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| Item No. 6.1 | Classification: Open | Date: 29 June 2020 | Meeting Name: Planning Committee |
| Report title: | Development Management planning application: Application 19/AP/0404 for: Full Planning Application Address: 40-44 BERMONDSEY STREET VINEGAR YARD WAREHOUSE 9-17 VINEGAR YARD AND LAND ADJACENT TO 1-7 SNOWFIELDS SE1 Proposal: 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); new landscaping and public realm; reconfigured pedestrian and vehicular access; associated works to public highway; ancillary servicing; plant; storage and associated works. | | |
| Ward(s) or groups affected: | London Bridge & West Bermondsey | | |
| From: | Terence McLellan | | |
| Application Start Date 08/03/2019 | | Application Expiry Date 07/06/2019 | |
| Earliest Decision Date 20/11/2019 | | | |

RECOMMENDATIONS

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 an Environmental Impact Assessment has been undertaken, 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. That in the event that the requirements of paragraph 1 above are not met by 30 November 2020, the director of planning be authorised to refuse planning permission, if appropriate, for the reasons set out under paragraph 274.

EXECUTIVE SUMMARY

5. The proposed development is for a mixed use office and retail scheme on a development site at the northern end of Bermondsey Street and Snowfields. The site itself is formed of two parts, Snowfields and Bermondsey with the Snowfields part accommodating the Vinegar yard warehouse which is a local heritage asset and the Bermondsey part accommodating offices.
6. The scheme is conceived as part of a wider development framework that runs between Weston Street to the west and the head of Bermondsey Street to the east and includes the neighbouring development plots of Capital House, Becket House and Vinegar Yard. The sites' landowners have sought to coordinate an approach for comprehensive redevelopment and have established a framework for developing the area.
7. The framework envisages a series of perimeter buildings that reinforce the street edges of Weston Street, St Thomas Street and Snowfields and define a public garden to the rear towards Weston Street and a new public plaza towards Snowfields. It retains north-south routes across the site and opens up a new east-west pedestrian route that bisects the framework area, linking Weston Street with the two new public spaces and through to Bermondsey Street.
8. In this instance, the current planning application is for the complete redevelopment of the Bermondsey part of the site to provide a new part five part 10-storey office and retail building and the redevelopment of the Snowfields site to restore the existing warehouse building as well as constructing a new tower above it. Integral to the development is the creation of a new pedestrian route linking Bermondsey Street and Snowfields as well as the important role the Snowfields site will play in the future public realm of the St Thomas Street sites.
9. A total of 122 objections have been received in response to the proposed development. The main points of the objections are set out below along with the number of times they have been raised. A detailed breakdown of the objections along with a detailed officer response is set out in paragraphs 302-342.

| Objection topic | Number of time raised |
|--|-----------------------|
| Heritage and conservation area impacts | 75 |
| Height/scale/massing | 52 |
| Out of character with the area | 37 |
| Daylight/sunlight/overshadowing | 30 |
| Wind | 27 |
| Disruption during and after construction | 26 |
| Transport and traffic impacts | 20 |
| Insufficient benefits/no justification | 16 |
| Overdevelopment | 15 |
| Noise | 14 |
| Detailed design | 12 |
| Overbearing | 12 |
| Views | 11 |
| Consultation | 10 |
| Privacy | 10 |
| Public realm | 6 |
| Cumulative impacts | 5 |
| Air quality | 4 |
| Trees and landscaping | 4 |

BACKGROUND INFORMATION

Site location and description

10. The application site relates to two plots of land divided by Snowfields. The plot to the west of Snowfields is known as the Snowfields site and the plot to the east is known as the Bermondsey Street site. The comprehensive application site (the site) lies to the south of London Bridge Station close to the junction of St Thomas Street, Snowfields, Bermondsey Street and Crucifix Lane.
11. The Snowfields site is bounded by Snowfields on the south/east and Vinegar Yard to the north/west. The site is currently occupied by the building known as the Vinegar Yard warehouse which extends to four storeys in height with an additional semi basement level. The warehouse is currently vacant due to its poor state of repair and various structural issues. The remainder of the plot consists of hard standing. Adjacent to the warehouse to the west is the Horseshoe Inn and to the south is a four storey building with a bar/restaurant on the ground floor and homes on the upper levels. To the north of the site, on the opposite side of Vinegar Yard, is a larger cleared site which is currently in temporary use as a market and food/beverage outlet. There is a cycle hire docking station with capacity for 31 cycles adjacent to the site on Snowfields. Buildings in the immediate vicinity of the Snowfields site range in height from three to six storeys.

Site Plan



12. The Bermondsey Street site is bounded by Bermondsey Street to the east, the junction of Bermondsey Street/St Thomas Street and Crucifix Lane to the north and Snowfields to the west. The Bermondsey Street site is currently occupied by two buildings and a large yard area. The building at the south end of the plot is a warehouse building comprising offices whilst the building to the north is a four storey building with retail at ground floor level and offices on the upper levels. The Bermondsey Street site is adjacent to existing residential buildings to the west at Raquel Court and Hardwidge Street whilst Bermondsey Street to the east

accommodates a range of uses including retail, cultural space, offices, and residential. The Wine and Spirit Education Trust is located adjacent to the site on Bermondsey Street. Buildings in the immediate vicinity of the Bermondsey Street site range in height from four to six storeys.

13. The Bermondsey Street site lies adjacent to the Bermondsey Street Conservation Area on its south and east boundaries. On the Snowsfields Site, the part of the plot occupied by the Vinegar Warehouse sits within the Bermondsey Street Conservation Area which recognises the heritage value of both the Vinegar Warehouse and the Horseshoe Inn which are classed as undesignated heritage assets.
14. The surrounding area is characterised by a range of uses including retail, office, cultural, education and residential. The northern end of Bermondsey Street is dominated by the London Bridge Station railway viaduct, the arches of which have been redeveloped into new retail outlets as part of the station refurbishment.
15. In terms of accessibility, the application site benefits from the highest level of public transport accessibility with a PTAL rating of 6B reflecting the proximity of London Bridge Railway Station and associated Jubilee and Northern lines of the London Underground. Bus routes are available to the north of the site on Tooley Street and west on Borough High Street.

Details of proposal

16. Planning consent is sought for the redevelopment of the site to provide new office Class (B1) and retail space (Class A1/A2/A3/A4) across two new buildings.

| Proposed use | Proposed floorspace |
|-------------------|---------------------|
| Class B1 Office | 21,522sqm GIA |
| Class A1/A2/A3/A4 | 1,281sqm GIA |
| Total | 22,803sqm GIA |

17. Building 1 would be located on the Bermondsey Street site and would be part five part ten storeys in height (44.05m AOD) with one level of basement. The new building would be formed of two distinct parts linked at all levels by bridges spanning the new public route from Bermondsey Street to Snowsfields. Building 1 would incorporate retail use at ground floor with Class B1 office space on all upper levels. Amenity terraces would be provided at fifth floor level.
18. A loading bay would be accessed from Snowsfields which would provide access to an on-site servicing area as well as two accessible car parking bays. The single level of basement would accommodate the cycle parking and showering facilities as well as all relevant plant rooms.
19. Building 2 would be located on the Snowsfields site and would rise to 17 storeys in height (67m AOD), 13 of which would be located above a fully restored Vinegar Yard warehouse. This building would include a large retail unit at ground floor as well as an office lobby and Class B1 office use on all upper levels. An amenity terrace would be provided at fourth floor level where the Vinegar Yard Warehouse meets the new structure.
20. Two levels of basement are proposed with basement Level 2 accommodating all relevant plant and basement Level 1 providing all cycle parking and showering facilities. Servicing for building 2 would take place from an on-street loading bay positioned adjacent to the site on Snowsfields.

21. The development would provide a new public realm in the Snowsfields site that would link up with the open space proposed as part of the adjacent application site known as Vinegar Yard. The public realm improvements would also include the provision of a new route between Bermondsey Street and Snowsfields as well as resurfacing works and tree planting.

Planning history

22. Whilst there is no specific history for the application site that is of relevance, there is a varied and significant planning history for adjoining and nearby sites. Those that are most recent and relevant are set out below:

London Bridge Tower (Shard of Glass) (ref 01/AP/0476):

23. Redevelopment of Southwark Towers for a 306m tower for offices, hotel, residential and public viewing areas. This development is now complete.

Guys Hospital new Cancer Building (ref: 12/AP/2062 granted January 2013):

24. 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.

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):

25. 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.

147 Snowsfields (reference 20/AP/0744):

26. Demolition of existing buildings and construction of a 10 storey building plus basement consisting of 17 residential units, commercial at ground floor and basement and associated cycle and waste storage and other associated works. This application has not yet been decided.

St Thomas Street East Framework

27. The application site forms the eastern boundary of a series of adjacent development plots that have become known as St Thomas Street East. The adjacent sites include Capital House at 42-46 Weston Street, Beckett House at 60 St Thomas Street and the site known as Snowsfields which includes the Vinegar Yard Warehouse as well as the buildings at the top west side of Bermondsey Street (as set out below). The site at Beckett House has been part of an ongoing pre-application enquiry. A planning application for Beckett House has recently been received and is out to public consultation. The site at Capital House has a resolution to grant consent (reference 18/AP/0900) for a 39 storey building comprising new student homes and some retail/office space, having been received positively by the Planning Committee on 14 May 2019. Officers are finalising the S106 Agreement with the applicant and then it will be referred to the Mayor of London in accordance with the regulations. Details of these applications are set out below:

18/AP/0900 – CAPITAL HOUSE, 42-46 WESTON STREET, SE1 3QD

28. *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.*
29. This application has been approved by the planning committee and is awaiting referral to the Mayor following negotiation of the S106 Agreement.

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:

30. 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.
Recommended for approval.

20/AP/0944 – BECKET HOUSE, 60-68 ST THOMAS STREET, SE1

31. Redevelopment of the site to include demolition of Becket House and the erection of a 27 storey building with additional level of plant and basement levels in order to provide office use (Class B1), retail (flexible Class A1/A3), cycle parking, servicing, refuse and plant areas, public realm improvements and other associated works incidental to the development.
32. This application has yet to be determined and is currently out to public consultation.
33. 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 an instrument of planning policy.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

34. The main issues to be considered in respect of this application are:

- Principle of the proposed development in terms of land use;
- Environmental impact assessment;
- Design, layout, heritage assets and impact on Borough and London views;
- Landscaping and trees;
- Impact of proposed development on amenity of adjoining occupiers and surrounding area;
- Transport and highways;
- Noise and vibration;
- Energy and sustainability;
- Ecology and biodiversity;
- Air quality;
- Ground conditions and contamination;
- Water resources and flood risk;
- Archaeology;
- Wind microclimate;
- Planning obligations (S.106 undertaking or agreement);
- Mayoral and borough community infrastructure levy (CIL);
- Community involvement and engagement;
- Consultation responses, and how the application addresses the concerns raised;
- Community impact and equalities assessment;
- Human rights;
- All other relevant material planning considerations.

35. These matters are discussed in detail in the 'Assessment' section of this report.

Legal context

36. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2016, the Core Strategy 2011, and the Saved Southwark Plan 2007. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications for development within Conservation Areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. Section 66 of the Act also requires the Authority to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.

37. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

Planning policy

38. The statutory development plans for the Borough comprise the London Plan 2016, Southwark Core Strategy 2011, and saved policies from The Southwark Plan (2007 - July). The National Planning Policy Framework (2019) and emerging policies constitute material considerations but are not part of the statutory development plan.

39. The site is located within the:

- Air Quality Management Area
- Bankside, Borough and London Bridge Strategic Cultural Area (Snowfields

site)

- Bankside, Borough and London Bridge Opportunity Area
- Borough, Bermondsey and Rivers Archaeological Priority Zone
- Central Activities Zone
- London Bridge District Town Centre (Snowsfields site)
- The Thames Special Policy Area.

40. The site has a Public Transport Accessibility Level (PTAL) of 6b where 1 is the lowest level and 6b the highest, indicating excellent access to public transport.
41. The site is located within Flood Zone 3 as identified by the Environment Agency flood map, which indicates a high probability of flooding however it benefits from protection by the Thames Barrier.
42. The following listed buildings are adjacent to the site:
- London bridge Station, Platforms 9-16 (Brighton Side) – Grade II
 - 55 Bermondsey Street – Grade II
 - Numbers 59, 61 and 63 Bermondsey Street and attached railings – Grade II
 - 68-76 Bermondsey Street – Grade II.
43. The site is partially located within the Bermondsey Street Conservation Area. The Tooley Street Conservation Area is located to the north on the opposite side of London Bridge Railway Station.
44. The application site is located with LVMF protected view 2A.1 from Parliament Hill summit to St Paul's Cathedral, and 3A.1 from Kenwood viewing gazebo to St Paul's Cathedral.

National Planning Policy Framework (NPPF)

45. The revised National Planning Policy Framework ('NPPF') was published in February 2019 which sets out the national planning policy. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental. Paragraph 212 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.
46. Chapter 2 Achieving sustainable development
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

47. 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 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

The Core Strategy 2011

48. 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 10 - Jobs and businesses
Strategic Policy 12 - Design and conservation
Strategic Policy 13 - High environmental standards

The Southwark Plan 2007 (Saved policies)

49. In 2013, the Secretary of State issued a saving direction in respect of certain policies in the Southwark Plan 2007. These saved policies continue to form part of the statutory development plan. 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 3.18 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

Supplementary Planning Documents

50. Design and Access Statements SPD 2007
Development Viability SPD 2016
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 Guidance

51. Central Activities Zone SPG 2016
Character and Context (SPG, 2014)
Energy Assessment Guidance (2018)
London View Management Framework 2012
London's World Heritage Sites SPG 2012
Sustainable Design and Construction (Saved SPG, 2006)
Town Centres (SPG, 2014)
Use of Planning Obligations in the Funding of Crossrail 2010

Emerging policy

Draft New London Plan

52. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2nd March 2018. Following an Examination in Public, the Mayor then issued the Intend to Publish London Plan, which was published in December 2019. The Secretary of State responded to the Mayor in March 2020 where he expressed concerns about the Plan and has used his powers to direct changes to the London Plan. The London Plan cannot be adopted until these changes have been made.

53. The draft New London Plan is at an advanced stage. Policies contained in the Intend to Publish (ItP) London Plan published in December 2019 that are not subject to a direction by the Secretary of State carry significant weight. 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. The following policies are relevant to this proposal:

GG1: Building strong and inclusive communities
GG2: Making the best use of land
GG3: Creating a healthy city
GG5: Growing a good economy
GG6: Increasing efficiency and resilience
SD1: Opportunity Areas
SD4: The Central Activities Zone
SD5: Offices, other strategic functions and residential development in the CAZ
SD6: Town centres and high streets
SD7: Town centres development principles and Development Plan Documents
D1: London's form, character and capacity for growth
D2: Infrastructure requirements for sustainable densities
D3: Optimising site capacity through the design-led approach
D4: Delivering good design
D5: Inclusive design
D8: Public realm
D14: Noise
S1: Developing London's social infrastructure
E1: Offices
E2: Providing suitable business space
E3: Affordable workspace
E9: Retail, markets and hot food takeaways
E10: Visitor infrastructure
E11: Skills and opportunities for all
HC1: Heritage conservation and growth
G1: Green infrastructure
G5: Urban greening
G6: Biodiversity and access to nature
G7: Trees and woodlands
SI1: Improving air quality
SI2: Minimising greenhouse gas emissions
SI7: Reducing waste and supporting the circular economy
SI12: Flood risk management
SI13: Sustainable drainage
T1: Strategic approach to transport
T2: Healthy streets
T3: Transport capacity, connectivity and safeguarding
T4: Assessing and mitigating transport impacts
T5: Cycling
T6: Car parking
T7: Deliveries, servicing and construction
T9: Funding transport infrastructure through planning
DF1: Delivery of the Plan and Planning Obligations.

New Southwark Plan (NSP)

54. For the last five 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 consultation closed in May 2019. These two documents comprise the Proposed Submission Version of the New Southwark Plan.

55. These documents and the New Southwark Plan Submission Version (Proposed Modifications for Examination) were submitted to the Secretary of State in January 2020 for Local Plan Examination. The New Southwark Plan Submission Version (Proposed Modifications for Examination) is the council's current expression of the New Southwark Plan and responds to consultation on the NSP Proposed Submission Version.
56. In April 2020 the Planning Inspectorate provided their initial comments to the New Southwark Plan Submission Version. It was recommended that a further round of consultation take place in order to support the soundness of the Plan. Consultation is due to take place on this version of the NSP between June and August 2020. The final updated version of the plan will then be considered at the Examination in Public (EiP).
57. It is anticipated that the plan will be adopted in late 2020 following the 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.

Assessment

Principle of the proposed development in terms of land use

Introduction

58. The redevelopment of the site would be office led, creating a significant uplift in Class B1 office space in addition to retail opportunities at street level and the creation of active frontages where there is currently very little animation and activity at street level.

Policy background

59. The National Planning Policy Framework (NPPF) was updated in 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. Relevant paragraphs of the NPPF are considered in detail throughout this report.

London Bridge, Borough and Bankside Opportunity Area

60. The London Plan designates Bankside, Borough and London Bridge as one of four Opportunity Areas in the London South Central area.
61. 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. This is further reflected in Policy SD2 – Opportunity Areas of the New London Plan which sets a target of 5,500 new jobs.
62. 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, retail and around 25,000 jobs by 2026. Additionally, Strategic Policy 10 states that between 400,000sqm and 500,000sqm of additional business floorspace will be provided within the Opportunity Area to help meet central London's need for office space.

Central Activities Zone and London Bridge District Town Centre

63. The site is located within the CAZ which covers a number of central boroughs and is 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.
64. In addition, part of the site is within the London Bridge District Town Centre. 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.

Draft New Southwark Plan Site Allocation NSP51

65. The New Southwark Plan is in its Proposed Modifications for Examination version and was submitted to the Secretary of State in January 2020 for Local Plan Examination. The examination in public and formal adoption is set to take place in late 2020 and as such the policies currently have limited weight. The site is listed as an allocated site under the New Southwark Plan. The site allocation (NSP51) sets out that development must provide at least the amount of employment floorspace (B use class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater; provide a new north-south green link from Melior Place to St Thomas Street; enhance St Thomas Street by providing high quality public realm and active frontages including town centre uses (A1, A2, A3, A4, D1, D2) at ground floor; and provide new open space of at least 15% of the site area. NSP51 also states that the development 'should' provide housing as opposed to it being a mandatory requirement under 'must'.

Conclusion on policy designations

66. The principle of a large scale development containing a mix of uses including Class B1 office space and retail would support the role and functioning of the Central Activities Zone and the London Bridge District Town Centre as well as being consistent with the policies for the Opportunity Area. The acceptability of each use will be considered below:

Offices

67. 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).
68. 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.

