Open Agenda

Planning Committee (Major Applications) A

Tuesday 22 July 2025
6.30 pm
Ground Floor Meeting Room G02 - 160 Tooley Street, London SE1 2Q

Membership

Councillor Richard Livingstone (Chair)
Councillor Kath Whittam (Vice-Chair)
Councillor Gavin Edwards
Councillor Darren Merrill
Councillor Reginald Popoola
Councillor Catherine Rose
Councillor Emily Tester

Reserves

Councillor Ellie Cumbo
Councillor Sam Dalton
Councillor Sabina Emmanuel
Councillor Jon Hartley
Councillor Nick Johnson
Councillor Michael Situ
Councillor Cleo Soanes

INFORMATION FOR MEMBERS OF THE PUBLIC

Access to information

You have the right to request to inspect copies of minutes and reports on this agenda as well as the background documents used in the preparation of these reports.

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Access

The council is committed to making its meetings accessible. For details on building access, translation, provision of signers or any other requirements for this meeting, please contact the person below.

Contact: Gerald Gohler on 020 7525 7420 or email: gerald.gohler@southwark.gov.uk

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Members of the committee are summoned to attend this meeting
Althea Loderick
Chief Executive
Date: 14 July 2025

PRINTED ON RECYCLED PAPER

Planning Committee (Major Applications) A

Tuesday 22 July 2025
6.30 pm
Ground Floor Meeting Room G02 - 160 Tooley Street, London SE1 2Q

Order of Business

Item No.	Title	Page No.
1.	**APOLOGIES** To receive any apologies for absence.	
2.	**CONFIRMATION OF VOTING MEMBERS** A representative of each political group will confirm the voting members of the committee.	
3.	**NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT** In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.	
4.	**DISCLOSURE OF INTERESTS AND DISPENSATIONS** Members to declare any personal interests and dispensation in respect of any item of business to be considered at this meeting.	
5.	**MINUTES** To approve as a correct record the minutes of the meeting held on 2 July 2025.	1 - 5
6.	**DEVELOPMENT MANAGEMENT**	6 - 10
6.1.	**NEW CITY COURT 4-26 ST THOMAS STREET LONDON SE1 9RS**	11 - 232
6.2.	**TIMBER SQUARE (PHASE 2), 63 EWER STREET, LONDON SE1 0NR**	233 - 336

Item No.	Title	Page No.

ANY OTHER OPEN BUSINESS AS NOTIFIED AT THE START OF THE MEETING AND ACCEPTED BY THE CHAIR AS URGENT

EXCLUSION OF PRESS AND PUBLIC

The following motion should be moved, seconded and approved if the committee wishes to exclude the press and public to deal with reports revealing exempt information:

> "That the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in paragraphs 1-7, Access to Information Procedure rules of the Constitution."

Date: 14 July 2025

Planning Committee (Major Applications)

Guidance on conduct of business for planning applications, enforcement cases and other planning proposals

1. The reports are taken in the order of business on the agenda.

2. The officers present the report and recommendations and answer points raised by members of the committee.

3. The role of members of the planning committee (major applications) is to make planning decisions openly, impartially, with sound judgement and for justifiable reasons in accordance with the statutory planning framework.

4. The following may address the committee (if they are present and wish to speak) for **not more than 3 minutes each**.

   (a) One representative (spokesperson) for any objectors. If there is more than one objector wishing to speak, the time is then divided within the 3-minute time slot.

   (b) The applicant or applicant's agent.

   (c) One representative for any supporters (who live within 100 metres of the development site).

   (d) Ward councillor (spokesperson) from where the proposal is located.

   (e) The members of the committee will then debate the application and consider the recommendation.

   Note: Members of the committee may question those who speak only on matters relevant to the roles and functions of the planning committee that are outlined in the constitution and in accordance with the statutory planning framework.

5. If there are a number of people who are objecting to, or are in support of, an application or an enforcement of action, you are requested to identify a representative to address the committee. If more than one person wishes to speak, the 3-minute time allowance must be divided amongst those who wish to speak. Where you are unable to decide who is to speak in advance of the meeting, you are advised to meet with other objectors in the foyer of the council offices prior to the start of the meeting to identify a representative. If this is not possible, the chair

will ask which objector(s) would like to speak at the point the actual item is being considered.

6. Speakers should lead the committee to subjects on which they would welcome further questioning.

7. Those people nominated to speak on behalf of objectors, supporters or applicants, as well as ward members, should sit on the front row of the public seating area. This is for ease of communication between the committee and the speaker, in case any issues need to be clarified later in the proceedings; it is **not** an opportunity to take part in the debate of the committee.

8. Each speaker should restrict their comments to the planning aspects of the proposal and should avoid repeating what is already in the report. The meeting is not a hearing where all participants present evidence to be examined by other participants. **As meetings are usually livestreamed, speakers should not disclose any information they do not wish to be in the public domain.**

9. This is a council committee meeting which is open to the public and there should be no interruptions from the audience.

10. No smoking is allowed at committee.

11. Members of the public are welcome to film, audio record, photograph, or tweet the public proceedings of the meeting; please be considerate towards other people in the room and take care not to disturb the proceedings.

Please note:
Those wishing to speak at the meeting should notify the constitutional team by email at ConsTeam@southwark.gov.uk in advance of the meeting by **5pm** on the working day preceding the meeting.

The arrangements at the meeting may be varied at the discretion of the chair.

Contacts: General Enquiries
Planning Section
Resources
Tel: 020 7525 5403

Planning Committee Clerk, Constitutional Team
Governance and Assurance
Tel: 020 7525 7420

Agenda Item 5

Planning Committee (Major Applications) A

MINUTES of the Planning Committee (Major Applications) A held on Wednesday 2 July 2025 at 6.30 pm at Ground Floor Meeting Room G02 – 160 Tooley Street, London SE1 2QH.

PRESENT: Councillor Richard Livingstone (Chair)
Councillor Kath Whittam (Vice Chair)
Councillor Gavin Edwards
Councillor Reginald Popoola
Councillor Catherine Rose
Councillor Emily Tester

OFFICER SUPPORT: Tim Cutts (Head of Planning and Growth – Old Kent Road)
Catherine Brownell (Head of Sustainable Growth – North)
Nick Grant (External Legal Counsel, Landmark Chambers)
Matthew Hill (Project Manager)
Alexander Cameron (Planning Team Leader)
Neil Loubser (Planning Project Team Leader CIL/S106)
Gerald Gohler (Constitutional Officer)

1. APOLOGIES

There were apologies for absence from Councillor Darren Merrill.

2. CONFIRMATION OF VOTING MEMBERS

Those members listed as present above were confirmed as the voting members for the meeting.

3. NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT

The chair drew members' attention to the members' pack and addendum report which had been circulated before the meeting.

The chair informed the meeting that items 9.2 and 9.3 related to Chambers Wharf,

Chambers Street, London, SE16 4XQ had been withdrawn at the request of planning officers and would be heard at a future meeting.

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

The following members declared an interest in item:

9.1 Ilderton Wharf, 1 – 7 Rollins Street, London SE15 1EP [24/AP/3575 - Full Planning Application]

Councillor Richard Livingstone, non-pecuniary, as the application was in his ward. He would, however, be approaching the application with an open mind.

5. MINUTES

RESOLVED:

That the minutes of the Planning Committee (Major Applications) A meeting held on 4 June 2025 be approved as a correct record and signed by the chair.

6. TO RELEASE £118,394.60 FROM SECTION 106 AGREEMENTS TO DELIVER ROCKINGHAM STREET AND ARCH STREET IMPROVEMENTS

Report: see pages 5 to 12 of the main agenda pack.

The officer introduced the report.

Members of the committee asked questions of the officers.

A motion to approve the release of the funds was moved, seconded, put to the vote and declared carried.

RESOLVED:

That the release of the funds amounting to £118,394.60, which were received by the council (pursuant to the terms of the legal agreement pertaining to the planning applications noted in Table 1 of the report), be approved and applied towards the Rockingham Street and Arch Street improvements of the public realm.

7. TO RELEASE £200,000 FROM SECTION 106 AGREEMENTS FOR THE CONSULTANT SERVICES FOR ASYLUM ROAD NURSING HOME DELIVERY

Report: see pages 13 to 20 of the main agenda pack.

The officer introduced the report.

Members of the committee asked questions of the officers.

A motion to approve the release of the funds was moved, seconded, put to the vote and declared carried.

RESOLVED:

That the release of the funds amounting to £200,000.00, which were received by the council (pursuant to the terms of the legal agreements pertaining to the planning applications noted in Table 1 of the report), be approved and be applied towards consultancy services to lead a market-led development opportunity for a new nursing home at Asylum Road.

8. RELEASE OF FUNDS TOTALLING £577,522.84 TOWARDS THE LITTLE DORRIT PARK IMPROVEMENTS

Report: see pages 21 to 125 of the main agenda pack.

The officer introduced the report.

There were no questions put by members of the committee.

A motion to approve the release of the funds was moved, seconded, put to the vote and declared carried.

RESOLVED:

That the release of the S106 funds totalling £577,522.84 (which were paid to the council under the terms of the legal agreements pertaining to the planning applications listed in the table at paragraph 1 of the report) towards the Little Dorrit Park Improvements (LDPI) project be approved.

9. DEVELOPMENT MANAGEMENT

The committee considered the report.

RESOLVED:

1. That the determination of planning applications, or formal observations and comments, the instigation of enforcement action and the receipt of the reports included in the attached items were considered.

2. That the decisions made on the planning applications be subject to the

conditions and/or made for the reasons set out in the attached reports unless otherwise stated be agreed.

3. That where reasons for decisions or conditions were not included or not as included in the reports relating to an individual item, they be clearly specified and agreed.

9.1 ILDERTON WHARF, 1 – 7 ROLLINS STREET, LONDON SE15 1EP

Planning Application Number: 24/AP/3575

Report: see pages 131 to 271 of the agenda pack and pages 1 to 7 of the addendum report

PROPOSAL:

Demolition of the existing buildings on the site and the construction of a linked building with a tower housing purpose built student accommodation (Use Class Sui Generis), a shoulder element housing affordable residential housing (Class C3) both with basement level, and an industrial building including affordable workspace at the southern element of the Site (Classes B2, B8, E(g)(iii), and Sui Generis), alongside the delivery of a flexible Class E unit at ground floor level, and a mixed community cafe and PBSA co-working space (Class E/Sui Generis) at ground floor level on the corner of Ilderton Road and Surrey Canal Road, in addition to the delivery of hard and soft landscaping, pedestrian and vehicle access including the provision of a loading bay on Ilderton Road, cycle parking, blue badge car parking, wider public realm improvements including new public open space, with associated highway works and all other ancillary works associated with the development.

The committee heard the officers' introduction to the report and addendum report. Members put questions to officers.

There were no objectors present and wishing to speak.

The applicant's representatives addressed the committee and answered questions put by members of the committee.

Following this, the meeting adjourned for a comfort break from 8:12pm to 8:16pm.

A representative of supporters living within 100 metres of the development site addressed the committee and responded to questions put by members of the committee.

There were no ward councillors present who wished to address the committee in that capacity.

Members of the committee put further questions to officers and discussed the application.

Members asked for the allocation procedure of “twodio” spaces to be addressed satisfactorily in the student management plan.

A motion to grant planning permission as on paper was moved, seconded, put to the vote and declared carried.

RESOLVED:

1. That planning permission be granted subject to the conditions set out in the report and the addendum report, the applicant entering into an appropriate legal agreement, and referral to the Mayor of London.

2. That in the event that the requirements of paragraph 1 above are not met by 31 October 2025, the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 379 of the report.

9.2 CHAMBERS WHARF, CHAMBERS STREET, LONDON SE16 4XQ [24/AP/3800 – S73 MATERIAL AMENDMENT]

This item was withdrawn by planning officers and will be heard at a later date.

9.3 CHAMBERS WHARF, CHAMBERS STREET, LONDON, SE16 4XQ [24/AP/3801 – S73 MATERIAL AMENDMENT]

This item was withdrawn by planning officers and will be heard at a later date.

The meeting ended at 8.31 pm.

CHAIR:

DATED:

Agenda Item 6

Meeting Name:	Planning Committee (Major Applications) A
Date:	22 July 2025
Report title:	Development Management
Ward(s) or groups affected:	All
Classification:	Open
Reason for lateness (if applicable):	Not applicable
From:	Proper Constitutional Officer

RECOMMENDATIONS

1. That the determination of planning applications, or formal observations and comments, the instigation of enforcement action and the receipt of the reports included in the attached items be considered.

2. That the decisions made on the planning applications be subject to the conditions and/or made for the reasons set out in the attached reports unless otherwise stated.

3. That where reasons for decisions or conditions are not included or not as included in the reports relating to an individual item, they be clearly specified.

BACKGROUND INFORMATION

4. The council's powers to consider planning business are detailed in Part 3F which describes the role and functions of the planning committees. The matters reserved to the planning committees exercising planning functions are described in part 3F of the Southwark Council constitution.

KEY ISSUES FOR CONSIDERATION

5. In respect of the attached planning committee items members are asked, where appropriate:

    a. To determine those applications in respect of site(s) within the borough, subject where applicable, to the consent of the Secretary of State for Levelling Up, Housing and Communities and any directions made by the Mayor of London.

b. To give observations on applications in respect of which the council is not the planning authority in planning matters but which relate to site(s) within the borough, or where the site(s) is outside the borough but may affect the amenity of residents within the borough.

c. To receive for information any reports on the previous determination of applications, current activities on site, or other information relating to specific planning applications requested by members.

6. Each of the following items are preceded by a map showing the location of the land/property to which the report relates. Following the report, there is a draft decision notice detailing the officer's recommendation indicating approval or refusal. Where a refusal is recommended the draft decision notice will detail the reasons for such refusal.

7. Applicants have the right to appeal to Planning Inspector against a refusal of planning permission and against any condition imposed as part of permission. Costs are incurred in presenting the council's case at appeal which maybe substantial if the matter is dealt with at a public inquiry.

8. The sanctioning of enforcement action can also involve costs such as process serving, court costs and of legal representation.

9. Where either party is felt to have acted unreasonably in an appeal the inspector can make an award of costs against the offending party.

10. All legal/counsel fees and costs as well as awards of costs against the council are borne by the budget of the relevant department.

Community impact statement

11. Community impact considerations are contained within each item.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Assistant Chief Executive – Governance and Assurance

12. A resolution to grant planning permission shall mean that the director of planning and growth is authorised to grant planning permission. The resolution does not itself constitute the permission and only the formal document authorised by the committee and issued under the signature of the director of planning and growth shall constitute a planning permission. Any additional conditions required by the committee will be recorded in the minutes and the final planning permission issued will reflect the requirements of the planning committee.

13. A resolution to grant planning permission subject to legal agreement shall mean that the director of planning and growth is authorised to issue a planning permission subject to the applicant and any other necessary party entering into a written agreement in a form of words prepared by the assistant chief executive – governance and assurance, and which is satisfactory to the director of planning and growth. Developers meet the council's legal costs of such agreements. Such an agreement shall be entered into under section 106 of the Town and Country Planning Act 1990 or under another appropriate enactment as shall be determined by the assistant chief executive – governance and assurance. The planning permission will not be issued unless such an agreement is completed.

14. Section 70 of the Town and Country Planning Act 1990 as amended requires the council to have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations when dealing with applications for planning permission.

15. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The development plan is currently the Southwark Plan which was adopted by the council in February 2022. The Southwark Plan 2022 was adopted after the London Plan in 2021. For the purpose of decision-making, the policies of the London Plan 2021 should not be considered out of date simply because they were adopted before the Southwark Plan 2022. London Plan policies should be given weight according to the degree of consistency with the Southwark Plan 2022.

16. The National Planning Policy Framework (NPPF), as amended in July 2021, is a relevant material consideration and should be taken into account in any decision-making.

17. Section 143 of the Localism Act 2011 provides that local finance considerations (such as government grants and other financial assistance such as New Homes Bonus) and monies received through CIL (including the Mayoral CIL) are a material consideration to be taken into account in the determination of planning applications in England. However, the weight to be attached to such matters remains a matter for the decision-maker.

18. "Regulation 122 of the Community Infrastructure Levy regulations (CIL) 2010 as amended, provides that “a planning obligation may only constitute a reason for granting planning permission if the obligation is:

    a. necessary to make the development acceptable in planning terms;
    b. directly related to the development; and
    c. fairly and reasonably related to the scale and kind to the development.

A planning obligation may only constitute a reason for granting planning permission if it complies with the above statutory tests."

19. The obligation must also be such as a reasonable planning authority, duly appreciating its statutory duties can properly impose i.e. it must not be so unreasonable that no reasonable authority could have imposed it. Before resolving to grant planning permission subject to a legal agreement members should therefore satisfy themselves that the subject matter of the proposed agreement will meet these tests.

