

<b>Item No</b> <b>31</b>	<b>Classification</b> Open	<b>Committee</b> PLANNING COMMITTEE	<b>Date</b> 24 <sup>th</sup> March 2003
<b>From</b> DEVELOPMENT & BUILDING CONTROL MANAGER		<b>Title of Report</b> DEVELOPMENT CONTROL (full application)	
<b>Proposal</b> Demolition of existing Southwark Towers office building and the construction of a mixed use building 306m in height and totalling 118,270 gross, providing 75,943m <sup>2</sup> offices (Class B1), 15,207m <sup>2</sup> hotel (Class C1), 14 residential units (Class C3), 2,106m <sup>2</sup> retail and restaurant use (Classes A1 and A3), 1,029m <sup>2</sup> health and fitness club (Class D2), together with associated servicing and parking.		<b>Address</b> Southwark Tower, St Thomas Street, SE1.  <b>Ward:</b> Grange	

## 1. **PURPOSE**

- 1.1 To consider amendments to the full planning application. This application requires committee consideration because it is a departure from the development plan.

## 2. **RECOMMENDATION**

- 2.1 Resolve to recommend to the Secretary of State that planning permission be granted subject to a legal agreement to secure public transport improvements, environmental improvements, a contribution towards affordable housing, employment and training initiatives, highway works, controls over demolition and construction, design guidance and a scheme of management for the building and environs.
- 2.2 The decision will be made by the Secretary of State following a Public Inquiry, which starts on the 15<sup>th</sup> April 2003.

## 3. **BACKGROUND**

- 3.1 On the 11<sup>th</sup> March 2002, the Development Control Committee resolved to grant planning permission for this development, subject to a legal agreement. The legal agreement will secure financial contributions towards public transport improvements, environmental improvements, a contribution towards affordable housing, employment and training initiatives, highway works, controls over demolition and construction, design guidance and a scheme of management for the building and environs. It was noted that the decision would also be subject to both the Mayor for London deciding not to direct refusal and the Secretary of State not calling in the application for determination. A copy of the previous report is attached.
- 3.2 On the 22<sup>nd</sup> February 2002 the London Mayor informed the council that he did not wish to direct refusal of the planning application. The Mayor, as strategic planning authority, concluded that his views on the proposal are as follows:
- The proposal is considered to deliver architecture of world class quality that is acceptable in heritage terms.

- The scheme provides significant regeneration benefits.
  - Some detailed design issues should be capable of resolution.
  - Contributions to public transport provision are expected.
  - The proposed new tower will be a landmark building for London and raising the standard of architectural quality appropriate for a world class city.
- 3.3 On the 25<sup>th</sup> March 2002, the Secretary of State directed under Article 14 that the Council not grant permission without specific authorisation.
- 3.4 On the 29<sup>th</sup> July 2002 the Government Office for London informed the Council that the Secretary of State had decided that this was an application that he ought to decide himself because he considered that the proposal may conflict with national policies on important matters; could have significant effects beyond their immediate locality; give rise to substantial regional or national controversy; and raise significant architectural and urban design issues. The application will now be considered at a Public Inquiry, starting on the 15<sup>th</sup> April 2003.
- 3.5 The Secretary of State particularly wishes to be informed on the following matters relevant to the application:
- (a) The appropriateness, and impact on both the local and wider area, of a very tall building in this location;
  - (b) The impact of the proposals on Strategic Views of St. Paul's Cathedral (as set out in Strategic Guidance for London, RPG3a);
  - (c) The extent to which the proposals comply with Government policy advice on the need for good design (PPG1);
  - (d) The impact of the proposals on the Tower of London World Heritage Site and the setting of nearby listed buildings and conservation areas (PPG15);
  - (e) The ability of the transport system to deal with the increase in demand and intensity of use created by this proposal, taking account of both the current and planned capacity of the public transport system (PPG13);
  - (f) The extent to which the proposals comply with other national and regional planning policies;
  - (g) The relationship of the proposals to the London Borough of Southwark's Unitary Development Plan; and
  - (h) Any other relevant matters.
- 3.6 On the 17<sup>th</sup> January 2003 revised plans were submitted as substitutes for those previously considered. The applicants now ask that the Council drop the proposed condition (2) that required that the development should only be carried out at the same time as, or after, the implementation of the Railtrack Masterplan scheme for London Bridge Station. The substitute plans now show the proposed new building in the context of the existing station but equally capable of being implemented together with the Railtrack Masterplan scheme. There are also minor improvements to the overall design and details of the scheme and small changes to the internal floorspace.
- 3.7 The revised development will provide a mixed use building totalling 118,270m<sup>2</sup> gross internal floorspace (down from 127,493m<sup>2</sup>), providing 69,892m<sup>2</sup> offices (formerly 75,943m<sup>2</sup>), 14,418m<sup>2</sup> hotel (from 15,207m<sup>2</sup>), 14 residential units (5,890m<sup>2</sup>) and a 854m<sup>2</sup> health and fitness club. There will also be retail, café, bar and restaurant uses on the public areas at 5<sup>th</sup>, 34<sup>th</sup> and 35<sup>th</sup> floor levels (and 'aparthotel' restaurant on 37<sup>th</sup> and 38<sup>th</sup> floors), together with associated servicing and parking for 48 cars (8 as disabled bays), 50 bicycles and 50 motorcycles. It is likely to provide employment space for over 5,000 people.  
(Further details are given in Appendix A.)

3.8 The foot print of the 'back pack' office accommodation has now been decreased and it's overall height increased from 64.7m to 72m. The revised application also makes small changes to the site boundary, the canopies and access arrangements.

3.9 The proposed height will be 305.78m (1,016ft). This has not changed but is now described as 306m rather than 305m previously, for accuracy.

#### **4. FACTORS FOR CONSIDERATION**

##### **4.1 Principal Issues**

The principal issues in this case are whether the proposed amendments to the development are acceptable and can be supported at the Public Inquiry.

##### **4.2 Planning Policy**

See Previous report.

There are no changes that affect policy considerations.

##### **4.3 Consultations**

See Previous report for full list of consultees and responses.

Due to the limited nature of the amendments, only the following were re-consulted on the amendments:

The London Mayor, Transport for London, London Underground, Railtrack, PricewaterhouseCoopers (occupiers of Southwark Tower), English Heritage, CABE, Tower of London Environs, Guy's Hospital, Kings College, Civil Aviation Authority, Environment Agency, Pool of London Partnership, City Corporation, Government Office for London, London Boroughs of Camden, Tower Hamlets, Lambeth, Islington, Greenwich and the City of Westminster.

##### **Replies from:**

Replies have been received from English Heritage and the London Borough of Camden re-stating their objections and that the amendments do not change their view.

**Design and Conservation Officer:** Supports the amended application.

**Transportation Officer:** Supports the amended application.

#### **5. PLANNING CONSIDERATIONS**

5.1 The original planning application was produced to fit in with the Railtrack masterplan Scheme for London Bridge Station. This involved the construction of a new concourse at street level beneath the tracks to the east of the proposed London Bridge Tower, as part of the Thameslink 2000 scheme. The Thameslink 2000 scheme has since been turned down following an Inquiry and the Masterplan Scheme is therefore unlikely to go ahead in the short term, at least.

5.2 Although it is inevitable that there will have to be some improvements at London Bridge in the future, it is not possible to say what they will be with great certainty. Therefore the London Bridge Tower scheme has been amended to show the proposed development in the context of the existing station, whilst still being capable of being attached to a station improvement scheme at a later date (including Masterplan).

5.3 These changes are comparatively minor and do not adversely affect any public areas or the overall design quality of the development. There is therefore no basis for continuing to require a condition that prevented development occurring until, or after, the development of the Masterplan scheme.

5.4 At the same time as making this change to separate the Tower from the Masterplan Scheme, a number of minor amendments have been made with the objective of

improving the development. There is a small change to the site boundary on the eastern side (which the public would not see) and part of the office extension, known as the 'back-pack', has been reduced in plan area to accommodate the listed train shed. In turn, to maintain the office space, the height of the 'back-pack' has been increased from 64.7m to 72m. This is not considered to have any significant impact on neighbouring properties or on views of the Tower.

- 5.5 Minor changes have been made to the vehicle access arrangements to the basement levels and the frontage of the building beneath the back-pack has been pulled back 5m to allow more public space on St. Thomas's Street.
- 5.6 Two additional public escalators are provided between street and concourse level, to the east of the building core. On the west side, the external staircase linking Joiner Street to the Concourse will be replaced by another two escalators. There will still be a wheelchair/bicycle lift retained in this scheme. These changes will greatly improve public accessibility and the permeability of the building.
- 5.7 As before, the pedestrian footbridge over St. Thomas's Street will be removed and replaced by a street level crossing. A new entrance into Thomas Guy House will be provided from Great Maze Pond. The public and office entrances to the building have been reorganised and concentrated to the east and west respectively. A public library is shown on level 02 (concourse level but south facing) with access from St. Thomas's Street.
- 5.8 The elevation and radiator has been further developed, creating a more articulated and dynamic form. A wider variety of façade types is proposed, with more 'winter gardens' at the corners. Whilst the geometry has been refined the mass is unaltered. Parts of the back-pack are to be clad with a light terracotta screen but at street level the steel columns will no longer be clad in terracotta. All these detailed changes are considered minor but welcome improvements to a proposal which was already of a high standard of design quality.
- 5.9 There are changes to the canopies. On the south side the canopy extends across to the face of Guy's hospital but do not take support from it, having supports on the south side of the street. A new canopy is proposed as a replacement roof for the bus station.
- 5.10 The substitute plans show the bus station retained with minor amendments. Future bus station improvements have been proposed and discussed but do not form part the application. These could involve the further extension of the canopy across the whole bus station. These works could be enabled by the Section 106 contribution made for bus improvements.
- 5.11 The proposed amendments provide a number of detailed improvements to design and accessibility which are to be welcomed. The changes will work satisfactorily with the present bus and rail arrangements and will not prejudice the future Thameslink 2000 or other improvements to London Bridge, indeed may help by being phase one of those improvements. The amendments provide for improvements to the station concourse, the ticket barriers and pedestrian movement between levels. There are no detrimental affects arising from these changes.
- 5.12 It is proposed to submit the substitute plans at the Public Inquiry. The Council is supporting the application at the Inquiry and it is recommended that the Council now support the amended scheme as an improvement, without the condition requiring implementation of the Masterplan Scheme.

## **6. EQUAL OPPORTUNITY IMPLICATIONS**

6.1 Accessibility has been improved between street and concourse level.

7. **LOCAL AGENDA 21 [Sustainable Development] IMPLICATIONS**

7.1 See previous report.

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CASE FILE: TP/3-28

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## APPENDIX A - Details of revised floorspace

The proposed replacement building would be a 305m (1,000ft) tower of tapering design, similar to a spire or slender pyramid in section. It will be a mixed use building totalling 118,270m<sup>2</sup> gross floorspace (reduced from 127,493m<sup>2</sup>). The net floorspace figures are 77,546m<sup>2</sup> total floorspace (down from 81,316m<sup>2</sup>), with 54,126m<sup>2</sup> offices (down from 75,943m<sup>2</sup>), 10,828m<sup>2</sup> hotel (Class C1), 14 residential units (Class C3), 462m<sup>2</sup> health and fitness club, together with retail and restaurant uses within these spaces and associated servicing and parking.