69. Saved policy 1.4 of the Southwark plan states that development will be permitted subject to there being no net loss of Class B floorspace with the following exceptions:
- The applicant can demonstrate that convincing efforts to dispose of the premises, either for continued B Class use, or for mixed uses involving B Class, including redevelopment, over a period of 24 months, have been unsuccessful; or
 - the site or buildings would be unsuitable for re-use or redevelopment for B Class use or mixed use, having regard to physical or environmental constraints; or
 - the site is located within a town or local centre, whereby suitable Class A or other town centre uses will be permitted in the place of Class B uses.
70. The site currently provides 4,328sqm of employment floorspace. The proposed development would provide a total of 21,522sqm of Class B1 floorspace resulting in an uplift of 17,194sqm which meets the policy objectives of protecting employment floorspace and is welcomed as a significant benefit of the scheme. The provision of 21,522sqm of Class B1 floorspace would equate to 1,600 jobs which is an uplift of 1,360 jobs and satisfies the aims of the Core Strategy and London Plan in creating new jobs and high quality office space within the Central Activities Zone and the Opportunity Area.

Retail

71. The development would include new retail units (A1/A2/A3/A4) at ground floor level of all buildings. In total, 1,281sqm (GIA) of retail floorspace is proposed.
72. The provision of new town centre uses such as retail is supported by saved Southwark Plan Policy 1.7 since the site lies partially in a town centre. The retail units would activate the ground floor of the development, particularly on Bermondsey Street, Snowsfields and the new public route linking these two streets. The retail units would serve the existing population as well as new workers and would contribute to the vitality and viability of the London Bridge Town Centre. The current buildings have a very inactive frontage whereas the proposal would create a much more attractive and vibrant street environment with retail opening out onto streets as well as the newly formed public space adjacent to the Vinegar Yard Warehouse. The amount and type of retail provision is considered to be acceptable and would help to meet the needs of residents, workers and visitors in the area.
73. In order to protect the amenities of the area, it is suggested that a cap be placed on the amount of floorspace that could be used for Class A4 (drinking establishments) and Class A5 (hot food takeaway). A condition would be attached to this effect.

Conclusions on land use

74. The proposal involves the provision of high quality office floorspace alongside a range of acceptable town centre retail uses. The provision of new offices is fully supported and the provision of a modern, high quality offices is considered to be a benefit of the scheme and will facilitate a growth of employment numbers within the

Central Activities Zone and Opportunity Area. The proposed development includes a mix of uses that are considered to be appropriate for the site's location within the CAZ, Opportunity Area, Strategic Cultural Area and district town centre.

Affordable workspace

75. Draft London Plan Policy E2 - Providing suitable business space, seeks the provision of low cost B1 business space to meet the demand of micro to medium sized business as well as start ups and enterprises looking to expand. The policy is clear that proposals for new B1 spaces over 2500sqm in size (or a locally deemed lower threshold) should consider the provision of a proportion of workspace that would be suitable for these target businesses.
76. Draft London Plan Policy E3 relates specifically to affordable workspace and states that "In defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purposes". The policy identifies the circumstances in which it would be appropriate to secure affordable space. Part B of the policy specifically identifies the CAZ as an important location for securing low cost space for micro, small and medium sized enterprises.
77. Emerging Policy P30 of the New Southwark Plan deals with affordable workspace. Criterion 2 of the policy requires Major 'B Use Class' development proposals to deliver at least 10% of the floorspace as affordable workspace on site at a discounted market rent for a period of at least 30 years. The policy recognises that there are many different forms that such space could take depending on the site location, characteristics and existing/proposed uses on site. Only where on-site provision would be impracticable are developers permitted to make an in lieu payment
78. Taking into account the requirements of emerging policy P30, the proposed development would need to provide at least 10% of the Class B1 floorspace as an affordable workspace. This would equate to 2152sqm affordable workspace. The applicant proposes to meet this requirement in its entirety within either Building 1 or Building 2 or a combination of both. As such the quantum of affordable workspace being provided is compliant with the emerging London Plan and New Southwark Plan policies.
79. In order to ensure the space is attractive to potential occupiers, conditions will be imposed requiring the affordable workspace to be fitted out to a minimum specification and for the common facilities (such as the bike store, showers and lifts) to remain accessible to staff throughout the lifetime of the affordable workspace unit.
80. In addition, the Section 106 Agreement will include a dedicated 'affordable workspace' schedule. This will ensure, among other things, that:
 - the workspace is provided for a 30-year period at a discount of 25% on the market rent level;
 - no more than 50% of the market rate floorspace can be occupied until the affordable workspace has been fitted-out ready for occupation;
 - detailed plans showing final location of affordable workspace;
 - a management plan is in place to secure the appointment of a Workspace Provider and a methodology for that Provider to support the occupiers;
 - appropriate marketing of the affordable workspace will be conducted;
 - the rates and service charges payable by the tenant will be capped, and;
 - a rent-free period is offered to incentivise uptake.

Environmental impact assessment

81. The proposed development falls within Schedule 2, Category 10(b) 'Urban Development Project' of the EIA Regulations 2017 and constitutes EIA development having regard to its potential for likely significant environmental effects.
82. Regulation 3 of the EIA Regulations precludes the granting of planning permission unless the council has undertaken an Environmental Impact Assessment, taking account of the environmental information, which includes the ES, any further information, any representations made by consultation bodies, and any other person, about the environmental effects of the development.
83. In accordance with the EIA Regulations, an Environmental Statement (ES) comprising a Non-Technical Summary, Environmental Statement and Technical Appendices accompanies the application. That information has been taken into account. Officers are satisfied that the ES is up to date and that the effects described in the ES properly identify the likely significant effects of the proposed development on the environment.

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 as well as environmental factors including townscape; wind microclimate; daylight and sunlight; impacts on views; and air quality. 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 Bankside, Borough and London Bridge Opportunity Area. To not develop the site would lead to a missed opportunity to secure a high quality scheme.

Cumulative impacts

87. The ES considers cumulative effects arising from the proposed development in combination with other surrounding consented and planned developments. In most cases the cumulative impacts of the development were limited and were relevant are discussed further in the topic specific chapters later in the report.

Conclusions on the EIA

88. 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

89. The NPPF at Paragraph 56 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.
90. 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

Site context

91. The application site is located at the crossroads of St Thomas Street/Crucifix Lane and Bermondsey Street, occupying much of the junction's southwest quadrant, just south of London Bridge Station viaduct. The site comprises two parts that straddle Snowsfields, a secondary road that runs diagonally into the junction. The "Bermondsey" part contains 2 properties that were built in the late 1980s and front onto Bermondsey Street: no.42-44, a single storey warehouse with mezzanine used for offices; and no.40, a four storey warehouse-style building used for a restaurant/bar with offices above. The "Snowsfields" part contains a derelict, mid-Victorian warehouse building of four storeys above a semi-basement known as the Vinegar Yard warehouse, and a fenced-off area of hardstanding previously used as a car park.
92. The site sits within the varied context of the grade II listed railway arches on St Thomas Street and Crucifix Lane opposite; the 1970s, seven and 10-storey office buildings of Becket House (no.60-89 St Thomas St) and Capital House (no.40-46 Weston St) to the west, and the 1980s, 16-storey Wolfson House (Guy's Hospital) at no.49 Weston Street beyond; and a mixture of modest-scaled, repurposed workshops and warehousing, and housing and social infrastructure that date from the mid Victorian through to the 1930s to the south and east.
93. Its immediate neighbours to the west of the Snowsfields part are the hoarded Vinegar Yard site with its meanwhile food and beverage market; the 1930s council housing block with ground floor retail at 8-20 Snowsfields and a single storey retail annex; and the late Victorian Horseshoe Public House at 26 Melior Street, which together with the application building (no.1-7 Vinegar Yard) form the northeast boundary of the Bermondsey Street conservation area. Those to the east of the application site (Bermondsey) include Raquel Court (147 Snowsfields), a 1990s 5-storey residential building with a commercial ground floor; no.3-5 Hardwidge Street, a four storey Edwardian warehouse converted to offices; and no.46-48 Bermondsey Street, a part 3/ 4-storey Victorian warehouse used as a bar and restaurant with commercial offices above. The latter building and those on the opposite side of Bermondsey (no.35-37 and no.39-41) mark the northern boundary of the Bermondsey Conservation area, which wraps around onto Crucifix Lane, but excludes the Bermondsey application buildings.
94. Tooley Street and its conservation area are located just to the north of the site, immediately beyond London Bridge station and its viaducts; whilst Borough Conservation Area and Tower Bridge Conservation Area are located some 400m to

the west and north-east respectively. The site falls within the Central Activities Zone (CAZ) and the Bankside, Borough and London Bridge (BBLB) Opportunity Area that are characterised in this location by a rich mix of historic and modern buildings, streets and places; the vibrancy and diversity of its uses; and by landmark buildings and infrastructure, including most noticeably the Shard, which dominates the skyline with its monumental scale and outstanding architecture.

95. The scheme is conceived as part of a wider development framework that runs between Weston Street to the west and the head of Bermondsey Street to the east and includes the neighbouring development plots of Capital House, Becket House and Vinegar Yard. The sites' landowners have sought to coordinate an approach for comprehensive redevelopment and have established a framework for the area.
96. Briefly, the framework envisages a series of perimeter buildings that reinforce the street edges of Weston Street, St Thomas Street and Snowsfields and define a public garden to the rear towards Weston Street and a new public plaza towards Snowsfields. It retains north-south routes across the site and opens up a new east-west pedestrian route that bisects the framework area, linking Weston Street with the two new public spaces and through to Bermondsey Street. The redevelopment scheme is mostly for commercial offices, but with significant elements of retail, leisure and student accommodation; and are mainly conceived as tall buildings.
97. In this instance, the planning application scheme is for the clearance of the "Bermondsey" part of the site; the excavation of a single storey basement; and the construction of a new part five part 10-storey building above grade (maximum AOD 44.05m) conceived as two volumes bisected by a new pedestrian route that runs diagonally across the site directly connecting Snowsfields with Bermondsey Street. On the "Snowsfields" part of the site, the Victorian warehouse building (no.9-17 Vinegar Yard) is mostly retained and refurbished, but with its southern portion demolished to make way for the excavation of two basement levels and the construction of 17 storeys above grade (67.0m AOD), incorporating the warehouse into a new tall building. Its perimeter is re-landscaped as additional public open space. All buildings on both sites provide retail at ground floor and commercial offices above. Ancillary services and plant are at basement and rooftop levels.
98. Conceived as part of the St Thomas Street framework, the scheme regards itself as an important townscape moment, transitioning the shift in character and scale from the modern, head-quarter style office developments emerging in the London Bridge Opportunity Area through to the more fine-grained, historic context of the adjoining Bermondsey conservation area. It blends old and new architecture, hi-rise and modest scales, and pavilion-style and street-based buildings; and is intended to moderate the otherwise marked changes in townscape and character, offering a more graduated transition. Whilst the design intent is clear, the key factors are whether the urban design and architecture are convincing and sufficiently high quality, and whether the impacts on the surrounding townscape and heritage assets are acceptable.

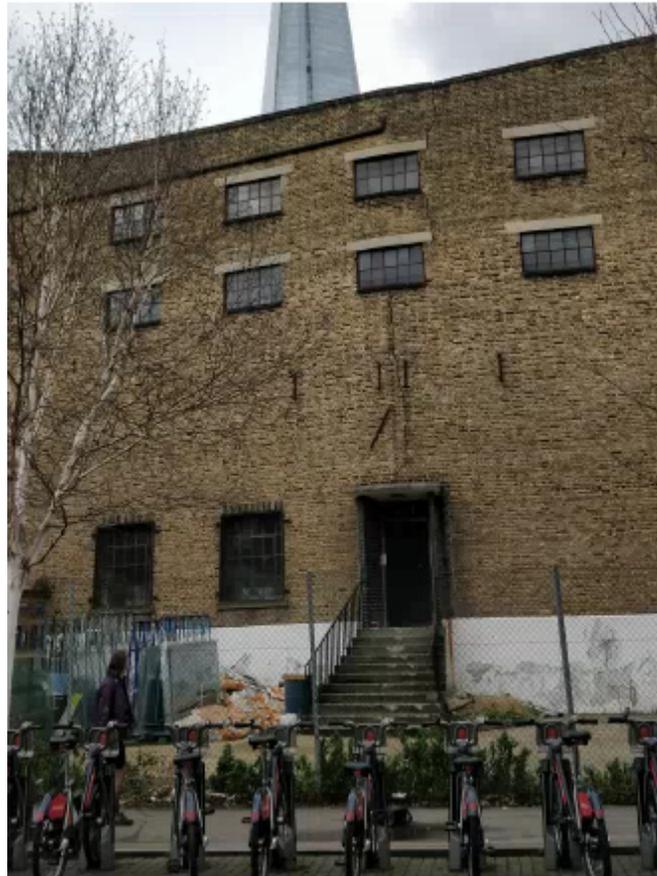
Site layout

99. The development's layout is well-conceived and is a distinct improvement on the present condition of a mainly disengaged and under-utilised site. It supports the framework's emerging townscape, whilst remaining respectful of the adjacent, traditional urban context. The new layout promotes good urban design, with a coherent arrangement of legible new buildings and spaces that provide an engaging, functional and safe public realm.
100. The development adopts a perimeter block layout, where the retained and new

buildings respond to the general street form and building alignment, promoting a strongly defined public realm. The warehouse is mostly refurbished and its site hoardings removed, re-establishing the building's positive relationship with Vinegar Yard; whilst its extended form to the south replaces the former car park, infilling the unattractive gap in the street scene and re-establishing the common building line along Snowsfield.

101. The Bermondsey building is laid out with its main facades running parallel to the street, establishing strong building lines and a well-defined corner at the junction of Bermondsey Street with St Thomas Street and Snowsfields. A main feature of its layout is the new public route that cuts diagonally through the building's footprint, offering a direct pedestrian link at grade between Bermondsey Street and Snowsfields. This provides considerable benefits to local permeability and in time connectivity; running onward through the framework area to Guy's Hospital and London Bridge Station beyond. The link is 4.5m in width and would have the feel of an alley or passageway. This could be an attractive route for pedestrians, offering an alternative to the main roads.

Vinegar Yard warehouse



View of South wall from exterior showing vertical crack

102. Importantly, the site layout provides a series of commercial entrances and shopfronts that are more than sufficient to support active street frontages and good informal surveillance of the surrounding public realm, including the new passageway. The warehouse hatch doors are repurposed at grade to provide new retail and an office entrance onto Vinegar Yard. The main commercial office entrance to the Snowsfields building similarly opens onto the plaza space, whilst its highly glazed foyer space flanks directly onto Snowsfields, animating the street scene. The main office entrance to the Bermondsey building sits diagonally opposite that of the Snowsfields offices, creating a moment of heightened activity between the two buildings. A series of small scale retail units within the base of the Bermondsey building brings a pleasing rhythm and good activation of the public realm along the new passageway. Several of the shops have dual access, with additional entrances on Bermondsey Street and St Thomas Street. It is important that these perimeter frontages remain activated and do not become secondary or used only for servicing/emergency egress. This should be secured by condition.
103. It is notable that the building line of the Bermondsey building (southwest volume) is pulled back some 5m behind the kerb line and is recessed behind the common building line along this part of Bermondsey Street. This setback is distinct, but not so obvious as to disrupt the continuity of the built form. Moreover, it creates some additional open space at the mouth of the passageway. The space serves the dual purpose of providing a moment for pause and orientation before emerging onto the bustle of Bermondsey Street; and also of cleverly aligning the passageway so that it has an engaging view of the retained warehouse and oak tree and of the Shard beyond that should aid local wayfinding. The Bermondsey building (northeast volume) then returns forward to re-establish the common building line, which is welcome, maintaining the visual continuity of the streetscape.

104. Overall, the general layout is well-considered and should provide for a successful series of buildings and spaces at grade level that link well between the contrasting townscapes, and subject to scale and landscaping (see below) should make for a coherent urban form and good urban design.

Built form and scale

105. The design premise is a development that links the monolithic, large scale buildings around London Bridge station with the finer-grained context of Bermondsey Street. This is evident in the proposed massing. Arranged as two discrete buildings, the “Snowsfields” and “Bermondsey” buildings both have a role to play in this link, affecting a built form that is engaging and a graduation in scale (height and massing) that is convincing.
106. Looking at each of the buildings in turn, whilst the “Snowsfields” building can be regarded as a tall building sat on top of the warehouse, the architecture is much more subtle and complex. The intricacy of the built form derives from partially demolishing the warehouse and extending it to the rear to form the base of a new office tower. The warehouse is not a simple façade that cloaks the lower floors, but retains the depth and robustness of its built form and would be restored internally. The additional floorspace is not an obvious extrusion sideways or upwards, but is articulated into a series of interlocking volumes that ease the overall sense of scale and, importantly, allows the familiar built form of the warehouse to continue to be read.
107. The lower, rear “extension” onto Snowsfields is conceived as a 4-storey volume that is equal in scale to the warehouse building; thereby maintaining a comfortable massing relationship with the warehouse and continuing the c.15m parapet height round onto Snowsfields where it is generally consistent with the adjoining context. The junction between the warehouse and the “extension” is articulated to help express the separate, but conjoined built forms (see later).
108. The massing is further articulated horizontally to confirm the sense of a base to the building; and vertically to read as two tall volumes that interlock with a central core, which are then stepped in height to create a slender and engaging silhouette. Above the warehouse and “extension” the façade lines are set back onto Snowsfields and above the warehouse to help define the four storey parapet height. The set-in facade is continued over part of the 4th, 5th and 6th floor levels, generating a stepped “girdle” that gives clarity to the base, but also echoes the gable roof form of the warehouse below. Above the girdle, the floorplates return to the general façade line with the massing seemingly hovering above the base. The asymmetrical upper volumes continue in full, before setting back above 15th floor level of the southern volume and concluding the northern volume with a part 16th floor containing offices, a rooftop terrace and enclosed plant. The highly articulated massing gives a dynamic built form that is distinctive and compelling

New pedestrian link



109. Rising to approximately 65m in height (including plant overrun), there is no obvious relationship between the “Snowfields” building and its immediate surroundings, which typically comprise buildings of between 12 and 20m in height. It does, however, relate to the general scale of Wolfson House, Guy’s tower and the lower elements of the Shard complex beyond. It is just within the BBLB opportunity area, where tall buildings are generally appropriate. Importantly, in time it would relate to the remaining framework sites and to the consented Capital House scheme in Weston Street (18/AP/0900, 14/5/2019 and subject to legal agreement and mayoral referral), where it would become part of a new cluster of tall buildings.
110. Looking at the “Bermondsey” building it continues the onward graduation of built form towards Bermondsey Street’s context through a similar process of complex articulation. In this instance it divides its massing into two distinct volumes, bisected by the 4.5m pedestrian route. At five main storeys (c.21m) the volumes shoulder the comparatively narrow route, invoking the historic passageways and servicing alleys of the neighbouring conservation areas. The northeast block tops out at five storeys with a roof-top garden; whilst the southwest block sculpts five further floors, which are set back extensively from its Bermondsey Street façade and have rooftop terrace spaces at fifth and ninth floor levels.
111. At 21m the building will sit less than 2m above the current building on site (no.40 Bermondsey Street), albeit the difference is accentuated by the latter’s pitched roof form. Nonetheless, it will sit at much the same height as the nearby converted signal box above the London Bridge viaduct (no.33 Bermondsey Street) and similar in overall height to the Tanneries building (no.55 Bermondsey Street) diagonally opposite and to International House (no.39-45 Bermondsey Street) directly opposite, albeit the latter has a mansard roof form. Whilst there is a step up in height from the immediately adjacent 3-storey Tanner and Co building (no.46-50

Bermondsey Street), the impact is moderated by the slight setback of the proposed building line and the retention of the access way that sits between the two neighbours. Overall, the development should maintain a comfortable scale onto the street.