BACKGROUND DOCUMENTS

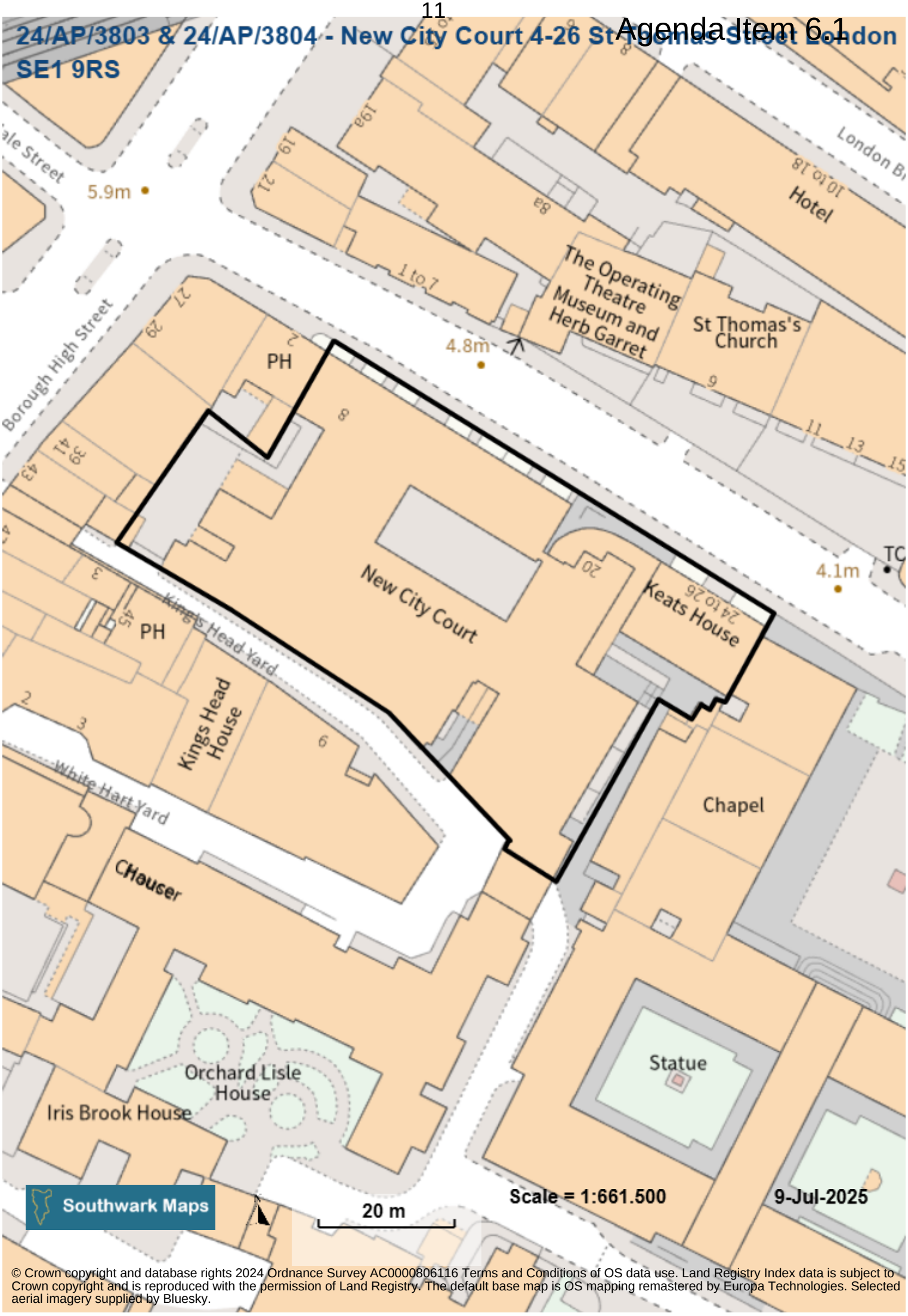
Background Papers	Held At	Contact
Council assembly agenda 23 May 2012	Constitutional Team 160 Tooley Street London SE1 2QH	Virginia Wynn-Jones 020 7525 7055
Each planning committee item has a separate planning case file	Development Management 160 Tooley Street London SE1 2QH	Planning Department 020 7525 5403

APPENDICES

No.	Title
None	

AUDIT TRAIL

Lead Officer	Chidilim Agada, Head of Constitutional Services	
Report Author	Alex Godinet, Lawyer, Finance and Governance Gerald Gohler, Constitutional Officer	
Version	Final	
Dated	14 July 2025	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	**Comments sought**	**Comments included**
Assistant Chief Executive – Governance and Assurance	Yes	Yes
Director of Planning and Growth	No	No
Cabinet Member	No	No
Date final report sent to Constitutional Team		14 July 2025



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Meeting Name:	Planning Committee (Major Applications) A
Date:	22 July 2025
Report title:	**Development Management planning application:** Application 24/AP/3803 for: Planning Permission Application 24/AP/3804 for: Listed Building Consent **Address:** New City Court 4-26 St Thomas Street London SE1 9RS **Proposal:** Redevelopment of the site to include: - Redevelopment of the existing 1980s office building with partial demolition (including demolition of the St Thomas Street entrance building and the King's Head Yard facade); the construction of side extensions and upward extension to add 5 storeys and create a 10-storey office building plus plant, balconies and roof terraces; - Redevelopment of Keats House (nos. 24-26 St Thomas Street) with retention of the historic frontage and construction of a roof extension to add one storey of office floorspace; - Restoration and refurbishment of the listed Georgian terrace (nos. 4-16 St Thomas Street) to create level front entrances to the offices, internal alterations and new glazed roof to the rear courtyard (with separate LBC application ref. 24/AP/3804); - Associated public realm and highway works to St Thomas Street and King's Head Yard, cycle parking and all ancillary works. And: Listed building consent for the restoration, rebuilding and refurbishment of the listed terraces for office use (nos. 4-16 St Thomas Street) including: Making good of atrium roof, entrance building and link building interface; Internal alterations within the terrace to reinstate the plan form and reconfiguration of circulation space on each floor; Reinstatement of front doors along St Thomas Street. (Related planning application ref. 24/AP/3803.)
Ward(s) or groups affected:	London Bridge & West Bermondsey
Classification:	Open
Reason for lateness (if applicable):	Not Applicable
From:	Director of Planning and Growth

Application Start Date: 10/02/2025	**Application Expiry Date**: 12/05/2025
Earliest Decision Date: 12/03/2025	

RECOMMENDATIONS

1. That planning permission be granted for application ref. 24/AP/3803 subject to conditions, the completion of a section 106 legal agreement and referral to the Mayor of London; and

2. That listed building consent be granted for application ref. 24/AP/3804 subject to conditions; and

3. That the planning committee in making its decision has due regard to the potential equalities impacts that are outlined in this report; and

4. In the event that the requirements of paragraph 1 above are not met by 31 October 2025, the Director of Planning and Growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 383 of this report.

EXECUTIVE SUMMARY

5. This pair of applications proposes the extension and redevelopment of New City Court. The planning application proposes to take the 1980s office building back to its concrete frame, to refurbish and extend it to become a 11-storey building. The listed building consent application proposes renovations in the grade II listed Georgian terrace to make it ready for affordable workspace use. These applications follow on from two earlier schemes that were determined by the Secretary of State in September 2023 following appeals and the public inquiry in summer 2022. This current scheme is a significantly different scheme, of much reduced scale and with a greater sustainability focus by reusing much of the existing building fabric.

6. There would be an uplift of approximately 11,200sqm of office space on the site within the Central Activities Zone and the London Bridge, Borough and Bankside Opportunity Area where office use space is supported by policy. The renovations and extensions would improve the quality of the existing office space. The affordable workspace represents 10% of the uplift in office space.

7. Amendments were made in response to consultation responses on technical matters such as servicing, cycle parking, biodiversity net gain and drainage. Small amendments were made to the design of the extension, the material of the top floor and to lower the height of the building.

8. The proposed extensions would make the main building a tall building and it would sit within the most historic area of the borough. Consultation responses include objection from the Georgian Group to the harm to the Borough High Street Conservation Area, grade II* listed Guy's Hospital, and Georgian terrace due to the height and positioning of the proposal. Historic England (HE) acknowledges this is a more modest scale of development to the appeal

schemes, however HE say it fails to respond to the character and appearance of the conservation area. HE's view is that it would cause less than substantial harm to the conservation area and to a number of listed buildings. The Conservation Area Advisory Group recommends refusal due to the harm to the conservation area, from the height and prominence of the extended building and the changed scale and character of Kings Head Yard. Objection was received from The Old King's Head pub about the harm to the amenity of its residential accommodation (loss of daylight, outlook and privacy) and heritage harm to the listed pub. Southwark Cathedral raised areas of concern to do with harm to the setting of the grade I listed Cathedral, views of the Cathedral, the character of the conservation area. The Guy's and St Thomas Foundation supports the principle and its positive benefits, and raises concerns with servicing, construction phase impacts and landscaping the amenity spaces. A public objection was received to the proposal being overdevelopment, poor design, height, causing harms to the conservation area and the listed buildings.

9. The increased massing and height of the main building, widened to the west and southern sides would be much closer to the residential accommodation of The Old King's Head pub, causing significant daylight losses and reduced outlook. Other residential properties in the area would have reduced daylight levels. While the delivery of high quality office space and a greater amount on this central site in a good design are welcomed, officers consider that there would be heritage harms and neighbour amenity harms from the increased massing of the building. The proposal would cause a middle level of less than substantial harm to the Borough High Street Conservation Area from the proposed tall building and removal of most of the Victorian screen (which itself is locally listed). The scale, bulk and height would cause harms to listed buildings on the site and around the site including:
    - a low level of less than substantial harm to grade I listed Southwark Cathedral;
    - a middle level of less than substantial harm to grade II* listed Guy's Hospital;
    - a low level of less than substantial harm to grade II* listed 9, 9a and Mary Sheridan House;
    - a low level of less than substantial harm to grade II listed The Old King's Head pub;
    - a middle level of less than substantial harm to grade II listed Georgian terrace on the site and adjoining Bunch of Grapes pub;
    - a mid-to-low level of less than substantial harm of the grade II listed buildings on the eastern side of Borough High Street (nos. 41-57).

10. Consideration has been given to whether these harms are outweighed by the benefits. The scheme would deliver public benefits including approximately 675 to 875 additional jobs on the site, the jobs and training in construction phase and end use, the improved quality of office space, over 1,000sqm of on-site affordable workspace, the sustainable retrofit approach, the public realm areas and urban greening; such benefits would be secured by planning obligations. The listed building consent proposal would be beneficial for the Georgian terrace and provide accessible front entrances. The planning balance of the harms and the benefits from the proposal has been undertaken carefully, and is set out in more detail in the Assessment section later, with the

benefits found to outweigh the harms to heritage assets and neighbour amenity.

11. The planning application ref. 24/AP/3803 is recommended for approval, subject to conditions, completion of a legal agreement and Stage 2 referral to the GLA. The listed building consent ref. 24/AP/3804 is recommended for approval subject to conditions.

Planning Summary – Tables

Commercial

Use Class	Existing sqm	Proposed sqm	Change +/-
Use Class E(g)(i) office	12,763	23,937 GIA	+11,174sqm
Affordable workspace Use Class E(g)(i)	0	1,132sqm as 10% of uplift	+1,132sqm
Jobs full time equivalent (FTE)	Estimated at 655-855 FTE jobs (if fully occupied)	1,330-1,730 FTE jobs	+ Approx. 675-875 estimated FTE jobs

Public realm

	Existing sqm	Proposed sqm	Change +/-
Public realm	0	90	+90
Play space	0	0	0

CO2 savings beyond Part L Building Regulations	36% on Part L 2021
Trees lost	0
Trees gained	41

	Existing	Proposed	Change +/-
Urban Greening Factor	0	0.307	+0.307
Greenfield Run Off Rate	30.9 litres/second	3.49 litres/second	-27.41 litres/second
Green/Brown Roofs	0sqm	526sqm	+526sqm
EVCPs (on site)	0	0	0
Cycle parking spaces	50	320	+270
Disabled parking spaces	0	0	0

Southwark CIL (estimated)	£1.16 million
MCIL (estimated)	£2.48 million
Section 106 contributions	£403,486

BACKGROUND INFORMATION

Site location and description

12. The site is on the southern side of St Thomas Street and to the east of Borough High Street, with Guy's Hospital to its east and Kings Head Yard to the south. It

has an area of 0.37 hectares and comprises three main buildings which are shown on the image and photographs below:

- The majority of the site is occupied by the main office building, built in the 1980s called “New City Court” (no. 20 St. Thomas Street), which comprises a part four-storey, part five-storey office building. Its entrance is within the curved glazed frontage onto St Thomas Street, and it is linked at the rear of the Georgian terrace to form a courtyard. Its southern side on the Kings Head Yard frontage is a two-storey façade in a Victorian design and is on the council’s local list. A small service yard is to the west. The basement level connects with the other buildings on the site.
- Keats House (nos. 24-26 St Thomas Street) has its original red brick and stone façade, part of its side façade, its railings and front lightwell, which were constructed in the mid-late 19th century. Behind this façade is the four-storey main office building. Keats House is on the local list.
- The row of grade II listed Georgian terrace buildings (nos. 4-16 St Thomas Street) were constructed in the early 19th century and are in office use. Alterations made to the buildings in the 1980s after they were listed included connecting the formerly separate buildings so that their historic plan form has been eroded. These too are attached at the east side and rear into the main office building.

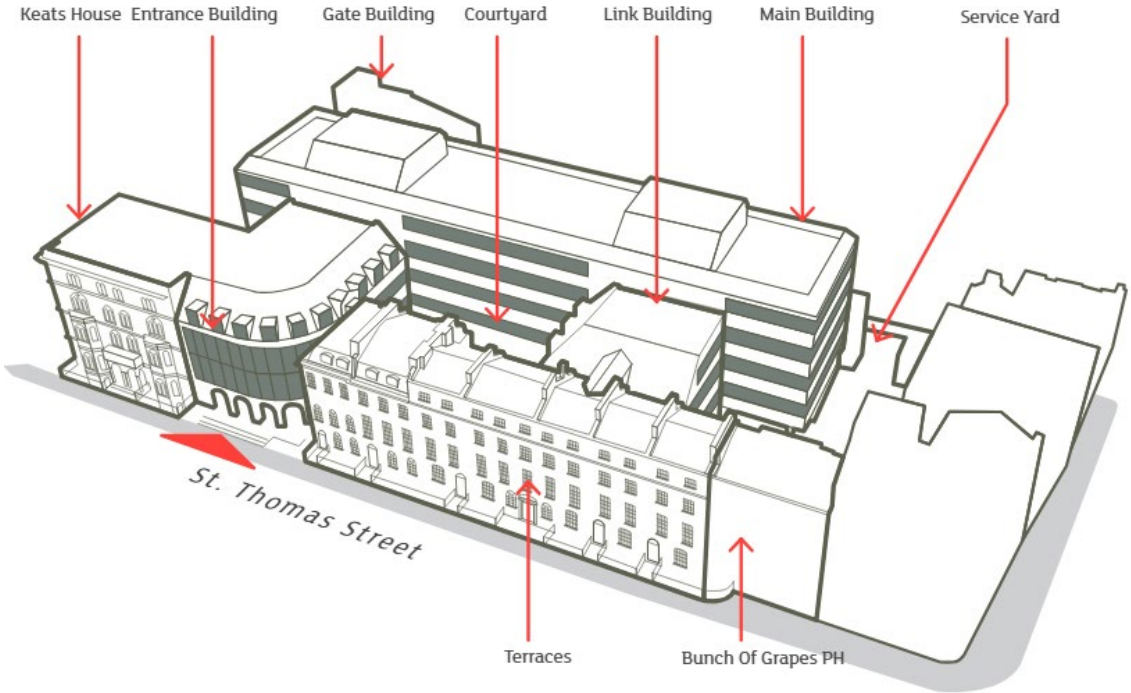


Image showing the site as viewed from the north



The main building's entrance on St Thomas Street



View along Kings Head Yard showing the Victorian screen and main building



Keats House



The grade II listed Georgian terrace

13. The site is in the London Bridge, Borough and Bankside Opportunity Area, Central Activities Zone, London Bridge town centre and the South Bank Strategic Cultural Quarter.

14. The site is within the Borough High Street Conservation Area and the North Southwark and Roman Roads Archaeological Priority Area. In addition to the grade II listed buildings and locally listed façade within the site, it is within close proximity to a number of neighbouring listed buildings. These include no. 2 St Thomas Street (grade II listed); Old King's Head Public House (grade II); Guy's Hospital main building including wings and chapel (grade II* listed); St Thomas' Church (grade II* listed); 9, 11 and 13 St Thomas Street (grade II* listed). Southwark Cathedral and The George Inn (grade I listed) are situated within

the locality. Several buildings close to the site are on the council's local list, including Kings Head House to the south, nos. 39-51 Borough High Street, Barclays Bank, and the railings in front of 9A-15 St Thomas Street.

15. The site is within the wider setting consultation areas of two London View Management Framework views, the London Panoramas from Parliament Hill and Kenwood. The proposal would be visible in the LVMF protected downriver view from Southwark Bridge. The site is within the wider assessment area of the borough view of St Paul's Cathedral from Nunhead Cemetery.

16. The site has an excellent PTAL rating of 6b due to its proximity to London Bridge rail and Underground stations and bus routes in the area. Its main entrance is on St Thomas Street and it has vehicle access to the rear service yard from Kings Head Yard.

17. The site is within flood zone 3, a critical drainage area (with high risk and medium risk areas within and immediately adjacent to the site) and the air quality management area. There are no protected trees within or adjacent to the site.

18. Further east on St Thomas Street is the tall building cluster of The Shard and Shard Place, and the News Building further north set around London Bridge station.

Details of proposal

19. These two applications seek planning permission and listed building consent for the redevelopment of the site to provide additional and refurbished office floorspace and provision of public realm improvements along St Thomas Street and Kings Head Yard, along with the restoration and refurbishment of the listed Georgian terrace.

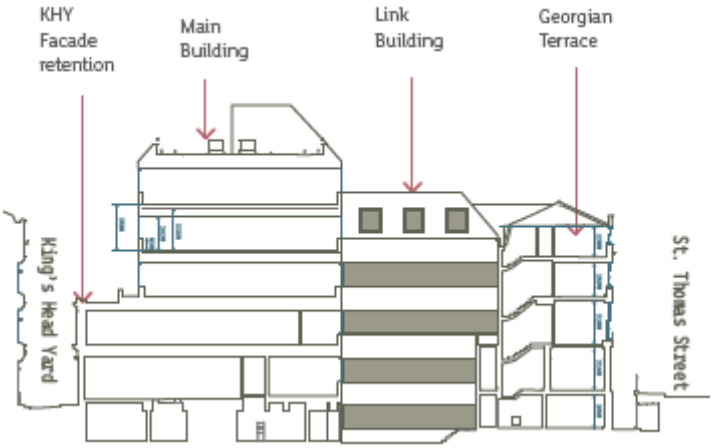
Planning application (ref. 24/AP/3803)

20. The proposal in the planning permission for the site's redevelopment follows a retention-and-extension approach, focusing on optimising the existing structure of the 1980s building through refurbishment and extension. The development aims to deliver a highly sustainable building, adopting a "fabric first" approach of reusing the existing structure, and incorporates heat pumps and PV panels to reduce on-site operational carbon emissions.

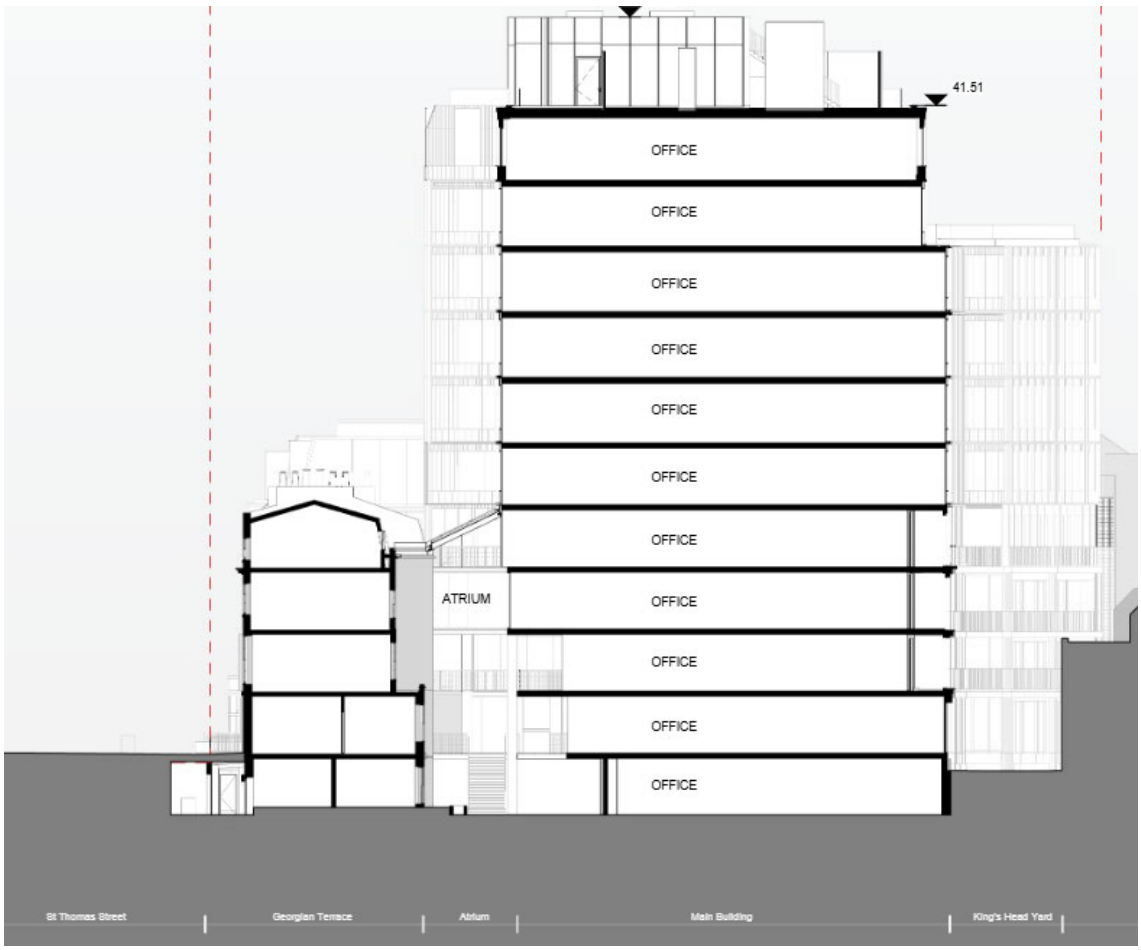
21. The approach to this proposal marks an important change in approach from the previous planning applications which sought permission for the full demolition of the existing 1980s office block and the dismantling of the existing historic façade of Keats House. The earlier schemes are summarised in the planning history section later in this report and will be referenced in the assessment.