Floor area schedule for Residential /Hotel floors in Tower

Floor	Floor level from 0 (street) in metres	Use of Floor	Original Net Internal Area (NIA)	Proposed Net Internal Area (NIA)
Top	305.78			
		Radiator		
66	228.00	Public	213	135
65	224.50	Public	239	298
64	221.30	Plant room / Refuge	0	0
63	218.25	Duplex Apartment 14 / Plant	269	112
62	215.20	Duplex Apartment 14	293	356
61	212.15	2 duplex apartments 12 & 13	318	324
60	209.10	2 duplex apartments 12 & 13	344	407
59	206.05	2 duplex apartments 10 & 11	371	364
58	203.00	2 duplex apartments 10 & 11	398	461
57	199.95	2 Apartments 8 & 9	426	479
56	196.90	2 Apartments 6 & 7	455	507
55	193.85	2 Apartments 4 & 5	485	535
54	190.80	2 Apartments 2 & 3	516	564
53	187.75	Duplex apartment 1 & Plant	427	226
52	184.70	Duplex apartment 1 & Plant	0	309
51	181.65	Aparthotel	492	575
50	178.60	Aparthotel	525	608
49	175.55	Aparthotel	560	641
48	172.50	Aparthotel	595	675
47	169.45	Aparthotel	591	709
46	166.40	Aparthotel	627	744
45	163.35	Aparthotel	665	743
44	160.30	Aparthotel	703	779
43	157.25	Aparthotel	742	816
42	154.20	Aparthotel	781	854
41	151.15	Aparthotel	822	892
40	148.10	Aparthotel	843	905
39	144.45	Aparthotel	806	373
38	140.80	Aparthotel incl. Restaurant	858	488
37	137.15	Aparthotel incl. Restaurant	1135	1026
36	133.50	Public Piazza	699	299
35	129.85	Public Piazza	788	766

34	126.20	Public Piazza incl. Cafe	1014	1121
33	122.55	Plant / refuge	0	0
32	118.90	Plant / refuge	0	0
31	115.25	Office	1169	1104
30	111.60	Office	1206	1147
29	107.95	Office	1223	1213
28	104.30	Office	1285	1268
27	100.65	Office	1334	1322
26	97.00	Office	1402	1377
25	93.35	Office	1457	1433
24	89.70	Office	1525	1489
23	86.05	Office	1582	1547
22	82.40	Office	1602	1587
21	78.75	Office	1667	1618
20	75.10	Office	1732	1670
19	71.45	Office	1800	1722
18	67.80	Office	1900	1941
17	64.15	Office	2013	1979
16	60.50	Office	2305	2542
15	56.85	Office	2524	2490
14	53.20	Office	2570	2533
13	49.55	Office	2627	2575
12	45.90	Office	2682	2617
11	42.25	Office	2733	2658
10	38.60	Office	2783	2699
09	34.95	Office	2832	2740
08	31.30	Office	2882	2780
07	27.65	Office	2932	2851
06	24.00	Office	2983	2891
05	20.35	Office / Public, café, shop.	3348	2333
04	16.70	Public & office lobby	1630	870
03	11.55	Public & office lobby	694	472
02	7.90	Public entry / Library	740	807
01	3.65	Health & Fitness / lobbies	1133	1209
00	0.00	Public entrances / health club	2491	1509
-1	-3.00	Mezzanine/parking/ health club	530	462
-1	-7.00	Deliveries / bike parking	0	0
-2	-10.00	Parking & Plant	0	0
-3	-15.00	Plant	0	0

<b>Office</b>	<b>56,098</b>	<b>54,126</b>
<b>Hotel</b>	<b>10,745</b>	<b>10,828</b>
<b>Residential</b>	<b>4,302</b>	<b>4,644</b>
<b>Public</b>	<b>9,641</b>	<b>7,486</b>
<b>Health Club</b>	<b>854</b>	<b>462</b>

**Total**                      **81,316**                      **77,546**

Note    Level 00 is street level at St. Thomas Street  
Level 02 is the pedestrian concourse level at the bus station and railway station.

**PREVIOUS REPORT**

**Committee Report of 11<sup>th</sup> March 2002**  
**(As amended by the Addendum Report)**



<b>Item No</b>	<b>Classification</b> Open	<b>Committee</b> DEVELOPMENT CONTROL COMMITTEE	<b>Date</b> 11 <sup>th</sup> March 2002 as amended by addendum report to committee
<b>From</b> DEVELOPMENT & BUILDING CONTROL MANAGER		<b>Title of Report</b> DEVELOPMENT CONTROL (full application)	
<b>Proposal</b> Demolition of existing Southwark Towers office building and the construction of a mixed use building totalling 127,493m <sup>2</sup> gross, providing 75,943m <sup>2</sup> offices (Class B1), 15,207m <sup>2</sup> hotel (Class C1), 14 residential units (Class C3), 2,106m <sup>2</sup> retail and restaurant use (Classes A1 and A3), 1,029m <sup>2</sup> health and fitness club (Class D2), together with associated servicing and parking.		<b>Address</b> Southwark Tower, Thomas Street, SE1 <b>Previous Report</b> Abbey Ward	

## 1. PURPOSE

- 1.1 To consider the full planning application. This application requires committee consideration because it is a departure from the development plan and the number of objectors.

## 2. RECOMMENDATION

- 2.1 Resolve to grant planning permission subject to a legal agreement to secure public transport improvements, environmental improvements, a contribution towards affordable housing, employment and training initiatives, highway works, controls over demolition and construction, design guidance and a scheme of management for the building and environs.
- 2.2 The decision is also subject to both the Mayor for London deciding not to direct refusal and the Secretary of State not calling in the application for determination.

## 3. BACKGROUND

- 3.1 The application site is immediately adjacent to, and to the south of the entrance to London Bridge Railway Station. It is occupied by a part 23 and part 26 storey office building (120m high) adjacent to London Bridge Station, known as Southwark Towers and built in the 1970's. This is currently occupied principally by Price Waterhouse Coopers. It has less than 20,000m<sup>2</sup> of office floorspace and accommodates about 2,000 people. It has vehicular entrances at street level onto St. Thomas Street / Joiner Street and the main entrance to the offices is at the railways station and bus station concourse.
- 3.2 The proposal will involve the demolition of the existing office building. The proposed replacement building would be a 305m (1,000ft) tower of tapering design, similar to a spire or slender pyramid in section. The proposed building will be the tallest in Europe,

with the Messeturm in Frankfurt being 259m (850ft) high and One Canada Square, Canary Wharf being 244m (800ft) high.

3.3 It will be a mixed use building totalling 127,493m<sup>2</sup> gross floorspace, providing 75,943m<sup>2</sup> offices (Class B1), 15,207m<sup>2</sup> hotel (Class C1), 14 residential units (Class C3), 2,106m<sup>2</sup> retail and restaurant use (Classes A1 and A3), 1,029m<sup>2</sup> health and fitness club (Class D2), together with associated servicing and parking for 48 cars (8 as disabled bays), 50 bicycles and 50 motorcycles. It is likely to provide employment space for over 5,000 people.  
(Further details are given in Appendix A.)

3.4 The proposed development is designed to fit in with the proposed Railtrack development proposals for London Bridge Station. Any amendments to these proposals are also likely to result in an amendment to the London Bridge Tower proposals. The relevant development proposals for London Bridge Station are:

(a) The Thameslink 2000 Scheme (T2000) which would be a redevelopment, with the use of a Compulsory Purchase Order (CPO) to obtain the area in front of London Bridge House to provide a 13 stand bus station. This is subject to the decision of a Public Inquiry due later this year.

(b) The Railtrack Masterplan Scheme (by t.p.bennett) which is compatible with T2000 and would only progress if the Thameslink scheme is permitted. This includes new station accesses from Tooley Street and St. Thomas Street, creating a new pedestrian concourse in the area between and including Weston Street and Stainer Street. A shopping arcade will link that to the existing access route along Joiner Street which is retained. All the tracks and platforms would be realigned and a new office development of 62,000m<sup>2</sup> would be built above the tracks. This proposal retains the bus station in its current position, providing 15 stands and removing the need for a CPO for the additional land in front of London Bridge House. This scheme was granted planning permission in November 2000 subject to a legal agreement.

#### **4. FACTORS FOR CONSIDERATION**

##### **4.1 Principal Issues**

The principal issues in this case are firstly whether a building of this height and scale is appropriate in this location; secondly what impact this building would have on the immediate area and how can they be alleviated; and thirdly whether the details of the proposed building are satisfactory.

##### **4.2 Planning Policy**

Government Advice in PPG1, PPG3, PPG4, PPG13. Meets the requirements of latest Government Planning Advice for sustainable development.

Southwark Unitary Development Plan [UDP]:

Within the archaeological priority zone of Borough/Bermondsey/Riverside.

Within a designated Employment Area

Within the Strategic Views Backdrop Consultation Zone.

Policy R.1.1: Central Area of Community Need – No conflict with policy.

Policy R.2.1: Regeneration areas - Outside but adjacent to regeneration area . Would comply with policy objectives by generating employment, improving environment and transport facilities.

Policy R.2.2: Planning Agreements - A planning agreement is proposed.

Policy E.1.1: Safety and Security – Complies. Will provide a safer, better supervised public area around the Tower.

Policy E.2.1: Layout and building line - Maintains building line.

Policy E.2.2: Heights of buildings - Contrary to this policy.

Policy E.2.3: Aesthetic Control - A very high quality of design is proposed.

Policy E.2.4: Access and facilities for people with disabilities - Complies. All parts of building are accessible by lifts and escalators are used instead of stairs from St. Thomas Street to the Station Concourse level.

Policy E.2.5: External Space - High standard of landscaping to be provided.

Policy E.3.1: Protection of Amenity - No adverse impact. Public areas in lower floors are kept to the north elevation away from Guy's Hospital.

Policy E.3.2: Environmental Assessment - Complies. Full details provided.

Policy E.3.4: Upgrading the environment - Complies. The station concourse, Joiner Street and St. Thomas Street will be upgraded near to Tower.

Policy E.4.3: Proposals affecting Conservation Areas - Complies.

Policy E.4.6: Proposals affecting Listed Buildings - Complies.

Policy E.5.1: Sites of Archaeological Importance - Complies, with conditions.

Policy E.7.1: Riverside Townscape and Thames Path - No adverse impact.

Policy H.1.4: Affordable Housing: Potential for further sub-division of flats, and thereby a need for affordable housing, is covered by Legal Agreement which will include contribution to the Council's Affordable Housing fund.

Policy B.1.1: Protection of Employment Areas and Identified Sites - Complies. Likely to contribute to regeneration of employment area.

Policy B.2.1: Employment Areas and Sites - Complies.

Policy B.3.1: Access for People with Disabilities - Complies.

Policy B.3.2: Employment facilities and conditions - Secured by agreement.

Policy C.4.2: New leisure and Recreational Facilities - Provided in proposals.

Policy C.6.1: New Entertainment and Business Facilities - Complies.

Policy S.2.1: New retail units under 2000 sq. m. - Suitable location.

Policy T.1.2: Location of development in relation to Transport Network - Complies

Policy T.1.3: Design of development and conformity with Council Standards and Controls - Complies.

Policy T.2.1: Measures for Pedestrians - Taken into account in proposal and in the proposed legal agreement.

Policy T.3.1: Safeguarding and improving the quality of public transport: - Provided for in the proposal and in the legal agreement.

Policy T.4.1: Measures for cyclists - Secure parking provided.

Policy T.6.3: Parking space in new developments - Restricted due to location and requirement for a Green Travel Plan.

#### 4.3

##### **Consultations**

Press Notice:5/4/2001      Site Notices: (all adjacent roads) 11/4/2001

Consultees: 145 consultees contacted by the council by letter, including every other London Council, the City Corporation, English Heritage, CABE, The Pool of London Partnership, Guy's & St. Thomas Hospital, Railtrack, Transport for London, London Underground, GLA planning, Government Office for London, C.A.A., Tower Environs Project, Tooley St. Residents Association, Bermondsey Street Association, Cathedral Residents Association, Bankside Residents Forum, Southwark Cathedral, Southwark Heritage Assoc., City Heritage Soc., New London Bridge House, Southwark Cyclists, Local Agenda 21, PricewaterhouseCoopers, Borough Market, London Bridge Hotel and local businesses and addresses in Station Approach, St. Thomas Street, Bermondsey Street, Holyrood Street, Borough High Street and Tooley Street, Southwark M.P.'s.