112. The sculpted upper floors of the southwest block are pushed some 16m away from the Bermondsey Street façade and stepped further away at ninth floor level, forming a deep roof terrace. As a result its main massing sits directly onto Snowfields and St Thomas Street. Importantly, the sixth floor is set in by 1-1.5m from the façade line on the west, south and northeast elevations, repeating the earlier ‘girdle’ effect used on its taller sibling and bringing visual coherency to the overall development.
113. Whilst at 10 storeys (approximately 44m) the southwest block will present an increase in contextual scale along Snowfields, the disparity will be moderated to a degree by the girdle suggesting a five-storey shoulder line, and by the street geometry: The new building will be seen axially along the curving street and experienced more as a background building in this view with the elevational treatment of the lower volume easing the impact. The scale of its upper volume will be read in conjunction with the taller sibling building, presenting a considerable step down in massing towards the adjacent context. Nonetheless, the overall additional scale onto Snowfields remains significant.

Architectural treatment

114. The tall “Snowfields” building presents as a composition of large, fractured volumes rather than a single, monolithic built form. The warehouse reads as one of these volumes, paired with a similar scaled volume to its side; with two much larger volumes cantilevering above and interlocking with a central core. This fractured composition is overlaid with an intricate detailed architectural treatment that gives the tall building a distinctive, finer-grained appearance.
115. The derelict warehouse is mostly retained and refurbished, with elements rebuilt to match and as much of its original features restored or re-used as possible. Externally, the street-facing brick elevations are retained and the badly damaged west elevation rebuilt. The hatch rank doorways, segmented brick arches and York stone cills are refurbished or reinstated where missing; whilst the cast iron and steel windows are replaced with steel Crittal windows to match, upgrading their performance. Internally, the intention is to similarly restore the building’s former appearance, retaining and refurbishing the cast-iron columns, beams and timber flooring where possible or matching in suitable replacement elements. It is important that this restoration is carried out to a high standard for the design premise to succeed, and details for the restored brickwork, openings, and replacement windows and doorways should be confirmed by condition as a minimum.
116. The extension and upper volumes transition to a modern, glazed office building, providing a strong distinction with the warehouse, reinforcing the latter’s identity. That said, the modern elevations are cleverly detailed to reflect and respond to the rhythm and detailing of the warehouse below, bringing a visual coherency to the architecture. The new facades are set out in much the same module as the warehouse with the floors and window spacing aligned and a similar vertical emphasis to the elevations expressed. This gives a calm, ordered appearance to the design that locks the warehouse into the composition.
117. The tower’s main built form comprises a framework of steel columns and beams, with composite decks and a reinforced concrete structural core. The steel columns run on the outside of the building envelope between the fourth and sixth floors as the elevations cut back to create the “girdle”. The upper volumes cantilever well

above the warehouse and extension, supported on the steel columns, which gives a moment of drama to the architecture. The columns then drop discreetly through the warehouse and “extension” below, so as not to disrupt their floorplans or appearance. Following revisions, the number of columns has been reduced from 12 to 6 to further limit their visual and physical impacts, which is welcome.

Snowfields building



118. The upper glazed elevations are brought onto the same façade line as the warehouse and extension below, ensuring a continuity of elevational planes. The new elevations of the volume above the warehouse feature window openings set within reveals and a mullion detail that reflects the punched-hole and double door aesthetic below. By contrast, the elevations of the second upper volume comprise flush glazing with no secondary articulation that offers a crisper, more monolithic finish. This contrast is effective and adds to the compositional quality, although the exact detailing should be conditioned to confirm the high quality of finishes.
119. A key feature of the elevational design is the detailing of the glazed envelope, which cleverly uses cast glass in a unitised, double-layered system using clear and opaque glass for its secondary layer. This gives the elevations a sense of solidity and liveliness, and a fine-grained finish that should make for a distinctive appearance. During daylight hours when the light comes in, the cast glass should have an even appearance regardless of the type of backing, with its fine grain and material depth expressing a sufficiently strong sense of mass. This will change during the mornings and dusk, when internal lighting will filter through the clear-backed cast glazing, lending sections of the facades a more translucent and engaging appearance.
120. The proposal is to use cast glass in a brick-style format, suggesting the traditional brickwork of the adjacent warehouse. The detailed format (50x300mm) is more of a Roman brick dimension than Imperial brick, albeit the additional courses will lend slightly more mass and horizontality to the finish. The proposal is to stack the cast glass units rather than use a Stretcher, Flemish or English bond, which distinctly

limits the brickwork effect. Nonetheless, the narrow cast glass format brings a finer grain to the elevations and a richness of detail, which is welcome. It also works well to frame the clear glazed openings and to disguise the horizontal window vents that are incorporated into the unitised system to provide the option of natural ventilation. Its success, however, is dependent on the material finish and detailing, which should be secured by condition (see later).

121. The cast glass finish is particularly well used for the Snowfields “extension”, which is intended to read more as a solid volume, similar in design to the adjacent warehouse. Nonetheless, its material palette and detailing clearly dovetails with the finishes of the main offices above, reading well as part of the tall building composition. The “extension” features a generous lobby that partly steps forward of the common building line, with its entrance onto Vinegar Yard, but animates much the length of its Snowfields elevation. Its scale and design help both to ground the tower and to give the structure its sense of base.
122. It is also notable that a clear glazed “scenic lift” is neatly detailed to sit within the junction of the “extension” and the retained warehouse, helping to articulate the two volumes as discrete neighbours. Expanses of similar clear glazing are also used to detail the building’s girdle on its fourth, fifth and sixth floor levels, and to detail the recessed ‘slot’ that continues above the scenic lift and runs the full height of the upper floors, articulating the two main upper volumes. The recessed clear glazing and slotted junction in particular are effective in expressing the architecture’s compositional quality and contributing to its slender appearance.
123. Lastly, the tower’s upper most storeys feature taller floor-to-floor heights that together with the glazed parapet finish bring a hierarchy and sense of top to the building; albeit the crown is rather understated in its design. That the slot detail is seen to sit lower on the skyline than the adjoining volumes, however, is important in emphasising the stepped massing and the tower’s slender silhouette when viewed at grade from St Thomas Street. The same detail is not required on the opposing elevation, where the irregular floorplan generates a slipped form, which works equally well to express two slender profiles when viewed from the east.
124. Turning to the “Bermondsey” building, it shares the same architectural language of cast glass and steel elevations, but looks to progress the warehouse undertone and integrate the development with the Bermondsey Street context. Working in tandem with its more modest scale, the elevations for the five-storey base offer a stronger interpretation of a traditional built form, featuring modern hatch-rank style doors with balconies, modern bay-fronted shops and a regular grid of recessed upper floor windows for the five storey base that lend a robust, punched-hole character to the facades.
125. The distinctive cast glass and steel frame design is maintained, but its appearance is mediated by the substitution of ceramic for the opaque glass backing, softening its tone. In addition, projecting horizontal metalwork bands are introduced between ground and 1st floors and above the fifth floor, providing a simple string course and cornice detailing and the sense of a traditional elevational hierarchy. Strong mullion details at ground floor help to ‘ground’ the building and project to provide bay windowed shopfronts, not dissimilar to the traditional bow windowed shopfronts along parts of Bermondsey Street. Much of the articulation’s success will be down to the final detailing of the recessed openings, the hatch-rank doors, the decorative finishes and new shopfronts, which should be confirmed by condition; as should the signage, security and lighting strategies for the new retail, offices and servicing bay to ensure that the elevations do not become cluttered or target-hardened, which may otherwise compromise the appearance of the building and streetscene.

126. The outstanding matter, however, is the main material finish of cast glass. As stated earlier, its dynamic appearance and long, thin format could work well to offer a contemporary character that nonetheless is redolent of the predominantly brick context.
127. As with the “Snowsfields extension”, it is acknowledged that the “Bermondsey” building is outside the conservation area. Nonetheless, it is within its setting and is part of a coherent townscape that is predominantly brick. The concerns in this instance are two-fold, its durability and visual appropriateness. It is questioned whether it is sufficiently robust to withstand staining and mechanical damage (collision and abrasion), given the busy, narrow condition of the street and the requirement for regular street cleaning. It may be that some form of plinth device would be required, which could be reviewed by condition.
128. Secondly, whilst the introduction of the ceramic backing may well lend a tonal quality to the cast glass elevations, it is questioned whether the stacked format and neutral colour are sufficiently convincing. It is acknowledged that the cast glass is important to the distinctiveness and visual coherency of the overall scheme. The use of the material for the upper rear volume onto Snowsfields and within the new passageway is supported. Nonetheless, it may be that the architecture could work equally well if these elements were contrasted with attractive conventional stock brickwork for the street facades, which would be both robust and contextual. The design’s success in this instance will greatly depend on whether the final detailed finishes of the ceramic and cast glass are convincing in this location; and therefore a condition for the review of the detailed material palette for the “Bermondsey” building, using on-site sample panels and mock-ups, should be attached.
129. Two further notable features of the “Bermondsey” building are the rooftop amenity spaces and bridge links. Outdoor gardens are proposed at fifth floor level above the two volumes, which will be extensively planted and include trees. The gardens will provide excellent amenity for the office occupiers and soften the building’s roofline onto Bermondsey Street, bringing a green fringe to an otherwise dense, urban context. The two office volumes and rooftop gardens are connected by two ranks of bridges that link the opposing floorplates across the intervening new public route. The bridges are designed to be transparent and discrete, comprising glass and concrete and arranged as physically separate bridges rather than a four-storey element. At 2.9m wide, the bridges offer elements of informal meeting/ breakout space. The bridge links are welcome: They bring added animation and character to the passageway, and give the feeling of traditional dockyard and service-yard warehousing, not dissimilar to Shad Thames. It is important that the bridge links are crisply detailed and retain their openness and visual transparency, and do not become heavy or cluttered in appearance, or impacted upon by modesty screens. These matters should be confirmed by condition.

Tall buildings

130. The “Snowsfields” building reaches a maximum of 65.1m above grade (including rooftop plant) and is significantly taller than its immediate context to the south and east, which comprises buildings of between 12 to 20m in height, although the contextual scale rises westwards towards Guy’s Hospital and London Bridge station beyond. As a tall building it is located within CAZ and the BBLB Opportunity Area where such high-rise intensification of development is generally appropriate. Nevertheless, the tall buildings (both Bermondsey and Snowsfields) are expected to also comply with policy 3.20 in full. Looking at the policy requirements in turn:

Positive contribution to the landscape

131. The development provides several notable extensions to the public realm: Most significant is the new passageway that bisects the “Bermondsey” site and re-provides a direct pedestrian link between Bermondsey Street and Snowsfields. Elsewhere, the “Bermondsey” building (southwest volume) sets back onto Bermondsey Street to provide an extended pavement/ threshold space at the entrance to the passageway; whilst its northeast volume presents orthogonally onto St Thomas Street at its junctions with Snowsfields, creating a wide tree-lined pavement on this busy corner.
132. The removal of the hoarding on the “Snowsfields” site opens up its east and north perimeters as additional public realm, creating a sizeable area of hard landscaping onto Vinegar Yard. As set out in the framework, in time this area would combine with that of the adjacent site to provide a new plaza, as well as new public routes that would connect north-westwards to Fenning Street and possibly westwards to Melior Street, creating a new, highly permeable public realm. Overall, the landscape contribution is commensurate with the proposed scale of development.

Bermondsey Street view



Point of landmark significance

133. The application site sits at the point of convergence of St Thomas Street, Crucifix Lane, Bermondsey Street and Snowsfields immediately to the south of London Bridge Station, one of London's major transport interchanges. As such the application site is considered to be a point of landmark significance.

Highest architectural standard

134. The tall building is a well-designed modern building in terms of its functional quality and its architecture, but also in its clever incorporation of the warehouse. The offices are well-appointed, with good sized floorplates on the upper floors (370 – 390 sqm per floor) and generally uninterrupted space, with the structural columns pushed to the perimeter. The upper levels benefit from decent ceiling heights of 2.8m (minimum) to 3.3m with exposed services, and floor-to-ceiling windows with the option of natural or mechanical ventilation. The offices benefit from the amenity of Juliette balconies on 1st to 4th floor levels, making use of the restored hatch rank openings; and from south-facing roof terraces at 5th and 16th floor levels. The building is served by a decent sized lobby with the main entrance onto Vinegar Yard, supported by secondary entrances onto Snowsfields and via the warehouse. The lobby is shown opening through to the ground floor of the warehouse, benefitting from its restored character. Intended for retail at ground floor, the warehouse is likely to be used as a café/restaurant facility, serving the offices and general public. The retail opens onto the plaza using the restored hatch rank doorways and an extended window opening.

135. Regarding the elevational architecture, as set out earlier, it is well-conceived and well-detailed, making use of a high quality material palette. The architecture has a strong compositional quality, comprising fractured volumes that interlock around a central core, articulating the height and massing and cleverly suggesting a slender built form. Its detailed finish is textured and variable, with the clever use of layered cast glass that brings both visual solidity and transparency to the elevations, and a sense of a finer-grain. It retains and expresses the warehouse, cantilevering above and juxtaposing the historic building, and yet simultaneously drawing it into the compositional whole as the base of the tower. The outcome is striking, memorable and impressive. Overall, the design is effective and engaging. However, much will depend on the final materials and detailing, and therefore the highest quality should be ensured by conditions.

Relates well to its surroundings

136. As mentioned above, the building will help to consolidate the cluster of tall buildings within St Thomas Street and the wider London Bridge area. Its contribution is generally positive. It mediates reasonably well the distinct change in scale and character from the modern, taller context of Guy's Tower and the Shard beyond down to the historic, finer grain of Bermondsey Village. Its extensively articulated built form, elevational detailing and clean, stepped profile bring an engaging design and slender profile to the tall building, and a pleasing appearance to the local skyline. Overall, the development's designs sufficiently meet the policy criteria for a new tall building. However, a significant outcome of a tall building is its visibility and whilst this is not harmful in itself, the potential effects on the 'receptor' townscape and heritage assets must be considered.

Heritage and townscape

137. The application documents include a Zone of Visual Influence (ZVI) and a townscape visual impact assessment (TVIA). The former comprises a map indicating where in the surrounding area the new tall building would probably be visible from, but excludes the impacts of any tree cover. The latter provides 25 verified images of the development when viewed from chosen locations in and around the Bermondsey and London Bridge areas, and of relevant protected London panoramas.
138. In general, the tall building is less widely visible than its height suggests. In part this is because of the large buildings located mainly to the north and west of the site that often mask the development from wider view; but also because of the tight, historical urban form to the south and east that offers limited visual prospects. Nonetheless, it is likely to remain visible occasionally on the north bank of the Thames (e.g., Lower Thames Street, EC3); to the west and south across open parkland (e.g., Victoria Tower Gardens, SW1; Tabard and Bermondsey Spa Gardens, SE1); from the New Kent Road flyover and a number of intervening streets where the roadway directly aligns with the site.
139. Of more significance, the development is visible in a number of nearby and middle distance views where it impacts upon the settings of designated heritage assets. Looking at the categories of views and townscape in turn:

Protected views

140. The LVMF seeks to protect and manage 27 views across London and some of its major landmarks. The submission demonstrates that at the proposed height the

development will have no impact upon the protected views of St Paul's and little discernible impact upon London's riverside prospects.

141. In the panoramic view from Parliament Hill to St. Paul's (views 1, 1.1), the development is unseen, being obscured from view partly by the Shard in the middle ground and partly by the Cathedral itself. Similarly, from Kenwood (views 2, 2.1) the proposed buildings are completely obscured from view by the two foreground residential towers at no.200 Pentonville Road, N1.
142. Looking at the river prospects, from upstream the development is mostly obscured from view by the GLA building and no.3 More London when looking from Tower Bridge (view 11). It emerges briefly to the west, where it appears distinctly below the general roofline and that of the background Strata building. It has a negligible impact in this view. From downstream the development is unseen from Southwark Bridge (view 12), being completely obscured by the News Building at no.3 London Bridge Street and by the Shard.
143. Though not demonstrated in the submission, the development is unlikely to have any discernible impacts upon the additional key views protected by policies within the Southwark Plan. The scheme would be remote from and unseen in the key-hole view towards St Paul's from Nunhead Cemetery; and whilst it would be visible from One Tree Hill, it would be seen remote from St Paul's and as part of a loose cluster of tall buildings near to the Shard that is stepping down in height (see cumulative view 8, TVIA for Vinegar Yard scheme, 18/AP/4171).

Impacts on the World Heritage Site

144. The Tower of London is a heritage asset of the highest order. It is grade I statutory listed and is recognised internationally as a certified World Heritage Site of Outstanding Universal Value. Any development that intrudes upon views within the Tower complex must be carefully considered.
145. In this instance the development is not visible from within the tower complex. It remains sufficiently low on the skyline to be obscured from view by the tower's buildings and ramparts or by intervening buildings in the middle ground. As demonstrated by the views from within the Inner Ward towards the site of the scaffold (view 3) and the wider setting from the White Tower, the development sits unseen mostly behind the Queen's House, extending only briefly to its west where it is nonetheless hidden behind no.4 More London. In the view from Lanthorne Tower the development remains fully below the ramparts (view 5); whilst from the ramparts themselves, the development is unseen behind no.3 and 4 More London (view 6).
146. The submission includes three selected views from nearby to the Tower of London, looking towards the development and showing the setting of the World Heritage Site. It is evident that the development has no effect on the World Heritage Site's setting in these views. From Tower Hill (view 6) and Wakefield Gardens (view 7), the development is obscured from view by no.1 and 2 More London, whilst in the view of the Tower of London from the Mint (view 8) the proposed development is obscured by the historic complex itself.