22. The current proposal involves the partial demolition of the existing 1980s offices at New City Court (no. 20 St. Thomas Street), including the removal of the St Thomas Street entrance building and most of the Kings Head Yard façade. The 1980s office building would be stripped back to its concrete frame,

removing the façade panels and internal fittings. The frame would be extended by proposed side and upward extensions to add five storeys, resulting in a 10-storey office building plus a roof level amenity room at level 11, and the refurbished lower ground office space.

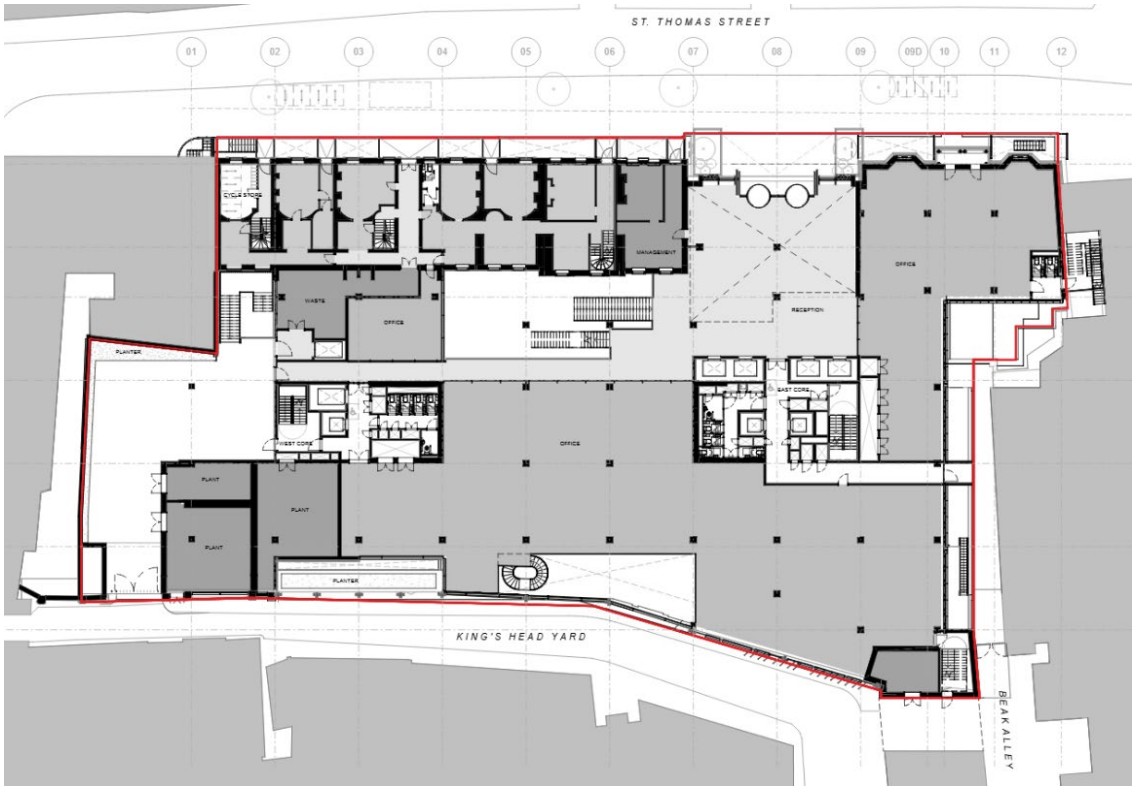


Section through the existing site looking west, showing on the left the main building's lower ground and five existing office floors, and the Georgian terrace on the right.



Section through the proposal looking east, showing the additional office floors to the main building on the right and the Georgian terrace on the left.

23. In terms of the layout of the site at ground floor, on the northern side it would remain similar to the existing with the Georgian terrace retained, a new entrance building on St Thomas Street, Keats House façade retained. The external courtyard in the centre of the site would be enclosed to provide an internal atrium space and circulation around the offices. On the southern side of the site, most of the Kings Head Yard façade would be demolished and replaced. A pocket garden is proposed, two bays wide. The western servicing yard would remain.

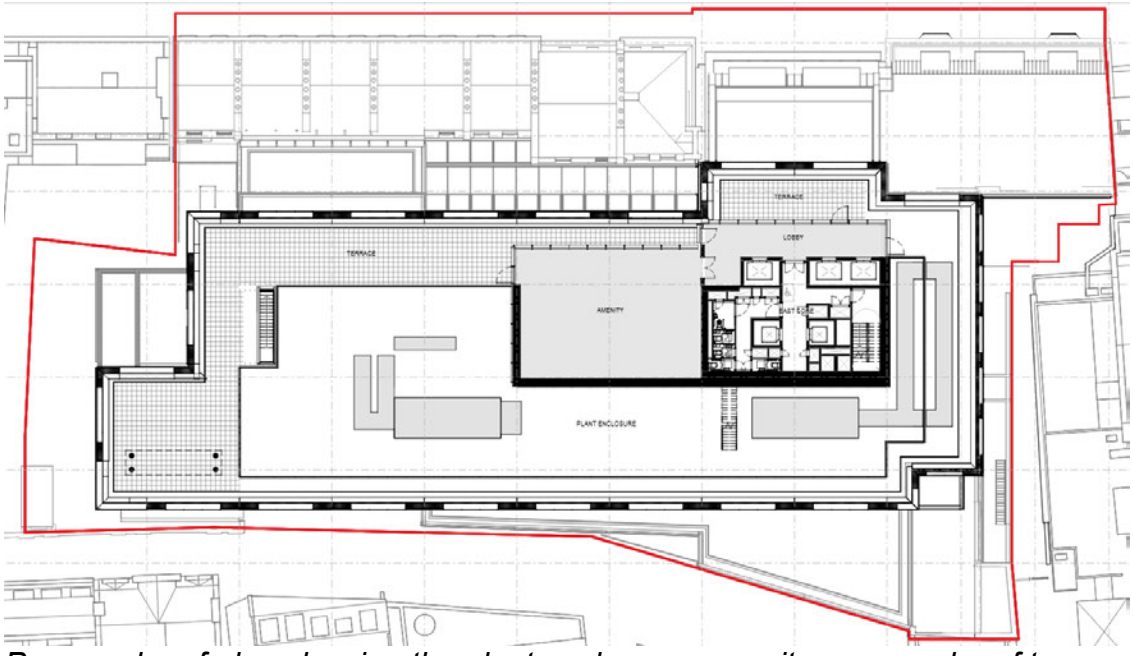


Proposed ground floor layout

24. At the upper levels, the main office building would measure 72m east-west by 47.7m north-south at its widest (and including Keats House). The floorplans with two lift and stair cores would allow subdivision to suit future tenants. Each floor would have a balcony or terrace, and workers would have access to the main roof terrace on the top.



Proposed fifth floor plan



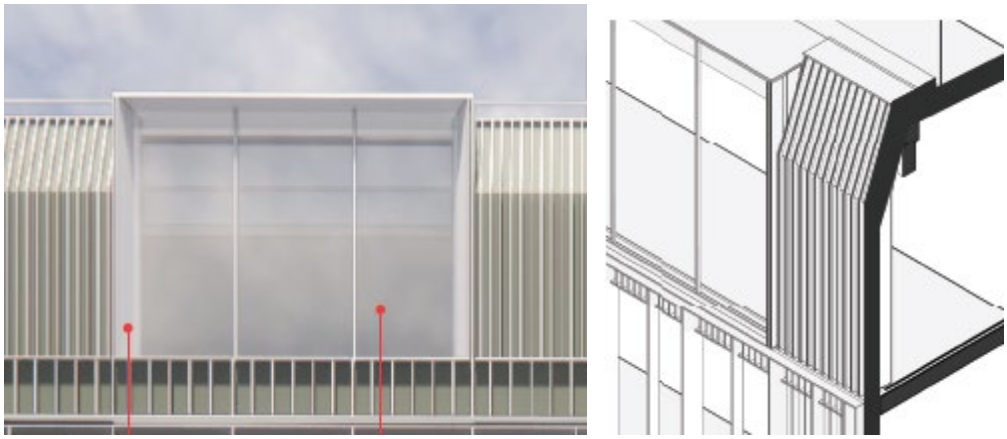
Proposed roof plan showing the plant enclosure, amenity room and roof terrace

25. The proposed building would be 42.4m high (46.83m AOD), compared with the current building's maximum height of 22.3m at the plantrooms towards the centre of the site. The proposed architecture for the extended main building is characterised by a grid of repeating bays, mostly 7.5m wide which come in different types depending on where in the building it is being used. The most common bay is divided into 1.5m modules, three of glazing and a solid panel on each side in a coloured metal finish, with the horizontal upstand panel across the bottom and spandrel across the top in the same colour metal. The bays have vertical profiled metal frames (in a natural metal finish) to provide shading, especially on the southern façade which would have more vertical fins than the northern side.



Images to show a typical bay of the main building

26. The top floor across the main building would have an angled mansard element and dormer windows, again with a coloured metal panel and natural metal fins.



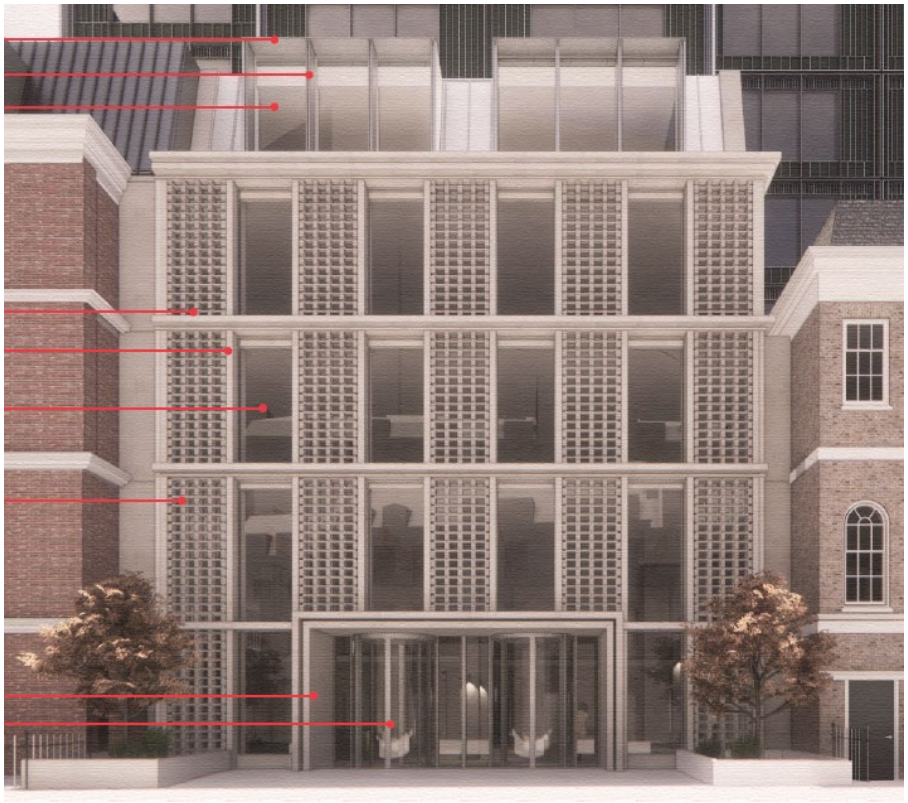
Images to show a typical dormer bay on the top floor of the main building

27. The bay dimensions are amended on the eastern end where the building would be visible above Guy's Hospital Chapel and the western wing of the quad. Here the architecture would be centred on the Chapel pediment and the bays proportioned to respond the five windows in the Chapel frontage. At the western end where the building would be visible above Borough High Street, the elevation has been broken up with differing bay widths to reference the historic burgage plots.

28. The choice of a green for the main building has been informed by the architect's research of patterns and colours in historic Southwark, finding it to be a relatively colourful neighbourhood of earthy tones and bolder highlights (brickwork, stonework, copper roofs and industrial heritage such as the green of Borough Market) which the architecture could embrace, and intentionally contrast with the glass background of the Shard Quarter.

29. The St Thomas Street entrance building (with its curved brick façade) would be replaced by a five-storey building, of four storeys and a mansard roof level, plus a roof terrace above. It would sit behind the building line of its two neighbours to allow a step-free entrance and for planters. Its design has taken horizontal datums from Keats House and vertical rhythm of the openings from the Georgian terrace. It would include hit-and-miss brickwork in front of the glazing, masonry horizontal transoms and standing seam metal roof. The

light/buff brick and masonry colour would be a tone that sits between the red and stock brick of the historic buildings on either side.



Visual of the St Thomas Street entrance building, sitting between Keats House on the left and Georgian terrace on the right

30. To support the extension of the footprint of the main building, most of the Kings Head Yard elevation would be demolished. The western end of the façade, which is thought to be the oldest, original Victorian section, would be retained. A two- and three- storey masonry frame would be built along the yard elevation.



Visual of the Kings Head Yard frontage showing the retained Victorian façade, pocket garden and new-build frame

31. The proposed reuse of the main building's concrete frame would include the floors in Keats House (nos. 24-26 St. Thomas Street) which sit behind the historic frontage. The historic façades would be retained. A mansard roof extension is proposed to create an extra storey of office space.



The extended Keats House with natural metal roof extension and new west side elevation

32. Together the extended 1980s building, refurbished Georgian terrace and Keats House would provide 23,937sqm of office space (GIA), as an uplift of 11,174sqm on the existing offices. Of this 1,132sqm would be provided as affordable workspace within the Georgian terrace. Each floor of the main building would have balconies and roof terraces to provide amenity space for the office workers.



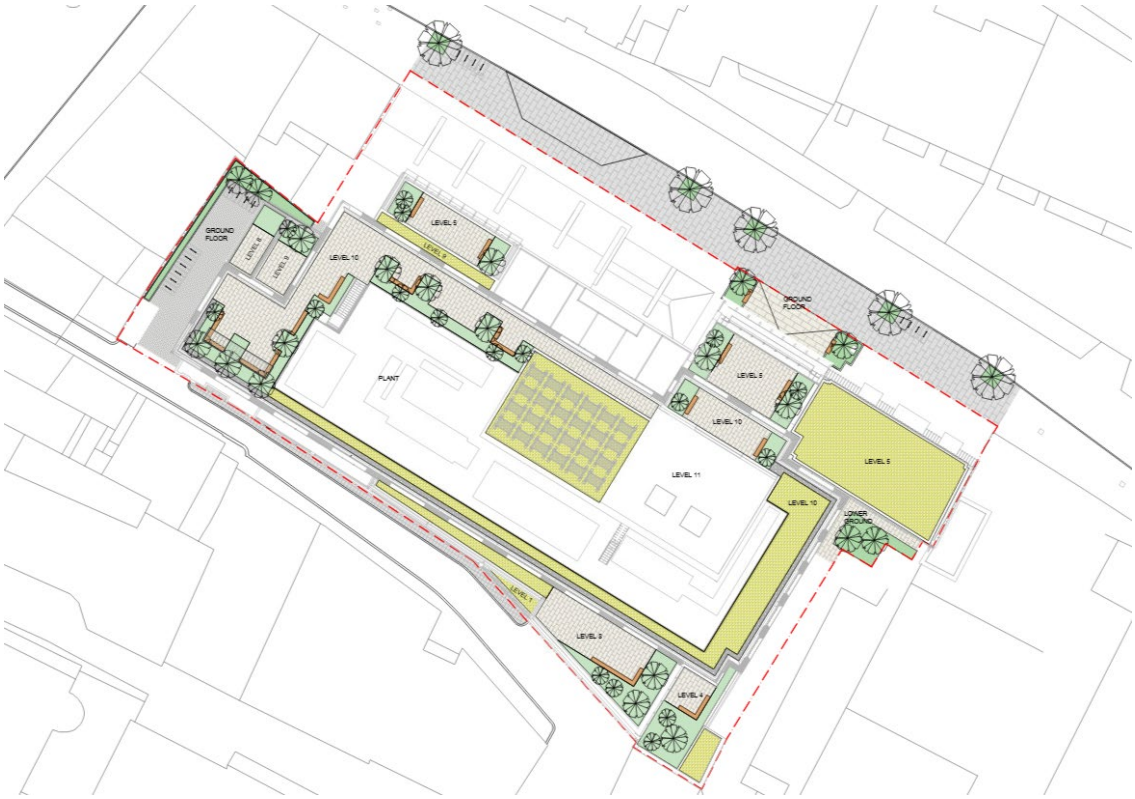
Aerial view from the north-west to shown the northern side of the proposal



Aerial view of the south-west to show the southern side of the proposal.

33. For landscaping at ground level, tree planting is proposed within the site at the St Thomas Street entrance, within the servicing yard, the eastern boundary and within the pocket garden on the Kings Head Yard frontage. Street tree planting is indicated on St Thomas Street, which would need the agreement of TfL as it is within the highway. At the upper levels of the building, most of the roof terraces for staff would include planters with trees and seating, and the inaccessible flat roof areas would provide biodiverse roofs. The 10th floor roof terrace for office workers would be the largest, extending along most of the length of the building and at its western end extent across the width of the building.

34. Public realm improvements are proposed around the main entrance. The St Thomas Street entrance would be set back from the building line, and provided with an accessible sloped approach to remove the existing stairs, and include planting and seating. The Georgian terrace would have step free entrances. On Kings Head Yard, a pocked garden is proposed set within the façade frame. The yard highway would be resurfaced and made more accessible, and highway works are indicated on St Thomas Street.



Proposed landscaping. NB this visual is of the original submission and later changes removed the cycle parking in the servicing yard and amended the south-eastern corner. The landscaping outside the red line is shown indicatively.

35. The servicing arrangements have developed during the application with input from council officers and TfL. With vehicle sizes restricted at the yard entrances from Borough High Street, only smaller vehicles can enter the yards. Larger vehicles would need to use St Thomas Street instead. The application

proposes that a loading space be created on the St Thomas Street pavement for the site's refuse vehicles to use.

36. The existing servicing yard at the western side of the site would be reorganised to remove the car parking and to provide servicing space for vans with two bays. A cycle lift and cycle stairs would provide access down to the basement cycle store, the staff changing and shower facilities. No car parking is proposed and the development is car free. Waste and recycling would be transferred to the ground level waste store, ready for collection from a proposed servicing space on St Thomas Street.