In addition the applicant has had discussions with, and presentations to, numerous agencies and authorities before and during consideration of the application, in addition to holding two public exhibitions and meetings with local residents associations.

**Consultation responses:** *(Due to the large number of responses these are greatly summarised here but some are given in more detail in Appendix B.)*

There were 73 responses in favour of the proposal and just 11 against or concerned. 12 consultees responded with no comments or observations (e.g. London Council's)

and organisations like TfL supplied detailed comments, generally in support of certain measures carried out.

North Southwark Community Development Group object on three grounds. Firstly the impact on the nearby conservation areas and listed buildings. Secondly the effects on the strategic views of St. Paul's and the Tower of London, and finally, concern that there is not the public transport capacity in the area to cope with the influx of workers.

Charterhouse in Southwark: object. Although there is much to be welcomed about this building, have concerns that there are local people who will not benefit from the proposal. The community should be involved in allocating Section 106 money and some money should be allocated to Charterhouse to be used for redeveloping its Rainbow building in Crosby Row.

Corporation of London – make the following comments and concerns:

The Corporation supports proposals for major office and mixed use development on the fringes of the City and at major transport interchanges. In proposing a landmark, mixed-use building providing offices, residential and tourist facilities, the development would contribute to London's role as a World City and leading business and cultural centre.

However, the Corporation wishes to express concern about the adverse effect which would be caused to the backdrop of the Strategic Views of St. Paul's Cathedral from Parliament Hill and Kenwood. In the view from Parliament Hill, the proposed tower would appear immediately behind and slightly to the right of the dome of St. Paul's Cathedral, and from Kenwood, it would appear to the left. From these viewpoints, the proposed tower would appear more than twice the height of the Cathedral, and being on the skyline in such close proximity to the Cathedral, would have a serious detrimental effect on these protected views. As such the proposal would be contrary to the national and regional planning guidance on the protection of the Strategic Views.

There is an additional concern in relation to the strategic views that the issue of solar dazzle has not been fully addressed by the applicants. It is considered that solar dazzle reflected off the west/north-west façade of the tower in the late afternoon might have an intrusive impact on the views from the north.

Finally, the Corporation welcomes the improvements to the pedestrian environment around London Bridge Station and the rationalisation of facilities at this major transport interchange.”

London Borough of Camden – Raise Objections:

The Council recognises the substantial benefits that the proposed development would bring in terms of physical, economic and environmental regeneration of this area of London. However, given the bulk, mass scale and height of the proposed development, this Council considers that the development would present a highly visible form on the skyline of London. Specifically this council objects to the impact upon the statutorily designated strategic views from Parliament Hill to St. Paul's Cathedral and from Kenwood to St. Paul's Cathedral, given that the application site lies within the background consultation areas from these strategic views.

The Council considers that the proposed tower would cause material harm to the visual integrity of these views, which have their point of origin within the borough of Camden. It is considered therefore that the application fails to accord with the principles of policies EN43, EN44 and EN45 of the London Borough of Camden Unitary Development Plan 2000, and RPG3A.

If the London Borough of Southwark is minded to recommend that planning permission is granted this Council urges that adequate legal safeguards, via the associated S106 Agreement are imposed upon the development to ensure that the original architectural vision, rationale and integrity of the development remains of paramount importance. This would prevent the original design concept being diluted to the detriment of the proposed development aesthetics.”

London Borough of Lambeth no objections but makes the following comments: Although not opposed to tall buildings in principle, is the scale appropriate in this location? Concern about the effect on views of Tower of London and County Hall. Concerned also about potential impact on public transport and impact on television reception.

London Borough of Bromley object as there will be increased passengers into London Bridge which does not have the capacity. This will affect residents of Bromley.

London Borough of Greenwich – Objection:

It is considered the proposal is too high and will affect views across London's historic landscape. In particular marring the backdrop to the Maritime Greenwich World Heritage site.

London Borough of Havering – Comments:

Broadly support the proposals, however disappointed at the number of residential units provided.

Governor of the Tower of London - opposed. Impact on views to and from the Tower of London.

City Heritage Society - opposed to skyscrapers.

The London Society – recommend that the most civilised course of action would be to reject the application. Concerned about the view from the Tower of London and backdrop views of St. Paul's Cathedral.

Surveyor for St. Paul's Cathedral - opposed due to impact on view, scale and reflectiveness of glass

Resident of Essex opposed to the tower on the grounds that it is not compatible with London's low rise skyline.

London Dungeon - concern about impact on business during demolition and construction.

73 letters and e-mails were received from individuals across London in support of the tower. Comments included: 'a very beautiful and impressive building'; 'a world class design'; 'support the viewing platform'; 'perfect outline for a skyscraper'; will attract a great deal of prestige'; will regenerate local economy'; 'a stunning modern landmark and a catalyst for further investment'; 'Don't be swayed by reactionary arguments by those who would like nothing better than see our City frozen in time and turned into a huge museum'; 'a fine and graceful structure. It would be a stunning addition to the London Skyline' 'It seems that whenever anything new or consequential is planned English Heritage negate the project out of hand.'; 'a stylish and graceful building'; 'Don't let the bombing of the twin towers detract from the London bridge Tower'; 'Views are already affected by low rise dumpy towers. Tall towers, e.g. B.T. Tower, can be as well received as architectural masterpieces such as St. Paul's.' 'The inflexible policy of English Heritage is having an adverse affect on London's heritage.'

Exhibitions held by applicant: (See *Appendix B* for details.)

The applicant held exhibitions on 28 – 30<sup>th</sup> June 2001 at Bermondsey Village Hall and from 9<sup>th</sup> to 13<sup>th</sup> July at Hays Gallery. Visitors were invited to put their comments in a visitor's book. 436 people made comments, 70% positive, 8% negative and 22% of a 'mixed' nature.

Railtrack – The importance of co-ordinating this development with the Railtrack Masterplan cannot be over-stated. Express some concerns about the canopy but this can be resolved as a matter reserved by condition.

(See also *Appendix B*)

Pool of London Partnership – General support. It is consistent with the Partnership's strategy and vision for the Pool of London as a whole, and for the London Bridge Gateway. It will contribute to the economic and social regeneration of the area without harming the Pool's special character and unique historical environment. It conforms

with the Mayor of London's interim guidelines for tall buildings and the emerging Spatial Development Strategy for London.

English Heritage: *(Detailed comments are given in Appendix B)*

For English Heritage the overriding consideration is whether the location is suitable for a tall building in terms of its effects on the historic environment at a city-wide as well as a local level. If not, then no tall building will be acceptable, however good the design. Only if it can be demonstrated that the location and context are appropriate will other factors including design quality be addressed (*from: Guidance on Tall Buildings*). There seems to be a clear conflict with the policy of protecting the Strategic Views, which suggests that this is not a suitable location.

English Heritage four principle objections:

- The impact upon the Tower of London World Heritage site.
- Impact on Strategic Views of St. Paul's Cathedral.
- Impact on the setting of Tower Bridge, and
- Impact on the conservation areas and historic buildings nearby.

As a result they conclude that this is the wrong location for a tall building and this is the wrong building for this location.

Commission for Architecture in the built Environment (CABE):

*(Detailed comments are given in Appendix B)*

On 23<sup>rd</sup> January 2002 CABE, the government's design watch-dog, issued a press release praising the latest proposals for the London Bridge Tower, which would become the tallest building in Europe. They were impressed with the progress which has been made, calling it 'clear, credible and very positive'. It was the sixth time the Commission had seen the developing scheme, which is designed by Italian architect Renzo Piano. Most of the new work concerns the lower parts of the tower and its immediate surroundings, including London Bridge station, a new bus station and a public piazza, part of which would be covered with striking new canopies.

The way in which the canopies are to be used is, in principle, welcome. They could provide a unifying language for the lower levels of the scheme and serve a vital purpose in tackling the wind problems around the area, particularly in St Thomas Street. However, CABE are concerned that the initial cost of the canopies, and the ongoing cost of their maintenance, and urge that their construction and maintenance be included as one of the major design points to be safeguarded legally in any permission granted.

In the press release, the Deputy Chairman of CABE said: "CABE supports the idea of a tower of this size, of this quality and on this site, but has a number of detailed comments concerning technical aspects of the design. For example, CABE is delighted to see the amount of public space which has been provided around the base of the tower. However, if it is to be a popular place for residents, workers and visitors to gather, it needs to be extremely well maintained. The beautifully designed canopies which criss-cross the area will be wonderful for pedestrians, but they will need regular cleaning if they are to serve their proper purpose."

The Mayor of London (Greater London Authority)

The application was referred to the Mayor as a major application and on 22<sup>nd</sup> February 2002 the Mayor stated that his views on the proposal are:

- (a) The Proposal is considered to deliver architecture of world class quality, which will positively contribute to London's World City image and the London skyline. In heritage terms St. Paul's Cathedral, neighbouring listed buildings and conservation areas are not considered to be harmed by the proposals, either in terms of their setting, character or appearance.

- (b) The scheme provides significant regeneration benefits to both the local area and London's transport needs, and will help sustain London's economic position. The proposal is for a very high density development over a major transport interchange in Central London within an existing tall building cluster and in this respect it meets the requirements of the emerging London Plan.
- (c) There are some detailed design issues which remain to be resolved mostly at ground floor level in the layout and provision of the bus station and of a high quality public space. There are emerging detailed proposals which address these concerns, and these should be capable of resolution. The Mayor would expect the developer to make contributions to public transport provision. The scheme has been designed so that it does not compromise the London Bridge Station redevelopment proposals, and if it were to proceed would compliment that strategically important adjoining redevelopment.
- (d) The proposed tower will be a landmark building for London and raising the standard of architectural quality appropriate for a world class city. The scheme is in accordance with the Mayor's interim and emerging London Plan and High Buildings Strategy and is in the interests of good strategic planning in London. In order to ensure the buildings quality is not diluted at a later stage should consent be granted, Southwark Council should seek to ensure that the Renzo Piano Building Workshop are retained at the implementation stage through condition or legal agreement.

Transport for London – Generally supportive. TfL is keen to work with the council to agree an adequate package of measures to fund transport improvements which result from the London Bridge Tower planning application. For London Underground, a station capacity assessment shows a worsening of conditions particularly in the morning peak for the northern Line platforms and their entrances, especially northbound. Key works to alleviate this could include an additional escalator and wider platform access points. TfL recognise that the Tower development would only contribute a small percentage to the number of passengers using the station and would therefore not envisage that the developer's contribution would cover all these costs. However recommend a contribution towards the congestion relief works at the station.

They are concerned that the development will not provide for sufficient bus stands to meet future bus travel demand requirements. There have been extensive discussions between the applicants and TfL, together with Council officers, regarding the bus station. Since it is not possible to meet the operational requirements of London Buses on the application site, TfL recommend that the developer contributes towards the costs of a Compulsory Purchase Order (CPO) of additional land and the provision of a new bus station. (*As in the T2000 scheme*)

The public viewing gallery will make it very difficult to stop coaches picking up and dropping visitors. The applicant's management plan may go some way to address these issues but enforcement is unclear. Given the difficulties in providing for coaches, a possible alternative arrangement could be a dedicated area in an enlarged bus station. This gives further support for the developer contributing towards land acquisition and an enlarged bus station.

TfL welcomes the cycle parking provision within the building but would like to see some external provision too. TfL also support the careful management of car parking and the proposed Green Travel Plan.

Whilst recognising that the Tower development would not be expected to pay for the full cost of any congestion relief scheme for the Underground or additional bus

facilities, it will be adding additional trips to the stations so it would be appropriate to contribute towards the transport improvements.

Comments on behalf of Guys and St. Thomas' NHS Trust (The Hospital)  
(Given in more detail in Appendix B)

The Trust strongly support the regeneration of the London Bridge area and welcome the application proposals in the role that they may play in this regeneration process. However the Trust has concerns regarding the control of activities required in the demolition of the existing tower and the construction of the replacement tower.