Impacts on local heritage assets – Conservation Areas and Listed Buildings

147. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to consider the impacts of proposals upon a conservation area and to pay "special regard to the desirability of preserving or enhancing the character or appearance of that area". Section 66 of the Act also

requires the Authority to consider the impacts of a development on a listed building or its setting and to pay special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Chapter 16 of the NPPF contains national policy on the conservation of the historic environment. It explains that great weight should be given to the conservation of heritage assets. The more important the asset, the greater the weight should be (paragraph 193). Any harm to, or loss of significance of a designated heritage asset should require clear and convincing justification (paragraph 194). Pursuant to paragraph 195, where a proposed development would lead to substantial harm or total loss of significance of a designated heritage asset, permission should be refused unless certain specified criteria are met. Paragraph 196 explains that where a development would give rise to less than substantial harm to a designated heritage asset, the harm should be weighed against the public benefits of the scheme. Paragraph 197 deals with non-designated heritage assets and explains that the effect of development on such assets should be taking into account, and a balanced judgment should be formed having regard to the scale of any harm or loss and the significance of the asset. Working through the relevant paragraphs of the NPPF will ensure that a decision-maker has complied with its statutory duty in relation to Conservation Areas and Listed Buildings.

Significance

148. Part of the application site lies within the Bermondsey Street conservation area. This has the Church of St Mary Magdalen and the high street as its focus, but spurs both eastwards and westwards; the latter spur extending to include the warehouse building at no.9-17 Vinegar Yard. The warehouse is identified within the Conservation Area Appraisal (CAA) as making a positive contribution to the local conservation area. Despite its current poor condition, the warehouse remains a big, robust, stock brick building that clearly expresses its function, and is a strong reminder of the historical industrial character of this part of Bermondsey, and of the brewing and distilling trades in particular. The building is very much part of the character and appearance of the conservation area, and is a non-designated heritage asset. The local area also includes a number of listed buildings: the closest being the grade II listed railway viaduct opposite the site and the grade II listed terraces within Bermondsey Street (no.68-79 and no.68-76 and 78); and most notably the grade II* listed Church of St Mary Magdalen.



View of East and North Elevation of the Vinegar Yard Warehouse

149. Looking in more detail the Conservation Area, its special interest lies in its historic development of tightly packed eighteenth century housing, many with shops, and modest scaled late nineteenth / early twentieth century warehouses and workshops that have adopted the medieval pattern of narrow streets and plots, arched alleyways and rear yards. The tight urban scale, simple classical architecture and industrial detailing have created an evocative and characterful townscape. All but cut-off from the riverside by the construction of London Bridge station in the 1830s, the area has evolved as a quiet hinterland; distinctly different in purpose, scale and character from the wharves, warehouses, institutions and commerce of the nearby Tooley Street and Tower Bridge conservation areas. As its CAA records, this clear change in character has prevailed and is made evident by the close proximity to the hub of activity and large developments associated with Guy's Hospital and the London Bridge area.

Assessment of Heritage Impact

150. The Listed Buildings Conservation Areas Act establishes the desirability to preserve or enhance designated heritage assets and their significance. In this case the designated heritage asset is the Bermondsey Street Conservation Area. The applicant's Heritage Assessment (Feb 2019) and ES Addendum Vol 2 both identify some harm to the conservation area – in some cases at the moderate and some at the major level. Harm arising as a consequence of the development, is due mainly to the visibility of the proposal tested in a number of views scoped in the EIA. Each view is considered in detail in terms of the magnitude of the change (registered on a scale of low, medium or high) and the effect of that change (ranging from No change/negligible to minor/moderate and major) on the significance of the conservation area.

Impact on the Bermondsey Street Conservation Area

151. The development is located at the edge of the conservation area with one part of it located within it. The application documents chart the magnitude and effect of the change and demonstrate that, the impact of the development on the conservation area is extremely localised. The conservation area is large and extends from Snowfields at the north to Grange Road at the south and includes a range of heritage assets primarily located along the Bermondsey Street, Tanner Street and Grange Road spines. The EIA documents demonstrate that, beyond the immediate context of Snowfields and open spaces around Leathermarket Gardens, there will be limited visibility of the proposal from any other location in the conservation area.
152. The visual impact of the development is most obvious in nearby streets and parks within the conservation area (views 20, 22 and 19) or when looking into the conservation area (view 18 and 25). However, the tall building has no impact within Bermondsey Street (views 15 to 17) or the churchyard gardens of St Mary Magdalen (view 14), being obscured from view by the built context. Any harm to the conservation area and its setting by the new tall building is extremely localised; albeit this does not diminish the extent of the impact within the sub-area affected.
153. The “Bermondsey” building occupies an important position at the head of Bermondsey Street at its junction with St Thomas Street, outside but immediately adjacent to the conservation area (sub-area 1). The TVIA presents a progression of views running northwards along Bermondsey Street in which the new “Bermondsey” building can be seen; its profile evident against the foreground context. Whilst the uppermost floor of the southwest volume is seen on the skyline, it is read as part of the general roofline and has a negligible impact. Similarly, the northwest volume sits forward within the streetscene, but not so overtly as to read inconsistent with a common building line that articulates moderately.
154. Where it becomes apparent is not its scale or position, but its material finish that is outstanding. The use of cast glass as the primary elevational finish is distinctive. It draws attention within a generally coherent streetscene where masonry and brickwork predominate. Elements of stucco and painted render are present within the street scene (views 15-17), including the bright paintwork of the Museum of Fashion, whose legibility reflects its role as a public building. In this instance the proposed glazed finish will be eye-catching and reflective. That the ceramic backing could offer a warmth and materiality that will complement the character of the conservation area. The quality of the design will rely to a great degree on the quality of the cladding materials and this will emerge from detailed construction drawings, sample panels and large scale mock-ups to be considered in the context of Bermondsey Street and should be reserved by condition. As stated earlier, this could be assessed on site in more detail and, if required, addressed by substituting traditional brickwork for the cast glass on the street-facing elevations. The use of cast glass could continue to be used within the alleyway and for the upper volume, retaining the visual link with the Snowfields buildings.
155. Elsewhere, the new development has neutral or minor effects on other surrounding conservation areas, such as the Tooley Street conservation area (view 13) given the intervening townscape and tree cover; and similarly neutral or minor impacts on the setting of nearby listed buildings. The closest listed building is the grade II railway viaduct (view 18) where the viewer’s appreciation of the major infrastructure is unchanged by the proposed development opposite; whilst it remains low-key and distinctly in the background when looking towards the grade II Leather Exchange building in Weston Street (view 21). In Bermondsey Street, the glassy finish of the Bermondsey building is visible in the background to the grade II listed terraced properties (no. 68-76 and 78) emerging above the neighbouring roofline and forward of the general building line (views 16 and 17); but not to such an extent than to have more than a minor impact on the group’s special interest. The

development is unseen within the backdrop to the grade II* listed Church of St Mary Magdalen, being obscured from view by the intervening townscape (view 14).

156. In this case the application documents demonstrate that magnitude of the change on the Bermondsey Street conservation area is considered Negligible or Minor due to its limited presence in the wider conservation area. Bearing in mind that the parts of the conservation area that are of the highest significance are concentrated in the Bermondsey Street / Tanner Street spine, the effect of that change on significance of the conservation area as a whole is Low or Negligible due to its limited visibility from these most significant parts. The guidance on assessment of the significance of impact (see table below) places the impact on the conservation area on a sliding scale and confirms that, in this case, the impact would be considered Neutral or Neutral/Slight. (see table below)

| Effect on significance | Magnitude of Impact | | | | |
|------------------------|---------------------|----------------|--------------------|---------------------|---------------------|
| | No change | Negligible | Minor | Moderate | Major |
| Very high | Neutral | Slight | Moderate or Large | Large or Very Large | Very Large |
| High | Neutral | Slight | Moderate or Slight | Moderate or Large | Large or Very Large |
| Medium | Neutral | Neutral/Slight | Slight | Moderate | Moderate or Large |
| Low | Neutral | Neutral/Slight | Neutral/Slight | Slight | Moderate or Slight |
| Negligible | Neutral | Neutral | Neutral/Slight | Neutral/Slight | Slight |

The areas of greatest concern and where additional justification would be necessary are highlighted in grey (the impact of the development on the conservation area is highlighted in green)

157. The NPPF requires decision-makers (in para 193) to consider whether the harm identified is ‘Substantial’ or ‘Less than Substantial’. ‘Substantial’ harm would be on the order of Large or Very Large impact (above) and includes loss of all significance, such harm would be considered ‘wholly exceptional’. ‘Less than Substantial’ harm covers a range of impacts including Slight and Neutral (above). In this case the harm arising due to the Neutral or Neutral/Slight impact on the Bermondsey Street Conservation Area is considered to be ‘Less than Substantial’.

Impact on the non-designated heritage asset (the retained warehouse)

158. The most immediate impact of the proposal will be on the non-designated heritage asset – the Vinegar Yard warehouse. The warehouse is not statutory listed and is of local interest. Its significance to the conservation area is recognised in the conservation area appraisal and the council’s adopted policies confirm the general presumption against the demolition of positive contributors like the warehouse. The proposal does not seek to remove the non-designated heritage asset but seeks to restore it both internally and externally and extend it vertically with a new structure introduced within the body of the building.
159. The physical effect of the development on the fabric of the warehouse is limited to the removal of the flank wall facing onto Snowfields and the removal of the roof as well as the localised effects of inserting the new structure. In this respect the magnitude of the impact is considered to be Minor to Moderate due to the large proportion of the warehouse that is preserved by the development. The warehouse itself is of limited significance to the conservation area as a whole mainly due to its

location and its limited contribution to the setting of the highly significant Bermondsey Street / Tanner Street spine. As a consequence, the effect of the change on its significance is considered to be Low to Medium. (see table below)

| | Magnitude of Impact | | | | |
|------------------------|---------------------|----------------|--------------------|---------------------|---------------------|
| Effect on significance | No change | Negligible | Minor | Moderate | Major |
| Very high | Neutral | Slight | Moderate or Large | Large or Very Large | Very Large |
| High | Neutral | Slight | Moderate or Slight | Moderate or Large | Large or Very Large |
| Medium | Neutral | Neutral/Slight | Slight | Moderate | Moderate or Large |
| Low | Neutral | Neutral/Slight | Neutral/Slight | Slight | Moderate or Slight |
| Negligible | Neutral | Neutral | Neutral/Slight | Neutral/Slight | Slight |

The areas of greatest concern and where additional justification is necessary are highlighted in grey (the impact on the warehouse is highlighted in green)

160. Using the same scale and taking the above into account, the impact of the development on the non-designated heritage asset is considered to be Neutral/Slight or Slight. This would again place any harm to the non-designated heritage asset, the warehouse, in the order of 'Less than Substantial'.
161. The NPPF states in para 196 that: “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.” In this way the NPPF enables decision-makers to consider the benefits arising from a development as a whole in the balance when they consider harm to a designated heritage asset. The designated heritage asset in this case remains the Bermondsey Street Conservation Area and there is a strong presumption in law against granting planning permission for development that would fail to preserve the character or appearance of a conservation area.

The public benefits of the proposal

162. The current proposal arises from a direct response to its location in the conservation area. By developing both sites together and introducing a route across the Bermondsey Street site the scheme introduces a direct connection from the core of the conservation area to the non-designated heritage asset. The new lane on the Bermondsey Street site and the yard on the Snowesfield site which are typical features of the conservation area and are both aimed at integrating the warehouse into the core of the conservation area. Coupled with this is the confirmation that the scheme will preserve and restore the Vinegar Yard Warehouse inside and out causing minimal harm to its fabric. In this way, some of its most obvious public benefits of the development arise out of a deep understanding of the historic setting and the desire to preserve or enhance it.
163. In terms of the impact on the non-designated Vinegar Yard warehouse, as set out earlier, the scheme proposes to retain and restore much of the building’s historic fabric, both externally and internally; reinstating missing features, including brick segmental arches, Portland stone cills and hatch rank doors. It also proposes to rebuild the scarred and damaged brickwork of the building’s west façade. The intention is to convert the building for mainly retail at ground floor and offices above,

and allow staff and the public to experience its repurposed historic character. The extensive repairs and restoration work are positive features in terms of preserving its physical presence, and in revitalising the building and its contribution to this part of the conservation area.

164. There are parallels to this proposal in the 47-49 Tanner Street (ref: 18/AP/0896) determined by the Planning Committee on 28 October 2018 (and approved on 28 February 2019). Both that proposal and this current proposal involve the fulsome restoration of the original warehouse building (also identified as a positive contributor to the conservation area) and the addition of a substantial extension above, albeit to a lesser degree at 47-49 Tanner Street. That scheme was consented subject to specific conditions added by the Committee, to capture the fragile nature of the existing historic building, taking into account the implications of its fulsome restoration, and its incorporation into a substantial new development. These conditions would be recommended here as well to ensure a consistent approach.
165. Regarding the proposed tall building above the warehouse, it has to be considered in the context of the two sites working together to develop a closer link between the conservation area and the non-designate heritage asset – the warehouse. Its location at the edge of the conservation area but also in the CAZ and immediately adjacent to one of London’s most significant transport hubs at London Bridge Station requires a design of the highest quality to deliver a scheme that will enhance this sensitive historic setting. The proportions and detailed design of the tall building have been carefully calibrated to ensure that the warehouse retains its primacy. Whilst the building is of a significant scale, it is of a design quality of the highest order and can therefore be considered to enhance the character and appearance of the conservation area.

Conclusions on design and heritage

166. The proposals are for an office-led development that features a new tall building and is partly located within the Bermondsey Street conservation area. The designs are unusual in that they incorporate an existing warehouse into the architecture of the new tall building, using the mid-Victorian building to form part of its base, with the 65m glazed tower cantilevering above. The tower is notable for its steel columns that emerge from the building envelope immediately above the warehouse; its fractured form, reading as two tall volumes above the base; and for its use of cast glass in a stacked brick format as the material finishes. The warehouse is a non-designated heritage asset and makes a positive contribution to the conservation area, and as such the scheme proposes to refurbish or sensitively replace much of its historic fabric, both external and internal; albeit the majority of its roof and southern elevation are demolished to make way for the new build. The scheme also includes the demolition of two, modest scaled 1980s buildings that front onto nearby Bermondsey Street, but which are outside the conservation area; and their replacement with a new part 5/ part 10-storey office building that provides ground floor retail and a pedestrian route that runs diagonally across the site, directly connecting the high street with Snowsfields and the proposed plaza of the emerging St Thomas Street framework. The new building features the same material finish of cast-glass, albeit with a coloured backing.
167. The development is large, though the height and massing have been adjusted to avoid impact upon Protected Strategic Views and key borough-wide views, and so as not to appear in the direct backdrop to the Tower of London as a protected World Heritage Site. It is also articulated to minimise its townscape impacts within Bermondsey Street, albeit its success is dependent on the detailed material finish of the cast glass, which could draw undue attention within the local townscape,

detracting from the streetscene. This can be addressed through the imposition of suitably worded conditions.

168. Regarding the tall building, its architecture is complex, but it has an engaging, compositional quality and slender built form. Its junctions with the retained warehouse are well-handled in terms of their detailed designs, and the material finishes are high quality. The designs should make for a local landmark building, adding to the sense of place within the framework area. The associated public realm provision is commensurate with the building's scale. However, these positive features must be set against the adverse impacts of the tower on the warehouse and on this part of the local conservation area as non-designated and designated heritage assets respectively.
169. The proposed tower would be visible and of a distinctly different character to the surrounding buildings in terms of scale, composition and material finish however this contrast is not in itself disagreeable and officers consider any harm arising to the conservation area and the non-designated heritage asset – the warehouse – to be 'Less than Substantial'. The restoration of the warehouse fabric and incorporating it into the development, thus securing its future is a notable public benefit; as are the characterful new pedestrian route and the visual connection the passageway creates between two separate parts of the conservation area, which improves its setting. Other features of the scheme are as much the policy requirements of tall buildings and good design. The scheme is of high quality, with an accomplished architecture and urban design.
170. As there is less than substantial harm to the significance of Bermondsey Conservation Area as a designated heritage asset, great weight must be given to the conservation of the heritage asset, and a judgment must be formed as to whether the harm is outweighed by the public benefits of the proposals. In this case the public benefits to be taken into consideration are three-fold:
 1. The restoration of the warehouse (inside and out). The application sets out that the whole building is being restored, not just its façade and special conditions included to require the applicant to get the council's agreement for:
 - a) a detailed condition survey and archaeological recording of the building;
 - b) a method statement for removal, repair and reinstatement of historic fabric; and
 - c) include monitoring of the works – which will require funding via S106.
 2. The public realm benefits to the setting of the Conservation Area and the non-designated warehouse, including the creation of a new route across the site and the new landscaped public space on the Vinegar Yard site. The new route not only opens up new east-west connections but picks up on the historic character of yards and lanes typical of the Bermondsey Street conservation area and extends this character across the site and onto Snowfields. Further, the new route focusses in on the existing retained warehouse opening up views and highlighting its contribution to the area. A large part of the Vinegar Yard site will be landscaped with mature planting to create a local focus and contribute positively to new routes and connections.
 3. The provision of a substantial uplift in office floorspace that will bring up to 1,600 high quality jobs to the borough in addition to 2,152sqm of affordable workspace.
171. As referenced earlier, the retention and refurbishment of much of the warehouse is

of benefit, particularly given the careful restoration both externally and internally; albeit an appreciation of the restored building is tempered by the incongruity of the tall building above. Its construction above the warehouse does allow a large scale development to be achieved without greater recourse to the Bermondsey Street site, where arguably the impacts on the designated heritage assets – the conservation area – would be more significant. In addition, there is the uniqueness of the new architecture and its compositional quality of using the warehouse as its rusticated base. This brings a sense of place to the scheme and to the wider framework area.

172. As well as the contribution to local permeability there is the benefit of opening up a characterful new route that connects two parts of the Bermondsey Street conservation area, albeit the route itself is outside the conservation area. Nonetheless, the link does reveal an attractive new view, with traditional warehouses glimpsed at either end.
173. Having given great weight to the conservation of the Conservation Area, officers are satisfied that the 'Less than Substantial' harm to the Bermondsey Street Conservation Area and the non-designated heritage asset – the warehouse – is outweighed by the substantial public benefits arising from this development including the exceptional quality of design and public realm of the new route and public space, the conservation/restoration benefits to the warehouse itself and the connectivity of the conservation area, as well as the wider public benefits associated with the delivery of office and retail floorspace.