Listed building consent application (ref. 24/AP/3804)

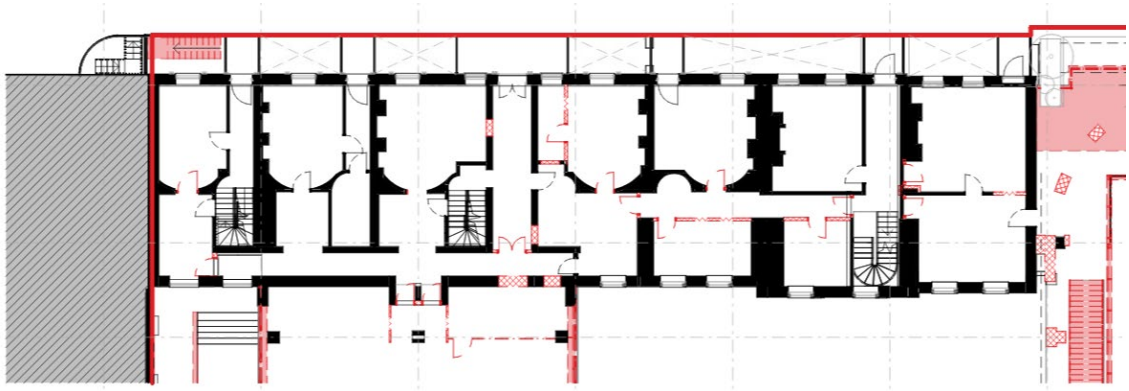
37. Listed building consent is sought for the refurbishment of the grade II listed Georgian terrace with mostly internal alterations. The primary façades of the buildings would be preserved, with the front doors returned to use as entrances to the building. The Georgian terrace is proposed to provide the affordable workspace element of the overall proposal.

38. Internal alterations of these buildings would be undertaken to reconfigure circulation spaces. The existing plan form mostly reflects modern adaptions and non-original partitions and modern features. The terrace would be separated off from the refurbished main office building with only one connecting ground floor door.

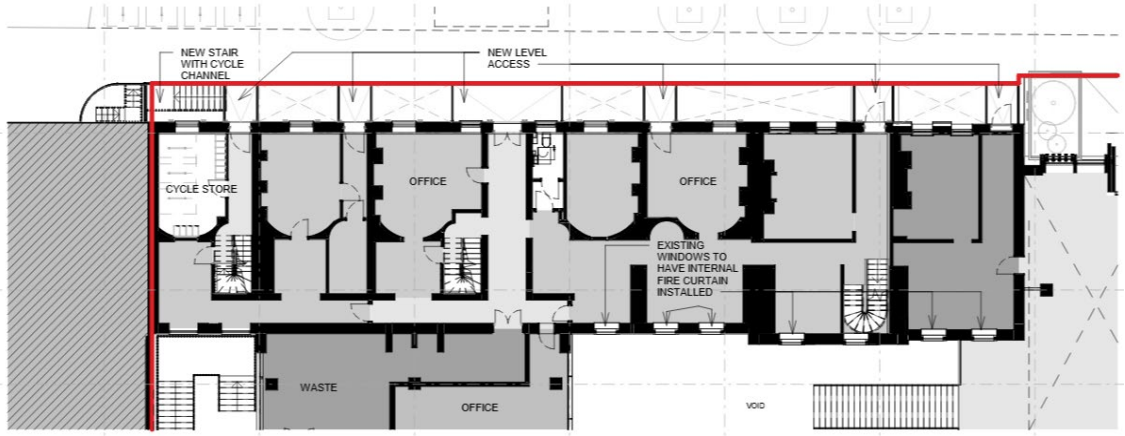
39. To give an example of the ground floor of the terrace, the drawings below show firstly the existing layout at the top, the proposed demolition in the middle (in red) and the proposed layout below.



Existing ground floor plan



Proposed demolition on the ground floor (demolition shown shaded and in red, showing the 1980s building to the right and below)



Proposed ground floor layout

40. Where the link building would be removed at the rear of the terrace, the roof slope would be reinstated. The canopy roof over the atrium on the southern side of the terrace would rest on the rear parapet of the Georgian terrace, as shown in the image below.



Visual of the covered atrium between the Georgian terrace and main building

41. In front of the building within the lightwell, the existing set of stairs would be replaced at the western end, and replaced with cycle stairs. Cycle storage is proposed within the vaults under the pavement and in a ground level cycle store within the building.

Amendments to the planning application

42. The planning application's proposal was amended to address officer comments and in response to some consultee comments. The proposal's design was amended to change the proposed material colour of the top floor (from green to silver) and reduced the overall height of the extended building by 1m from 47.83m AOD to 46.83m AOD through lowering the ceiling heights in the extension. A couple of the visuals to show these changes are included below. The applicant intended to reduce the massing, improve the visual hierarchy of the proposal and give a softer skyline presence.

Initial submission	**Amended submission**



View westwards along St Thomas Street



View westwards along St Thomas Street

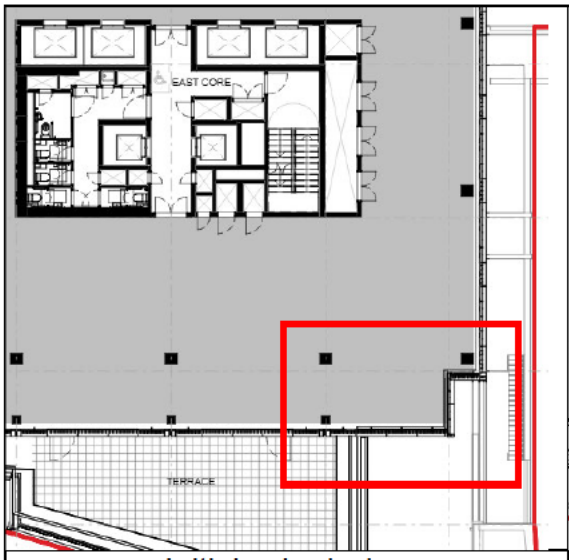


View along Borough High Street

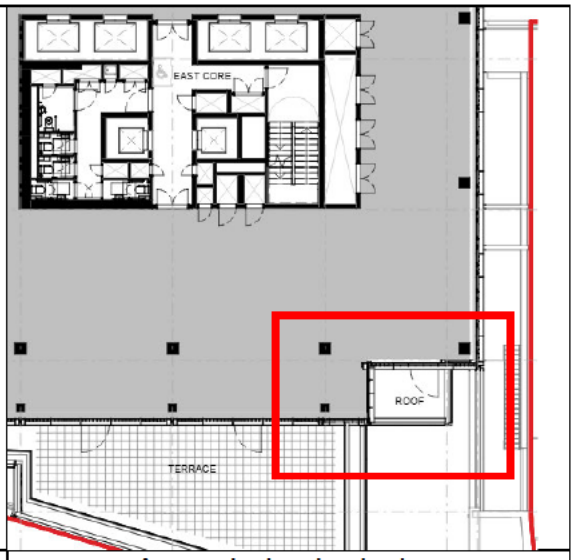


View along Borough High Street

43. The south-eastern corner of the extended building has been set back for the top two floors, resulting in a floorspace reduction of 148sqm GIA. The set back is highlighted in red on the floorplans below.



Initial submission



Amended submission

44. The cycle parking was amended in the basement and in the service yard following officer comment to improve its quality and allow sufficient turning space within the servicing yard.

45. These changes resulted in a new set of proposed drawings being submitted, as well as a design addendum, daylight and sunlight reports and an addendum to the heritage, townscape and visual impact assessment (HTVIA). Updated documents were provided to respond to consultee comments, for example the BNG metric was amended, and further information provided on drainage, energy savings and Thames Water's assets.

Planning history of the site, and adjoining sites

46. This site has an extensive history in recent years, as listed in Appendix 4. In summary, two schemes were submitted in 2018 and 2021 for substantial tall buildings, each with a planning application and a listed building consent application. The proposal description and a few of visuals for each scheme are included below.

47. 1) 18/AP/4039: Planning application which proposed "Redevelopment to include demolition of the 1980s office buildings and erection of a 37-storey building (plus two basement levels) of a maximum height of 144m (AOD), restoration and refurbishment of the listed terrace (nos. 4-16 St Thomas Street) and change of use of lower floors to Class A1 retail, and redevelopment of Keats House (nos. 24-26 St Thomas Street) with removal, relocation and reinstatement of the historic façade on a proposed building, to provide a total of 46,374sqm of Class B1 office floorspace, 765sqm of Class A1 retail floorspace, 1,139sqm of Class A3 retail floorspace, 615sqm of leisure floorspace (Class D2), 719sqm hub space (Class B1/D2) and a 825sqm elevated public garden within the 37-storey building, associated public realm and highways improvements, provision for a new access to the Borough High Street entrance to the Underground Station, cycling parking, car parking, service, refuse and plant areas, and all ancillary or associated works. The application was accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, which can be viewed on the council website southwark.gov.uk using the reference number".

    It had appeal reference APP/A5840/W/22/3290473 from the Planning Inspectorate (and council's appeal reference APPEAL/22/0003).

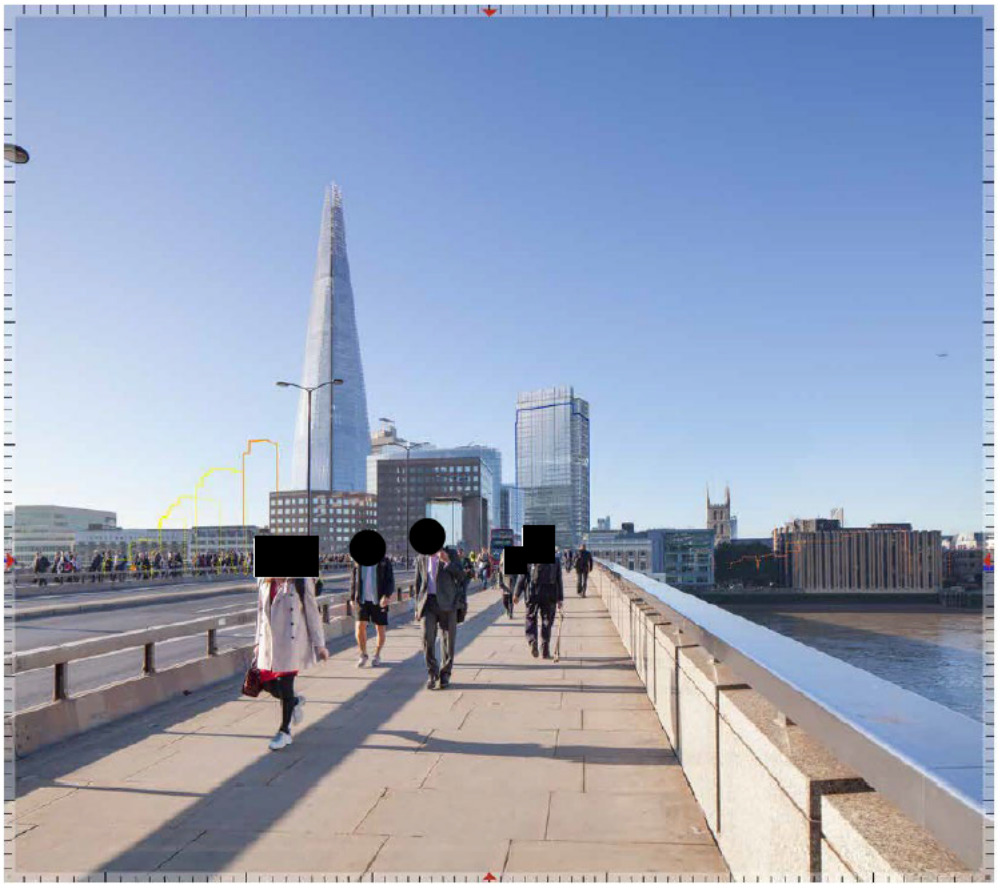


Image of the 2018 proposal, showing the proposed 37-storey glazed tower as viewed from London Bridge



Image of the 2018 proposal, showing the tower (on the right) as viewed from Bedale Street/Borough High Street



Image of the 2018 proposal, showing the proposal as viewed from the south-west on Borough High Street

48. 2) 18/AP/4040: The associated Listed Building Consent application for "restoration, rebuilding and refurbishment of the listed terrace (nos. 4-16 St Thomas Street) including:

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

It had appeal reference APP/A5840/Y/22/3290477 from the Inspectorate (and council reference APPEAL/22/0001).

49. 3) 21/AP/1361: The second planning application which proposed "Redevelopment to include demolition of the 1980s office buildings and erection of a 26-storey building (plus mezzanine and two basement levels) of a maximum height of 108.0m AOD, restoration and refurbishment of the listed terrace (nos. 4-16 St Thomas Street), and redevelopment of Keats House (nos. 24-26 St Thomas Street) with removal, relocation and reinstatement of the historic façade on a proposed building, to provide 46,442sqm GEA of Class E(g)(i) office floorspace, 358sqm GEA flexible office E(g)(i)/retail E(a) floorspace, 450sqm GEA Class E(b) restaurant/cafe floorspace and a public rooftop garden, and 5,449sqm GEA of affordable workspace within the Georgian terrace, Keats House and part of the tower, associated public realm and highways improvements, provision for a new access to the Borough High Street entrance to the Underground Station, cycling parking, car parking, service, refuse and plant areas, and all ancillary or associated works. (Associated listed building consent app 21/AP/1364). The application is accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, which can be viewed on the council website southwark.gov.uk using the reference number." It was appeal reference APP/A5840/W/22/3290483 (and council's appeal reference APPEAL/22/0004)

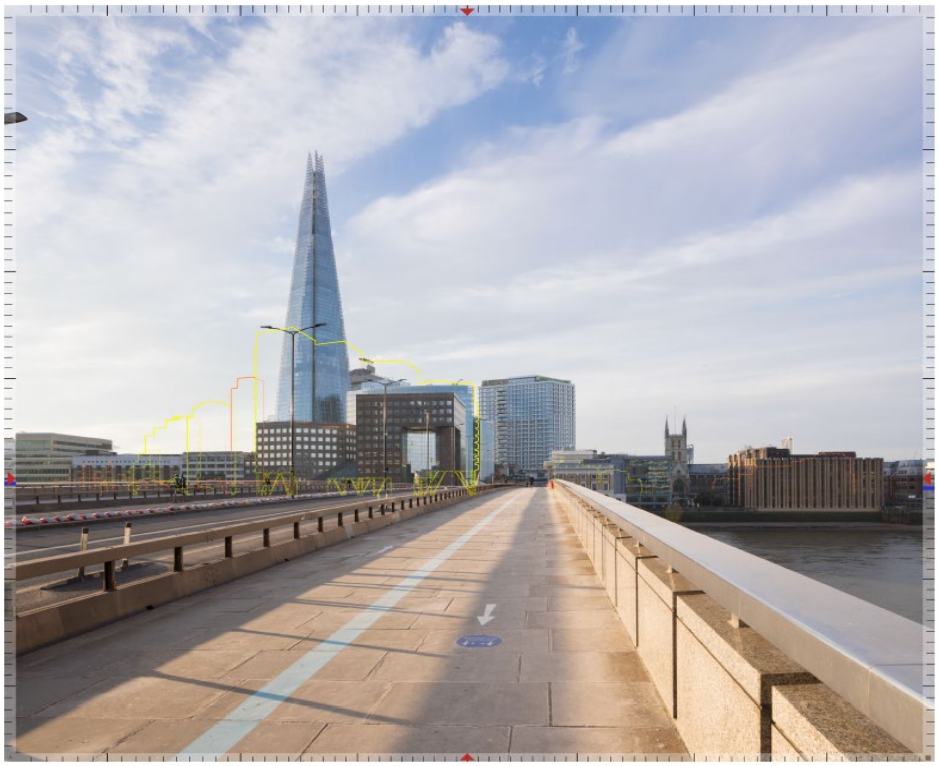


Image of the 2021 proposal, showing the proposed 26-storey tower as viewed from London Bridge



Image of the 2021 proposal, showing the tower (on the right) as viewed from Bedale Street/Borough High Street



Image of the 2021 proposal from the south-west on Borough High Street

50. 4) 21/AP/1364: associated Listed building consent for the restoration, rebuilding and refurbishment of the listed terrace (nos. 4-16 St Thomas Street) including:

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

It had appeal reference APP/A5840/Y/22/3290490 (and council's appeal reference APPEAL/22/0002).

51. The main points of different between the council and applicant in each scheme were the height/design of the tall building, and the heritage harms (harms that were not outweighed by the package of public benefits). A public inquiry to hear the non-determination appeals of both schemes was held between July and August 2022. The two listed building consent applications were allowed and the two planning applications were dismissed by the Secretary of State in September 2023. The decision letter and Inspector's report run to over 200 pages and will not be repeated in this report, but particular references and quotations will be included in considering the impacts of the revised scheme on the key heritage assets and townscape which formed the main issues of the planning applications.

52. In terms of the planning history of neighbouring sites the adjoining sites on St Thomas Street have the following recent planning history:

The Bunch of Grapes public house, 2 St Thomas Street:

- 23/AP/1614 Installation of new pergola with retractable roof within beer garden to rear, addition of rainscreen to existing pergola and associated external alterations, including new external wall mounted lights, aged rendered finish to walls at basement level and new timber boarded door at basement level; and internal alterations. Listed building consent granted 20/10/2023.
- 23/AP/2225 associated planning permission to the above, granted 18/10/2023.

Conybeare House (the part of Guy's Hospital attached to Keats House) and Keats House:

- 19/AP/5519 Works to the party wall between Keats House (nos. 24-26 St Thomas Street) and Conybeare House, including: removal of link to Keats House, reinstatement of the string courses and cornice to Conybeare House, and refurbishment of existing fire escape. (Works associated with applications ref. 18/AP/4039 and 18/AP/4040 for adjoining New City Court 4-26 St Thomas Street, SE1 9RS). Withdrawn 9/10/2023 following the appeal decisions on New City Court.
- 19/AP/5520 associated listed building consent, withdrawn 9/10/2023 following the appeal decisions on New City Court.
- 21/AP/2591 Works to the party wall between Keats House (nos. 24-26 St Thomas Street) and Conybeare House, including removal of links to Keats House and the following works to Conybeare House:
  - Restoration of the corner and side wall of Conybeare House, exposed from the moving of Keats House west;
  - The cornice partially returned along the exposed side wall of Conybeare House;
  - Removal of the non-original existing parapet and replace with new coping;
  - Installation of a rendered based to the newly exposed wall;
  - Refurbishment of existing fire escape in Conybeare House;
  - Erection of a green wall on the exposed elevation of Conybeare House to screen the fire escape, in front of which is a proposed new 750mm-deep planter for creeping foliage

(associated application references 21/AP/2592 (listed building consent) and 21/AP/1361 and 21/AP/1364 for New City Court). Withdrawn 9/10/2023 following the appeal decisions on New City Court.

- 21/AP/2592 associated listed building consent application, withdrawn 9/10/2023 following the appeal decisions on New City Court.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

53. The main issues to be considered in respect of these two applications are as follows:

- Principle of the proposed development in terms of land use
- Affordable workspace
- Environmental impact assessment
- Quality of office accommodation
- Design, including layout, building heights, designing out crime and fire safety
- Heritage considerations (including the LBC application)
- Public realm, landscaping and trees
- Green infrastructure, ecology and biodiversity
- Archaeology
- Impact of proposed development on amenity of adjoining occupiers and surrounding area
- Transport and highways
- Environmental matters
- Energy and sustainability
- TV, radio and telecoms networks
- Digital connectivity infrastructure
- Aviation
- Planning obligations
- Mayoral and borough community infrastructure levy (CIL)
- Other matters
- Planning balance
- Consultation responses and community engagement
- Community impact, equalities assessment and human rights.

54. These matters are discussed in detail in the ‘Assessment’ section of this report.

Legal context

55. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan (2021) and the Southwark Plan (2022). Section 72 of the Planning (Listed Buildings and Conservation Areas) Act (1990) requires decision-makers determining planning applications for development within conservation areas to pay special attention to the

desirability of preserving or enhancing the character or appearance of that area. Section 66 of the Act also requires the local planning authority to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.