The Trust seek a clear, precise and enforceable agreement to be put in place to control the processes involved in demolition and construction. They believe that this must be by legal agreement which runs with the land, rather than by condition which is on the permission. A detailed list of requirements for such an agreement has been submitted. The Trust also offer to arrange a visit for members of the Development Control Committee and officers to gain a clear understanding of the implications of the application proposals.

Late submission on behalf of Guys and St. Thomas's NHS Trust, South London and Maudsley NHS Trust and Kings College London:

Express support for the recommendation to Committee, that they should grant permission subject to a section 106 agreement which will cover, amongst other things, provision for the control over demolition and construction.

The trust requests a suitably worded condition attached to the permission that requires the identification of affected windows and the provision of suitable mitigation measures in agreement with the Trust. The Trust also holds reservations regarding the fourth floor canopy and note that there is no agreement to attach it to Thomas Guy House. The Trust acknowledges that the details of the canopy are to be dealt with as a reserved matter and as an organisation with considerable interest in St. Thomas Street and Great Maze Pond, would wish to be party to future discussions. The initial concerns about the canopy are regarding the possible impact of the canopy on daylight received by Thomas Guy House, the implications for the escape of ground level air pollution and the means by which the top and bottom of the canopy will remain constantly clean and free from contamination.

The Trust notes the removal of the utilitarian footbridge which crosses St. Thomas Street at high level. This footbridge provides vital pedestrian access to a number of outpatient departments which are positioned at second floor level to take advantage of this pedestrian link. The Trust therefore objects to the removal of this footbridge without the provision of a suitable replacement entrance at street level.

The Development & Building Control Manager – Response to late submission: It has always been the intention to include the NHS Trusts in the further discussions about the canopies adjoining St. Thomas Street and Great Maze Pond, just as the public transport operators would be involved in the details of the canopy where it adjoins their operations. The NHS Trust concerns are the same as some of our detailed concerns which have yet to be resolved.

Many of these points should be resolved in the detailed design of the canopy, which is reserved by condition for approval. The canopy does not have to be attached to Thomas Guy House but that is one option that may be considered. Minor amendment to the condition on canopies have been made.

It would be sensible to retain the pedestrian footbridge until alternative arrangements are made. These are provided for in the S106 Agreement attached to the Railtrack Masterplan Scheme which provides for a satisfactory alternative pedestrian access at ground level to Hospital facilities. The tower scheme depends upon the implementation



of the Railtrack Masterplan Scheme so this alternative arrangement should be provided before the bridge is removed.

Traffic - No objections. Considerable advice given at the early stages on the functioning of the building at street and concourse level, including requirements for revising drop-off points and servicing, that were carried out

Archaeology - Within an Archaeological Priority zone. All archaeological investigation will be undertaken in accordance with a brief set by the Council. In order to ensure that archaeological investigation takes place, and that preservation in situ may be achieved if necessary, it is recommended that conditions are attached to any consent that may be granted

Public Protection - Construction noise should be dealt with under the Control of Pollution Act. Use of BS5228 in calculating noise exposure. Concern that there will be vibration both during demolition and construction (with substantial pile foundations), and the impact this will have on Guy's hospital. Within a designated Air Quality Management Area. Demolition and construction will contribute significantly to dust generation both from on-site activities and vehicle movements and pollution will arise from plant and vehicles. This is a concern for Guy's. The principle causes for concern after construction will be -the plant noise and wind noise in the 'radiator'.

#### 4.4 **Planning Considerations**

##### Description of the proposed development

- 4.4.1 The proposed London Bridge Tower will appear as a slender spire of glass with steeply sloping faces (just 6 degrees from vertical). The facades of the tower will consist of large planes of glass (or 'shards') placed at different angles, which will not touch each other at the junctions. The glazing will be of 'extra white glass' which has a very low iron oxide content. This will guarantee a high degree of transparency and low reflectivity. At the junctions of the shards, recessed horizontal operable double glazed lamellas will provide natural ventilation for the 'winter gardens' inset into the corners of the tower.
- 4.4.2 The combination of this slender spire and the shards or glass will make the tower appear to partly disappear into the sky. It is likely to change its character, appearance and virtual shape with the daily and seasonal variations of light and weather.
- 4.4.3 Different types of cladding materials will be used. The cladding of the core and outriggers at the three public levels will be a textured terra cotta, while the external primary construction elements will be clad or made of expressed steel work with a textured metallic composite paint finish. This finish will also be applied to the radiator elements, mullions and edge profile of the shards and canopy. Burnt textured granite is proposed for the pedestrian area at concourse level and station concourse. At street level the surfacing will be consistent with the brick surfacing of the area.
- 4.4.4 In addition to the spire and shards of glass, the distinctive features of the design include a large glass canopy around the base at about fourth floor level, and a tall 'radiator' structure at the top of the spire. Less conspicuous from the western approach, but clearly visible from the railway, would be a lower level extension to the east and an antenna rising from it.
- 4.4.5 It is proposed to adopt indirect internal lighting, which will avoid fluorescent lights from being visible from the street. Similarly, external lighting will aim at giving the building a 'soft' presence at night. At ground and concourse level the design of the building and shop fronts, signs and lighting would have clean angular lines, presenting a modern design image consistent with the overall appearance and impression of the tower.

- 4.4.6 The overall design and appearance of the building, just as its internal workings, is likely to become a classic symbol of 21<sup>st</sup> Century architecture. This will depend on the quality of design being both translated into the quality of the construction and the maintenance of that design quality into the future. It is therefore proposed that more detail will be required, by conditions, of the key features such as the canopies and the radiator.
- 4.4.7 The distinctive features that need to be protected from any future 'dumbing down', or other loss of quality, need to be protected as part of the legal agreement for this building. These include the overall proportions, the shards of glass, distinctive facades, the winter gardens, radiator, sustainability of design, method of lighting, public access to viewing galleries, and the design of the public areas a ground and concourse levels. *(These are set out in more detail in Appendix D)*

#### Scheme evolution

- 4.4.8 The Southwark Towers were acquired by Teighmore Ltd in November 1998 and their developer, the Sellar property group, asked Broadway Malyan to produce a scheme with 97,500 m<sup>2</sup> (1,050,000 ft<sup>2</sup>) of offices. In April 2000 a design of 350m high circular building (410m with aerials) was produced. In July 2000 Renzo Piano Building Workshop was appointed to work in collaboration with Broadway Malyan and in September 2000 Renzo Piano produced a spire form of building 427m (1,400ft) high, described as a 'shard of glass'. This also had now become a mixed use building. In November 2000, following consultation with the Civil Aviation Authority (CAA) this was reduced to 390m (1,280ft) in height.
- 4.4.9 Following further discussions with interested parties, especially the CAA, the building was further reduced to 305m (1,000ft) in height in December 2000 (*equal to 310m / 1,016ft above ordnance datum, which is also sometimes quoted*). This resulted in a more squat building so it was remodelled to regain its slenderness, in January 2001, which also reduced the office accommodation to 79,000m<sup>2</sup> (850,000ft<sup>2</sup>), acquiring a 'backpack' of additional office space at lower levels. Further consultations with CABA, led to a further refinement and reduction of the 'backpack' but retaining the internal space. The form of the building had evolved to a more geometric and rational plan, losing the subtlety of the original shard of glass. The design was modified with planes of glass placed at slightly different angles to create a complex pattern of reflection characteristics on each façade. This was the design that was submitted for planning approval in March 2001
- 4.4.10 The applicants recognised that the proposal would require the submission of an Environment Statement under the Environmental Impact Assessment Regulations. Prior to the submission of the application a 'scoping statement' was agreed with the applicants and accordingly the application was supported by a considerable amount of documentation, including a detailed design report, photographs from numerous strategic and other view points in London, a comprehensive Environmental Statement, and plans.
- 4.4.11 The Environmental Statement provided a great deal of the background information, including the scheme justification, alternatives considered and social and economic benefits. It also dealt with site conditions, land use, impact on air traffic, archaeology, traffic and transport, air quality, noise, microclimate, ecological assessment and the principles of sustainability, water resources, soil conditions and contamination, television and radio reception, and demolition and construction details. *(See also Appendix C)*
- 4.4.12 Following consideration of the Environment Statement and other material by the Council and consultees, additional material was submitted to the Council in November 2001, including amended plans for the building, additional illustrative material, and amendments and additions to the Environmental Statement. Following detailed

discussions with TfL and other interested parties, further amended drawings at the lower levels of the building have now been submitted to the Council and these largely meet the points referred to above and raised by the Mayor of London in relation to pedestrian and vehicular routes around and access to the building. The details of the canopies will be dealt with by condition. In considering the application, the Environmental Statement has been taken into account and it is considered to have fully met the requirements of the Regulations and all issues that were raised have either been resolved or can be mitigated by either conditions or the proposed Section 106 Agreement.

#### Why there is a need for a building of this size

- 4.4.13 The applicant has submitted the following case in support of the application. The current demand for office accommodation in central London greatly exceeds the current and predicted supply. Analysis submitted by agents for the applicant, show that in early 2001 the known demand for office accommodation was 2.29 million m<sup>2</sup>, with 83% being for larger scale users, with about two thirds seeking in excess of 10,000m<sup>2</sup>. By spring 2002 the demand was expected to be about 3.7 million m<sup>2</sup>. This is largely due to the number of mergers in the financial sector, the growth in consumer demand for service sector products (businesses in this sector make up 78% of the demand), economies of scale, and the trend towards companies providing services on a global scale and requiring a location of the right image and prestige for this.
- 4.4.14 The applicant states that the current trend towards greater space requirements is not being matched by the existing supply of office space. In early 2001, the total office supply could only meet 22.5% of that demand and little of it of the scale required. This situation is expected to get worse, leaving prospective large space users with few options. They may wait until a suitable development can be completed or they may consider relocating to an alternative European site.
- 4.4.15 The applicant's case is that the need for large scale office development can be achieved either by a low rise development over a very large site area or by a high rise development over a small area. Even if the low rise alternative was desirable, such large sites in central London would be extremely difficult to find. Sites are generally small due to the fragmented land ownership, difficulties in assembling larger sites, restrictions imposed by adjoining land owners (e.g. light or access), listed buildings and conservation areas, and the ability of obtaining simultaneous vacant possession of a number of sites. This makes extensive low rise developments impractical. The only solution is now to build higher buildings to achieve the floorspace required.

#### Why the Tower is being proposed in this location

- 4.4.16 If London is to meet the requirements for a substantial increase in urban density; it needs to do so in a sustainable way. This means making the most effective use of urban land and locating the development, which will generate large numbers of traffic movements, at or very close to major public transport interchanges. This would be consistent with Government Guidance set out in PPG1, PPG3, PPG4, PPG13, RPG3 and elsewhere. Bearing in mind the nature of the likely office occupiers, proximity to major termini or stations serving international traffic would be desirable.
- 4.4.17 In preparing the current proposal, the applicant looked at the areas around all 13 major railways stations in central London. The area up to 500m around each station was considered, based on the criteria in PPG6, which specifies this as, being within easy walking distance of a station. Each location was considered with respect to existing planning policies, strategic views, availability of sites, other development proposals planned in the area, and the quality of the transport interchange (e.g. number of tube stations, destinations of services, etc.). This analysis was provided with the application. This concluded that six stations were far too constrained by planning policies, especially strategic views and St. Paul's heights. Three more were restricted by

emerging policy in Westminster on impact on the Royal parks and Buckingham Palace. Leaving four (Liverpool Street, Fenchurch Street, London Bridge and Waterloo) which also had local issues that needed to be addressed. The area south of Liverpool Street is already being intensively developed and the sites around Fenchurch Street will be in the next ten years. This means there is little chance of site availability there. London Bridge followed by Waterloo are the remaining least constrained locations in relation to tall buildings.