Landscaping and public realm

174. The scheme includes a number of public realm benefits, most notably the new passageway that links Bermondsey Street directly with Snowfields; and a sizeable forecourt area onto Vinegar Yard that in time would connect through to Melior Place and would become part of a significant new plaza, as set out in the collective framework. In addition, the scheme provides short stretches of widened pavement onto Bermondsey Street and onto St Thomas Street.
175. The proposals also include the upgrading of footways and the suggestion of raising the carriageway finish to within 25mm of the kerb along part of Snowfields. This effectively creates a single surface and the sense of a more generous public realm between the two new buildings, as well as enhancing the connection between the passageway and plaza. The landscaping throughout comprises high quality natural stone, using York stone for the paving and granite setts for the carriageways. It includes the retention of a number of trees, including the large oak tree in Vinegar Yard, which will become a focal point for the forecourt area and for the view along the new passageway. It provides 5 replacement trees and 14 additional street trees, including onto St Thomas Street, where they will help soften the streetscape. The palette is high quality, although the landscaping details (including tree species) should be conditioned to co-ordinate with the adjoining sites and wider public realm, and to avoid any corporate fee. The conditions should include the requirement for new public art that would add to the local sense of place.
176. Looking at the climatic conditions within the new public realm generated by the development, the new passageway from Bermondsey Street through to Snowfields is generally in shadow for much of the daytime. This is not surprising, with sunlight penetration limited by the route's orientation and narrow width, combined with the height of the Bermondsey building. However, the new route remains comfortable for strolling and standing, with wind conditions remaining sufficiently moderate. The daylighting within the forecourt/plaza area is not unreasonable, with the area shown to be sunlit over the lunchtime period (12-3pm)

during Spring and Autumn. The space is suitable for standing rather than sitting, due to the wind, though this would improve slightly with the proposed tree planting and the development of the neighbouring Vinegar Yard site. The main concern is the wind conditions within Snowfields and between the two proposed buildings in particular, where it is shown to be moderately windy and unsuitable for outdoor seating. Nonetheless, it remains sufficiently comfortable for walking throughout the year, with the extensive new tree planting providing some cover. As such, the climatic conditions remain sufficiently benign without any mitigation features beyond the new tree planting, which is welcome in maintaining an attractive, clutter-free design.

177. Lastly, the new landscaping extends to several high-level gardens and roof terraces above both buildings that provide welcome greening. The gardens at 5th floor level onto Bermondsey Street are notable for being extensive and including some 40 new trees. The planting should bring an attractive fringe to the building's parapets, as well as soften the townscape when viewed obliquely along Bermondsey Street. Overall, the landscaping and public realm are high quality and commensurate with the scale of development.

Design Review Panel

178. The proposals were considered by the council's DRP at the pre-application stage in October 2018. At the meeting the scheme was presented along with the pre-application proposals for the neighbouring Vinegar Yard site, and within the context of the informal St Thomas Street framework. The Panel generally endorsed the framework, subject to the clearer definition of the new east-west pedestrian route, better landscaping and confirmation of benign climatic conditions. Nonetheless, it did support the concept of the new connection through to Bermondsey Street.
179. The DRP generally supported the proposed development heights across the sites, acknowledging that the scale onto Bermondsey Street as shown was adequate and was part of a change in scale across Snowfield and onwards towards London Bridge. However, the Panel was concerned with the tall building and its uncomfortable relationship with the warehouse below; in particular the flat soffit that at the time came close to the top of the warehouse gable roof and felt unresolved. These matters have been addressed to a large extent by subsequent revisions to the scheme.

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

180. 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.
181. 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 has required an EIA 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 be such as to justify

the refusal of planning permission.

Overlooking

182. 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. This distance is met between the Snowfields building and the adjacent residential building across Snowfields known as Raquel Court. The residential properties at 8-20 Snowfields are not directly opposite the Snowfields building, which is set at almost a right angle to the existing homes and would not have any windows at comparative floor levels. On Bermondsey Street the distance is not met however this is a result of maintaining the building line on Bermondsey Street which is a character of the conservation area and would not result in any additional or intensified overlooking. Overall, the development is not considered to give rise to any unacceptable effects on amenity as a result of overlooking.

Daylight

183. 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.
184. 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 dense urban environments and areas of modern high rise buildings, a higher degree of obstruction may be unavoidable to match the height and proportion of existing buildings. This area south of St Thomas Street and the redeveloped London Bridge Station has been identified as an area where tall buildings are appropriate and there are existing tall buildings in the area such as the Shard and Guys Hospital Tower as well as consented schemes at Capital House which are within close proximity to the site.
185. The BRE sets out the detailed daylight tests. The first is the Vertical Sky Component test (VSC). 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 their original value before the loss is noticeable. The ES categorises the impacts in terms of loss of VSC as follows;

| Reduction in VSC | Level of impact |
|------------------|-----------------|
| 0-20% | Negligible |
| 20.1-30% | Minor |
| 30.1-40% | Moderate |
| 40% + | Major |

186. The second method is the No Sky Line (NSL) or Daylight Distribution (DD) method which assesses 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.
187. The ES considers the impact on the following neighbouring buildings:

- 72 Weston Street
- 70 Weston Street
- 123 Snowsfields, The Rose PH
- Nelson Rec. Ground 115-122 Snowsfields
- 62-66 Weston Street, 38-43 Snowsfields
- Land Adjoining, 14 Melior Street
- La Salette Church & 14 Melior Street
- 52-54 Weston Street
- 48-50 Weston Street
- Wolfson House, 49 Weston St
- 7-25 Bermondsey Street
- Buildings at Holyrood St and Magdalen St
- 2 Crucifix Lane
- 4 Crucifix Lane
- 6 Crucifix Lane
- 10-14 Crucifix Lane
- 16 Crucifix Lane
- 60-66 Whites Grounds Estate
- 67-91 Whites Grounds Estate
- 23-59 Whites Grounds Estate
- 1-22 Whites Grounds Estate
- 99-108 Whites Grounds Estate
- 79-83 Bermondsey Street
- 60 Bermondsey Street
- Tyers Estate
- 68-70 Bermondsey Street
- 72 Bermondsey Street
- 2 Carmarthen Place
- 4 Carmarthen Place
- Land to rear of 72-76 Bermondsey Street
- 74 Bermondsey Street
- 76 Bermondsey Street
- 78 Bermondsey Street
- 80 Bermondsey Street
- Part of 82-84 Bermondsey St, 2 Tyers Gate
- 4-6 Tyers Gate
- 8 Tyers Gate
- 1 Tyers Gate

188. The daylight report has considered a large number of windows and rooms around the site. It assessed 2,388 windows serving 1,596 rooms across 37 buildings for daylight amenity. Of the 2,388 windows assessed 2,242 (93.9%) would satisfy the BRE recommended levels for VSC. Of the 1,596 rooms assessed, 1,567 (98.2%) would meet the BRE standards for NSL. The following buildings would experience a negligible daylight impact as a result of the proposed development.

- Bermondsey Village Hall
- 16 Hardwidge Street
- 145-147 Guinness Court
- 80 Weston Street
- 72 Weston Street
- 70 Weston Street
- 123 Snowsfields, The Rose PH
- Nelson Rec. Ground, 115-122 Snowsfields

- 62-66 Weston Street, 38-43 Snowsfields
- Land Adjoining, 14 Melior Street
- Our Lady of La Salette Church & Adjoining
- 14 Melior Street
- 4 Carmarthen Place
- 52-54 Weston Street Street
- 48-50 Weston Street
- Wolfson House, 49-55 Weston St
- 7-25 Bermondsey St
- Buildings at Holyrood St & Magdalen St
- 2 Crucifix Lane
- 4 Crucifix Lane
- 6 Crucifix Lane
- 10-14 Crucifix Lane
- 16 Crucifix Lane
- 60-66 Whites Grounds Estate
- 67-91 Whites Grounds Estate
- 23-59 Whites Grounds Estate
- 1-22 Whites Grounds Estate
- 99-118 Whites Grounds Estate
- 79-83 Bermondsey Street
- 60 Bermondsey St
- 68-70 Bermondsey Street
- 72 Bermondsey St
- Land to rear of 72-76 Bermondsey Street
- 74 Bermondsey Street
- 76 Bermondsey Street
- 78 Bermondsey Street
- 80 Bermondsey Street
- Part of 82-84 Bermondsey St, 2 Tyers Gate
- 4-6 Tyers Gate
- 8 Tyers Gate
- 1 Tyers Gate

189. 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;

Table – Impact of proposed development on VSC

| Property | No. of windows tested | No. retaining at least 80% of their baseline value | No. with minor adverse impact of up to 29.9% reduction in VSC | No. with moderate adverse impact of between 30%-39.9% reduction in VSC | No. with major adverse impact of over 40% reduction in VSC |
|-------------------------------|-----------------------|--|---|--|--|
| 26 Melior Street | 20 | 13 | 1 | 5 | 1 |
| 8-20 Snowsfields | 74 | 64 | 5 | 1 | 4 |
| 2 Melior Place | 13 | 11 | 2 | 0 | 0 |
| 4-31 Melior Street | 148 | 140 | 4 | 4 | 0 |
| Globe House, 2A Crucifix lane | 38 | 19 | 1 | 8 | 10 |
| 147 Snowsfields, Raquel Court | 56 | 17 | 0 | 3 | 36 |

| | | | | | |
|----------------------------|-----|-----|----|---|----|
| Snowsfields Primary School | 96 | 81 | 13 | 1 | 1 |
| 1-114 Guinness Court | 337 | 336 | 1 | 0 | 0 |
| Tyers Estate | 168 | 124 | 24 | 6 | 14 |
| 2 Carmarthen Place | 16 | 15 | 1 | 0 | 0 |

Table – Impact of proposed development on NSL

| Property | No. of windows tested | No. retaining at least 80% of their baseline value | No. with minor adverse impact of up to 29.9% reduction in NSL | No. with moderate adverse impact of between 30%-39.9% reduction in NSL | No. with major adverse impact of over 40% reduction in NSL |
|-------------------------------|-----------------------|--|---|--|--|
| 26 Melior Place | 9 | 7 | 1 | 1 | 0 |
| 8-20 Snowsfields | 63 | 60 | 0 | 0 | 3 |
| Globe House, 2A Crucifix Lane | 13 | 10 | 0 | 0 | 3 |
| 115-144 Guinness Court | 68 | 67 | 1 | 0 | 0 |
| 1-114 Guinness Court | 272 | 270 | 2 | 0 | 0 |
| Tyers Estate | 134 | 116 | 6 | 6 | 6 |

26 Melior Street

190. A total of 20 windows and nine rooms have been tested for VSC and NSL at 26 Melior Street. There would be noticeable changes to VSC at seven windows and alterations to NSL within two rooms. In terms of the VSC, one room would experience a minor reduction of 25.53% which is considered acceptable. Five rooms would experience reductions of between 32.71% and 37.13% however they would still achieve at least 20% VSC which is considered acceptable within an urban area. The window that experiences a reduction in VSC in excess of 40% serves a room where there are two additional unaffected windows and is therefore considered acceptable. In terms of NSL only two rooms would be affected and whilst the reductions in NSL would be classed as minor and moderate respectively, they would be served by windows that achieve in excess of 20% VSC and as such the impact is considered acceptable.

8-20 Snowsfields

191. There are 74 windows serving 63 rooms at this property. A total of 10 windows and three rooms would experience changes beyond the BRE guidelines with the proposed development in place. Of the affected windows, there would be five with minor impacts of VSC reductions of between 20.34% and 29.54%; one window with a moderate reduction of 37.34%; and four with a major reductions of between 44.64% and 70.82%. All of the windows with minor impacts (5) and moderate impacts (1) would continue to have BRE compliant NSL and as such would have good daylight access. Of the four windows categorised as having major VSC impacts, one is a bedroom which is less sensitive to daylight levels and would also continue to have BRE compliant NSL. The remaining three windows would see NSL reductions in addition to the VSC reductions set out above, however these rooms do not appear to be principle living accommodation and as such the reductions

would not have significant amenity impacts. On balance, the impact of the development on this building is considered acceptable.

2 Melior Place

192. VSC has been tested at 13 windows in this property with 11 remaining fully compliant with the BRE. The two affected windows would experience reductions of between 24.55% and 28.53% VSC which is considered to be a minor impact and all rooms would continue to have BRE complaint NSL. The impact on this property is therefore considered acceptable.

4-31 Melior Street

193. A total of 148 windows serving 70 rooms have been assessed at this property for VSC and NSL respectively. Eight windows would experience reductions in VSC with four windows being categorised as minor reductions (20.22% - 24.48%) and four being categorised as moderate reductions (34.79% - 39.21%) however in all cases, the rooms these windows serve would continue to be fully BRE compliant in terms of NSL and as such the impact is considered acceptable.

Globe House, 2A Crucifix Lane

194. There are 38 windows serving 13 rooms at this property. Three of the 13 rooms would continue to be BRE compliant in terms of both VSC and NSL. Of the remaining 10 rooms, three would experience reductions to both VSC and NSL beyond the BRE guidelines. One of the rooms would experience a moderate reduction in VSC with a 34.14% reduction leading to a retained VSC level of 21.36% which is considered acceptable within an urban environment. The remaining two rooms would experience major impacts to both VSC (reductions of between 42% and 47.07%) and NSL however, from information obtained from the planning register these rooms are bedrooms which by their typical use are less sensitive to daylight reductions. The impact on this property is therefore considered to be acceptable on balance.

147 Snowsfields

195. A total of 56 windows serving 30 rooms have been assessed at this property for VSC and NSL respectively. 17 of the windows would continue to achieve BRE compliant VSC whilst three windows would experience moderate impacts with reductions of between 33.92% and 35.8% and 36 would see major VSC reductions of between 40.89% and 58.14% however in all instance, all windows would continue to be fully BRE compliant in terms of NSL. The majority of affected rooms have VSC levels that are high for such an urban area as a result of the open aspect of the adjacent development site.

196. The proposed development would reduce the VSC to these windows to levels which are more typical of those found in highly urbanised locations. This results in high percentage VSC changes against the baseline level for each window as the previously low rise/open development site is redeveloped and these VSC changes would all be of moderate to major adverse significance as set out above. However, despite the material changes in VSC, the affected windows serve rooms that benefit from multiple windows and as such the changes in NSL to these rooms are all fully compliant with the BRE guidelines compliant and all of the rooms would retain daylight distribution to between 83.4% and 100% of their area. This is above the BRE Guidelines recommended minimum and is positive for an urban location.

Snowsfields Primary School

197. 96 windows have been assessed for VSC at Snowsfields Primary School and whilst there would be reductions in VSC to 15 windows, seven of these windows are located in rooms served by additional unaffected windows and the remaining eight windows have residual VSC levels of between 20.53% VSC and 26.10% VSC which is considered acceptable within an urban area. It should also be noted that all of the assessed rooms would continue to have BRE compliant NSL indicating that good levels of daylight would be achieved.

1-114 Guinness Court

198. A total of 337 windows and 272 rooms have been assessed for VSC and NSL respectively at this property. Only one window would see a reduction in VSC beyond the BRE guidelines. The affected window would only marginally exceed the BRE threshold at 20.72% and would continue to achieve BRE compliant NSL. Two rooms would experience minor reductions in NSL however they would continue to achieve BRE compliant VSC. The impact is therefore considered acceptable.

Tyers Estate

199. 168 windows and 134 rooms have been assessed for VSC and NSL respectively at the Tyers Estate properties. A total of 44 windows would see changes beyond the BRE guidance in terms of VSC reductions whilst 18 rooms would notice impacts on NSL. Of the 44 windows assessed for VSC, seven windows would serve rooms that would also benefit from additional unaffected windows. Furthermore, 26 of the windows would serve rooms that would continue to achieve compliance with the BRE in terms of NSL. Of the 18 rooms that would see reductions in NSL, one room would benefit from a window that meets the BRE guidelines.
200. The remaining affected 18 windows would be located in 17 rooms that would also see reductions in NSL. Of these 18 windows, six would see only minor reductions in VSC of between 20.13% and 25.36%. The remaining 11 windows would have reductions of between 45.26% and 90.68% however it should be noted that the baseline VSC levels were already very low and as such, any reduction in VSC results in a disproportionate percentage change. In reality, these windows will experience less than 5% VSC reductions in real terms. The overall impact on this property is considered acceptable.

2 Carmarthen Place

201. Of the 16 windows assessed for VSC at this property, 15 would continue to meet the BRE standards and one window would see a minor reduction of 23.89% however it would serve a room that benefits from an additional four unaffected windows and as such the impact is considered acceptable. All rooms assessed for NSL would continue to meet the BRE guidance.

115-144 Guinness Court

202. All 94 windows assessed for VSC at this property would continue to meet the BRE guidelines. One of the 67 rooms assessed for NSL would see a reduction beyond the BRE threshold of 20% with a reduction of 22.8% which is only marginally above the 20% limit and this room would continue to be served by windows with BRE compliant VSC. The impact on this building is therefore considered acceptable.

Cumulative daylight impacts

203. The applicant has considered the cumulative daylight impacts of the proposed

development. By comparing the impact of the proposed development to a future cumulative baseline. The future baseline comprises other planned and consented developments.

204. As before, the daylight assessment considered windows and rooms within the vicinity of the site with the daylight impacts summarised below:

| Property | Significance of Cumulative Effect |
|-------------------------------|-----------------------------------|
| 26 Melior Street | Moderate adverse |
| 8-20 Snowsfields | Moderate adverse |
| 2 Melior Place | Minor adverse |
| 4-31 Melior Street | Minor adverse |
| Globe House, 2A Crucifix Lane | Moderate adverse |
| 147 Snowsfields | Minor adverse |
| Snowsfields Primary School | Moderate adverse |
| 1-114 Guinness Court | Minor adverse |
| Tyers Estate | Minor adverse |

205. Four properties have been identified as having a moderate adverse cumulative effect and these will be considered further. The VSC and NSL cumulative impacts for these properties is set out in the table below:

Table – Cumulative scenario VSC results

| Property | No. of windows tested | No. retaining at least 80% of their baseline value | No. with minor adverse impact of up to 29.9% reduction in VSC | No. with moderate adverse impact of between 30%-39.9% reduction in VSC | No. with major adverse impact of over 40% reduction in VSC |
|-------------------------------|-----------------------|--|---|--|--|
| 26 Melior Street | 20 | 12 | 0 | 2 | 6 |
| 8-20 Snowsfields | 74 | 41 | 0 | 10 | 23 |
| Globe House, 2A Crucifix lane | 38 | 19 | 2 | 7 | 10 |
| Snowsfields Primary School | 96 | 75 | 18 | 2 | 1 |

Table – Cumulative scenario NSL results

| Property | No. of windows tested | No. retaining at least 80% of their baseline value | No. with minor adverse impact of up to 29.9% reduction in NSL | No. with moderate adverse impact of between 30%-39.9% reduction in NSL | No. with major adverse impact of over 40% reduction in NSL |
|-------------------------------|-----------------------|--|---|--|--|
| 26 Melior Place | 9 | 7 | 1 | 1 | 0 |
| 8-20 Snowsfields | 63 | 46 | 1 | 3 | 13 |
| Globe House, 2A Crucifix Lane | 13 | 10 | 0 | 0 | 3 |
| Snowsfields Primary School | 60 | 43 | 3 | 10 | 4 |

26 Melior Street

206. A total of 20 windows serve nine rooms at this property with eight windows and two rooms seeing reductions beyond the BRE guidance. Five of the affected windows would serve rooms that would continue to achieve BRE compliant NSL and the remaining three windows would serve two rooms that would also see NSL reductions. Overall the cumulative impact on this building is considered to be acceptable on balance.