56. An application for listed building consent is considered under the terms of the Listed Building and Conservation Areas Act (1990), "the Act" as amended and updated. The main principles of the Act are repeated in the NPPF (2024), and reinforced by the council's policies, and associated guidance documents. The main issue in these cases is the effect of the proposal on the special architectural and historic interest of the listed building. The Act places great weight on the "special interest" of heritage assets and their settings, and stresses the importance of preserving and enhancing their architectural and historic significance. The NPPF reinforces these principles stressing that heritage assets are irreplaceable and once lost can never be recovered. It requires the local planning authority to avoid harm to heritage assets and to ensure that development conserves and enhances heritage assets and their settings.

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

Planning policy and material considerations

58. The statutory development plan for the borough comprises the London Plan (2021) and the Southwark Plan (2022). The National Planning Policy Framework (2024), LPGs, SPDs and SPGs constitute material considerations but are not part of the statutory development plan. The appeal decisions are material considerations in the consideration of these two applications. A list of policies and material considerations which are relevant to the applications is provided at Appendix 4. The policies which are particularly relevant to the consideration of the applications are highlighted in the report.

59. The site is located within the:
- Central Activities Zone
- London Bridge, Borough and Bankside Opportunity Area
- London Bridge town centre
- Borough High Street Conservation Area
- North Southwark and Roman Roads Archaeological Priority Area
- air quality management area
- flood zone 3
- critical drainage area (with high risk and medium risk areas within and immediately adjacent to the site)
- South Bank Strategic Cultural Quarter
- PTAL rating of 6b.

60. The Georgian terrace within the site is grade II listed. The site is within close proximity to a number of neighbouring listed buildings: no. 2 St Thomas Street (grade II listed); Old King's Head Public House (grade II); Guy's Hospital main building including wings and chapel (grade II* listed); St Thomas' Church

(grade II* listed); 9, 11 and 13 St Thomas Street (grade II* listed). Southwark Cathedral and The George Inn (grade I listed) are situated within the locality.

61. Keats House and the Kings Head Yard frontage are locally listed. Several buildings close to the site are on the council's local list, including Kings Head House to the south, nos. 39-51 Borough High Street, Barclays Bank, and the railings in front of 9A-15 St Thomas Street.

62. The site is within the wider setting consultation areas of two LVMF views, the London Panoramas from Parliament Hill and Kenwood, and would be visible from the LVMF river prospect from Southwark Bridge. It is also within the wider assessment area of the borough view of St Paul's Cathedral from Nunhead Cemetery.

ASSESSMENT

Principle of the proposed development in terms of land use

63. The buildings on the site are in office use, Class E(g)(i), and would remain solely in office use in the proposed scheme. There is policy support for office development and employment opportunities on a site such as this within the Central Activities Zone, an Opportunity Area and designated town centre, within London Plan policies GG2, SD1, SD4, SD5, SD6 and E1, and Southwark Plan policies ST1, ST2, SP4, P30 and the AV.11 London Bridge Area Vision. The scheme is in a highly accessible area with a PTAL rating of 6b, further suggesting this is a good location in principle to deliver further employment space.

64. To consider first the existing business on the site and the impact of the proposed redevelopment on them the offices in Keats House, the main building, Georgian terrace and the basement are currently occupied with leases due to expire in June 2026. The number of staff in the six occupying businesses is unknown, and all the tenants are relatively large occupiers. Runway East occupy most of the site to provide serviced offices for others, and the applicant has worked in partnership with Runway East on another of their sites. The current arrangement and condition of the offices means they are relatively low-cost accommodation for the location and offered on short-term flexible lets to be convenient for the current occupiers.

65. A short business relocation strategy was provided, as required by Southwark Plan policy P33. The applicant has been working on plans redevelop the site since 2017 and so has talked to the office occupiers over many years to make them aware of the plans, manage expectations and assist with business continuity, and to agree extensions to leases. None of the existing businesses have expressed to the applicant a willingness to return to the completed scheme, although the applicant would be happy to retain their custom. The applicant has other office sites in Southwark where it could relocate its tenants if there is space to suit, and has already moved one tenant to another property in its portfolio. It would not be feasible to maintain occupiers on the site through a phased demolition and construction of the proposal.

66. The proposed development for high quality office space to improve and extend the existing offices may not meet the needs of the current occupiers, as the applicant would require longer leases of 10-15 years. Existing occupiers may meet the criteria for occupying the affordable workspace to be delivered in the Georgian terrace, but they may choose to leave sooner and move into a new longer-term location. Given the long planning history of this site trying to gain permission for redevelopment, its use for short-term lets in recent years, and the applicant's other office sites in the borough to potentially relocate current occupiers, there has been sufficient consideration given to business relocation, without needing planning obligations to secure space for any businesses returning. For the same reasons, the business relocation strategy is considered sufficient to be secured as a planning obligation to help existing businesses move from the site.

67. Turning to the employment opportunities the proposal could bring, a marketing strategy was provided, to address Southwark Plan policy P30 part 1.3. The marketing strategy refers to the continuing growth in office employment in London despite a reduction in office space, and how the low vacancy rate and high rent prices of office space in the SE1 Southbank indicate a constrained supply. The proposed uplift of approximately 11,200sqm of office space would contribute towards the Southwark Plan's target uplift of 704,369sqm of employment space over the Plan period, and towards the 43,156sqm of employment floorspace uplift for the London Bridge area over the Plan period. The New City Court site is not a site allocation within the Southwark Plan, so the delivery of more office floorspace here would be additional to the office development anticipated by the site allocations at the eastern end of St Thomas Street (at NSP53 and NSP54 Melior Street, Weston Street, Vinegar Yard and Snowsfields, and NSP55 at Colechurch House).

68. To put this in the context of the Southwark Plan, the target set out in ST1 is to delivery 460,000 sqm of office floorspace between 2019 and 2036, which would average 27,000sqm a year over the Plan period. The uplift in office space within the current proposal (of approximately 11,200sqm) represents 41% of this average annual office target. The delivery of more office space on this CAZ site and high quality office space would accord with policies GG2, SD1, SD4 and E1 of the London Plan, and the strategic targets within ST1 and ST2 of the Southwark Plan, the office space target of SP4, as well as policy P30 and the AV.11 London Bridge Area Vision within the Southwark Plan.

69. The application shows flexible office floorplans in the extended main building. The applicant anticipates demand from life sciences occupiers, given the proximity to Guy's Hospital and the life sciences cluster. By providing office space (rather than "wet lab" space), future occupiers may form synergies with technology and healthcare innovators, the neighbouring hospital and specialists in the local area on digital health and artificial intelligence. The application shows awareness of the site's context, potential office-type occupiers and how the site can be occupied by several businesses.

70. The marketing strategy also explains how the move to hybrid working has meant businesses have looked to prioritise easily accessible and high-quality office spaces to encourage employee back to the office. Amenities such as kitchens, break rooms, cycle storage and showers, roof terraces are in demand

within modern offices as businesses look to promote wellbeing, draw workers to the offices and retain staff. The demand for more sustainable offices has grown in central London, and the proposal is targeting BREEAM “excellent”. The proposed scheme would provide best-in-class grade A+ office space for the main building, high quality affordable workspace in the Georgian terrace and has integrated sustainable design into the scheme. This compares with the existing offices on that site which are categorised as grade B. The quality of the proposed office space is given further consideration in the later assessment section.

71. The applicant estimates the proposal would support between approximately 1,425 and 1,855 jobs (which is 1,330 to 1,730 FTE jobs), which is between 720 and 940 more than the existing site (an additional 675 to 875 FTE jobs), and represent an approximate doubling of the number of jobs on site. These additional jobs on the site are estimated by the applicant to contribute an additional £2.9m to £3.7m per year in worker spending in the local area compared to the existing, and an additional £63m to £82m of economic activity per year. These public benefits will form part of the overall consideration of the proposal.

72. The additional jobs that the expanded offices would bring and the delivery of high quality office space are public benefits of the proposal. The employment opportunities for local people in the completed office scheme, calculated as 70 sustained jobs for unemployed Southwark residents, are also a public benefit. These would be secured in a planning obligation, along with payments for any shortfalls to ensure compliance with Southwark Plan policy P28. Procurement opportunities for local businesses would also be required by an obligation. The construction phase jobs and training of 23 sustained jobs to unemployed Southwark residents, 23 short courses and 5 construction industry apprentices would also be secured in a planning obligation, along with payments for any shortfalls.

73. The Class E(g)(i) office use would be secured by condition to prevent changes to other Class E uses, such as the top floor changing to a bar/restaurant without a separate planning permission, or other uses through permitted development rights.

74. Subject to this condition and obligations, the proposal would comply with policies GG2, SD1, SD4 and E1 of the London Plan, and policies ST1, ST2, SP4, P30 and the AV.11 London Bridge Area Vision of the Southwark Plan.

Affordable workspace

75. London Plan policy E2 “Providing suitable business space” refers to incorporating a range of size of business units for micro, small and medium sized businesses, and policy E3 “Affordable workspace” sets out circumstances in which to secure affordable space for specific social, cultural or economic development purposes. Southwark Plan policy P31 “Affordable workspace” requires developments over 500sqm employment floorspace to deliver at least 10% of the employment floorspace as affordable workspace on site, at discount market rents for at least 30 years, of a type and specification that meets current local demand and to work with the council and businesses

to identify such businesses to occupy the workspace. In the reasons for the policy P31, it states that for extensions to buildings the policy applies to the new floorspace created.

76. An affordable workspace strategy has been provided. In this proposal, the affordable workspace is within the refurbished Georgian terrace as office accommodation. This is an appropriate type of affordable workspace provision, given the office employment type already on the site and in the area. The proposed 1,132sqm GIA of affordable workspace represents 10.1% of the uplift in office space on the site. The Georgian terrace buildings contain suitable, smaller rooms that can be linked and organised to suit different sizes and arrangements, and with the reinstated front doors offering further flexibility in how the affordable workspace is arranged. The precise specification of the fit out would need to be agreed to ensure it is sufficiently renovated for high quality affordable workspace, and in the context of the listed nature of these historic buildings. How the linked nature of the terrace and multiple front doors would work to suit affordable workspace providers, or subdivided needs would need to be discussed with a future affordable workspace provider, whether a lift would be incorporated into the building (if not, that accessible toilet facilities and kitchen would need to be included at ground level).

77. The affordable workspace would have its own cycle parking and given access to the shared refuse stores and rear servicing yard. It would be let to one of the council's approved workspace providers with an approved marketing strategy, for at least 30 years for rents at a 25% discount on market rents.

78. The affordable workspace provision is a public benefit of the proposal. Its size, the 25% discounted rent, service charge cap, specification, management by an affordable workspace provider, marketing strategy, access to the shared servicing yard and refuse store, and minimum 30-year period would be secured by obligations. With these in place, the proposal would comply with policies E3 and P31.

Environmental impact assessment

79. The proposed redevelopment falls within a Schedule 2, Category 10(b) "urban development project" of the Environmental Impact Assessment Regulations 2017 (as amended). A screening opinion was submitted for the proposal, ref. 25/AP/0051 in January 2025. Having considered the characteristics of the proposal, its location, and the type and characteristics of the potential effects, the council concluded it did not require an environmental impact assessment. The various documents submitted with the planning application provide sufficient information for the council to consider the proposal and its likely impacts.

Quality of office accommodation

80. A large, double height reception area would be created off St Thomas Street. Keats House would keep its two front doors to allow for a separate entrance. The covered courtyard at lower ground level would provide an indoor amenity

space next to an amenity room, and the outside terrace at lower ground behind the hospital chapel would be extended. Various outdoor spaces are proposed to the main building. Balconies are included on the south elevation at first, second and third floors, a terrace at the south-east corner at fourth floor level, two roof terraces at fifth floor on the northern side, balconies on the western side at fifth to ninth floors, and a terrace on the southern side at eighth floor. A larger, landscaped roof terrace on the tenth floor and an amenity room at this level for workers would form the largest amenity offer. It would have good sunlight levels and views out across to St Paul's Cathedral, along Borough High Street and across to The Shard. All upper floors of the main building are provided with at least one outside space. As set out in the later neighbour amenity section, the hours of use of these balconies and terraces would need to be restricted by condition to by 7am to 10pm Mondays to Fridays and 10am to 5pm on Saturdays.

81. The design of the upper floors provides many large windows to allow natural daylight and sunlight (with solar shading incorporated into the detailing of the southern façade to reduce overheating), and the atrium would provide some natural light into the north side of the building. The existing lower ground office space would benefit from the lightwell created at the southern side of the building, allowing more daylight down to this level. The daylight to the ground floor office spaces would remain similar to the existing scenario. Ceiling heights in the existing floors would remain as they are (approximately 3.1m), and in the new floors be 3.25m.

82. The extended main office building would have two stair and lift cores, and the main entrance changes would improve its accessibility. Wide floorplates are shown for the upper floors without being subdivided, however the two core arrangement would allow for subdivision for future tenants. Toilet provision – including accessible facilities – is shown around each core on each floor of the main building. No staff kitchens are shown, but the layouts provide sufficient space for such facilities and flexibility in where they would be located to suit the subdivision of the building and floors. Staff would have access to the secure cycle storage in the basement and shower facilities.

83. These features would help to provide attractive and pleasant space for future workers in the main building. The applicant is aiming to deliver best-in-class grade A+ office space. This compares with the existing offices which are categorised as grade B.

84. The Georgian terrace would be refurbished and have independent entrance(s) from St Thomas Street. This would help to improve the quality of the rather tired accommodation it currently provides, ready for use as affordable workspace. The Georgian terrace would have natural ventilation from its windows which provide outlook out to the street and across the covered courtyard to the main building. No outdoor amenity spaces are proposed, which given the listed nature of the building and its separation off from the main building is understood. Separate cycle parking would be provided in a ground floor store and the lower ground vaults. Toilet facilities are shown at lower ground, ground, second and third floors. A site management office is shown at the eastern end of the Georgian terrace, to help manage and maintain the whole site, with a link through to the main reception and outlook onto the street.

85. The submitted ventilation statement details the offices, their toilets, potential tea points etc, air filtering and the intake and discharge points. Air handling units on the roof and risers would provide the ventilation for each floor of the extended building, and the basement showers would have a separate air handling unit at the ground floor. These measures should create a comfortable environment within the extended building, while not causing issues for neighbour amenity.

86. The improvement in the quality of office accommodation is welcomed, and accords with policies E1 of the London Plan and P14 of the Southwark Plan.

Design, including layout, building heights, designing out crime and fire safety

87. The NPPF stresses the importance of good design, considering it to be a key aspect of sustainable development, and chapter 12 "Achieving well-designed places" states: "*The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve*". Chapter 3 of the London Plan deals with design related matters. In particular, policy D4 focuses on delivering and maintaining good design and policy D9 sets out the requirements for the development of tall buildings – such as within this proposal. The most relevant Southwark design policies in the Southwark Plan for this part-5, part 11-storey building are policies P13 "Design of places", P14 "Design quality" and P17 "Tall buildings".

The proposal and site context

88. As has been described at the start of this report and will be set out in more detail in the heritage chapter of this assessment, the site is within the most historic part of the borough, within the Borough High Street Conservation Area and surrounded by listed buildings. The Shard, Shard Quarter and Guy's Hospital tower are to the east within 100m, however the site relates most to the townscape of the western end of St Thomas Street with its set of Georgian buildings and Kings Head Yard with its two- and three-storey yard buildings. The main 1980s building, aside from its glazed frontage building, is not especially noticeable in public views around the area and has limited impact on the townscape character.

89. The site layout of the proposal would remain similar to the existing arrangements, particularly with the grade II listed Georgian terrace and historic Keats House frontage being kept, and part of the locally listed Victorian façade on Kings Head Yard being retained. By extending the main buildings outwards and upwards to create a tall building, it would become more visible from the local area and in some longer distance views.

Appeal decision

90. The impacts on the townscape character and appearance of the two appeal schemes formed one of the main considerations in the public inquiry. In her report on the appeals, the Inspector considered that the site was broadly

acceptable in principle for a tall building, that it was at a point of landmark significance, the proposed tall building for each scheme was of a distinct quality in the proposed architectural language and each had elegance in its design. The proposed ground floor public realm in each appeal scheme was considered to be of limited success due to their size and light issues, although the upper public gardens were positive elements. Reference will be made to the appeal decision in this design sections as it has guided the consideration of the current proposal. The appeal decision is a material consideration for the current planning application.

91. Officers note the comments in the appeal decision that the site would be broadly acceptable in principle for tall buildings in policy terms – although as each appeal scheme would have caused significant harms and fail to respond positively to local character and townscape, they were not exemplar and conflicted with design policies. In terms of the policy point on landmark significance of the site, the Inspector considered the site would be the focus of views from several directions in the future, to thus meet the definition.

92. The appeal decision gives further assessment of the context of the site. The Inspector stated "*there is a logic to having a tall building in this location*" and that the site is constrained. In terms of the site's context, she commented: *"While the schemes themselves have many positive attributes, as outlined above, none of these can be judged in isolation. Context is key and the fundamental difference between parties is whether the proposed schemes would successfully integrate into the wider area or whether that juxtaposition would be a cause of harm."*

93. The Inspector commented further:
"From what I have seen, I consider that the appeal site is located in an area of transition between the more domestic scale buildings and traditional architecture along Borough High Street and St Thomas Street which then transforms into a more contemporary area created by the developments at the Shard Quarter and the cluster of tall buildings which has, and continues to, develop around that area... Due to the proximity of the site near to the Shard cluster there is a logic to having a tall building in this location and both schemes would complement existing and consented schemes when viewed in mid-longer distance views."

94. The Inspector considered that each proposed tall building at 37 and 26 storeys "*would have somewhat of an abrupt effect and rather than an intermingling between the two areas*" so that the transition along St Thomas Street to the Shard cluster would be lost. She found the immediacy of the contrast to be "striking", "*uncomfortable and…have a jarring effect*" in the townscape.

95. The Inspector concluded:
"*My analysis has broken down both of the schemes into different elements and I have found there would be commendable attributes in architectural, and public realm terms with specific regard to the public access gardens. However, good design cannot exist in a vacuum, and in spite of the site being broadly acceptable in principle for tall buildings in policy terms, there would also be significant harms caused…Such effects are due to the scale and massing of the scheme and the poor relationship that the developments would have in the*

local street and townscape. This is also reflected by some of the harms identified in the public realm, particularly in the 2021 scheme in terms of the size and light issues at ground floor level. Context is a key aspect of good design and in these cases both schemes would fail to respond positively to local character and townscape."

96. During the pre-application discussions and current application, officers have been supportive of the reduction in scale from the appeal schemes, nonetheless the proposal remains a tall building and therefore will be assessed against the requirements of London Plan policy D9 and Southwark Plan policy P17.

Site layout

97. The site layout would not change significantly from the existing arrangement. As the proposal is to retain much of the existing structures on the site, there is limited opportunity to make substantial changes to the site layout. The Georgian terrace would remain, its front doors brought back into use and would be separated internally from the currently linked main building. The historic Keats House frontage would remain in its location (unlike the two appeals schemes which proposed to relocate it) and its front doors provide pedestrian access. The entrance building on St Thomas Street would be rebuilt and set further back from the pavement edge than the current building to allow for a step-free entrance and small area of public realm to created. It would remain the pedestrian entrance to the main office building.