- 4.4.18 Although justified by the process of elimination, there is also no clear reason why a high building should not be located at London Bridge. There has long been a view that high buildings in central London must only be north of the Thames, particularly in the City or more recently at Canary Wharf. The London Bridge area already has three tall buildings (Guys Hospital, London Bridge House and the application site of Southwark Towers) and there are others on the south bank to Waterloo. The proposal is to redevelop one of the existing towers and provide a larger capacity high building immediately adjacent to a major railway station, tube and bus station, and within walking distance of the City.

The suitability of this location for a tall building.

- 4.4.19 The suitability of this location next to a major public transport interchange is obvious and has not been an issue of contention. However the suitability of this location has been queried in two respects. Firstly by those who believe high buildings should only be in the city or at Canary wharf or simply do not want to see one in Southwark. Secondly due to its alleged impact on strategic views, or that it can be seen from the Tower, which is the main concern of English Heritage, The Tower of London and the City Corporation.
- 4.4.20 With regard to the first point, the only policy in the Southwark UDP with which the proposal is in conflict is Policy E.2.2 which states that Southwark is not considered to be an appropriate area for high buildings. The material considerations which indicate that this policy can be set aside in respect of this proposal include the emerging requirements of international banking, financial and professional organisations for large office buildings within or close to the City of London, the LPAC strategic planning advice on high buildings and strategic views (1999) and the emerging strategic policies of the Mayor. In addition it is appropriate to take into account the regeneration benefits of the proposal in North Southwark, the employment opportunities that will be created for residents of the area, and the mixed use nature of the proposal which is consistent with Government advice in PPG1 and elsewhere.
- 4.4.21 Tall buildings in central London have been largely confined to the City of London and Canary Wharf, with a few isolated examples in Westminster and Camden, north of the Thames. On the south bank of the Thames there are groups of tall buildings in Southwark close to London Bridge (Guys Hospital, Southwark Tower and London Bridge House) and Blackfriars Bridge (Kings Reach and ITN). None of these are comparable to the proposed tower, which would be higher than any other built or proposed in London, and currently in Europe as a whole. For comparison, it would be 25% higher than One Canada Square (244m / 800ft high), at Canary Wharf, although much more slender and giving less of a bulky appearance.
- 4.4.22 The siting of a major City Centre function in this location is consistent with government advice set out in RPG3: Strategic Guidance for London Planning Authorities (May 1996). This has the objectives of promoting London as a world city, aiming to maintain and enhance the competitiveness of business, including encouraging tourism. It also aims to reduce the need to travel, promotes regeneration and identifies the 'Central Area' as extending south of the Thames to include areas from Nine Elms and Waterloo to Tower Bridge, including this location. It states that a considered extension of Central

Area uses across the River Thames can both strengthen London's world city role and assist with the regeneration of the South Bank.

4.4.23 Existing strategic guidance (RPG3) will soon be replaced by the London Mayor's Spatial Development Strategy. Interim policies indicate that the Mayor has no objection, in principle, to London having the tallest buildings or to the siting of this Tower at London Bridge. He also supports higher densities for both residential and commercial development, initially concentrated in town centres and other places of high public transport accessibility. The Mayor has also indicated that such higher densities will require high quality design and management, and sustainable in mixed use terms. He also seeks to improve public transport in London and resist developments that increase private car use to serve their transport needs.

4.4.24 The proposed location is at a major public transport interchange and walking distance from the business heart of London. It would be sited immediately adjacent to London Bridge Railway and Bus Stations and the entrances to the London Underground system. This is consistent with national and regional planning policy.

#### Strategic Views

4.4.25 The area is in the backdrop of the strategic views of St. Paul's from Parliament Hill and Kenwood, as identified in RPG3A. This also advises that backdrop views should be less restrictive for development than locations in the foreground where the views could be blocked by the development. Views of Tower of London are mainly from the south and are not blocked by this building. Compared to other potential sites adjacent to major public transport interchanges, this location has few problems with strategic views but those few are subject to significant objection by English Heritage and others.

4.4.26 The main concerns are (a) the backdrop views from Parliament Hill and Kenwood, and (b) the view from the tower of London towards the proposed Tower. The illustrative material provided in support of this application has been carefully examined so as to establish whether or not the proposal will have any noticeable or significant effect on either of these views.

4.4.27 From Parliament Hill the dome of St. Paul's can just be seen in the distance. It is not clearly seen except in magnified view (binoculars or at least a 200mm telephoto camera lens). In magnified view it can be seen that the proposed Tower will be located behind and to the right of the dome. The objection is that Tower arises from above the curvature of the dome and being much larger will distract from the view of St. Paul's. However, it should also be noted that there is an office block directly behind the dome of St. Paul's and just to the right, and higher than the dome, is the unattractive tower of Guy's Hospital.

4.4.28 The view from Kenwood also has the same objection but less so. The distances are even greater and the dome of St. Paul's already has Guy's hospital tower directly behind it. Having the proposed tower sited to the left and behind the dome will have no significant further adverse impact but will also become an equal and prominent landmark in that view.

4.4.29 These views have therefore already been compromised from the point of view being claimed. Indeed, any tall building sited in the City, anywhere on the South Bank, or in many other locations would have the same impact of potentially distracting from the view of the St. Paul's dome. Alternatively, it could be considered a dramatic and interesting contrast between the architecture of the seventeenth and twenty first centuries. It would be a different view from that seen now but no less interesting or worthwhile.

- 4.4.30 Views from Blackheath Point in the southeast are even less affected. Apart from the difficulty of seeing St. Paul's clearly, the view is already seriously compromised by blocks of flats in Southwark and the SELCHP waste incinerator chimney. The proposed tower would not encroach upon the view but would be seen amongst other towers in the distance.
- 4.4.31 In relation to these strategic views, it has been concluded that the proposed Tower will be an enhancement of the skyline. Although visible in views of St. Paul's, it will not have any significant adverse effect on those views. Indeed, the Tower may help lessen the impact of other tall buildings which already impinge on those views to a greater or lesser extent.
- 4.4.32 The views from within the Tower of London are extremely limited and hidden by trees except in winter. The objectors seek to preserve a claimed sense of isolation from the 21<sup>st</sup> Century, as if this allows the visitors to see the castle and fortress as it was in the 14<sup>th</sup> Century. The presence of so many tourists with their camcorders and the many other signs of 21<sup>st</sup> Century life within the walls will have a greater effect in breaking this illusion than any partial view of a tall glass spire in the distance. The view from the riverside outside the Tower of London would be spectacular, with HMS Belfast and the GLA building in the foreground, it is likely to become a much photographed and popular view of London.
- 4.4.33 In London any medium size or tall building will be seen from great distances. For any tall building to be acceptable it must be of the highest quality of design, as they are likely to become new landmarks and part of the lasting impression of London.
- 4.4.34 If built, this building would become a major landmark in London and, because of its unique profile and appearance, would be best seen standing in its own setting rather than surrounded by competing high buildings. It would become a building that would attract visitors and be much photographed and a symbol of London, just as other Towers in the World have become, from the Eiffel Tower to the Empire State Building.
- 4.4.35 The proposed location amongst existing buildings of 20 to just over 30 storeys and many modern buildings such as the GLA building and More London, would provide a suitable setting for this dramatic icon of 21<sup>st</sup> Century architecture.

#### Effect on Listed Buildings and Conservation Areas.

- 4.4.36 English Heritage have also expressed concerns about the impact of the proposal on historic buildings and conservation areas in North Southwark. Although there will be changes to views into and out of the conservation area, and to the setting of Listed Buildings in the area, the overall conclusion has been reached that the development of this high quality proposal at this location represents a significant enhancement of the area, particularly when judged against the existing Southwark Towers with its lack of a public interface at street level and outdated form and appearance.

#### Canopies

- 4.4.37 The proposed canopy around the tower is the talked about feature of the design and will only be seen when close to the building. It's purpose is two-fold: it aims to improve the climatic conditions for pedestrians in the area, and unifies the disparate functions surrounding the site. Crucially the canopy provides shelter from wind, including down-draughts and has been designed using a wind tunnel and in comparison with the existing situation, as well as with the proposed Railtrack development. None of the existing high buildings make any attempt to deal with this problem.
- 4.4.38 An initial reaction to the canopy, which is proposed to cover much of St. Thomas Street, was that it needed to be kept back away from the road to avoid giving the public the feeling of a large private building spilling out over public space and dominating the

area. However, on analysis of the wind test data it was clear that the canopy was essential not just for this tower but also to alleviate existing wind problems in this area.

- 4.4.39 The alternative approach now favoured is to take the canopy right across the road and also extend it into Great Maze Pond and the Guy's hospital precinct. This would allow the canopy to be supported at each side instead of being cantilevered across the road. The structure could therefore be made to 'feel' lighter, more transparent and a separate structure in its own right. It would feel more like a glazed roof over a market street than a part of the tower imposing itself on its surrounds. This design is still evolving, in consultation with neighbours, and would be a detail reserved by condition. In order to provide further details of this, the architect's design statement is attached as in Appendix D.

#### The proposed uses within the building

- 4.4.40 The building will be occupied by a mix of different activities. Starting at ground level in St. Thomas Street there will be the entrances to the residential flats, hotel and offices within the upper floors and vehicle access to the two basement levels for parking and servicing (there will be two further basements of plant and machinery). The public will have access to the building at the station concourse level, which is the second floor of this building.
- 4.4.41 There will be offices from the 3<sup>rd</sup> to 31<sup>st</sup> floors. On the 34<sup>th</sup> to 36<sup>th</sup> floors there will be public viewing areas, together with shops, restaurant and auditoriums for visitors waiting to go to the higher viewing floors at the 64<sup>th</sup> to 66<sup>th</sup> floors. There will be a business hotel ('Aparthotel') on floors 37 to 52 and 14 large flats on the 52<sup>nd</sup> to 63<sup>rd</sup> floors. The highest occupied floors, the 64<sup>th</sup>, 65<sup>th</sup> and 66<sup>th</sup> floors, will be for public viewing floors. Above this, will be a tapering 'radiator' rising to 305m (310m above ordnance datum). (See Appendix A)
- 4.4.42 Although only 14 residential units are proposed, below the usual threshold of 15 dwellings before there is an affordable housing requirement, the Council's recently adopted Supplementary Planning Guidance provides the basis for requesting a contribution towards affordable housing in this case. This will be dealt with in the proposed Section 106 Agreement.

#### Impact on the public transport system at London Bridge

- 4.4.43 The expected capacity of the proposed building would be a maximum of 5,796 office employees (*based on 1 per 10m<sup>2</sup> net area*). Typically about 85% of employees can be expected to attend on any one day (*due to sickness, leave or meetings elsewhere*) resulting in a typical attendance of 4,927 employees.
- 4.4.45 Based on experience in the City, 95% of all journeys will be by public transport or on foot. In this location, it is expected to be 90% by train (incl. tube), 3% solely by bus and 2% solely by foot. (*TfL expect bus usage to be as high as 9%*). This reflects the fact that the limited parking provision at the site will not cater for commuting journeys by car. Most of the journeys will be made between 07.00 and 10.00 hrs and 16.00 and 19.00 hrs each day.
- 4.4.46 The tower will also attract large numbers of visitors to the viewing galleries. It is expected that the majority of visitors will either be tourists staying in London as part of an extended stay, or those visiting central London on a day trip. It is anticipated that 60% will arrive by train or tube, 20% by coach and 20% on foot. During consideration of the application, the scheme has been modified in two crucial ways regarding visitors. Firstly, the waiting / queuing areas have been moved from the ground floor and outside the building to inside on the fourth and fifth floors (*the entrance being at concourse level which is the second floor of the tower*). Secondly, coach travel and parking will be discouraged by management of the ticket sales.

