PD
401 Hestia House City Walk SE1 3ES
37 Tanner Street London SE1 3LF
Flat 14, The Milliners House 173 Bermondsey Street
SE1 3UW
239 Long Lane London SE14PT
Apartment 1 85 Weston Street SE1 3RS
18a Wilds Rents London SE1 4QG
87 Lynton Road Bermondsey SE1 5QT
11 Aylwin Estate Grange Walk SE1 3DU
1 Hestia House 1 Hestia House SE1 3ES
Flat 7, 37 Tanner Street London SE1 3LF
34 Lion Court Shand Street SE1
12 Pope St London SE1 3PR
Lion Court London SE1 2EP
38 Guildford Grove SE10 8JT
202 Vesta Court City Walk SE1 3BP
22, Leathermarket Street London SE1 3HP
Flat 402 Cedar Court 1 Royal Oak Yard SE1 3GA
402 Cedar Court 1 Royal Oak Yard SE1 3GA
Flat 5, 1 Leathermarket St London SE1 3HN
22 Leathermarket Street London SE1 3HP
Flat 2, Gemini House 180-182 Bermondsey Street

Medical School Southwark Wing Guys Hospital SE1 9TN
Unit 11 52 Bermondsey Street SE1 3UD
Unit 13 52 Bermondsey Street SE1 3UD

SE1 3TQ
148a Totteridge Lane London N20 8JJ
3 Antonine Heights City Walk SE1 3DB
C/O E-Mail

Re-consultation: 03/12/2018

APPENDIX 2

Consultation responses received

Internal services

Economic Development Team

Statutory and non-statutory organisations

Environment Agency
Historic England
London Underground Limited
Metropolitan Police Service (Designing out Crime)
Natural England - London Region & South East Region
Network Rail (Planning)
Thames Water - Development Planning
Transport for London (referable & non-referable app notifications and pre-apps)

Neighbours and local groups

Apartment 1 85 Weston Street SE1 3RS
Apartment 10 36 Snowsfields SE13SU
Apartment 20 36 Snowsfields SE1 3SU
Apartment 25 36 Snowsfields SE1 3SU
Apartment 29 36 Snowsfields SE1 3SU
Apartment 9 36 Snowsfields SE1 3SU
Apartment 9 36 Snowsfields SE1 3SU
Apt 25 36, Snowsfields SE1 3SU
City Road London EC1v 2PD
C/O E-Mail
C/O 10 Tanner House Tanner Street SE1 3LL
Flat 1 85 Weston Street SE1 3RS
Flat 12, 100 Building Alaska 61 Grange Road Se1 3ba
Flat 12, 100 Building Alaska 61 Grange Road Se1 3ba
Flat 14, The Milliners House 173 Bermondsey Street SE1 3UW
Flat 18 36 Snowsfields Se1 3su
Flat 2, Gemini House 180-182 Bermondsey Street SE1 3TQ
Flat 2 2 Whites Grounds SE1 3LA
Flat 20, 9 Bell Yard Mews SE1 3UY
Flat 23 36 Snowsfields SE1 3SU
Flat 23 36 Snowsfields SE1 3SU
Flat 25 Lion Court 12 Shand Street SE1 2EP
Flat 3 Globe House SE1 3JW
Flat 3 85 Weston Street SE1 3RS
Flat 34 197 Long Lane SE14PD

Flat 4, The Morocco Store 1 Leathermarket Street SE1 3HN
Flat 4, The Morocco Store 1 Leathermarket Street SE1 3HN
Flat 4 1 Leathermarket Street SE1 3HN
Flat 4 16 Melior Street SE1 3QQ
Flat 4, 37 Tanner Street London SE1 3LF
Flat 4, 37 Tanner Street London SE1 3LF
Flat 402 Cedar Court 1 Royal Oak Yard SE1 3GA
Flat 5, 1 Leathermarket St London SE1 3HN
Flat 5 42 Snowfields SE1 3SU
Flat 54 239 Long Lane SE1 4PT
Flat 7, 37 Tanner Street London SE1 3LF
Flat 8, 36 Snowfields London SE1 3SU
Flat 8, 36 Snowfields London SE1 3SU
Flat 8, 36 Snowfields London SE1 3SU
Flat 8 8 Bluelion Place SE1 4PU
Flat 8 8 Bluelion Place SE1 4PU
Ground Floor 48-50 Weston Street SE1 3QJ
Lion Court London SE1 2EP
Maltings Place 169 Tower Bridge Rd SE13LJ
Winstanley Rd London SW11 2DL
1 Hestia House 1 Hestia House SE1 3ES
1 Leathermarket Street London Se1 3hn
1 Melior Place London SE1 3SZ
1 Melior Place London SE1 3SZ
11 Aylwin Estate Grange Walk SE1 3DU
12 Elm Court Royal Oak Yard SE1 3TP
12 Pope St London SE1 3PR
13 Grange Walk SE1 3DT
14 Manor Road West Wickham BR4 9PS
145 Bermondsey Street London SE1 3UW
148a Totteridge Lane London N20 8JJ
15 Snowfields London SE1 3SU
16 Crucifix Lane London SE13JW
16b Muschamp Road Peckham SE15 4EF
18a Wilds Rents London SE1 4QG
2 Eynsford House Crosby Row SE1 3YB
202 Vesta Court City Walk SE1 3BP
207 Vesta Court London SE1 3BP
208 Hestia House Citywalk Se13es
21 Guinness Court Snowfields se1 3sx
21 Guinness Court Snowfields se1 3sx
22, Leathermarket Street London SE1 3HP
22 Leathermarket Street London SE1 3HP
239 Long Lane London SE14PT
3 Antonine Heights City Walk SE1 3DB
34 Lion Court Shand Street SE1
36 Leathermarket Court London SE1 3HS
36 Snowfields London SE1 3SU
36 Snowfields Flat 23 SE1 3SU
36 Snowfields London SE1 3SU
36 Snowfields London SE1 3SU
37 Guinness Court(Block E) Snowfields SE1 3SX
37 Guinness Court(Block E) Snowfields SE1 3SX

37 Tanner Street London SE1 3LF
38 Guildford Grove SE10 8JT
38 Snowfields London SE1 3SU
4 Tanner Street Flat 1 SE1 3LD
401 Hestia House City Walk SE1 3ES
402 Cedar Court 1 Royal Oak Yard SE1 3GA
45 St. Olaves Estate Druid Street SE1 2EX
48 Guinness Court Snowfields SE1 3SX
51 Whites Grounds Se13jz
53 Whitesgrounds Estate White Grounds SE1 3JZ
56 Maltings Place London SE1 3LJ
62e Trinity Church Square London SE14HT
66 Pennard Road London W12 8DS
69 Weston St London SE1 3RT
69 Weston St London SE1 3RT
69 Weston St London SE1 3RT
87 Lynton Road Bermondsey SE1 5QT
9 Comyn Road London SW11 1QB
9, 230 Long Lane London Se14qa
9, 230 Long Lane London Se14qa