98. At the western side the servicing yard would be kept, along with its gateway frame and first bay of the Victorian façade fronting Kings Head Yard. It would provide the cycle access and for small van deliveries. In demolishing and replacing the rest of the extent of the southern façade, another small area of public realm would be created within the frame of the replacement frontage, that maintains the same line of the existing façade. As is the case with the existing building, no office entrance is proposed on this side.

99. On the eastern side, the building line would broadly follow the existing arrangement except for an area behind Keats House where it would extend to take in the existing stairways and sunken courtyard areas. Near the centre of the site, the currently outdoor courtyard would be enclosed by a glazed roof to form a shared atrium for the offices.

100. The layout of the proposal is considered acceptable, and the proposed public realm and servicing aspects are assessed in more detail later.

Height, scale and massing

101. As a tall building, the 11-storey proposal needs to be considered against all the requirements of Southwark Plan policy P17 "Tall buildings" which in part 1) identifies areas where the council expects tall buildings, typically within the CAZ, Opportunity Areas and major town centres – such as this application site. The appeal decision concluded that the site is within a broad area identified by

the Southwark Plan where tall buildings are expected to be located. The proposal also addresses part B of London Plan policy D9 in this regard.

102. Each of the seven subsection requirements of part 2) of policy P17 will be considered below, that a tall building must:
    1. Be located at a point of landmark significance; and
    2. Have a height that is proportionate to the significance of the proposed location and the size of the site; and
    3. Make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings; and
    4. Not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough views; and
    5. Respond positively to local character and townscape; and
    6. Provide a functional public space that is appropriate to the height and size of the proposed building; and
    7. Provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents where appropriate.

Be located at a point of landmark significance (policy subsection 1)

103. In the appeal decision, the Inspector addressed this policy point and concluded the site met the definition for a point of landmark significance:
"On landmark significance, this is a policy requirement of SP Policy P17 (2) (1) and is defined as where a number of important routes converge, where there is a concentration of activity which is or will be the focus of views from several directions. The site is located behind existing buildings fronting major routes. St Thomas Street is also not a local route; it is an important access point for The Shard, London Bridge Station, and Guy's Hospital and Kings College Campus. The site is not a focus of views currently, however in light of the presence of The Shard as a focus of views and I consider that the site would be the focus of views from several directions in the future. The site would thus meet this definition."

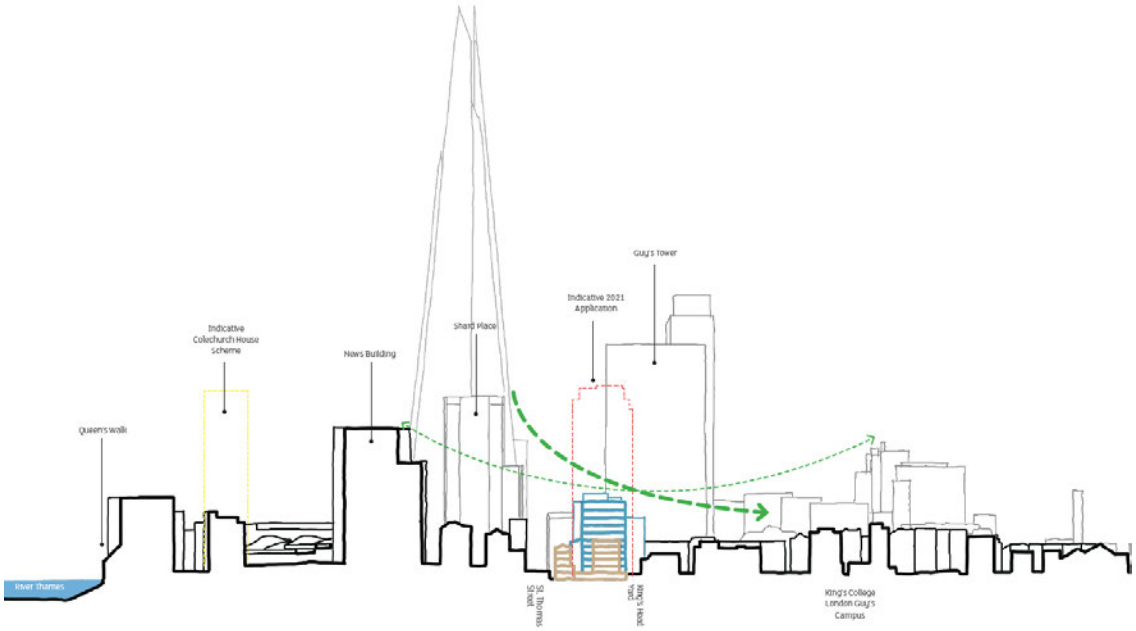
104. As the application site remains the same as in the appeals, the Southwark Plan and London Plan policies remain the same and with no change in the site's context, this policy requirement is met by the current scheme.

Have a height that is proportionate to the significance of the proposed location and the size of the site (policy subsection 2)

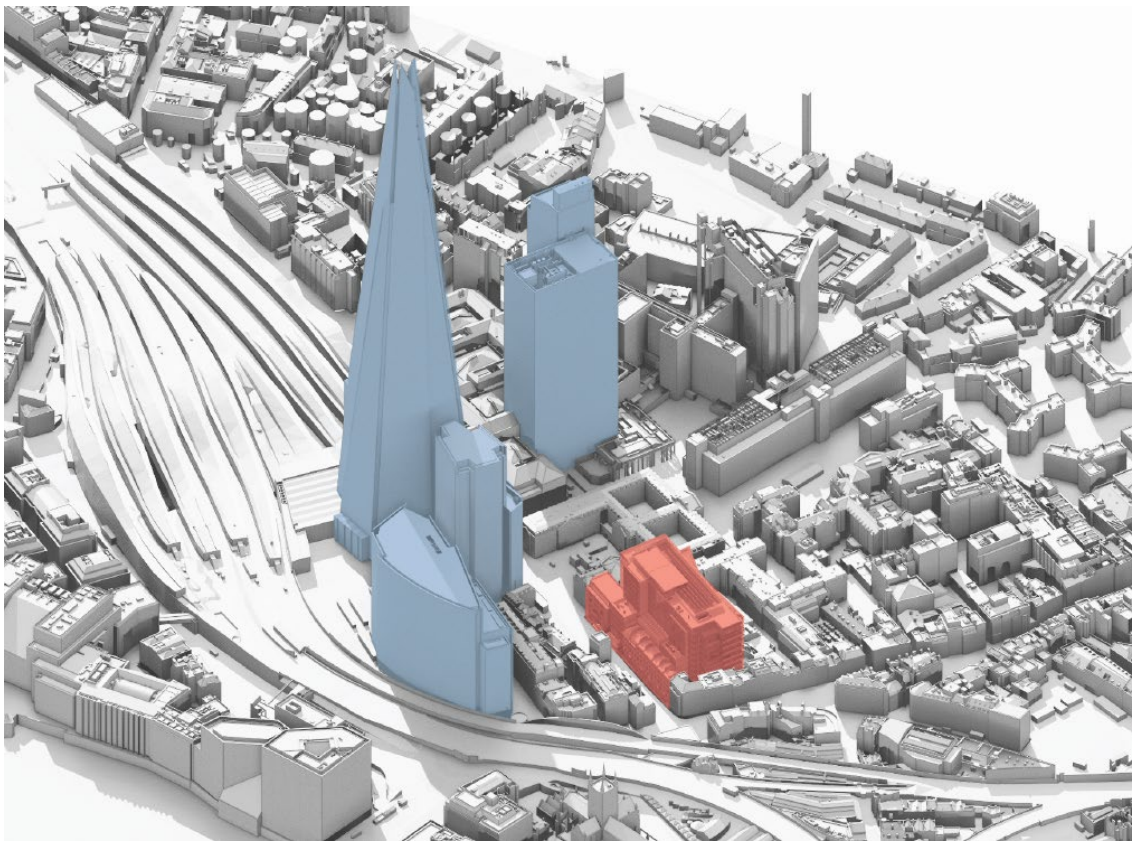
105. The current proposal is for a singular mid-rise block, set in the centre of the site with lower scale infills arranged around the edges of the site on St Thomas Street and Kings Head Yard. The existing 5-storey building plus a basement level would have its façade removed back to its original floor and column structure, then widened on all sides and extended vertically with 5 added floors plus a roof-top terrace and plant room. i.e. 11 storeys of accommodation plus a 12th floor providing an amenity room, plant and roof-top terraces. This mid-rise block has its height, scale and massing defined by the principal ambition to retain, extend and re-clad the existing New City Court building. This gives the building its rectangular footprint. A simple vertical extrusion of the base-

building could appear slab-like over the rooftops of the historic buildings. However in this scheme, the proposed building massing has been adjusted in two ways, firstly at the lower levels where it relates directly to St Thomas Street and Kings Head Yard, and secondly at the upper levels in response to the local and wider views. These two points are considered in later policy subsection 5.

106. At this 11-storey height, the proposal sits between the heights of the tall buildings around The Shard and the immediate context of three- to five- storey buildings, as shown by the applicant's diagrams below.



Sketch to show the relative height of the proposal (in blue) with the existing context (in black/grey) and 2021 appeal scheme (in red)



Visual of the area with the site shown in red and existing tall buildings in blue

107. In acknowledging the Inspector's comments about the site being in area of transition between the traditional architecture and the contemporary area around Shard Quarter, officers consider this scale of extended building to be appropriate to the site's context and proportionate to the significance of the site's location and size. The proposed tall building would have its own identity, as a relatively calm, simple background building given the townscape is rich and varied in this location. The building would appear over the roof tops in local views, so while it is a contrasting design it appears neutral and does not detract from the townscape where it is visible in local views along London Bridge, along Borough High Street and Southwark Street. The height, mass and bulk is considered to be acceptable, although the harms to heritage assets are assessed further below and must be considered in the planning balance.

Make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings (policy subsection 3)

108. The 11-storey height means that while it would be a noticeable addition in the local skyline and townscape, it would not be prominent in longer range views. The submitted heritage, townscape and visual impact assessment (HTVIA) includes 20 views showing the proposal from various points within Southwark and the City. The building would be visible along London Bridge, where it would infill the current sky between the buildings on the eastern side of the Bridge and the lower buildings on the west side of the Bridge (Glaziers Hall, Southwark Cathedral), but it would have a proportion that fits within the step in height. View 2 of the HTVIA is copied below.



View 2 of the HTVIA from towards the northern end of London Bridge, with the proposal in the centre

109. The townscape impacts of the tall building at closer locations are considered later in this report (within the heritage section and with copies of the HTVIA views) as they are within the Borough High Street Conservation Area. The proposed tall building would be taller than its immediate and historic context.

110. The emerging tall buildings group at the eastern end of St Thomas Street, where two towers are under construction, is some 250m from the site. The proposal would sit away from that group, and be of a lower order. Similarly the site is 150m from the Colechurch House redevelopment to the north (22-storeys), and so sits away from that proposed tall building.

Not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough views (policy subsection 4)

111. The proposed height would not harm the two LVMF views of St Paul's Cathedral from Parliament Hill and Kenwood House, as it would be seen against the base of Guy's Hospital tower. The proposal would be visible from the LVMF river prospect view from Southwark Bridge, and while it would sit higher than the existing building it would read as part of the group on the right-hand side of Southwark Cathedral. The scheme complies with the tall building policy requirements of Southwark Plan policy P17 part 2.4 and London Plan policy D9 part C.1.ai in this regard.



Visual to show the proposal appearing to the right of Guy's Hospital tower

112. The site sits within the wider assessment area of the borough view of St Paul's Cathedral from Nunhead Cemetery, but its height means it would not cause harm to this view.

Respond positively to local character and townscape (policy subsection 5)

113. As has been set out in the subsection 2 commentary above, the proposal's massing and architecture is considered to have responded well to the local character and streetscapes on each side of the site. On St Thomas Street the massing has been extended to provide a new infill entrance between Keats House and the Georgian terrace. This infill is set-back to give primacy to the historic buildings and establish a clearly defined and step-free main entrance. Its parapet height, stone and brick materiality, and its articulation are set by the historic buildings on either side and the set-back establishes a small pocket of green space at the entrance portico.

114. On Kings Head Yard the proposed replacement façade follows the articulated northern edge of the yard with a similarly articulated stone-clad base that reflects the character of the yard and the Victorian screen it would replace. This highly articulated base extends vertically to partly screen the rectangular form of the host building and break up this long southern façade. During the pre-application discussions various options were considered. In order for the building to engage with Kings Head Yard in a meaningful way, officers encouraged a piece of public realm in this location, to create a pocket of green space to contribute in a positive way to the yard. Its location as an intermediary between the preserved Victorian screen and the new yard screen would enable the design to transition between the preserved aspect of the yard and the new construction along this edge. This space acts as a transition piece between the two-storey Victorian screen and the taller replacement screen.

115. In its upper reaches the building is articulated relative to its orientation. To the north a bay extends over the infill entrance portico to give a clear indication of where the main entrance of the building is. A further small bay around the mid-point breaks up the northern façade and relates the enlarged building to its lower-scaled neighbours. On the western edge the facade is divided in two with large balconies at the northern end. This articulation reflects the burbage plots on Borough High Street and extends their vertical rhythm onto the new development. The articulation on the Kings Head Yard is extended vertically to break up this long southern façade. Finally, the eastern end has been simplified into a rectangular form so as to not detract from the historic foreground of the Guy's Hospital Chapel.

116. The proposal responds to the character of the historic area in two ways. Firstly, the upper reaches of the building are designed to be deliberately neutral presenting a simple rectangular form in a vertically proportioned cladding and a contrasting attic storey with modern dormers. Secondly where the design meets the public realm – the new entrance on St Thomas Street and the northern edge of the Kings Head Yard – the design changes in response to the historic context both in its form and its materiality. On St Thomas Street the entrance building sets back from the building line, is no taller than Keats House and is clad in stone and perforated brick. The design is not a pastiche of the historic buildings. Instead the design is a modern reinterpretation of the Georgian professional business and administration buildings typical of this sub-area of the conservation area. In Kings Head Yard the lower reaches of the building are more free in form to reflect the informal character of this historic Yard. Here again the parapet height is deliberately set at the height of the mock-Victorian screen that it replaces. Later paragraphs below expand upon the architectural design and materials of the proposal, and conclude it would add visual interest to the context. It is considered to comply with subsection 5 of policy P17 part 2 by responding positively to the local character and townscape, however there would be heritage harms.



Image showing part of the upper façade and its dormers



Image of the new entrance building on St Thomas Street



Image of the Kings Head Yard frontage

Provide a functional public space that is appropriate to the height and size of the proposed building (policy subsection 6)

117. Two areas of public realm totalling 90sqm (considered further below) are proposed. Considering the site constraints from retaining the main building's frame, the Georgian terrace, Keats House façade, part the Kings Head Yard frame and its building line, and a functioning service yard, the application proposes as much public realm as it can reasonably do. Although both appeal schemes demolished the main building to propose greater areas of public realm to link to a new Underground entrance with the redevelopment of the main building, they were found in the appeal decision to be of limited success as they were constrained and had light issues. The proposed two public realm areas would be useable and welcome green pockets on the busy St Thomas Street and quieter yard side. The current scheme would enhance the off-site public highways to improve the quality of the existing public realm. In view of the site's constraints, the proposal is considered to accord with part 2) subsection 6 of Southwark Plan policy P17.

Provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents where appropriate (policy subsection 7)

118. Similar to this subsection of policy P17, London Plan policy D9 at part D states "*free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London*". No public access is proposed to the site. The applicant

suggests it is not appropriate to make provision for a public accessible space within the tall building, as introducing public access to the roof terrace would be a significant challenge from security, access, and structural intervention aspects. It would require its own dedicated core and entrance process, separating visitors from the office workers. The most practical entrance would be on St Thomas Street, but there are limited opportunities to provide a separate reception here in between Keats House and the Georgian terrace, and it would compromise the size of the office reception to accommodate a separate public visitor flow. The additional core would be best located close to the main office core, which would increase the interventions to the retained structure. In terms of fire safety there would be an additional user group that are unfamiliar with the building who would need a dedicated management strategy, and from the security aspect the visitors would need to be kept separated from the ground floor to level 10 and have additional security/management. Adding these facilities for a public terrace would reduce the quality for future office tenants (especially at reception and by no longer having the largest roof terrace as a private amenity).

119. Officers note these reasons and practicalities for including public access to the top of this extended building, and consider this scheme is not one where it would be appropriate to have public access. The site is not far from the public viewing gallery at The Shard (with an entry fee) and at 10th floor level would not be particularly high.

Architectural design and materials

120. Part 3 of Southwark Plan policy P17 sets out five aspects of tall building design that proposals are required to achieve. The first subsection requires tall buildings to "*be of exemplary architectural design and residential quality*". While there is no adopted definition of "exemplary" design in relation to a commercial building, the expectation is that this will be a highly sustainable and ambitious design, and contribute positively to its context.

121. The tall building proposal is designed as a modern office block with a high-performing façade made of metal and glass at the upper reaches and clad in stone and brick at its base where it interacts directly with the historic fabric. The façade is designed as a "kit of parts" that is able to respond deliberately to its context and its orientation by the rhythm and depth of the fins to reduce overheating or allow more daylight into the north-facing façade.

122. The building's composition is defined by its bay design. In the same way as the façade responds to its orientation, the bay widths are adjusted to respond to the vertical articulation of the surrounding buildings. The tripartite bays on the northern façade reflect the Georgian character of St Thomas Street and the five bay widths on the eastern elevation visible over the Guy's Hospital reflect the five bays of the Chapel. The repeated bay design is an appropriate response and with subtle variations around the building allows it to respond to the context on each side.

123. The mansard design is a strong feature of the scheme and part of its response to the historic context. Mansards are a traditional feature in this area and in

this design the mansard and dormer window have been re-interpreted to give the mid-rise block an appropriate “crown”. In a twist from the traditional dormer windows return at the corners to soften the edges of the “crown” and also to capture the best views across the rooftops. The change in colour from green to silver complements the “crown” well and helps to make the top storey appear more recessive.

124. In its function the building is intended to be a high-performing environmental office building that provides amenities office workers expect of modern buildings. The introduction of balconies on the southern elevation not only introduces historic yard typologies to this façade but also offers outdoor amenity for occupiers and passive measures to reduce overheating. Securing the detailed design of features such as the balcony balustrade on the Kings Head Yard frontage would allow Team London Bridge’s consultation response to the “Inns and Yards Toolkit” to be picked up when the condition details are submitted for consideration.

125. As has been described in the proposal section of this report, the applicant is suggesting a green colour for the façades of the main building, and a lighter finish to the top floor. The choice of green is deliberate and helps to distinguish the upper storeys from the lower reaches of the design. In modern buildings the balance of window to solid has changed with regulations seeking to limit overheating and as a result this has placed a greater emphasis on the choice and detailed design of the proposed cladding. In this case the green colour is intended to reduce its visual weight of the building and perhaps reflects on some of the more decorative features of historic buildings nearby including glazed tiling and contrasting brick surrounds. The visualisations demonstrate that the green is a neutral colour that would have a softer visual appearance when viewed over the historic rooftops. The designers tested a variety of tones in the cladding at the pre-application stage but darker tones were considered to be too dominant and overbearing. In any event the final choice of colours and their finishes would remain be agreed through a condition.

126. The replacement entrance building on St Thomas Street would be in a simple, set-back infill contemporary architecture, designed to sit comfortably between the decorative style of Keats House and refined and cohesive design of the Georgian terrace. This building would not only serve as the main entrance to New City Court but also articulates the transition between Keats House and the terrace. The accessible main entrance on St Thomas Street is effective and an improvement upon the existing highly glazed and curved frontage.