- 4.4.47 An analysis of other visitor attractions and viewing galleries in towers around the world shows that a significant internal floor area is required for visitor queuing, ticket booths and waiting areas. There will need to be dedicated lifts for the attraction, with catering and shops in waiting areas. These points have now been incorporated into the proposals.
- 4.4.48 The issues of movement of office workers and visitors has been discussed in great detail with Transport for London, with London Underground and London Buses. Although there is no total agreement about the additional impact that the occupiers of the tower will have on the buses and tube trains, a package of remedial measures to be secured by a legal agreement has been broadly agreed. These include financial a contribution towards public transport infrastructure improvements. This could include, for example, the widening of the access tunnels to the northern line platforms and increased bus capacity.
- 4.4.49 A Green Travel Plan will also be secured by the legal agreement which will ensure a continued move towards maximising the use of public transport, bicycles or walking to destinations.

#### Impact on Guys Hospital

- 4.4.50 The main concerns of the hospital is the impact of the dust and vibration during the demolition and construction period. This could have serious implications for the hospital services and patients.
- 4.4.51 The site accommodates a hospital and university, both of international standing and providing ground breaking medical care and scientific research. The hospital provides facilities and care of national and regional significance, with specialities in renal medicine & surgery, urology, ENT, oncology, paediatrics and dentistry. The hospital treats approximately 350,000 patients a year. All the in-patient services plus many supporting departments function 24 hours a day, throughout the week.
- 4.4.52 The proposal involves demolition and construction that may take up to 5 years to complete and will result in substantial noise, dust, vibration and traffic. The site is very close to the hospital, with the closest point being just 15 metres from Thomas Guy House. The adjacent buildings contain a number of units which are highly susceptible to noise, dust and vibration. These include:
- Out-patients departments
  - Research and analysis laboratories
  - Pharmacy
  - Gait Laboratory
  - 4 Acute wards for urology and orthopaedics
  - 4 Acute mental health wards
  - 2 day hospitals - for the elderly and the mentally ill.
- In addition the essential ventilation required by these facilities is provided by a number of intake chambers either facing St. Thomas Street, on the roof or nearby.
- 4.4.53 Agents for both the applicant and hospital are continuing to negotiate an agreement that will address these concerns, allowing for the safe and uninterrupted functioning of the hospital services during the demolition and construction period. Although there may be an agreement between the two parties, it may also prove necessary to include some aspects within the legal agreement between this authority and the applicant.

#### The proposed planning agreement

- 4.4.54 There have been a number of requests have been received for allocation of 'planning gain money' to community groups. Planning obligations (or legal agreements) that may be negotiated as part of a development proposal have to comply with strict rules (set out in Government Circular 1/97) and can only be sought where the following tests are



met: The obligation must be: (1) necessary; (2) relevant to planning; (3) directly related to the proposed development; (4) fairly and reasonably related in scale and kind to the proposed development; and (5) reasonable in all other respects. What cannot happen is for there to be a 'pot of money' to dish out to local groups.

- 4.4.55 The proposed planning agreement negotiated with the applicant is being produced within the rules and in consultation with the relevant organisations (e.g. TfL, Pool of London Partnership and Guy's Hospital) and Council officers who are directly involved in working with the local community. The proposal involves both financial contributions to specific works or projects and non-financial issues such as a Green Travel Plan and scheme for Management.
- 4.4.56 It is proposed to provide substantial financial contributions towards the following general headings:

#### Affordable Housing

- Financial contribution to the Affordable Housing Fund for off-site provision of affordable housing.

#### Improvements for Public Transport

- Congestion relief works for the London Underground, for example widening of passageways to the Northern Line.
- Contribution towards the Compulsory Purchase Order (by TfL) of land required for a new bus station next to New London Bridge House.
- Contribution towards other bus service improvements, for example the new bus station or services.

#### Environmental improvements to the Public Realm

- Hard landscaping works in the piazza and beyond site curtilage at both concourse level and St. Thomas Street.
- Extension of canopy over piazza area.
- Possible extension of canopy into Great Maze Pond
- Removal of bridge over St. Thomas Street.
- Provision of street furniture, signage and lighting around area.
- Provision of public Art.
- Agree design guidance with Council to provide future control over shop fronts, adverts, signage, lights/lighting scheme, street furniture, etc.
- Upgrade surface finishes in Joiner Street
- Upgrade surface finishes in St. Thomas Street
- Contribution towards improvements to local open spaces.

#### Highway and pedestrian safety works in the area

- Pedestrian movement and circulation Improvements, or traffic management measures, between Great Maze Pond and the London Bridge.
- Pedestrian crossing on St. Thomas Street between Joiner Street and Great Maze Pond.
- Contribution towards improvements to Great Maze Pond.
- Financial contribution towards cycle lane improvements.

#### Employment and Training

- Local recruitment and advertisement of jobs on this development during demolition and construction, including training.
- Contribution towards a fund for a training organisation for local employment.
- Contribution towards accommodation for an employment and training organisation.

#### Guy's Hospital

- Measures to mitigate impact of demolition and construction on hospital services.
- Agreed code of practice for demolition and construction works.

#### Other agreements

- Design quality agreement, based upon the Renzo Piano ten aspects of the design that will be retained in the development.
- Management scheme – for the maintenance of public areas, control of parking, visitors and servicing deliveries, etc.
- Management agreement for servicing and deliveries. In the event of servicing controls over large lorries fails, a contribution towards parking enforcement, and/or provision of an alternative delivery point.
- Green Travel Plan.

4.4.57 The precise details of some of these are still under negotiation.

#### **Conclusions**

- 4.4.58 Having fully considered the application in the light of the policies of the Unitary Development Plan, Regional and National planning policy guidance and other material considerations, it is clear that the proposal has many positive aspects to commend it. A good case was made for a building of this height and scale to be located on this site and that it would bring considerable benefits to the locality. There seems to be very wide agreement, even amongst those opposing the siting of the Tower at London Bridge, that this proposal is a supreme example of world class architecture. With safeguards to be agreed that will ensure that the high quality of design is maintained through to implementation and beyond, the proposed Tower will be a magnificent landmark, appropriate for this central London location, and appropriate for London as a world class city.
- 4.4.59 Having closely examined the likely impact of the Tower from a great many distant, strategic and close view points, it is considered that the Tower will enhance the skyline of London. Even where there have been concerns expressed about a very small number of viewing points, the spire design and appearance as ‘shards’ of glass, enable the Tower to avoid any harmful affects on the important views, or the setting or character of nearby listed buildings and the conservation areas. The uniqueness of the building would set itself apart from competing with other important views of St. Paul’s or the Tower of London, which have their own unique styles.
- 4.4.60 The Tower will provide significant regeneration benefits to the local area and be of economic benefit to the central area of London as a whole. The development of a high density, mixed use development, designed to achieve a high level of energy efficiency and sustainability, at a major public transport interchange, meets the requirements of Government planning policy and the emerging London Plan. To overcome or mitigate against any local consequences of the Tower, financial contributions are to be agreed to assist with improvements for London Underground, the Bus Station, highway and public realm improvements for pedestrians, assistance for cyclists, improvements for the Guy’s Hospital precinct and contributions towards affordable housing provision and employment training.
- 4.4.61 In view of the positive contribution that this spectacular building would bring to north Southwark, there are no reservations in recommending that planning permission is granted, subject to legal agreements.

## **5. EQUAL OPPORTUNITY IMPLICATIONS**

- 5.1 The proposal has been developed with accessibility in mind. In addition to level access and internal lifts throughout the development, there will be escalators between St. Thomas Street and the station concourse level.

## **6. LOCAL AGENDA 21 [Sustainable Development] IMPLICATIONS**

- 6.1 The principles of sustainability have been taken into account in the development of the proposed Tower. The siting of the building at a major public transport interchange, provision for cycling, and proposed Green Travel Plan deal with transport issues. Energy efficiency is also very well considered. For example the façade is designed to combine high internal environmental quality with low energy consumption. It will ensure solar heat gain in winter, while in summer it will exclude heat from the sun.
- 6.2 The pre-assessment of the Tower using the Building Research Establishment Environmental Assessment Method (BREEAM) indicates a score of up to 528 which equals a rating of 'excellent'. On the Environmental Performance Index a score of 9/10 is likely. It is anticipated that this building will use considerably less energy than most equivalent office blocks.
- 6.3 The use of a borehole for 'grey water' supply will reduce the consumption of potable water by about 50%. It will also be used for pre-cooling of residential apartments fresh air systems in summer.
- 6.4 The development will recycle heat by using heat normally rejected by offices (at the bottom of the tower) to heat the apartments located at the upper levels.

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## APPENDIX A - Details of proposal

- The proposed replacement building would be a 305m (1,000ft) tower of tapering design, similar to a spire or slender pyramid in section. It will be a mixed use building totalling 127,493m<sup>2</sup> gross floorspace, providing 75,943m<sup>2</sup> offices (Class B1), 15,207m<sup>2</sup> hotel (Class C1), 14 residential units (Class C3), 2,106m<sup>2</sup> retail and restaurant use (Classes A1 and A3), 1,029m<sup>2</sup> health and fitness club (Class D2), together with associated servicing and parking.

Floor area schedule for Residential /Hotel floors in Tower

Floor	Floor level from 0 (street) in metres	Use of Floor	Gross Internal Area (GIA)	Net Internal Area (NIA)
Top	305.78			
		Radiator		
66	228.00	Public	306	213
65	224.50	Public	332	239
64	221.30	Public	355	0
63	218.25	Duplex + Plant	379	269
62	215.20	Duplex Apartment	403	293
61	212.15	Apartment	428	318
60	209.10	Apartment	454	344
59	206.05	Apartment	481	371
58	203.00	Apartment	508	398
57	199.95	2 Apartments	536	426
56	196.90	2 Apartments	565	455
55	193.85	2 Apartments	595	485
54	190.80	2 Apartments	626	516
53	187.75	Duplex apartment & Plant	657	427
52	184.70	Duplex & Plant	689	0
51	181.65	Aparthotel	722	492
50	178.60	Aparthotel	755	525
49	175.55	Aparthotel	790	560
48	172.50	Aparthotel	825	595
47	169.45	Aparthotel	861	591
46	166.40	Aparthotel	897	627
45	163.35	Aparthotel	935	665
44	160.30	Aparthotel	973	703
43	157.25	Aparthotel	1012	742
42	154.20	Aparthotel	1051	781
41	151.15	Aparthotel	1092	822
40	148.10	Aparthotel	1133	843
39	144.45	Aparthotel	1183	806
38	140.80	Aparthotel	1235	858
37	137.15	Aparthotel	1287	1135
36	133.50	Public piazza	1204	699
35	129.85	Public piazza	1263	788
34	126.20	Public piazza	1451	1014
33	122.55	Plant / refuge	1505	0

32	118.90	Plant / refuge	1562	0
31	115.25	Office	1661	1169
30	111.60	Office	1718	1206
29	107.95	Office	1735	1223
28	104.30	Office	1798	1285
27	100.65	Office	1855	1334
26	97.00	Office	1923	1402
25	93.35	Office	1978	1457
24	89.70	Office	2047	1525
23	86.05	Office	2104	1582
22	82.40	Office	2168	1602
21	78.75	Office	2233	1667
20	75.10	Office	2298	1732
19	71.45	Office	2366	1800
18	67.80	Office	2467	1900
17	64.15	Office	2583	2013
16	60.50	Office	2875	2305
15	56.85	Office	3167	2524
14	53.20	Office	3223	2570
13	49.55	Office	3280	2627
12	45.90	Office	3335	2682
11	42.25	Office	3386	2733
10	38.60	Office	3436	2783
09	34.95	Office	3485	2832
08	31.30	Office	3535	2882
07	27.65	Office	3585	2932
06	24.00	Office	3636	2983
05	20.35	Office / Public	4080	3348
04	16.70	Office / Public	2480	1630
03	11.55	Office / Public	1300	694
02	7.90	Public / retail / office	1520	740
01	3.65	Health & Fitness / lobbies	1427	1133
00	0.00	Entrances / retail / public	3224	2491
-1	-3.00	Mezzanine Health Club	1750	530
-1	-7.00	Deliveries / bike parking	3929	0
-2	-10.00	Parking & Plant	3929	0
-3	-15.00	Plant	3929	0
		<b>Office</b>	<b>71,957</b>	<b>56,098</b>
		<b>Hotel</b>	<b>14,751</b>	<b>10,745</b>
		<b>Residential</b>	<b>5,632</b>	<b>4,302</b>
		<b>Public</b>	<b>14,507</b>	<b>9,641</b>
		<b>Health Club</b>	<b>854</b>	<b>854</b>
		<b>Total</b>	<b>124,495</b>	<b>81,316</b>

Note Level 00 is street level at St. Thomas Street  
Level 02 is the pedestrian concourse level at the bus station and railway station.