8-20 Snowsfields

207. 74 windows serving 63 rooms have been assessed for VSC and NSL at this property. In terms of VSC there would be 10 windows that would experience moderate VSC reductions of between 31.07% and 39.28% however given the low baseline VSC results, the actual real terms loss of VSC is in the range of 2.33% and 3.60% which is unlikely to be noticeable. There would be 23 windows experiencing a major reduction in VSC with between a 41.22% and 100% reduction. Again, the already low baseline figures results in a disproportionate percentage reduction as the actual VSC reduction at 21 of the major affected windows ranges between 0.02% and 6.79% and it should be noted that those windows experiencing a 100% loss of VSC would only see real terms reductions of between 0.02% and 1.3% which would not be noticeable. The remaining two rooms would see significant VSC and NSL reductions however, as set out previously, based on the available information; these rooms do not form principle living accommodation and as such would not be as sensitive to alterations to daylight. The impact on this building is considered to be acceptable.

Globe House, 2A Crucifix Lane

208. There are 38 windows serving 13 rooms at this property. Of the 38 windows assessed for VSC a total of 19 would continue to meet the BRE guidelines with two experiencing minor reductions in VSC, seven experiencing moderate reductions in VSC and 10 experiencing major reductions in VSC of more than 40%. Of these 19 windows, 16 would serve rooms that would remain fully compliant in terms of VSC. The remaining three windows serve rooms that would also see reductions in NSL. One of the windows would experience a moderate reduction in VSC with a 32.26% reduction leading to a retained VSC level of 21.31% which is considered acceptable within an urban environment. The remaining two rooms would experience major impacts to both VSC (reductions of between 41.41% and 47.07%) and NSL however, from information obtained from the planning register these rooms are bedrooms which by their typical use are less sensitive to daylight reductions. The cumulative impact on this property is therefore considered to be acceptable on balance.

Snowsfields Primary School

209. At Snowsfields Primary School, 96 windows serving 60 rooms have been assessed for VSC and NSL respectively. A total of 21 windows would see VSC reductions as part of the cumulative scenario whilst 17 rooms would see reductions in NSL. However, only 12 rooms would experience both VSC and NSL reductions and in all cases the level of reduction would be minor ranging from 20.63% to 28.69%. It should be noted that of these 12 rooms, eight would have reductions in VSC of below 24% which isn't significantly above the BRE threshold. Overall the cumulative impact on this property is considered acceptable.

Conclusions on daylight

210. The results of the daylight assessment demonstrate that there would be a limited impact on daylight and sunlight to surrounding properties as a result of the proposed development. The overall BRE compliance rate for VSC and NSL would be 93.9% and 98.2% respectively. Whilst adverse impacts have been identified at some properties they are not considered to be significantly adverse, would generally not impact upon principle living accommodation and would not detrimentally harm residential amenity or room functionality.

Sunlight

211. All of the windows within 90 degrees of due south have been assessed with regards to impact on sunlight. The BRE guide states that if a window can receive 25% of summer sunlight, including at least 5% of winter sunlight between the hours of 21 September and 21 March, then the room would be adequately sunlight.
212. In terms of sunlight, 737 residential (or similar use) across 43 properties have been assessed for sunlight amenity both in terms of total Annual Probable Sunlight Hours (APSH) and Winter APSH.
213. Of the 737 rooms that have been assessed for sunlight, 720 would remain BRE compliant (97.7%). The remaining 17 windows would experience some sunlight reductions. 14 of these windows are located at 4-31 Melior Street and the remaining three are located at Globe House, 2A Crucifix Lane and are considered in more detail below.

4-31 Melior Street

214. A total of 54 rooms were assessed for sunlight amenity at this property and whilst 40 of the rooms would be fully compliant there would be 14 rooms that would experience noticeable impacts. None of the remaining 14 rooms meet the BRE requirements at baseline largely as a result of them being included in the assessment by virtue of the single narrow window forming part of a three pane bay window that would face the site and within 90 degrees of due south.
215. Consequently, the small changes in winter sun amenity and total sun amenity (less than 2% and 10% respectively) as a result of the proposed development suggest changes in sunlight amenity of moderate to major adverse significance. However, given the already low baseline values due to the general orientation of the room, the effect of the proposed development on the sunlight amenity within this building is considered to be minor adverse in significance. The impact of the development on sunlight to this property under the cumulative scenario has also been considered and the level of impact is comparable to that set out above and is considered to be minor in significance.

Globe House, 2A Crucifix Lane

216. A total of ten rooms have been assessed for sunlight amenity at this property, seven of which would satisfy the BRE requirements. The three rooms that do not satisfy the BRE requirements for both annual and winter sunlight would retain absolute levels of winter sunlight of 8% and 9% against the BRE recommended target of 5%, and would retain absolute levels of annual sunlight of 22% and 23% against a BRE recommended target of 25%.
217. These retained levels of sunlight amenity are acceptable given the urban location in which this property is located. The effect of the proposal on the sunlight amenity to these rooms is, therefore, considered to be minor adverse in significance. The impact of the development on sunlight to this property under the cumulative

scenario has also been considered and the level of impact is comparable to that set out above and is also considered to be minor in significance.

Overshadowing

218. An overshadowing assessment has been undertaken for the following properties and amenity spaces:

- Horseshoe Inn Garden
- Communal Seating Area/garden at Fenning Street/Melior Street.

| Amenity Space | Baseline (% of area receiving two hours of sun on the 21 st March) | Proposed (% of area receiving two hours of sun on the 21 st March) | % change between Baseline condition and completed development | Scale of Effect as categorised by the ES |
|--|---|---|---|--|
| Horseshoe Inn Garden | 41.4% | 34.2% | 17.4% | Negligible |
| Pocket Park Melior Street/Fenning Street | 57.1% | 50.1% | 12.3% | Negligible. |

219. In both instances the reductions are below the BRE threshold of 20% and as such are considered acceptable. For the purposes of the ES, the impact is categorised as negligible as users of these spaces are unlikely to notice the small reductions.

Solar glare

220. Solar glare has been considered as part of the ES and various car/train driving viewpoints have been considered. The viewpoints set out below have been considered for solar glare:

1. Junction of Crucifix lane, St Thomas Street, Bermondsey Street and Snowfields;
2. Junction of Hardwide Street with Snowfields;
3. Junction of Kirby Grove with Melior Place;
4. View east on Melior Street.

221. Viewpoints 1-3 set out above demonstrate that the development would be unlikely to adversely affect approaching car/train drivers as the development would only be in the peripheral vision of the driver and would not obscure any relevant traffic/train signals or pedestrian crossings and would only be present for a limited amount of time. The impact is therefore categorised as minor adverse.

222. On view number four as set out above, the impact would also be limited to minor adverse as the potential for glare is limited to five minutes each day for one week in February and one week in November. Additionally the potential for glare to occur is relatively high up on the building and would not impair the drivers vision of traffic signals or pedestrian crossings.

Light pollution

223. The ES demonstrates that prior to 11pm; there would be no greater incidence of light spillage onto the closest residential facades than the recommended maximum for an urban location. The pre-curfew effect of the proposed development is therefore considered to be negligible. With an implemented building management system that would have control of integrated blackout blinds, the post curfew effect of light pollution would also be limited and is considered to be negligible.

Noise and vibration

224. Noise and vibration impacts have been considered as part of the ES which considers the key considerations to be noise and vibration effects from demolition and construction as well as associated traffic during this period.
225. Demolition and construction activities including associated traffic would give rise to some environmental impacts at nearby homes, commercial premises and Snowfields Primary School. These impacts are associated with the demolition and construction of the development and whilst they would be significant and adverse, they would be short term and temporary and relevant planning conditions would be imposed to offer mitigation and control hours of work as well as agreeing routes for construction vehicles.
226. The completed development is unlikely to result in any adverse noise or vibration impacts and other than standard conditions around hours of use and plant noise, no further mitigation would be required. In terms of cumulative impacts the development would not lead to any significant adverse effects.

Energy and sustainability

227. 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.
228. 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.
229. 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. The applicants have submitted an energy strategy and a sustainability assessment for the proposed development which seek to demonstrate compliance with the above policy.

Be Lean

230. The measures proposed include
- High performance thermal envelope;

- Low G-Values and solar shading blinds to reduce solar glare into offices;
- Mixed mode ventilation with natural ventilation meeting the perimeter cooling load when conditions are favourable;
- Chilled ceiling rafts and perimeter heating for space conditioning inside the offices;
- High efficiency lighting with occupancy sensors and daylight dimming;
- Maximising daylighting to reduce artificial lighting loads and drive down electrical loads;
- Heat recovery devices inside the AHU's to reduce heating of incoming ventilation air.

Be Clean

231. Combined Heat and Power (CHP) is not considered suitable for office developments. There are currently no district energy networks near the site however the site has been designed to allow future connectivity.

Be Green

232. The measures proposed include:
- Removal of all fossil fuel proposals from the development (this would include CHP and Biomass);
 - Use of High Efficiency Air Source Heat Pumps with simultaneous heating and cooling;
 - Provision of photovoltaic panels on the roofs of both buildings to generate electricity.
233. Taken together, the Be Lean, Be Clean and Be Green measures would achieve a total carbon reduction of 40% taking into account SAP10 and decarbonising of the electricity grid and would exceed the requirements of the policy.

Ecology and biodiversity

234. The applicant has submitted a Preliminary Ecological Appraisal which has been reviewed by the council's Ecologist and is considered to be suitable for assessing the impact of the development on local ecology. The report concludes that there would be no adverse ecological impacts and in order to provide ecological enhancement the council's Ecologist has recommended conditions relating to the provision of biodiverse roofs and the installation of Swift bricks.

Air quality

235. Air quality impacts have been assessed as part of the ES. This includes:
- Impacts on air quality arising from construction traffic emissions and;
 - Impacts from operational plant combustion.
236. During the demolition and construction phase it is recognised that there would be impacts such as dust in the air as well as dust and dirt on the highway as a result of construction vehicle movements. This can be suitably managed and mitigated through a Construction Environmental Management Plan which would be a conditioned requirement of any consent issued. The impact of construction vehicle traffic emissions is not considered to be significant.

Ground conditions and contamination

237. Ground conditions and potential land contamination have been assessed as part of the ES through the following:

- A desk-based detailed review to identify potential sources of contamination on or surrounding the site;
- Assessment of the potential for contamination based on the baseline conditions
- A risk-based ground contamination assessment considering potential sources, receptors and pollutant linkages in line with Government guidance;
- Consideration of mitigation measures to address any adverse impacts.

238. The ES concludes that there would be no significant effects however it does note that there may be significant effects if asbestos is found in the soil. This would be identified early in the development programme through soil contamination studies and appropriate remediation would need to be put in place should asbestos be found. The council's environmental protection team have reviewed the information and consider it acceptable subject to standard conditions around land contamination, soil sampling and remediation measures that will ensure there would be no adverse impacts resulting from the proposed development in terms of ground conditions.

Climate change

239. The impact of the development on Climate Change has been assessed as part of the ES. The Climate Change assessment looks at both construction and existence effects. The ES notes that there would be a net increase in emissions associated with the proposed development. This is typical for all large developments and is not unique to the current application. It is a result of the energy (and resulting greenhouse gas emissions) going into the new materials and transporting those materials to site, as well as any energy associated with construction activities and later operation of the development. These are all unavoidable requirements, however they have been minimised where possible through consolidation and sourcing materials sustainability where feasible.

240. With regard to operations, the energy statement details how energy consumption and associated emissions have been minimised in accordance with policy requirements. This includes exceeding the commercial requirements for carbon emissions on site. However, when adding the emissions associated with materials and construction, a net increase in emissions is unavoidable. To minimise this, the applicant has committed to investigating use of materials with lower associated emissions; this will be a consideration as the project moves towards specifying materials at the detailed design stage, and forms part of the ongoing BREEAM assessment.

241. Guidance from the Institute of Environmental Management and Assessment states that any net emissions increase associated with a project, no matter how small, is considered a significant effect. Hence the conclusion in the ES. This conclusion therefore recognises the seriousness of the climate emergency rather than the development being a relatively large source of greenhouse gas emissions. As noted above, measures have been taken and will continue to be taken to reduce emissions associated with the project and to minimise the effect as far as possible.

Wind

242. Wind and microclimate impacts have been assessed as part of the ES. This assessment includes taking readings of predicted wind levels at various points around the site and the surrounding area and considering if the climatic conditions are suitable for the predicted use utilising wind tunnel testing.

243. The existing versus proposed and cumulative assessment concludes that the wind conditions at the assessed points would be suitable for their intended use. This includes walking conditions on Bermondsey Street, Snowsfields and the new passage linking the two as well as walking/standing and sitting conditions around the new Snowsfields building and public realm. The proposed environmental conditions would rely on appropriate mitigation such as tree planting and as such this will be a conditioned requirement of any consent issued alongside a Wind Mitigation Strategy in order to ensure that the predicted wind conditions at sensitive points is achieved.

Water resources and flood risk

244. The water resources subject area has been considered as part of the ES and the applicant has submitted a Flood Risk Assessment (FRA) and a Drainage Strategy in support of the application. No significant effects were identified as part of the ES. The site is located within Flood Zone 3 which is considered to be an area of high risk of flooding due to the proximity of the tidal River Thames. However the site is protected by the Thames Barrier and related defences. The Environment Agency were consulted on the application and have raised no objections.

Archaeology

245. The site lies at an exceptionally interesting location within the 'Borough, Bermondsey and Rivers' Archaeological Priority Zone (APZ) and is extremely sensitive for archaeological matters. When the New Southwark Plan is adopted the site will lie within the newly extended 'North Southwark and Roman Roads ' Archaeological Priority Area (APA). Saved Policy 3.19 of the Southwark Plan (2007) requires that proposals for development in APZ/As should be accompanied by an archaeological desk-based assessment (DBA) and an evaluation report (the results of digging archaeological trial trenches).
246. The site has been managed as two separate parcels of land, each having a different archaeological consultant and a different team of archaeologists. The applicant has submitted separate desk based assessments, written schemes of investigation (WSIs) and pre-determination archaeological evaluation reports for each of the two site areas. Effects on the historic built environment have also been quantified in the ES Volume 2. The two project teams for the two sites have been in close consultation with Southwark's Archaeology Officer and each other. The larger Vinegar Yard and St Thomas Street site was managed by MillsWhipp Projects and the archaeological team were Pre-Construct Archaeology (PCA); they have submitted a Written Scheme of Investigation (WSI) by MillsWhipp Projects dated Oct 2018 and a Summary Report of the Evaluation Works at Vinegar Yard and St Thomas Street by PCA dated Nov 2018. At the 40 Bermondsey Street, 42-44 Bermondsey Street and 1-7 Snowsfields the site was managed by ARUP and the archaeological team were Museum of London Archaeology (MoLA); they have submitted a WSI by MoLA, dated 9th November 2011 and a pre-determination evaluation report (including a Geoarchaeological Deposit Model report) by MoLA and dated January 2019.
247. As pre-determination evaluation has taken place on each parcel of land there is now sufficient information to make a planning decision and determine whether this development is likely to cause harm to the buried historic environment and, if so, what measures need to be in place to manage this. Whilst the ES has categorised the impact of the development on buried heritage as slight adverse, it should be noted that following a programme of archaeological recording, the impact on buried archaeological remains would be minimised and less than significant.

248. The archaeological potential of the general area is evidently high, particularly with regard to medieval and post-medieval settlement and water management regimes - as well as the potential for prehistoric deposits, structures and finds. The sites have high potential for paleo-environmental remains and deposits dated from the earliest times. It is also possible that Roman deposits may survive within the alluvial sequence at depth. Links to the historic route of Bermondsey Street and nearby Bermondsey Abbey may also be present. The sixteenth century mansion of Henry Goodyere, a rich merchant, may have been partially discovered on the Vinegar Yard site. Subsequently, the area became a centre for post-medieval industries and warehouses, particularly relating to the tanning industry - with extensive archaeological remains surviving.
249. The application scheme is for a large basement and if this were consented the applicant must be mindful that all archaeological remains within the area of impact (as these cannot be preserved in situ through sympathetic design options) must be fully excavated.
250. There is now sufficient information to establish that the development is not likely to cause such harm as to justify refusal of planning permission on the grounds of archaeological interest provided that robust archaeological conditions are applied to any grant of consent. So, if the application scheme gains consent the applicant must be mindful that for any archaeological remains that are encountered - if these cannot be preserved in situ under a foundation design condition - they must be prepared to pay for and manage the excavation of these remains entirely and/or potentially lift and preserve off-site or in the new development any previously unknown but important remains. Other requirements will also be to carry out full archaeological post-excavation mitigation, publication and deposition of the archaeological archive. Historic buildings on the sites should also be recorded to Historic England Level 3 standard.
251. In accordance with best practice as set out in current policy and guidance the applicant should consider opportunities for an appropriate programme of public engagement, for example: Historic England's 2015 publication 'Guidelines for Archaeological Projects in Greater London' provides advice on popular interpretation and presentation options. This can be provided for within the S106 Agreement.