127. In this sensitive historic context the quality of design will rely to a great degree on the quality of the detailing and choice of materials. It would be necessary to secure further details by condition for the main building, the new entrance building, southern façade, and roof extension to Keats House to ensure a high quality design is continued through to completion. Conditions relating to the following are recommended:
    - 1:5 / 1:10 scale details of all parts of the development including parapet, cill heads and jambs of all openings, roof and dormer details as well as details of interfaces between existing and new construction.
    - Material samples of all cladding materials including 1x1m samples of cladding, brickwork and stone, glass and metal work.

- Full-scale mock-up of a typical bay of the main building.

128. Subject to the further design details and materials (including detailed drawings, colour, samples and sample panels) being secured through proposed conditions, the design of the tall building along with its entrance building and extended Keats House is considered to be of an exemplary architectural design. The proposal would accord with London Plan policy D9, part C.1)c) on architectural quality and materials and part 3.1 of policy P17 of the Southwark Plan.

129. Other requirements of tall building policy P17 part 3 relate to the impact on heritage assets, environmental impacts, energy efficiency and public realm which are each covered in detail later in this assessment. In terms of other considerations set out in the London Plan tall building policy D9, the part 3) environmental impacts of a tall building on wind, noise, air quality, light pollution and overshadowing are considered in later sections of this report, and found to be acceptable (subject to mitigation). The safety aspect of D9 part 2)a), the transport impacts of parts 2)b), c) and d), the aviation and telecoms impacts of part 2)f) are considered in later sections. The economic benefits from the proposal have been set out earlier in this report to address part 2)e).

Design Review Panel

130. An earlier iteration of the scheme at pre-application stage was presented to the November 2024 Design Review Panel. To summarise the Panel's written response, while supportive of efforts to reuse the existing building, the Panel were not able to give its full support to the current proposals. They raised concerns about the architectural expression, the landscape and the scale and massing relative to the historic context, and challenged the designers to review these aspects of the scheme with the aim of developing an architecture that responds to the rich character and scale of the historic context. The Panel were not satisfied to endorse that proposal and felt it presented several challenges. In their view the site is an integral part of the fine grain urban development that characterises "old Southwark" and the area to the east of Borough High Street and should not seek to extend the urban forms and architectural language from the Shard and other tall buildings to the north of the site. Although substantially smaller than earlier proposals, the scale and massing remain challenging given the scale and character of the immediate context. This places particular demands on the how the architectural response can mitigate the scale of the new building, by breaking down the massing and developing an architectural response that responds to its immediate context.

131. The Panel's other comments are summarised:
    - Retention of the existing building: The Panel were supportive and impressed by the level of detail that has gone into the retention and re-use.
    - Architectural language: The Panel recognised that the design was at an early stage and were interested by the idea of the building design responding to its context, but they were not satisfied that the visuals demonstrated this was being achieved. The Panel enjoyed the idea of a 'kit of parts' that would adapt to its orientation and immediate context,

but it appeared to be a generic curtain-walling solution that references the Shard and not the texture and richness of the historic context. The design principles had not been developed sufficiently with a clear sense of scale materiality and colour. The interesting precedents have not been translated into the current architectural proposals that feel to be a glassy imposition into a complex and fine-grained historic context.

- St Thomas Street: The proportions of the new building appeared to be dominated by the main building and not polite enough. The entrance is at least a storey higher than its immediate neighbours, and as a result it appeared to challenge its setting. The building should respond to the scale of this historic street and stick to the established parapet height.
- Kings Head Yard: The Panel was concerned about how the building rises sheer from the edge of the yard. They were not convinced that the setback to provide the small sliver of landscape would be beneficial. They felt there was merit in mirroring the modest scale of the yard and to follow the current line of the yard – at least at the lower reaches of the building so as not to overwhelm the yard. Suggested finding possible uses to face onto the yard that could add some activation.
- Borough High Street and Guy's Quad: the gable ends could benefit from further development, articulation and greening. The Panel were not convinced that the large curtain walled gable was a suitable response in the context of Guy's Quad.
- Listed buildings: This is a complex historic setting. A proposed large building that is very visible over the listed buildings. Exemplary quality of the design will be required to justify the proposal. The Panel concluded that a further refinement and modulation of the design as well development of a more tactile architecture will be necessary before it could be considered that the design is able to mitigate the harm caused to the historic setting.
- Landscape: The Panel questioned the degree to which landscape had been considered. On St Thomas Street the main extent of the landscape appeared to be beyond the red line. On Kings Head Yard the Panel felt it was more appropriate to consolidate the landscape into one area opposite the pub where it could offer real amenity to the yard. The Panel welcomed efforts to see how the landscape could be maximised on terraces and greening of roofs to deliver the necessary UGF. The Panel also wanted to see how the atrium garden could be accessed from the yard.

132. In response to the Panel's feedback, the proposal was amended in the following ways and the design developed further for the submission:
    - The architecture and materials of the elevations have been further developed and remain different on each elevation. These have been further revised in the recent amendments to the scheme.
    - The entrance building was reduced by a storey.
    - Changed the landscaping on Kings Head Yard to be in one area, near to the pub (and not a longer, narrow sliver as it had been at pre-application stage).

133. As these positive changes had been made to the submitted scheme in response to the Panel's comments on the earlier iteration, the proposal has not taken back to the DRP.

Designing out crime

134. The Met Police was consulted on this application and a two-part condition regarding Secured by Design measures and certification is proposed. With such measures in place, the proposal would comply with Southwark Plan policy P16.

Fire safety

135. The Town and Country Planning (Development Management Procedure and Section 62A Applications) (England) (Amendment) Order 2021 establishes that any relevant building is subject to Gateway 1 requirements. Relevant buildings are those which satisfy the 'height condition' and contain two or more dwellings or educational accommodation. The height condition is that (a) the building is 18 metres or more in height; or (b) the building contains 7 or more storeys. The proposal is therefore not a relevant building as it contains no dwellings nor educational accommodation, and does not need to go through the Gateway 1 process with the HSE.

136. Policy D12 (B) of the London Plan (2021) requires that all major developments must submit a fire statement. The fire statement should demonstrate how the proposals respond to and contain information on the requirements of both parts A and B of the London Plan policy D12 on fire safety. This must be completed by a third-party, independent, suitably qualified person. Paragraph 3.12.9 of policy D12 explains that fire statements should be produced by someone who is "third-party independent and suitably-qualified". The council considers this to be a qualified engineer with relevant experience in fire safety, such as a chartered engineer registered with the Engineering Council by the Institution of Fire Engineers, or a suitably qualified and competent professional with the demonstrable experience to address the complexity of the design being proposed. This should be evidenced in the fire statement. The council accepts fire statements in good faith on that basis. The duty to identify fire risks and hazards in premises and to take appropriate action lies solely with the developer.

137. London Plan policy D5 about inclusive design requires developments to incorporate safe and dignified emergency evacuation for all uses, and a minimum of at least one lift per core should be a suitable sized fire evacuation lift.

138. A fire statement form and an outline fire strategy were submitted, and some further information provided in response to the GLA's Stage 1 comments. The report authors are a member and an associate member of the Institution of Fire Engineers. The reports detail: the active fire safety systems proposed for the offices; the means of warning and escape having been sized for the maximum occupancy of each level; passive fire protection systems in the wall linings and fire doors for example; external fire spread considerations with the wall

materials, green roof and roof covering selections. In terms of the access and facilities for fire services, the fire engine would be able to access the site from St Thomas Street, however with the size restrictions on Kings Head Yard only a smaller tender would fit through via the Hospital site. This is the case with the existing buildings on the site. Signage to clearly direct the fire service to the two firefighting shafts would be needed.

139. Dedicated evacuation lifts would be provided to serve all floors. The fire statement confirms that two firefighting shafts are included in the extended building, each providing a firefighting stair, firefighting lift and firefighting lobby from the basement to the ninth floor. At the tenth floor only one firefighting shaft is proposed and two stairwells. Two further stairwells are provided at the eastern side of the building up to the second floor level.

140. London Fire Brigade was consulted on the application and gave comments on water access and about any future changes to access. The submitted information is considered sufficient to address the planning policy requirements. A condition is proposed to require compliance with the submitted outline fire strategy (unless otherwise agreed) to ensure compliance with London Plan policies D5 and D12 and inclusion of the fire evacuation lifts.

141. The duty to identify fire risks and hazards in premises and to take appropriate action lies solely with the developer. The fire statement covers matters required by planning policy. This is in no way a professional technical assessment of the fire risks presented by the development.

Design conclusion

142. As was established by the appeal decision, the site is within an area where a tall building would be acceptable in principle and the site is at a point of landmark significance. The height is now proportionate to the significance of the location. It would sit higher than its immediate context of this historic part of Borough High Street, although its massing, architecture and lower floors respond well to the local character and streetscape, however as set out later it would cause heritage harms. It would not harm protected views. Two small areas of public realm are provided, with the site constrained by the retained frame of the 1980s building, the heritage assets and servicing yard from providing more public space. The reasons for not providing public access to the roof level of this office building are accepted.

143. The lower parts of the proposal to extend Keats House, replace the entrance building, and rebuild most of the Kings Head Yard facades are welcomed elements of the proposal and would deliver a high quality design. Overall the scheme is considered to comply with tall building policies P17 and D9, and the design policies of D3, D4, D5, D8, P13 and P14.

144. The scheme has given appropriate consideration to fire safety and Secured by Design principles, to address London Plan policies D5 and D12, and Southwark Plan policy P16.

Heritage considerations

145. The council has a statutory duty with regard to heritage. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority to consider the impacts of proposals upon a conservation area and its setting and to pay "*special regard to the desirability of preserving or enhancing the character or appearance of that area*". Section 66 of the Act also requires the local planning authority to consider the impacts of a development on a listed building or its setting and to have "*special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*". In this context "preserving" means doing no harm.

146. Chapter 16 of the NPPF sets out the national guidance on conserving and enhancing the historic environment. The heritage and culture policies set out in chapter 7 of the London Plan assert that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural details. London Plan policy D9 in part C.d) requires tall building proposals to take account of the significance of London's heritage assets and their settings, and part C.e) requires proposals to preserve and not harm the Outstanding Universal Value of a World Heritage Site. In the Southwark Plan, policies P19, P20, P21, P22 and P24 seek to protect listed buildings, conservation areas, the historic environment, borough views and World Heritage Sites.

147. The application site includes heritage assets which would be retained, restored, extended or removed in the current proposal, and have their settings affected by the proposed extensions.

148. The proposal would affect listed buildings that immediately adjoin the site, and are set further afield, and the Borough High Street Conservation Area. The assessment is separated out below into the conservation areas (including the on-site assets that contribute to the character of the Borough High Street Conservation Area), the listed buildings, and ends with an assessment of the LBC application for works to the Georgian terrace. A heritage impact assessment and a heritage, townscape and visual impact assessment (HTVIA) have been submitted. These include CGI visuals of the scheme from 20 viewpoints in the local area, from Southwark Bridge, from London Bridge and within the City. Many of these visuals are included below.

149. The heritage impacts of the earlier schemes formed the main part of the public inquiry, and an extensive part of the appeal decision. Historic England's involvement in the inquiry reflected the importance of the heritage impacts to this historic part of London. Various harms to a list of heritage assets within and outside the borough were found at different levels of "less than substantial" harm (LTSH) and these were weighed against the benefits of the schemes by the Inspector and Secretary of State in reaching the appeal decisions. Relevant quotes from the decision are incorporated into the assessment below for individual heritage assets. The heritage impacts were weighed with the public benefits from each appeal scheme. In conducting the planning and

heritage balance for the appeal scheme, the Inspector made the following comment.

"London is its heritage. It is a fundamental part of its intrinsic character. It is world renowned. However, its 21st Century developments also form a significant part of its character and are also world renowned; The Shard is one such development. Even if there is debate around the design quality of the modern developments, they are now part of the city and cannot be ignored.

Here are two schemes before the SoS, which due to the location of the appeal site, fall squarely in between old and new.

Both schemes have much to commend them. However, the extent of the harm caused to a number of designated heritage assets is significant. Plus there would be harm related to a number of aspects of the design and because of this, the schemes cannot be said to be exceptional, or exemplary. The heritage harm is set within the range of LTSH, however considerable weight is to be given to that harm. I am particularly mindful that the harm relates to a wide number of assets within Southwark and across London, including those of the highest significance.

Set against these, both schemes would bring about a great number of real benefits, heritage and public, which should be given moderate to substantial weight and collectively as a package, would be substantial.

In the balance, while I do not underestimate the benefits of the schemes, it is clear to me that the heritage harm and harm to townscape character and design are not outweighed by the public benefits, including heritage benefits."

150. The level of harms caused by the taller and different appeal schemes have informed officer's consideration of the impact of the current proposal on each heritage asset.

Conservation areas

151. Borough High Street is not only the UK's oldest high street and the centre of traditional commercial activity in this part of Southwark, but also integral to the religious, civic and medical development of the borough. The Borough High Street Conservation Area is one of the council's oldest conservation areas. It was designated on 29 September 1968 and extended in June 1970 and December 1980. Its significance is based not only around its street frontages and its numerous listed properties, but also its yards and lanes which are integral to the industrial archaeology and cultural heritage of the area. The adopted conservation area appraisal locates the New City Court site in sub-area 4 – St Thomas Street and Guys Hospital centred around this Georgian street and Medical School precinct. The main office building of New City Court and Keats House are both identified in the adopted conservation area appraisal as making a positive contribution to this conservation area.

152. Sub-area 4 is the north-east quarter of the conservation area, based on the orderly streets and closes of St. Thomas Street and Guy's Hospital. The close proximity and tightly-knit character of the conservation area coupled with clear views along Southwark Street, Borough High Street and the Cathedral Quarter demonstrate that a tall building proposal on the application site can impact on adjacent and neighbouring sub-areas of the conservation area.

153. In the appeal decision, the Inspector gave commentary on the St Thomas Street, and the Borough High Street/Southwark Street parts of the conservation area which remain today. For St Thomas Street she wrote:
The relatively complete 18th and 19th century setting to St Thomas Street and its restrained qualities of its buildings are readily apparent and has a marked change from the character of BHS. The buildings here were all developed as part of St Thomas Hospital complex to house various staff members and while there is an architectural hierarchy to the buildings, there is coherence and balance to the north and south of the street. There is a gradual opening out along the street and to the north side, there is a steady increase in scale from the entrance of St Thomas Street towards the grander buildings at Keats House, Conybeare House and to the Guy's Hospital entrance with its formal gates and railings leading into a forecourt to the complex. The 26-storey Shard Place located at the end of the BHSCA boundary, marks a distinct change in the character and scale, with Guy's Hospital Tower, and the Shard beyond. Guy's Hospital complex itself also marks an entry point into the CA when leaving London Bridge Station.

Against these qualities, the proposed developments, as tall buildings, would be particularly incongruous and would significantly undermine the qualities of scale. This can be particularly seen at viewpoints 50 and 51 [both looking west along St Thomas Street] *for the 2018 scheme where the tall building would loom behind the buildings. Although shorter, the effect would be similar for the 2021 scheme due to its solidity and bulk, and the overhang over the rear roof pitches of the listed terrace, as demonstrated at viewpoints 42* [from Southwark Street] *and 43* [from Borough High Street and the war memorial].

The effect would be experienced as a 'bleeding in' to the CA of the modern skyscraper developments of the Shard Quarter as viewed along St Thomas Street and the sense of separation of the two which is currently achieved, would be lost."

154. For the impacts on Borough High Street and Southwark Street, the Inspector stated:
"*The incongruous presence of the developments would also be felt along Borough High Street and Southwark Street. Both schemes would loom over and distract from the 3-4 storey buildings and, as major through routes into the city, those effects would be visible to users of the highway from many vantage points along these important routes.*

In some specific points, the developments would be seen in the context with the Shard and the 'bleeding in' effect of the cluster into the CA identified at St Thomas Street would be less distinguishable. Nonetheless, the stark juxtaposition and the immediacy of the proposed buildings behind the more human scale historic buildings would dominate in the views.

It is important to note here that while the main focus is around the streets and roads highlighted above, either of the proposals would be visible across the majority of the CA and from within each of the identified character areas with the abovementioned impacts visible at different vantage points, to differing degrees. For example, Southwark Cathedral in the Riverside sub area."

155. In terms of the current proposal to the main building, it seeks to retain, re-clad and extend the existing New City Court building, constructed in the 1980s and mostly located behind the historic frontages. The Inspector commented on the main building that "*While its architecture and quality of design is somewhat poor, it is recessive in form and I consider that it has a generally neutral impact*" on the conservation area. Policy P20 "Conservation Areas" of the Southwark Plan says that the demolition of buildings or structures that make a positive contribution to the historic character and appearance of a conservation area will not generally be permitted and that any replacement buildings or structures must conserve and enhance the conservation area's historic character and distinctiveness. This modern metal and composite-clad part of the 1980s building is considered to be detracting from the historic character of the area. Its substantial recladding is acceptable and accords with the policy.

156. The visual impact of the proposed enlarged building – which would make it a tall building – would have an adverse impact on the character and appearance of the Borough High Street Conservation Area, and would appear noticeably taller than its immediate surroundings. This impact is relatively localised as demonstrated in the HTVIA views where the proposal would be visible primarily from St Thomas Street, the approach from the west along Southwark Street, and parts of Borough High Street. Some of these images from the HTVIA are included below.



View 13 from the junction of Borough High Street, Southwark Street and Stoney Street showing the proposal above the roofline and against the base of The Shard



View 9 from the junction of Bedale Street and Borough High Street, showing the extended building appearing over the roofline on the right-hand side



View 14 from Borough High Street and the war memorial, looking north-east where the proposal would be seen over the roof line and against The News Building



View 12 from the railway bridge over Southwark Street at the western end of the Borough High Street Conservation Area

157. In each case the building would appear over the rooftops of the existing historic townscape which on Borough High Street is characterised by the narrow burbage plot-widths that give it a highly articulated vertical rhythm. The western elevation of the proposed building has been shaped to reflect the narrow burbage plot-widths (see HTVIA view 13 above). In this way the highly articulated historic townscape has influenced the design of the enlarged building.

158. The view analysis demonstrates that there would be some wider visibility in the Borough High Street Conservation Area, around Borough Market from Winchester Walk/Southwark Cathedral and from the south around the war memorial (and is considered in terms of the Cathedral later). This visibility would be fleeting and often limited to the articulation of the top floors and roof-top mansard. In these cases the proposal appears like a relatively distant and articulated structure that complements the historic townscape.

159. There would be occasions within the conservation area where the upper floors of the tall building would be seen separate to the tall buildings around London Bridge station however. The visual below (HTVIA view 19) shows the proposal when stood on St Thomas Street in front of the Hospital and station entrance, looking west. Here the building would be a very prominent addition over the roofs, and clearly of a much larger scale than the historic buildings in this part of the conservation area.



View 19 looking westward along St Thomas Street

160. There would remain some visual incursion into the conservation area of this modern development (as referenced by the Inspector) from the cluster around London Bridge station. The impact would be reduced compared to that of each appeal schemes (which the Inspector found to be a high level of less than substantial harm from each scheme) by no longer being a slab-like tower that was visible across great distances. The design incorporates a large amount of articulation in its architecture, and each façade responds to its context. The bay composition reflects that of the neighbouring buildings and is supported. However this impact of the tall building proposal due to its scale, bulk and height of the tall building is considered to be harmful, at a middle level of the less than substantial range of harm to the character and appearance of the Borough High Street Conservation Area.