## APPENDIX B: Consultation responses in more detail

### Results of public consultations carried out by applicants

An exhibition of the application was presented at two venues. The Bermondsey Village Hall on 28-30 June 2001 and Hays Gallery on 9-13 July 2001. 486 people signed the visitor's book at the exhibitions. Fifty of these made no comment. Of the 436 comments made in the book 70% were in favour of the proposals. The applicant has classified the comments as being either 'encouraging' or 'discouraging' (shown below). An inspection of the responses by the Council indicates that this is a fair and accurate assessment of the results, indeed many classed as 'mixed' seemed positive.

Exhibition Venue	Encouraging comments	Discouraging comments	Mixed comments
<i>Bermondsey Village Hall</i>	39 (60%)	8 (12%)	18 (28%)
<i>Hays Gallery</i>	265 (71%)	27 (7%)	79 (21%)
<b>Overall Total</b>	<b>304 (70%)</b>	<b>35 (8%)</b>	<b>97 (22%)</b>

Sample of encouraging comments: 'Can't wait'. 'Looks exciting'. 'Striking attractive building'. 'Go for it!' 'Very enthusiastic'. 'Good for the area'. 'I hope it goes ahead'. 'An appropriate landmark for SE1'. 'A welcome new landmark for the London skyline'. 'Excellent - a magnificent addition to the skyline'. 'Just what London needs'. 'Fantastic – will make London better than New York'. 'Very futuristic'. 'building looks gorgeous'. 'stunning building, hope it gets built'.

Sample of discouraging comments: 'Far too big'. 'Pointy, very pointy'. 'Presentation difficult to read. Difficult to understand street level implications. 'Don't like it, replaces a very attractive existing building'. 'Large'. 'Difficult to get acceptance of this big scale building' 'Just a pointy glass block'.

Sample of comments classified as mixed: *Very attractive design and positive idea but where will people queue for the viewing galleries and has provision been made for cycle lanes? 'Broadly sympathetic'. Attractive design but too big. Aesthetically attractive but what will it do for the existing community? 'Very interesting, have to see whether the planners let it through'. 'Impressive design with high visual impact. I believe it will be a major addition to the area...have concerns about traffic'. 'A great scheme for Southwark, hope it gets permission at current height'. Design is good but perhaps the wrong location. 'Like the idea, need to see more'. 'Visual impact is great ...have Railtrack been consulted?' 'Impressive but how much is it going to change'. 'Very exciting but unlikely to get past the planners or English Heritage'. 'Expensive? I like it'. 'Not bad'. 'Too low' 'Prefer it to concrete or glass blockhouses'. 'Unique – more Hong Kong/Singapore than London'. 'Doesn't look feasible'.*

70 letters and e-mails were received from individuals across London in support of the tower. Comments included: 'a very beautiful and impressive building'; 'a world class design'; 'support the viewing platform'; 'perfect outline for a skyscraper'; will attract a great deal of prestige'; will regenerate local economy'; 'a stunning modern landmark and a catalyst for further investment'; 'Don't be swayed by reactionary arguments by those who would like nothing better than see our City frozen in time and turned into a huge museum'; 'a fine and graceful structure. It would be a stunning addition to the London Skyline' 'It seems that whenever anything new or consequential is planned English Heritage negate the project out of hand.'; 'a stylish and graceful building'.

### English Heritage:

For English Heritage the overriding consideration is whether the location is suitable for a tall building in terms of its effects on the historic environment at a city-wide as well as a local level. If not, then no tall building will be acceptable, however good the design. Only if it can be

demonstrated that the location and context are appropriate will other factors including design quality be addressed (*from: Guidance on Tall Buildings*). There seems to be a clear conflict with the policy of protecting the Strategic Views, which suggests that this is not a suitable location.

They raise four principle issues:

1. The effect upon the Tower of London World heritage site.

The World Heritage site masterplan has the objective to 'ensure that the wider setting of the Tower is adequately protected from development which is not compatible with the unique status, dignity and character of the World Heritage Site.' The proposed Tower will be clearly seen from several locations within the precincts as well as in backdrop views from the north east. Although three of the four views from within the Tower precincts would be masked by trees for at least half of the year, which might preserve the important illusion of the precinct's apartness, this illusion would be less well preserved in winter.

2. Impact on the Strategic Views of St. Paul's Cathedral.

The proposed tower would be in the background consultation area of the Strategic views from Kenwood and Parliament Hill Fields. In these two views the proposed tower would rise behind St. Paul's just to the left and just to the left of the peristyle. We accept that these views are already compromised but it is still the Cathedral that dominates the view. As the new tower would be so much taller than the cathedral, and on such a close alignment to it, it would be the tower that commanded first attention at the expense of the dome. It is therefore not a suitable location for such a tower.

3. Impact on the setting of Tower Bridge

Although not part of the Tower World Heritage site, is a universally recognised symbol of London. Views of and through the bridge are compromised by ill-planned modern developments. From in front of the Tower Hotel the proposed tower would fill more of the gap between the towers. However, the bridge is a powerful enough structure visually to be able to stand up to the competition. The impact would be less severe than on the Tower of London but it would be a further erosion of the distinctive silhouette.

4. Impact on the Historic Buildings and Conservation Areas of North Southwark.

The site is not within a conservation area but close to the Tooley Street and Borough High Street Conservation Areas. There are also numerous listed buildings in the area, including the train shed to platforms 9-16 of London Bridge Station which would be demolished as part of Railtrack's Masterplan proposals. The existing Southwark Towers block already has a significant, adverse impact on the setting of most of these buildings and areas. With its distinctive cladding system of reflective glass it is clearly visible across a wider area and not a building whose demolition we would object to. A well-designed replacement building could provide an opportunity to improve the street environment. The proposed new tower would be two and a half times as high and would have an enormous impact.

It is also disappointing that the scheme fails to provide a comprehensive masterplan for the integration of the new building into the surrounding wider area. The proposed canopy over St. Thomas Street seems to relate more to the scale of the new tower than to the street. We note that Borough Market and Hay's Galleria have glazed over areas but these are different in form and function, being more indoor spaces.

**Commission for Architecture in the built Environment (CABE):**

The first question to consider is the one of principle. Irrespective of architectural quality, is a building of this size suitable on this site? It would be visible from near and far, from many different places, dominating many views. It would become a picture postcard image representing London. It could be argued that both practical and symbolic regeneration benefits will flow to a relatively neglected part of London from what might turn out to be one of the finest buildings south of the river. On the other hand, the project could be seen simply as an opportunistic speculative commercial development, and many would feel that this is hardly an appropriate starting point for a building that would inevitably assume iconic status.

A great deal of work has been done since this scheme was first presented to C.A.B.E. C.A.B.E. are supportive of this work and the direction in which the scheme is developing. We recognise that the scheme is still evolving; we offer the following comments with confidence that the issues they raise can be addressed satisfactorily as this process continues, with one important caveat.

We are pleased to see that serious consideration has been given to the immediate surroundings of the tower and to its wider setting, and we welcome the opportunity to consider the evolution of the scheme at ground level. A clear and credible attempt is made by this scheme to resolve the public realm around the London Bridge area. We regard this approach, which aims to deal with every aspect of the public realm, including the public streets and the bus and rail stations, as offering the very welcome prospect of a comprehensive solution to a longstanding series of problems.

The sequence of spaces, such as the hierarchical arrangement of the bus station and the rail station, appear logical and well considered. The reconfiguration of elements of the scheme to meld it better with Railtrack's plans is a very positive step. With regard to the bus station, the planned arrangements appear to be clear and sensible but we note that there is still uncertainty about what shape any reordering may take; we urge those involved to continue the dialogue and to plan for different eventualities.

The way in which the canopies are to be used is, in principle, welcome. They could provide a unifying language for the lower levels of the scheme and serve a vital purpose in tackling the wind problems around the area, particularly in St Thomas Street. However, we are concerned that the initial cost of the canopies, and the ongoing cost of their maintenance, is bound to be large and it is not clear upon whom this financial responsibility will rest; there needs to be clarity about who will pay these initial and ongoing costs. To lose the canopies because of financial constraints would be highly regrettable and would severely compromise the public realm benefits of this scheme. We urge that their construction and maintenance be included as one of the major design points to be safeguarded legally in any permission granted.

It is not clear how the management regime will work in these public areas, for example in terms of preventing them becoming havens for anti-social behaviour; more information is required on this. It may be that a small Business Improvement District could be created.

It appears that the ground floor arrangements as proposed will not offer the very clear experience of the tower above, which is a feature of the great (American) skyscrapers in whose company this building may come to be considered. Towers such as the Seagram, for example, provide a reading of their top, middle and lower elements as being connected, and no one entering the Seagram can fail to be aware of the structure above.

It appears that this proposal will feature a degree of disconnection between the ground level experience of the building and the structure above; it is not entirely clear how this relationship will work. However, we acknowledge that a different solution may be appropriate here; there are constraints created by placing such a tower in a cramped site in a European city, and we note the desire on the part of the architects to ensure that, while the presence of the tower above is not denied, it is not too overpowering either. The committee felt that there was potentially a great deal of excitement to be gained from the suggested idea of the canopies acting as screening, offering glimpses of the tower above; however it is difficult to visualise this as yet. It may be that further explanation and visual material would reveal that this approach offers a convincing alternative for the experience of world-class tall structures at their base. On this point and as a general point about the ground plane of the scheme, it would be helpful for narratives to be produced to describe and show in detail the experience of people using this scheme.

If indeed the canopies were to offer glimpses of the structure above, it will be necessary to ensure that the elements of the scheme which allow for this, such as the type of glass used and the angling of the panels, are safeguarded.



It would also be helpful, we think, for there to be greater architectural clarity about which elements below the canopies are structural or non-structural – at the moment, with the terracotta cladding of walls and columns, this is not clear.

Previous comments from CABE have covered the impact of the tower in longer views and we reiterate our support, in principle, for a building of this height, of this high quality, on this site. We note the refinement of the top of the tower, which has led to an opening out of the peak; we consider this to be a rational decision which works well visually as well as in terms of facilitating the performance of the radiator element.

### **Comments on behalf of Railtrack PLC**

The importance of co-ordinating this development with the Railtrack Masterplan cannot be overstated. There has been no assessment to test whether or not it would be possible to integrate the scheme with the station as it exists, nor with the alternative scheme that was considered at the Thameslink 2000 public Inquiry. The transport assumptions are different from the Masterplan scheme, with a lower estimate for the proportion that will travel by rail. Railtrack assumes that a substantial contribution will be made by the developer to fund public benefits. As the station will be the public service most affected, Railtrack assumes that a substantial contribution will be made towards the station redevelopment.

Attention is drawn to the ‘wind gutter’ on the Railtrack scheme not lining up with the canopy of the Tower, which could allow wind to be funnelled onto the platforms. (*This could be resolved when the details of the canopy is considered as a reserved matter*). Railtrack also point out that the Tower scheme is not creating a public space at piazza level as the space has already been approved as part of the Masterplan.