Transport

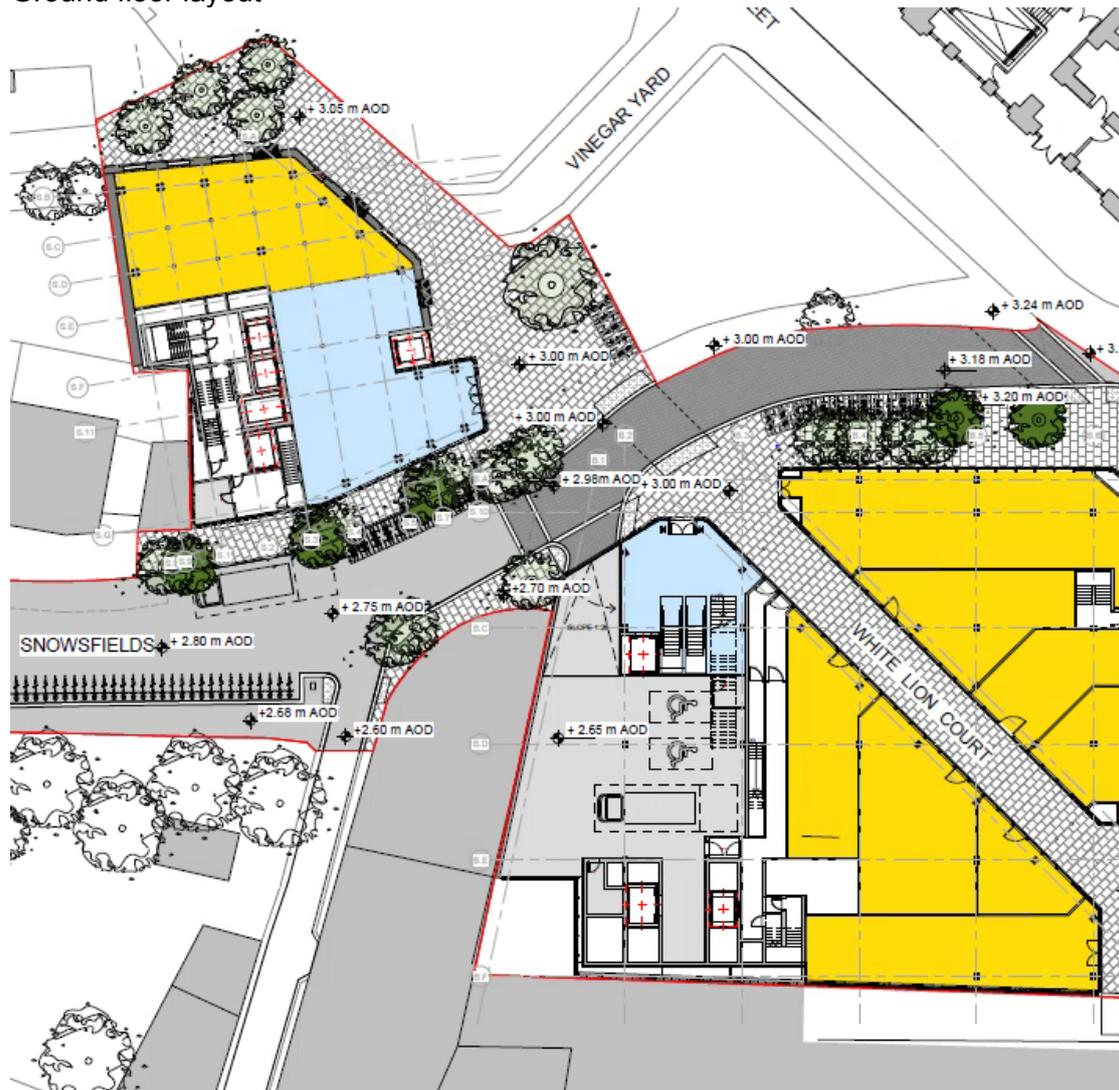
252. The NPPF states that planning decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.
253. Core Strategy Strategic Policy 2 encourages walking, cycling and the use 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.

Site context

254. The application site boundaries are marked by St Thomas Street to the north; Bermondsey Street to the east; and Snowfields which divides the site into east and west sectors. St Thomas Street forms part of the Transport for London Road

Network (TLRN).

Ground floor layout



255. London Bridge Station is the nearest train and underground station to the site, located approximately 200m to the west along St Thomas Street. Various buses run along nearby roads including Tooley Street, Crucifix lane, St Thomas Street and Borough High Street. Given the multiple public transport options available in close proximity to the site the PTAL rating is 6B, indicating an excellent level of provision. In addition to public transport, the site is served by the cycle hire scheme with docking stations located on Snowsfields, Potters Fields Road and Tanner Street

256. The site is well located for cycling with Cycle Superhighway 3 and 7 located close by at Monument and Southwark Bridge Road respectively. A new Cycle Superhighway between Tower Bridge and Greenwich is expected to run close to the site and there are hopes that this could be extended westwards to London bridge Station along Tooley Street.

Cycling and cycle hire

257. The development would incorporate 60 short stay and 3 long stay spaces which would be fully compliant with the draft London Plan. Re-location of the existing cycle hire docking station on Snowsfields would be required to accommodate the proposed servicing bay. TfL have reviewed this and raise no objection to the principle of the cycle hire docking station being re-located subject to the applicant

fully funding these works as well as increasing the number of docking points to 80, which would be an increase of 49 spaces. This would be secured under the S106 Agreement with on-going engagement with TfL.

Deliveries and servicing

258. The two buildings would be serviced independently of one another. The Bermondsey building would be serviced from an internal loading bay accessed from Snowfields. The Snowfields building would be serviced from an on-street layby on Snowfields.
259. The proposed service arrangements have been reviewed by both TfL and the council's transport officer and are now considered acceptable following clarifications around vehicle tracking and the repositioning of access gates on the Bermondsey building.

Traffic and transport impacts

260. In terms of vehicle movements the applicant's consultants have estimated that the development would generate around 10 two-way vehicle movements in the morning or evening peak hours. The applicants approach to establish a baseline trip generation is not supported. As such, the council's Transport Officer has undertaken an independent review of trip generation for the site using the TRICS database. The use of TRICS is supported by TfL.
261. The Transport Officer, using TRICS, has demonstrated that the development would produce approximately 27 two-way net additional vehicle movements in the morning or evening peak hours. This level of trip generation is a significant increase on the applicant's initial estimates. Even so, this level of trip generation would not have any significant adverse impact on the transport network.
262. In terms of servicing, the development is expected to generate negligible net additional servicing trips per day as the projected 38 two-way service vehicle movements per day compare with the 37 trips calculated for the existing buildings and the 33 to 43 trip range forecasted by the applicant's consultants.
263. It is envisaged that the applicant's proposed delivery strategy within the submitted DSP encompassing collective procurement and consolidation of office deliveries and non-perishable goods through the development's Facilities Management team in addition to 'just in time'/joint dates and times deliveries, would hugely reduce the number of servicing trips. Furthermore, the applicant will be encouraged to investigate the possibility of using the new innovative Guy's and St Thomas' Hospital hub to further reduce delivery and servicing trips and this will be secured as part of the S106 Agreement.
264. In terms of public transport, the development proposal would produce around 675 net supplementary two-way public transport trips in the morning or evening peak hours and as such is not anticipated to have any adverse impacts on the public transport network.

Car parking

265. Saved Policy 5.6 (Car Parking) of the Southwark Plan and Core Strategy Policy 2 (Sustainable Transport) state that residential developments should be car free. For office use, a maximum of one space per 1500sqm is permitted which would equate to a maximum of six spaces. No parking (except disabled provision) is permitted for retail or culture uses.

266. The development would provide two off-street accessible car parking bays which is considered acceptable and supported by both TfL and the council's transport officer.

Conclusions on transport

267. The proposed site layout including the vehicular access points, position of buildings in relation to highways and the new pedestrian routes are all welcomed. The proposed development would minimise car parking whilst encouraging walking and cycling which supports the council's sustainability agenda.

268. The development has been shown to have a very limited impact on the public transport network in terms of vehicle trips and the proposed servicing arrangements would minimise any highways impacts.

269. The S106 Agreement should secure details of a Demolition/Construction Environmental Management; Construction Logistics Plan, Delivery Consolidation Strategy; Service Management Plan; Car Parking Exemption; and Travel Plan.

Planning obligations (S.106 undertaking or agreement)

270. 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.

271. 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 |
|--------------------------------|---|--------------------|
| Archaeology | £11,171 | Agreed. |
| Employment During Construction | Provide 43 jobs, 43 short courses and 10 construction industry apprentices for Southwark residents or make a payment of £437,950. | Agreed. |
| Employment in the Development | Provide 139 sustained jobs for unemployed Southwark residents or make a payment of £597,700. | Agreed. |
| Transport for London | The applicant must pay for the re-location of the cycle hire docking station as well as an additional 49 cycle docking spaces. A | Agreed. |

| | | |
|---------------------------|--|---------|
| | contribution will also be required for updated/new legible London signage as well as a contribution to Healthy Streets. Transport for London to confirm figures. | |
| Transport (site specific) | £42,032 towards reconstruction of the footway on Snowsfields and £5,520 towards Bermondsey Street £270,000 towards bus improvements £100,000 towards cycle hire provision; £4,000 towards resurfacing works on Snowsfields. | 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 - £5,000 per tree. | Agreed. |
| Admin | Charged at 2% of total. | |

S106 Provisions

272. The legal agreement will also secure an Affordable Workspace Strategy; Estate Management Plan; Construction Environmental Management Plan; Construction Logistics Plan; Delivery Consolidation Strategy; Site Wide Energy Strategy; Service Management Plan; Landscaping Strategy; Basement Impact Assessment Review; Parking Permit Exemption; and Wind Mitigation Strategy. The agreement will also secure an admin charge of 2% of the total contributions.

273. The Legal Agreement will also secure the following S.278 works:

- Repave the footway including new kerbing fronting the development on Bermondsey Street and Snowsfields (London Borough of Southwark) in accordance with the SSDM requirements.
- Construct proposed vehicle crossover using materials in accordance with SSDM requirements.
- Reconstruct any redundant vehicle crossovers as footway along Bermondsey Street and Snowsfields in accordance with the SSDM requirements.
- Install any new signage/posts related to the proposed vehicle entrance/exit located in Snowsfields due to the one way system along the road. (Promote a TMO to amend any parking arrangements). Works to include road markings and signage.
- Change all utility covers on footway areas to recessed type covers.
- Upgrade street lighting to current LBS standards, including on private roads. Please contact Perry Hazell at Perry.Hazell@southwark.gov.uk for further details.
- Rectify any damaged footways, kerbs, inspection covers and street furniture due to the construction of the development.

274. In the event that an agreement has not been completed by 30 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 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).

Mayoral and borough community infrastructure levy (CIL)

275. 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 £3,513,473.19 and a Southwark CIL payment of £1,009,314.93.

Community involvement and engagement

276. The developer has undertaken an extensive, detailed and robust consultation with the local community (resident/business/stakeholders) both pre and post application submission.
277. This includes five meetings with local business groups and two meetings with resident groups. Two public consultation events were held as set out below:

St Thomas Street East public exhibition – 29 September and 1 October 2018

278. This event was attended by 254 people and focused on the proposed framework for the St Thomas Street sites.

Three Ten Bermondsey Ltd public exhibition - 10 and 12 November 2018

279. This event was held by the applicant and focused on the proposed development on the Snowfields and Bermondsey sites. It was attended by 512 people

280. As part of its statutory requirements the Local Planning Authority sent letters to surrounding residents, displayed site notices in the vicinity, and issued a press notice publicising the planning application. Adequate efforts have, therefore, been made to ensure the community has been given the opportunity to participate in the planning process. Details of consultation and any re-consultation undertaken by the Local Planning Authority in respect of this application are set out in the appendices. The responses received are summarised later in this report.

Consultation responses from external consultees

281. Summarised below are the consultation responses raised by external consultees, along with an officer response:

282. Environment Agency: No objections.
Response: Noted.
283. Greater London Authority: The GLA fully support the proposed land use and the provision of affordable workspace. In heritage terms the GLA consider that there would be some harm to heritage assets but that this would be less than substantial and would be outweighed by the heritage benefits and the wider benefits arising from the proposals. The GLA consider the proposed materials to be suitable for the Snowfields building but that materials that better contextualize with the surroundings would be more appropriate on the Bermondsey building. The height, scale, massing and architectural design of the proposal is supported. Further information is required with regards to energy savings, flood resilient design and transport trip rates.
Response: The proposed affordable workspace would be secured by design. Officers note the GLA concerns with regards to the materials for the Bermondsey building and this has been revised since the stage I response was issued and now includes ceramic panels behind the glass façade. Notwithstanding, the use of these materials whilst acceptable in principle, will only be fully considered through the provision of mock-ups on site and this would be a conditioned requirement of any consent issues and will provide an opportunity to change the façade to traditional brick should that be the most appropriate outcome. Additional information was submitted to address the GLA concerns around energy, flood resilience and trip rates and the supplementary information was considered acceptable to fully address any previous concerns.
284. Historic England: Concerns have been raised with regards to the harm caused to Bermondsey Street Conservation Area by the proposed tall building above the historic warehouse at Vinegar Yard. Historic England consider that the existing Victorian warehouse, despite war damage and post-war reconstruction, makes a positive contribution to the character and appearance of the conservation area through its scale, form and detailing, and the way it illustrates the historic industrial character of this part of Bermondsey. The redevelopment of the site with a tall building of a very different scale would cause harm to the significance of the relatively low scale conservation area through the great contrast in scale. Whilst Historic England welcome the retention of the principal facades of the warehouse, they believe the 'skin deep' retention would lack authenticity and integrity, and the tall building rising above a partially retained Victorian warehouse would appear incongruous.
Response: Officers acknowledge that the proposed development would give rise to less than substantial to the Conservation Area and to the non-designated heritage asset, Vinegar Yard warehouse, however, it is considered that these adverse effects would be greatly outweighed by the benefits of the scheme, including the beneficial works to the warehouse which go beyond a 'skin deep' façade retention in favour of a restoration including the re-use of as many original features as possible. Bringing the warehouse into a meaningful and productive use is a significant benefit of the scheme and whilst there would be a distinct contrast between the warehouse and the tower that would sit above it, the contrast is not unpleasant and would not affect the ability of people to appreciate the heritage significance of the warehouse or the wider conservation area.
285. London Fire Authority: An undertaking should be given that, access for fire appliances as required by Part B5 of the current Building Regulations Approved Document B and adequate water supplies for fire fighting purposes will be provided.
Response: Noted and agreed, the relevant undertaking will be secure by condition on any planning consent issued.
286. London Underground: No comment.

Response: Noted.

287. Metropolitan Police: It is possible for the scheme to achieve Secured by Design standard and a condition should be added to that effect.

Response: Noted and agreed, the relevant condition will be attached to any consent issued.

288. Natural England: No objection.

Response: Noted.

289. Network Rail: No objections.

Response: Noted.

290. Thames Water: No objections subject to conditions.

Response: Noted, the relevant conditions which relate to water supply, proximity to water infrastructure and proximity to Thames Water assets.

291. Transport for London: TfL support the level of cycle parking which would comply with the Draft London Plan and support the principle of the re-location of the cycle hire docking station on the condition that the applicant fully funds these works and increases cycle hire provision. TfL do not support how the applicant has calculated projected trips and would prefer that TRICS is used. The proposed level of car parking (two accessible spaces) is supported and request some revisions to the proposed servicing arrangements. TfL also comment that the Healthy Streets scheme should have been adopted and request that this is included in the S106 Agreement.

Response: The Healthy Streets Scheme will be secured as part of the S106. The developer has agreed to fund the re-location and extension of the cycle hire facilities. The additional information with regards to servicing (tracking diagrams) have been submitted and fully address the previous concerns. The council's transport officer agree with TfL that TRICS is the most appropriate way to project vehicle movements for a development and the council have undertaken their own assessment of the scheme using TRICS figures which were found to be acceptable.

Local groups

292. The Victorian Society: The Victorian Society objects to the proposed works to the Vinegar Yard warehouse and consider that the level of harm to both the building and the conservation area would be substantial and unjustified. The Victorian Society consider that the scale of the buildings and the proposed materials are inappropriate in the surrounding context and would harm the character and setting of the conservation area as well as resulting in amenity impacts such as overshadowing.

Response: Officers acknowledge that the proposed development would give rise to less than substantial to the Conservation Area and non-designated heritage asset, the Vinegar Yard warehouse. However, it is considered that the benefits of the scheme would outweigh the harms. Those benefits the positive works to the warehouse which goes beyond a 'skin deep' façade retention in favour of a restoration including the re-use of as many original features as possible. Bringing the warehouse into a meaningful and productive use is positive and is seen as a significant benefit of the scheme. Officers also acknowledge that there would be a distinct contrast between the warehouse and the tower that would site above it, but consider that the contrast is not unpleasant and would not affect the ability of people to appreciate the heritage significance of the warehouse or the wider conservation area.

293. SAVE Britain's Heritage: The Vinegar Yard warehouse has significant heritage

value in line with historic England advice and successful retention, repair and reuse of the building could take place without harmful additions. The proposed 17 storey tower would be completely out of character in the conservation area and local context and would result in significant harm to the warehouse and local area as well as harming the setting of the Horseshoe Inn Public House. The development would be contrary to local and national planning policy and should be refused. The proposals would cause harm to the character of the Bermondsey Street Conservation Area. A tall building in the Conservation Area, and one that causes near total loss of significance to a key non-designated asset within the CA, would set an unfortunate precedent for the protection of heritage in Southwark and London, and risk erasing the special character of this part of London.

Response: As set out previously, Officers acknowledge that the proposed development would give rise to less than substantial harm to the Conservation Area and the non-designated heritage asset, Vinegar Yard warehouse. However, it is considered that the harm would be significantly outweighed by the various benefits of the scheme not least the substantial restoration of the warehouse. The scale and massing would be in direct contrast to the surrounding area however this would not in itself be harmful and would still allow people to appreciate the heritage value of the building and area.

294. Old Bermondsey Neighbourhood Forum: OBNF object to the proposed development on the basis that they view the application process and engagement arrangements for the development as flawed. Further objections are made in terms of the impact of the development on heritage assets (the warehouse and conservation area); the scale of the proposal is inappropriate and would cause considerable harm; Environmental impacts such as wind and overshadowing; disruption during and after construction; and insufficient public benefits. OBNF contend that the development is not compliant with the Unitary Development Plan.

Response: The Southwark Unitary Development Plan (1995) that OBNF refer to was superseded by the Southwark Plan in 2007 and has not been an instrument of planning policy for over 13 years. In terms of the engagement process, the applicant (and other land owners forming the St Thomas Street East group) has held consultation events that have been well attended. Additionally, the council has undertaken two rounds of comprehensive consultation on the application. The engagement and consultation process is considered to be robust and comprehensive. With regard to wind the ES concludes that with mitigation, there would be no significant adverse impacts that would make any assessed points unsuitable for their planned use. The overshadowing assessment concludes that the surrounding areas that have been assessed would be well lit for an urban area. Whilst it is acknowledged that there would be unavoidable disruption during construction, this would be short term and temporary and could be mitigated by conditions. The scale of the proposed development is considered to be acceptable for the site and its surroundings, including the emerging context and the harm to the conservation area and warehouse building would be less than substantial, being outweighed by the various benefits of the development, not least the restoration of the warehouse.

295. Team London Bridge – Concerns have been raised regarding the detailed design approach; pedestrian flows and cycle parking; building uses (demand for retail); and environmental commitments.