### **Comments on behalf of Guys and St. Thomas’ NHS Trust (The Hospital)**

These comments are also on behalf of the South London Maudsley NHS Trust (Slam) and King’s College London (KCL). The Trust has been discussing the proposals with the applicant in order to minimise the impact of the development on the Hospital, particularly during the demolition and construction phases. The Trust strongly supports the regeneration of the London Bridge area and welcomes the application proposals in the role that they may play in this regeneration process.

However the Trust has concerns regarding the control of activities required in the demolition of the existing tower and the construction of the replacement tower.

The site accommodates a hospital and university, both of international standing and providing ground breaking medical care and scientific research. The hospital provides facilities and care of national and regional significance, with specialities in renal medicine & surgery, urology, ENT, oncology, paediatrics and dentistry. The hospital treats approximately 350,000 patients a year. All the in-patient services plus many supporting departments function 24 hours a day, throughout the week.

The proposal involves demolition and construction that may take up to 7 – 8 years to complete and will result in substantial noise, dust, vibration and traffic. The site is very close to the hospital, with the closest point being just 5 metres (15 feet) from Thomas Guy House. The adjacent buildings contain a number of units which are highly susceptible to noise, dust and vibration. These include:

- Out-patients departments
- Research and analysis laboratories
- Pharmacy
- Gait Laboratory
- 4 Acute wards for urology and orthopaedics
- 4 Acute mental health wards
- 2 day hospitals - for the elderly and the mentally ill.

In addition the essential ventilation required by these facilities is provided by a number of intake chambers either facing St. Thomas Street, on the roof or nearby.

The Trust seeks a clear, precise and enforceable agreement to be put in place to control the processes involved in demolition and construction. They believe that this must be by legal agreement which runs with the land, rather than by condition which is on the permission. A detailed list of requirements for such an agreement has been submitted. The Trust also offers to arrange a visit for members of the Development Control Committee and officers to gain a clear understanding of the implications of the application proposals.

### **Council's Archaeology Officer.**

The site lies within the archaeological priority zone of Borough/Bermondsey/Riverside, on the fringes of the Roman and medieval settlement in north Southwark. Archaeological deposits may survive on the site, but it is likely that considerable disturbance has already been caused by the existing building. Any surviving remains are likely to comprise water channel deposits, timber revetments and drainage ditches rather than buildings and structures. Nevertheless, these deposits are of local significance and the Council's Archaeology Policy E.5.1 applies.

The Environmental Statement submitted by the applicant contains sections on Archaeology and Construction. The Archaeology Section omitted some information and the Construction Section did not address the requirement for archaeological investigation adequately. Subsequent discussions between the Council and the applicant's agents resolved the issue and the following course of action has been agreed.

- Should consent be granted, an archaeological evaluation will be conducted before the demolition of the existing structure. The evaluation will probably take the form of test pits and/or trenches and will be located in the existing car park areas and within the basement of the current building. The results of the evaluation will be considered during the demolition process.
- The requirement for further archaeological investigation and/or preservation in situ will then be considered. The construction programme will maintain some flexibility to ensure that any archaeological excavation is accommodated. It is likely that excavation would take place before piling and ground reduction to form the basements and foundations for the new build.

All archaeological investigation will be undertaken in accordance with a brief set by the Council. In order to ensure that archaeological investigation takes place, and that preservation in situ may be achieved if necessary, it is recommended that conditions are attached to any consent that may be granted.

## **APPENDIX C: Selected technical consideration**

### **Shadow effect**

An analysis of the shadow that this tower may cast is sunlight has been made and it has been found to have only a minimal effect and no significant adverse impact on residential properties.

The shadow of the tower would sweep around at an angular rate of 15 degrees per hour. For buildings just 250m away this would mean that the shadow would take between one and one and a half hours to pass over. Buildings 500m away would be affected for about half an hour or less. The closest residential properties with gardens are over 650m to the west in Thrale Street and to the north west in Park Street. This area would be only marginally affected by overshadowing and would not be subject to a decrease in vertical sky component due to lower but closer developments. The likelihood, given the presence of other buildings in the intervening area, is that daylight effects on these properties will be minor and probably insignificant.

Computer simulations of where the shadow will fall on 21<sup>st</sup> March (spring equinox), 21<sup>st</sup> June (summer solstice) and 21<sup>st</sup> December (winter equinox) reveals the following:

On 21<sup>st</sup> March sunrise is at 06.01 hrs and sunset 18.13 hrs. Potential sunlight is 12.2 hrs but actual sunlight is about 4 hours. From 08.00 to 09.00 hrs the tip of the shadow falls on Thrale Street, by 09.30 it reaches Park Street. From 10.00 to 18.00 the tip of the shadow would fall on the river, generally near the mid point of the river as the shadow shortens to midday and then extends again the embankment at the Tower of London by 16.30-17.00, and by 18.00 extends across Tower Bridge.

On 21<sup>st</sup> June sunrise is 03.42 and sunset 20.20 and potential sunlight 16.6 hours but actual sunlight 7 hours. The shadow may be stronger but much shorter. It will start faintly towards the south west, becoming stronger by 07.30 and the tip of the shadow may just reach Thrale Street at about 08.30 but then fall short of other residential areas as it swings north then east. From 11.00 – 17.00 hrs the shadow points towards the river but will fall short of it. By 17.30 the shadow extends as far as the GLA building, by 18.00 south of Potters Fields park and 18.30 falls across the southern end of Tower Bridge approach.

On 21<sup>st</sup> December sunrise is 08.03 and sunset 15.52, with potential sunlight of 7.0 hours and actual sunlight of 1.5 hours. There will be longer but fainter shadows. Not really noticeable until 09.00 by which time it will fall north west across Blackfriars towards Holborn. From 09.00 to 09.30 the tip of the shadow may reach St. Paul's Cathedral, and by 11.00 the Bank. By 15.00 the shadow will be fading away before reaching the Tower of London.

In conclusion, there will be no significant adverse impact from the shadow cast by the tower.

### **Impact on television and radio reception**

There are two main causes of poor signal reception as a result of large buildings or structures: shadows and reflections.

Radio frequencies signals travel in the same way as light, i.e. in straight lines. As in the case of light, radio frequencies can diffract around obstacles, the amount of diffraction depending on the frequency. Radio frequency signals have longer wavelengths than light and therefore can diffract through larger angles than light. Low frequencies (LF,

long wave) signals diffract through larger angles followed by MF, HF, VHF, UHF, and then SHF.

In the UK radio signals are mainly transmitted on VHF (very high frequency) as 'FM' with some broadcasts at lower frequencies. Terrestrial Television services are transmitted by a network of high, medium and low power UHF transmitters. Most in London receive signals from the south at Crystal Palace (BBC1, BBC2, ITV and Channel 4 in both digital and analogue format) and Croydon (Channel 5). Satellite television services are transmitted at SHF at around 10GHz, again from a southerly direction, at an angle of between 17° and 31° above the horizon. The relevant satellites describe a curve in the southern sky. At due south (180°) the elevation is 31°, at 45° either side of due south the elevation drops to 21°.

As in the case of light, radio frequencies can be reflected. Therefore a receiver may receive two or more signals from the same source. The reflected signal arriving later and creates a 'ghost' of the television image (slightly to the right). There is no equivalent ghosting problem with radio reception.

As both the terrestrial and satellite transmitters are in a southerly direction only the facades facing south west, south and south east could affect reception. For satellite reception, due to the height above the horizon, the length of the longest shadow will be about 700m and due north of the tower, affecting mainly the River Thames and a small area of City offices.

The shadows for terrestrial television will also be approximately due north but much longer. As the Tower will taper and diffraction will make the shadow effect shorter and narrower, the affected area will be quite narrow. The affected area is served by terrestrial transmitters at Alexandra Palace and Edmonton and by repositioning antenna towards these all but Channel 5 can be received.

The facades may affect reflection. The percentage incident radio signal that may be reflected depends on the percentage of the facades that are flat metal and the level of metal impurities in the glass. The Tower will have impurity free glass and less than 20% metal on these facades. 20% may therefore be the percentage of reflection, a reduction of 6.5dB from the direct signal. The areas affected by reflected signals will be to the west (Battersea and beyond) and to the east (Millwall and beyond). In each case these can be off-set by the use of higher gain antenna or repositioning it towards a local transmitter, e.g. at Worlds End, Poplar or Hammersmith. With the increasing move to cable TV or satellite TV, less receivers will be affected by shadow or reflections.

## APPENDIX D:

### Statement concerning the quality of the detailed design of London Bridge Tower

When the idea of a building of the scale and impact of London Bridge Tower was first proposed, representatives of the Council, English Heritage, CABE and the GLA agreed that the sheer quality of the resulting construction was of paramount importance.

It was generally agreed that the planning system, which attempts to define the design at an early stage, should not preclude the ongoing development and improvement of the design in the future. It was further agreed that the detailed development of the design needed to be carried out under the auspices of the planning authorities who would work with the designers to ensure that the original design intent was preserved, expanded and improved.

To this end the planning authorities asked the designer, Renzo Piano, to prepare a list of those aspects of the design that he believes are of the essence of the quality of the design. These are as follows:

1. **Overall Proportion** - The overall spire shape of the building is exclusive and predominant in the perception of the proposed building. The slenderness and overall proportion of the building is paramount. As a rule of thumb, to preserve this slenderness, the largest floor plate should fit within a radius of 38m and the total height shall not exceed 306m. Were the height of the building to reduce from 306m, the slenderness would remain the same and the overall girth at low level would proportionally reduce.
2. **Shards (Facades of Glass)** - The shards are the shear planes of glass which make up the elevations of the building. They are designed to fragment the scale of the tower by reflecting the light at different angles. At least 9 shards per floor plate elevation are required. These shards should not appear as 2-dimensional planes and should not appear to close or return at the edges. Each must extend at least 5% of their length in the horizontal plane beyond the plane of the returning shard or corner of the floor plate.
3. **Facades** - The building should appear open and transparent. It should not appear to be exclusive. The facades should incorporate highly transparent extra clear glazing with no opaque elements other than minimal supporting structure. Blinds provide solar protection. No use of mirrored or tinted glass should be allowed. Minimising the reflection factor of the external pane reduces glare.
4. **Winter Gardens** - The winter gardens are an essential symptom of the 'openness' and 'breathability' of the structure. Each floor should incorporate at least 3 winter gardens, which should be, as far as possible naturally ventilated. The width of the recessed joint forming the winter garden should be at least 10% of the length of the shard measured in the horizontal plane. The floor area of the winter gardens is at least 1.5% of the total floor area. Architecturally this is deemed essential in allowing an otherwise hermetically sealed building to "breathe".

5. **Radiator** - The radiator at the top is an essential symbol of the energy efficiency and sustainability of the design and should be used to dissipate excess heat naturally. The detailed design of the structure should be as transparent as possible. At a height of 306m a minimum of 60m should be used for this structure.
6. **Sustainability** - The tower should aim to present a model for future developments in terms of energy efficiency and sustainability. The design should utilise the latest technology to ensure excellent environmental performance for a building of this type.
7. **Lighting** - The internal light fixtures near the edge beam of the façades in the offices and hotel should be indirect (i.e. uplighters) and should have the same temperature. Externally the tower should be softly lit to give it a subtle presence on the skyline.
8. **Public Access** - The tower should be accessible to the general public at the lower, mid and top levels. The viewing galleries are to be kept for public access. Spaces should be set aside for non-commercial activities.
9. **Lower Levels** - The generator for the architecture of the lower levels should be the architecture of the existing railway arches. The function of these 6 levels should be predominantly public. At street level at least 15% and at concourse level 35% of the site should be returned to public use.
10. **Public Realm** - The glazed canopies aim to unify the disparate functions surrounding the site such including the train station, bus station, the entrance to Guy's Hospital via Great Maze Pond and the piazza itself. They also aim to improve the climatic conditions for pedestrians. The canopy design should be used as a framework for the lighting, signage, street furniture, floor finishes etc. throughout the site. Particular attention should also be given to enforcing strict design guidelines for all tenant signage, lighting and associated advertising.