Response: The overall approach to design is considered to be well thought out, appropriate and high quality. Detailed design issues will be covered by condition, such as materials and mock ups to ensure the highest standards of finish. The development would improve pedestrian linkages and provide cycle parking that meets draft London Plan standards and is supported by TfL. The range of retail units on offer would suit a variety of business sizes and will serve residents, visitors and people employed in the new offices. The scheme would have a 40% reduction

in CO2 emissions and conditions would be imposed to secure BREEAM standards would be met.

296. WSET - Objection on the basis that there would be disruption/disturbance, the design is not in keeping with the area, the building scale is disproportionate and would be damaging to the historic area. The proposed development would harm the operations of the school and lead to significant disruption for staff and students. Concerns are also raised as to daylight impacts.

Response: Whilst it is acknowledged that there would be some disturbance as a result of construction, this would be temporary and short term. It could also be mitigated by way of planning conditions. The daylight impacts have been set out in detail in the report and are not considered to be significant to warrant refusal of the application. The scale, massing and detailing of the building are considered to be acceptable and would not be damaging to the heritage asset.

Consultation response from neighbours and representees

297. In response to public consultation, a total of 141 responses have been received. Of these, 123 were in objection and 17 were in support of the application. Summarised below are the objections raised by members of the public with an officer response:

298. Objection – The proposed development would have an adverse impact on the Vinegar Yard Warehouse which is a heritage asset with a positive contribution to the Conservation Area and local character.

Response - Officers acknowledge that the proposed development would give rise to less than substantial harm to the Conservation Area and the non-designated heritage asset, Vinegar Yard warehouse. However, it is considered that the harm would be greatly outweighed by the benefits of the scheme, including the beneficial restoration works to the warehouse, including the re-use of as many original features as possible. Bringing the warehouse into a meaningful and productive use is a significant benefit of the scheme and whilst there would be a distinct contrast between the warehouse and the tower that would sit above it and the scale of the surrounding conservation area, the contrast is not unpleasant and would not substantially affect the ability of people to appreciate the heritage significance of the warehouse or the wider conservation area.

299. Objection – The development would cause considerable disruption and disturbance during and after construction.

Response – All developments cause a degree of disturbance during their construction as a result of associated demolition, site clearance and construction works. These types of disturbance are generally unavoidable in order to allow development to take place however they are short term and temporary and can be effectively managed by condition. The applicant would be required to submit a Demolition and Construction Environmental Management Plan and a Construction Logistics Plan in advance of any work taking place in order to ensure that any potential for disturbance can be managed and minimised. Once the development is complete it is not anticipated that there would be any adverse impacts in terms of noise and disturbance.

300. Objection – The development would put pressure on local infrastructure including local roads and this will impact on residents and businesses. This would be as a result of the traffic associated with the construction phase and ongoing servicing requirements when the development is completed.

Response – The level of traffic associated with the completed development is not significant and would not lead to adverse pressures on the local road or transport network. The S106 Agreement would require the developer to enter into a delivery consolidation service with the other developments and this would minimise

deliveries even further. The development would also be subject to the Community Infrastructure Levy which can be used to fund infrastructure improvements in the area.

301. Objection – The proposed development is excessive in height, particularly the 17 storey tower.
Response - The proposed tower is significantly taller than the immediate surrounding buildings however it would provide a step up towards the towers to the west and the new consented developments on St Thomas Street.
302. Objection – The excessive scale and height of the development would have a harmful impact on the character and setting of the Conservation Area as well as designated and non designated heritage assets.
Response – As set out previously, the proposed tower would be visible and of a distinctly different character to the surrounding buildings in terms of scale, composition and material finish however this contrast is not in itself disagreeable and officers consider the harm to be less than substantial. The restoration of the warehouse fabric and incorporating it into the development, thus securing its future is a notable public benefit.
303. Objection – The development would lead to harmful wind and microclimate impacts.
Response – The existing versus proposed and cumulative assessment concludes that the wind conditions at the assessed points would be suitable for their intended use. This includes walking conditions on Bermondsey Street, Snowsfields and the new passage linking the two as well as walking/standing and sitting conditions around the new Snowsfields building and public realm. The proposed environmental conditions would rely on appropriate mitigation such as tree planting and as such this will be a conditioned requirement of any consent issued alongside a Wind Mitigation Strategy in order to ensure that the predicted wind conditions at sensitive points is achieved.
304. Objection – The development would cause significant harm to the historic environment that would not be outweighed by any public benefits.
Response – Officers consider that the harm to the heritage asset and conservation area would be less than substantial and would be significantly outweighed by the benefits of the scheme which include restoration of the warehouse, improved connectivity, additional retail spaces, high quality public realm and the creation of up to 1,600 new jobs.
305. Objection – The scale and massing of the buildings is inappropriate for the local setting and conservation area.
Response – The scale and massing of the proposed buildings, whilst in direct contrast to the immediate surroundings, would result in less than substantial harm and is not considered to be inappropriate in this location given the emerging townscape around St Thomas Street and London Bridge Station.
306. Objection – The development would result in harmful overshadowing to amenity spaces.
Response –Overshadowing has been assessed as part of the ES and the impacts on local amenity spaces have been shown to be negligible with reductions of less than 20%.
307. Objection – The development fails to increase or maximise the amount of greened area which is a requirement of the London Plan.
Response – The development would provide a substantial area of public realm that would link up with the public realm proposed on the site to the north. There would be opportunities for substantial tree planting and the final detail of this would be

secured as part of a Public Realm and Landscaping Strategy in the S106 Agreement. The development also includes larger, well planted terraces and green roofs would be a conditioned requirement of the scheme.

308. Objection – Trees are required for wind impact mitigation but it is not clear if the proposed trees would be feasible.

Response – Tree planting is an integral part of the development and would be secured as part of the S106 Agreement. Wind mitigation will also be secured as part of the S106 Agreement. If for any reason a particular tree cannot be provided in a particular location then it would need to be provided on another part of the site as close as possible to its originally planned location and alternative wind mitigation would need to be put in place. These details would be secured and agreed prior to development taking place.

309. Objection – The loss of five existing trees is unacceptable.

Response – All trees that are being proposed for removal and replacement are classified as Category C and the council's urban forester supports their removal and replacement.

310. Objection – The proposed buildings are poor quality in design and would result in a blank and bland commercial character.

Response – The proposed buildings are considered to be of the highest quality of architecture and design and would provide active frontages at street level.

311. Objection – The proposed development would be very overbearing in nature.

Response – Whilst the development would be tall, it is not considered that it would be overbearing either within the application site or towards adjacent streets and properties.

312. Objection – The development would have an adverse impact on local views.

Response – The development would be visible from local streets but this is not in itself harmful to one's appreciation of the local townscape..

313. Objection – The pavement widths are too narrow to accommodate such large developments and potential pedestrian flows.

Response – The pavement widths are considered acceptable given the local context and the fact that the tallest element, the tower at the warehouse, would open onto a generous public realm area.

314. Objection – The Construction Management Plan is insufficient and could lead to adverse impacts.

Response – A new Construction Environmental Management Plan and Construction Logistics Plan will be required as part of the S106 and provisions will be made for this plan to be updated to take into account surrounding developments that may come forward and obtain permission during the course of planning.

315. Objection – The works to the warehouse are tokenistic and would result in the loss of historic fabric and its original identity.

Response – A full internal survey of the warehouse would be required by condition in order to record all original and historic fabric. The works to the warehouse are considered to be restorative as opposed to refurbishment and the identity of the warehouse would be retained.

316. Objection - The development would have an adverse impact on public transport which is already overcrowded.

Response – The development is not considered to have an adverse impact on public transport and this has not been raised as a concern either by London

Underground, Transport for London or the council's transport officer.

317. **Objection** – The proposal would result in over development of the site.
Response – The proposed development is considered proportionate to its plot and the wider St Thomas Street aspirations.
318. **Objection** – The proposed development is out of character with the area.
Response – The development is of a different scale to the immediate surroundings but the layout of the Bermondsey buildings with the new passageway and the architectural composition/fenestration is related to the conservation area. The character of the warehouse would be retained and whilst the development is of a different scale the level of harm caused would be less than substantial.
319. **Objection** – The development would have an adverse impact on local heritage assets including the railway arches.
Response – As set out previously, the development would have a degree of harm to the warehouse but this would be less than substantial and would be outweighed by the benefits of the scheme.
320. **Objection** – The various schemes for St Thomas Street should be considered together.
Response – This would not be practical given that they are in different land ownership with different developers and applicant teams. Some of the schemes have already been decided (Capital House), some are still at pre-application stage (Beckett House) and some are in as applications (Vinegar Yard). All applications must be decided on their own merits but the ES has carried out a cumulative impact assessment that has been taken into account in determining the application..
321. **Objection** – The proposal would result in air pollution and would compromise air quality.
Response – During the demolition and construction phase it is recognised that there would be impacts such as dust in the air as well as dust and dirt on the highway as a result of construction vehicle movements. This can be suitably managed and mitigated through a Construction Environmental Management Plan which would be a conditioned requirement of any consent issued. The impact of construction vehicle traffic emissions is not considered to be significant.
322. **Objection** – The development would result in a loss of privacy.
Response – 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. This distance is met between the Snowfields building and the adjacent residential building across Snowfields known as Raquel Court. The residential properties at 8-20 Snowfields are not directly opposite the Snowfields building, which is set at almost a right angle to the existing homes and would not have any windows at comparative floor levels. On Bermondsey Street the distance is not met however this is a result of maintaining the building line on Bermondsey Street which is a character of the conservation area and would not result in any new, additional or intensified overlooking from the current situation. It is not considered that the proposed development would give rise to any unacceptable impacts on privacy.
323. **Objection** – The development would result in a harmful loss of daylight and sunlight to nearby residents.
Response - The results of the daylight assessment demonstrate that there would be a limited impact on daylight and sunlight to surrounding properties as a result of the proposed development. The overall BRE compliance rate for VSC and NSL would be 93.9% and 98.2% respectively. Whilst adverse impacts have been

identified at some properties they are not considered to be significantly adverse, would generally not impact upon principle living accommodation and would not detrimentally harm residential amenity or room functionality. Overall, it is not considered that the proposed development would give rise to unacceptable harm to daylight/sunlight conditions for nearby residents.

324. **Objection** – The proposed consultation has been insufficient and ineffective.
Response – The level of consultation undertaken by the applicant both pre and post application is considered to be acceptable. Furthermore, the council have undertaken two rounds of public consultation as part of the planning application, including sending letters to adjacent and nearby residents, posting of site notices at the application site and publication in the local press. As such it is considered that a full and meaningful consultation has been undertaken on the application.
325. **Objection** – All of the developments planned in the area will have cumulative impacts on the environment and heritage and this hasn't been properly considered.
Response – Cumulative impacts have been considered as part of the ES.
326. **Objection** – The proposed materials are not in keeping with the area.
Response – Materials are controlled by condition and will be agreed through further investigation with the applicant and presentation on site in order to ensure the materials are of the highest quality and contextualise with the area.
327. **Objection** – The new passageway between Bermondsey Street and Snowfields would be narrow and claustrophobic.
Response – The new passageway would be 4.5 metres wide and would have the character of an alley which is suitable for its use as a pedestrian route and the character of the conservation area.
328. **Objection** – The energy and sustainability proposals are unacceptable and insufficient.
Response – The proposed energy efficient measures and design would secure a 40% reduction in carbon emissions.
329. **Objection** – The proposed servicing arrangements are insufficient, would have an adverse impact on the local area and it is not clear how the proposed consolidation of servicing and use of electric vehicles be secured.
Response - Part of the servicing would take place on site and some would take place on street from a dedicated layby which is considered acceptable given the limited servicing requirements of the development and the ability to consolidate deliveries with other developments. The delivery and Servicing Management Plan would allow the council to set what times the development could be serviced at and using what type of vehicles. The Consolidation Strategy would secure the ability to link up with other development (notably the other St Thomas Street developments) in order to consolidate services and delivery.
330. **Objection** – The development would adversely affect local business and make it difficult for them to hire and retain the best staff and offer them a suitable work life balance due to the impacts on the local area.
Response – Impacts during construction would be short term, temporary and managed by condition. The operational development would provide an attractive public realm and new retail with improved pedestrian connectivity. Officers do not consider that this would impact on local businesses ability to attract and retain staff.
331. **Objection** – The area does not need anymore commercial or retail space.
Response – The area would benefit from new retail and office space given its location within the Central Activities Zone, Opportunity Area and London Bridge

Town Centre.

332. Objection – The outdoor amenity spaces associated with the development would result in noise and disturbance.
Response – The terraces on the Bermondsey Street building would be subject to an hours of use condition to remove the potential for adverse impacts and disturbance.
333. Objection – The building should be future proofed for net zero carbon emissions.
Response – The development would provide for a 40% reduction in carbon emissions and this could be minimised further in the future with continuing decarbonising of the electricity grid.
334. Objection – The development would have an adverse impact in terms of light pollution.
Response – The ES demonstrates that prior to 11pm; there would be no greater incidence of light spillage onto the closest residential facades than the recommended maximum for an urban location. The pre-curfew effect of the proposed development is therefore considered to be negligible. With an implemented building management system that would have control of integrated blackout blinds, the post curfew effect of light pollution would also be limited and considered to be negligible.
335. Objection – It is not clear how the impacts of the development will be managed should the St Thomas Street developments come forward for development at the same time.
Response – A new Construction Environmental Management Plan and Construction Logistics Plan will be required as part of the S106 and provisions will be made for this plan to be updated to take into account surrounding developments that may come forward and obtain permission during the course of planning. This approach would ensure that further and ongoing development is accounted for and that the impacts would be minimised and mitigated.
336. Objection – The proposed development would impact on the development potential of the Raquel Court site.
Response – The development would not harm the principle of developing the Raquel Court site. Each development will be assessed on its own merits.
337. Objection – The servicing arrangements are poorly designed.
Response – Part of the servicing would take place on site and some would take place on street from a dedicated layby which is considered acceptable given the limited servicing requirements of the development and the ability to consolidate deliveries with other developments.
338. Objection – The development would provide too many new homes without thinking about public services.
Response – The development does not propose any new homes.
339. Additionally, the main points of support are set out below:
- The design is high quality and well thought out;
 - the development would bring a much needed boost to the area;
 - there would be social, economic, security and employment benefits;
 - the development would bring much needed office and retail space;
 - the design is of a very high standard and would help extend the rejuvenation of the London Bridge area southwards;
 - the area would be much enhanced by the proposed development;

- the regeneration would allow Bermondsey Street to move with the times;
- the height of the proposed buildings would not be harmful;
- new pedestrian connectivity is welcomed; and
- affordable workspace would be a benefit.

Community impact and equalities assessment

340. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights.
341. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
342. 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:
1. The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act.
 2. 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.
 3. 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.
343. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

Human rights implications

344. 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.
345. This application has the legitimate aim of providing new comes, offices, retail opportunities and cultural space alongside a new and enhanced public realm. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

Positive and proactive statement

346. The council has published its development plan and Core Strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
347. The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.

| Positive and proactive engagement: summary table | |
|--|-----|
| Was the pre-application service used for this application? | YES |
| If the pre-application service was used for this application, was the advice given followed? | YES |
| Was the application validated promptly? | YES |
| If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval? | YES |
| To help secure a timely decision, did the case officer submit their recommendation in advance of the agreed Planning Performance Agreement date? | YES |

Other matters

Conclusion

348. The proposed development has been assessed against the relevant development plan policies and is considered to be compliant overall. The principle of redeveloping this site for a high density, mixed use development is supported by current planning policy. Redevelopment of the site to provide new retail and office space is welcomed and the improved connectivity between Bermondsey Street and St Thomas Street through Snowfields as well as the high quality public realm will be beneficial to the local area and people visiting this important part of London Bridge. The range of uses being proposed is in line with development plan policy aspirations to improve the area and maximise the number of jobs.
349. The development would result in a substantial uplift in office floorspace, maximising the development potential of the site and delivering up to 1,600 high quality jobs. The provision of affordable workspace would meet the requirements of emerging New Southwark plan and Draft London plan policies and is an added benefit of the scheme. The provision of new retail opportunities will provide appropriate shops and services for the uplift in residents, workers and visitors to the area and aligns with policy requirements.
350. Part of the application site lies within the Bermondsey Street Conservation Area. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to consider the impacts of proposals upon a conservation area and to pay “special regard to the desirability of preserving or enhancing the character or appearance of that area”. Section 66 of the Act also requires the Authority to consider the impacts of a development on a listed building or its setting and to pay special regard to the desirability of preserving the building

or its setting or any features of special architectural or historic interest which it possesses. proposed development would bring forward a fulsome restoration of an important local heritage asset which has fallen into a very poor state of repair. The development and associated restoration work would protect the warehouse for future generations and preserve its character and appearance whilst bringing it into a meaningful and sustained productive use.

351. The scale of the buildings being proposed are in contrast to the immediate context of Bermondsey Street however the site has been identified in planning policy as being suitable for tall buildings and the architectural quality of the proposal is considered to be of the highest standards. Whilst there would be a degree of harm to the warehouse and conservation area, even allowing for the great weight that must be accorded to the conservation of designated heritage assets, it is considered that the heritage harm is significantly outweighed by the benefits of the scheme including the restoration of the warehouse, the improved pedestrian connectivity, the provision of new jobs, new retail units and the provision of affordable workspace.
352. The public realm improvements with the creation of a new east-west route would significantly improve permeability and connectivity in the area and provide an eastern bookend to the St Thomas Street developments as well as providing a key element of the public realm. The proposal would provide an extensive improvement to the streetscape together with new active frontages which would improve the experience for pedestrians, and provide for natural surveillance. The new public spaces are a particular benefit of this development.
353. The impacts identified in the Environmental Statement have been assessed and taken into account and should be considered in determining the application. Whilst some moderate and major impacts have been identified these are largely capable of being mitigated through detailed design, planning conditions and provisions in the s106 agreement. The impacts identified in the ES are not considered to be so significant that they would warrant refusal of the application, particularly given the range of benefits that would be brought forward.
354. It is therefore recommended that planning permission be granted, subject to conditions, the completion of a S106 Agreement and referral to the GLA.

BACKGROUND DOCUMENTS

| Background Papers | Held At | Contact |
|--|--|--|
| 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: 0207 525 0254 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 | 9 June 2020 | |
| Key Decision | No | |
| CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER | | |
| Officer Title | Comments Sought | Comments included |
| Strategic Director of Finance and Governance | No | No |
| Strategic Director of Environment and Leisure | No | No |
| Strategic Director of Housing and Modernisation | No | No |
| Director of Regeneration | No | No |
| Date final report sent to Constitutional Team | | 10 June 2020 |