161. To consider the other elements of the proposal (aside from the tall building) that would impact on the Borough High Street Conservation Area, the scheme proposes to remove most of the Victorian screen along the Kings Head Yard, which had been preserved as part the current building. The frontage is noted to be a positive feature in the conservation area appraisal and is locally listed. It is a façade of two-storey former hop warehouses that defines the northern edge of the yard as a remnant of the brewing industry. It is marked on the bomb damage map of 1945 as having significant damage, but appears to have been reconstructed and replicated. Hints at the extent of the original fabric and rebuilt parts can be seen in the colour differences, textures, the degree of decoration in the pediments and differences in weathering. As part of the 1980s works, these facades were altered to put in large windows with smoked glass, doors, screens and fire exits for the offices. Nonetheless it is a positive contributor to the Borough High Street Conservation Area in forming the street pattern and historic grain, and along with the entrance building and the Old King's Head pub creates an "evocative archway approach from Borough High Street" (as stated in the conservation area appraisal).

162. In the appeal decision, the Inspector noted parts of the screen appear to have been rebuilt following bomb damage but that it contributes to the character of the yards and the conservation area. In both appeal schemes the Victorian screen would have been completely removed and an area of public realm created at the west end. The Inspector commented:

"*The number of yards leading off BHS are an important part of the character of the CA and the townscape. The Kings Head Yard area is particularly important given the presence of the Kings Head PH as an active draw, allowing visitors to experience the repurposed burgage plots and the historic uses of these areas, away from the hustle and bustle of BHS. The framing of the yard by these buildings, and the scale and intimacy are important reminders of the evolution of the area from its medieval origins and its commercial importance. While parts of the yard are not particularly pleasant due to antisocial behaviour, that itself does not take away from its character... The repurposing of Kings Head Yard to an open area of public realm through the removal of the hop sample rooms would erode the important character of the yard and the tight urban grain experienced here would be lost*."

163. The current proposal would demolish most of this Victorian screen façade, leaving only one bay at the western end, which appears to be historic fabric. The rest would be replaced by the articulated base of the enlarged building, designed to follow the Victorian footprint of the yard. This removal would adversely affect the character and appearance of the conservation area, and cause a low level of less than substantial harm. The demolition has been justified by providing further information on the age of the screen so that the oldest section has been kept, by the public benefits arising from the creation of a new public space and the high quality design of the replacement two-and three-storey frame façade (with an improved relationship with the street). It is proposed to reinforce the edge of the yard but also open up with the pocket of public realm near to the Old King's Head pub, but by rebuilding along the line of the yard with a three-storey frontage the sense of scale would replicate that on the southern side of the yard, and the intimacy would be recreated. The scheme would also deliver highway enhancements of the Kings Head Yard that would improve its quality and accessibility.

164. Keats House was constructed in 1863 for Guy's Hospital. Its highly decorated Italianate front façade, short side elevation and front railings survived the works in the 1980s which removed the rest of the building and linked it into the newly constructed office building. Only the remaining façades of Keats House are of historic interest and add positively to the character of the streetscene and Borough High Street Conservation Area. Keats House was added to the council's local list in 2024. Its siting between the related hospital buildings along this western end of St Thomas Street adds to its significance.

165. In the appeal schemes, the Inspector agreed Keats House is a positive attribute to the character and appearance of the conservation area. Each appeal scheme proposed to move the façade along the street for servicing reasons, which the Inspector considered "*would further erode its historic character and legibility in the streetscape*" and harm the character and appearance of the conservation area.

166. The historic frontage of Keats House would be maintained in situ in the current proposal, which is a welcomed element. The adjacent main entrance building would be set back further than the existing building, to allow more of the new side elevation Keats House (with added cornice and stonework) to be seen and appreciated in views eastwards along the street. The mansard roof extension is of an acceptable scale, with simple detailing and traditional materials so that the highly decorative design of the main façade retains its primacy. Although the tall building would be seen over the roof line of Keats House when looking westwards, overall these works to Keats House are considered to enhance it and the character of this part of the conservation area.



View 10 looking east along St Thomas Street showing Keats House and entrance building



View 20 looking westwards along St Thomas Street, with the tall building seen above Keats House

167. The proposed works to the entrance building would demolish the 1980s façade. It is classed as a building that makes a positive contribution in the conservation area appraisal (as the whole main building is categorised as such). This curved, highly glazed frontage with mirrored glass is of its time and while not especially prominent or distracting, does little to enhance the streetscene and the setting of the historic buildings on either side. The replacement and extension of its front façade would be acceptable. The replacement façade would be set slightly further back, as a midway point between the two ends of the current façade, and be of masonry materials in a contemporary, simple architecture that emulates the proportions and composition of the adjacent historic buildings. Through its deliberate set-back and its mannered architectural expression, this block seeks to complete this frontage without dominating it or challenging its primacy. Keats House and the listed Georgian terrace dominate the streetscene and the disruptive quality of the existing New City Court is removed. This proposed entrance block is considered to conserve the character and appearance of the conservation area.

168. The grade II listed 19th century Georgian terrace was built for Guy's Hospital as living accommodation for surgeons. The terrace has a coherent architectural character including London stock bricks, fenestration, consistent roofline and front railings. It sits within a group of related, and well-preserved Georgian buildings along this western end of St Thomas Street. The relatively complete example of late 18th/early 19th century streetscape was noted as an important attribute of the conservation area in the appeal decision. The shared setting of St Thomas Street with a number of grade II and II* listed buildings forms part of the Borough High Street Conservation Area's special interest. The Inspector noted that the Georgian terrace itself contributes to the conservation area and compliments the setting of other listed buildings. This remains true today.

169. The earlier appeal schemes were found to cause harm to the significance through the effect of their respective tall buildings on the setting of the Georgian terrace. Visuals of both appeal schemes are included below. The Inspector commented:
"The visual coherence of the terrace would be significantly eroded by the proposed schemes, particular in light of its proximity to these assets and scale. The jump in mass between the terrace and each of the schemes would have no regard for the scale and restrained formality of these buildings, which are appreciable in their largely original setting. Both schemes would have an overpowering influence, diminishing the visual presence of the terrace and its appreciation, causing harm."



Images of the 2018 scheme looking along St Thomas Street, with the tower appearing above the Georgian terrace



Images of the 2021 scheme looking along St Thomas Street, with the tower appearing above the Georgian terrace

170. In the current scheme, the proposed external works to the terrace's frontage would re-open front doors so that terrace has a direct relationship with the street once again. The atrium roof would sit on the parapet of the rear wall and sit low enough to not be visible in public views. As has been shown by HTVIA views 9 and 20 (copied again below), the upper floors of the tall building would appear over the roofline of the terrace. There is a mid-level of less than substantial harm arising to the conservation area as a result of this increased visibility. In this location the primary feature of the view is the Georgian terrace and the tower of the grade II* listed St Thomas Church. The visibility over the Georgian terrace rooftops would be permanent and would appear in a layered manner as a backdrop. The impact on St Thomas Church is more nuanced. The silhouette of the church is unaffected by this development which is across the road and set behind the terrace. Notwithstanding this there is a degree of harm arising due to its scale at the edges of the views of the Church tower.



View 9 from the junction of Bedale Street and Borough High Street, showing the extended building appearing over the roofline on the right-hand side



View 20 looking west along St Thomas Street

171. The applicant considers the proposal would cause no harm to the Borough High Street Conservation Area. Historic England raises significant concerns with the proposal due to what it considers to be the considerable harm to the conservation area. As the tall building would affect three of the four sub-areas of this conservation area, with the height at odds with the prevailing scale of buildings (mainly of three- to five-storeys) along Borough High Street and St Thomas Street, Historic England considers it to be large, incongruous and to have a jarring juxtaposition above the rooflines, and undermines the formal architecture along St Thomas Street. Historic England also raises concern with the loss of the Victorian façade along Kings Head Yard, erasing a vestige of the hop trade and reducing the character of the yard. The Georgian Group consider there to be mid-level of harm in the less than substantial harm scale to the Georgian buildings in this sub-area of the conservation area. The tall building would have a harmful impact on the ability to appreciate the character of St Thomas Street and Guy's Hospital. Southwark Cathedral also raised concern with the impact of the tall building on the conservation area.

172. Taking all impacts of the proposal on the conservation area (including the tall building becoming a permanent feature of the backdrop in sub-area 4 of the conservation area, the demolition of the screen along Kings Head Yard, the extension of Keats House and the installation of the new entrance building) it is considered to introduce a mid-level of less than substantial harm. In these cases decision makers are advised to place great weight on the harm arising to heritage assets. Any harm should be avoided or convincingly justified in accordance with the NPPF. In this case the public benefits that can be considered in the balance include the high quality office space and jobs, public realm, the affordable workspace and the heritage benefits of the restored Georgian terrace.

173. Turning to the other conservation areas that may be affected by the proposed tall building, the upper storeys of the extended main building would be visible from within the Thrale Street Conservation Area to the west of the site. In HTVIA view 11 copied below, it would be viewed against the base of The Shard, Shard Quarter and The News Building and above the railway bridge (which forms the eastern boundary of the conservation area, and along with HTVIA view 12 above just outside this conservation area). The proposed building is considered to preserve the setting of this conservation area.



View 11 looking east from the junction of Southwark Street and Southwark Bridge Road, near the western edge of the Thrale Street Conservation Area. The proposal is shown in blue wireline.

174. Two other conservation areas were considered in the appeal schemes. The Monument Conservation Area within the City of London includes the northern end of London Bridge, from where the proposal would be visible, infilling the visible sky at the southern end of London Bridge. It would be of a scale comparable with the viewed height of 1 London Bridge and Glaziers Hall, and is considered to preserve the setting of this conservation area. Similarly, the proposal would preserve the setting of The Bank Conservation Area further to the north in the City. In its consultation response, the City made no comments.

175. To conclude on the impacts to conservation areas, officers find the proposal would cause a mid-range level of less than substantial harm to the Borough High Street Conservation Area, (as did Historic England and the Georgian Group), and no harm to conservation areas further from the site. The table below compares the conclusions of three different parties.

Conservation Area	Harm found by the applicant	Harm found by the council	Harm found by HE
Borough High Street Conservation Area	No	Yes – middle level of less than	Yes – "considerable"

		substantial harm	less than substantial harm
Thrale Street Conservation Area	No	No	No commentary given
The Monument Conservation Area	No commentary given	No	No commentary given
The Bank Conservation Area	No commentary given	No	No commentary given

176. The harm caused to the Borough High Street Conservation Area means the proposal fails to comply with Southwark Plan policy P20 parts 1 and 4, and tall building policy P17 part 3.2. While the proposal includes demolishing the Victorian screen which makes a positive contribution to the historic character and appearance of the Borough High Street Conservation Area, its demolition and replacement would conserve the conservation area's historic character and distinctiveness, to address part 2 of policy P20. Similarly, while the entrance building is identified as a positive contributor to the conservation area, its replacement with the new design is considered to enhance the conservation area's historic character. The requirement in part 3 of policy P20 for any harm to the significance of a conservation area needing robust justification is considered in the planning balance section.

Listed buildings and structures

177. The impacts on listed buildings outside the site would not arise from any direct effects on the fabric of heritage assets, but would be from the impact of the development on the significance derived from their settings. The setting of listed buildings benefit from special protection in statutory instruments and officers have placed considerable weight on the special regard required by the Planning (Listed Buildings and Conservation Areas) Act 1990 on the setting of the affected grade I and grade II* listed buildings in the immediate context of this proposal, as well as those grade II listed buildings whose settings are also affected, of which there are a number in the area and within the site.

178. At the top of the hierarchy of listed buildings affected by this proposal is the grade I listed Southwark Cathedral (The Cathedral and Collegiate Church of St Saviour and St Mary Overie, Southwark). Constructed in the 13th century, it is the jewel in the crown of Southwark's heritage assets. While this important building has generally been subsumed by the city around it, within its immediate setting this important building has retained its pre-eminence despite the modern development nearby. Even The Shard, while visible from certain locations around the Cathedral, does not challenge its pre-eminence and any less than substantial harm was more than justified by The Shard's substantial public benefits.

179. The Inspector described the significance of Southwark Cathedral as follows in the appeal decision:

"Originally founded in the 12th century as the Priory of St. Mary Overie, this grade I listed building is a gothic church, rebuilt between 1220 and 1420, following a fire. Following dissolution, it became a parish Church until 1905

when it became the St. Saviour and St. Mary Overie, serving the new diocese of Southwark and preserving both its former names.

It has had several phases of development including the square tower dating from 14th century and extended in the later 14th and 15th centuries. The pinnacles were added in the 19th Century when the church was restored. It has a gothic architectural character.

In terms of setting, that is encapsulated by the description contained within the BHSCAA. This states that "the significance of the Cathedral in its wider historical context is not to be underestimated as it is an extant relict of medieval townscape, set within the everchanging environment of its modern setting. Once dominant over small lanes and buildings packed around it, it is now crowded by modern structures - the office buildings, railway viaduct and London Bridge approach that surround it."

"The surroundings of the Cathedral are crowded but its immediate setting allows viewers to appreciate its architecture against a clear sky. The Shard does encroach into this at various points as one travels around the building and care would be needed when photographing the asset in order to ensure that the tower could be seen in its full glory against that clear sky. In spite of an urbanised setting, this asset is also visually prominent in some wider views, including from London Bridge across Montague Square. The tower and pinnacles in particular are also distinguishable from several parts in the wider area and in this regard, the building has a landmark quality, as a reminder of the growth of ancient Southwark".

180. When considering the impact of the two appeal schemes, the Inspector considered they would be experienced in several viewpoints around the Cathedral and kinetically, moving around it. From some points, the appeal schemes' tower appeared as an isolated structure, away from the tall buildings of the Shard Quarter which form a group in these visualisations, to be "incongruous and intrusive into the backdrop of the tower". The impressive presence of the Cathedral would be undermined. In the views from London Bridge, the Inspector considered the different characteristics of the east side (having tall buildings) and the west side (being distinctly lower "with the tower and pinnacles acting as a focus and a clue to the historic nature of the area") would be eroded slightly with the introduction of the schemes roughly located in line with the end of London Bridge. The Inspector considered that in light of the setting and contribution that makes to significance, that both appeal schemes would cause a moderate level of less than substantial harm to the Cathedral.

181. For the current application, Southwark Cathedral has raised objection to the harm to the significance and setting of the Cathedral; the objection is summarised in the consultation section towards the end of this report. Historic England considers there would a negligible impact on the Cathedral's setting and any harm would be very limited.

182. The current proposal introduces a modest new incursion into the wider setting of the Cathedral. This is best understood in the view from Winchester Walk where the building would appear over the rooftops of the Borough Market and the viaduct that flanks the Cathedral Yard (see HTVIA view 8 copied below with

the proposal in blue wireline behind the leaves). The visible top parts of the proposal would read as am addition to the roofscape and a few chimneys that can currently be viewed above the viaduct from this side of the Cathedral (as well as Guy's Hospital tower and The Shard). It is considered that any harm arising to the Cathedral as a result of this visibility is of the lower range of less than substantial harm.



View 8 of the HTVIA showing the appearance from Cathedral Street/Winchester Walk

183. In other views of the Cathedral, the HTVIA views demonstrate that the current proposal would preserve the significance of the Cathedral and its setting. The HTVIA view 2 across London Bridge has been included earlier in the assessment and shows that the proposed building would sit comfortably to not challenge the prominence of the Cathedral tower in this view. The reduced massing of the proposal from the appeal schemes responds well to the Inspector's comment about the heights of buildings in views of the Cathedral from London Bridge.

184. Part of the proposed roof level (in grey metal) would be visible from Cathedral Square by filling a small area of sky within the gap between the Cathedral's gabled roof and the adjacent modern building. This is considered not to be a prominent incursion into the setting of the Cathedral.



View 5 of the HTVIA from Cathedral Square where the roof of the proposal can be seen next to the gable on the left-hand end of the Cathedral

185. The scale of the current scheme when viewed from Montague Close would no longer appear "*incongruous and intrusive into the backdrop*" of the Cathedral that the appeal decision noted. The incursions into the setting from the current proposal would cause some harm, considered to be less than substantial harm at the low end of the range. In accordance with paragraph 215 of the NPPF this less than substantial harm would need to be convincingly justified by the public benefits arising from the proposal, and is analysed in a later chapter of this assessment.

186. The George Inn is located some 60m to the south of the site and set behind the buildings on the White Hart Yard nearby. The significance of the grade I listed historic Inn is appreciated from its yard (which continues to be used as its beer garden). Looking south from the yard this 17th century timber-framed Inn forms the southern range of the yard. The Inspector's report set out the significance of this building as follows, which remains the same today:

"Built after the Southwark fire in 1676, The George Inn is a fine example of a 3 storey brick and galleried timber framed building. It is a unique survival in the area and in London, albeit its north wing and centre were demolished in the 19th century. It has historic associations with Guy's Hospital, Great Northern Railway and is now in the stewardship of the National Trust. It also has literary associations, including with Shakespeare and Dickens. Its historic and architectural interest is reflected in its grade I listed status.

Its setting comprises a courtyard area, although today it is contained by late 20th century office developments (akin to the scale and design of the 1980s extensions at New City Court) which detracts from that setting. Guy's Tower, the Shard, and Shard Place are also visible behind this building. This area is lively, used as a beer garden allowing visitors to experience a historic

semblance of an ancient, backland coaching inn. Visitors are able to also view this area from the galleries of the building. While the setting has been affected, the courtyard area still positively contributes to significance."

187. The Inspector concluded each of the appeal schemes would cause less than substantial (at the low end of the scale harm) to the significance by dominating and distracting from the backland yard character, "*the looming presence of the developments in this area would be very apparent*", as well as eroding the views out from the galleries and the experience of accessing the Inn from Borough High Street.

188. The current scheme would be many storeys lower than the appeal schemes, and would not be visible from the yard of the George. It has successfully addressed the Inspector's comments about the earlier designs being very apparent and looming. The proposal is considered to preserve the setting of this grade I listed building.

189. Guy's Hospital is a grade II* listed building. The Hospital was founded in 1721, on the former burial ground of St Thomas Hospital and was developed by Thomas Guy. As noted in the appeal decision, the original complex comprises two symmetrical four-sided ranges of wards with arcaded courtyards separated by a central range, designed to be airy and spacious yet form a secure environment for its long-term patients. The forecourt to St Thomas Street was created by the development of ranges, with the east wing built in 1738-41 and the west wing in 1774-7. The original range was also re-faced at that time and although different architects were involved in the development of the wings, the composition was clearly designed to be unified with pedimented classical designs. The west wing includes what is today the only surviving 18th century hospital Chapel in England. The Chapel incorporates three stained glass windows which face west onto New City Court. The east wing was heavily damaged during the Second World War but was faithfully reconstructed in the 1960s. The Inspector commented that "*The sequence of spaces in the forecourt and courtyards are all an intrinsic part of the design ethos of the site and thus significance is derived from that setting. The forecourt at St Thomas Street acts as a controlled entry point into the calmer, more secluded courtyards beyond*."

190. The statue of Thomas Guy in the centre of the St Thomas Street forecourt/quad aligned with the pediments to the surrounding buildings, and the elaborate iron gates, piers and railings along the street are both listed in their own right. This forecourt has been improved in recent years to replace the car park with a landscaped, pedestrianised space and seating. The Hospital complex is a rare survival of a purpose-built institution associated with the emergence of healthcare provision in the 18th century, and all of these features gives it significant historic and architectural interest.

191. In the appeal schemes, the Inspector found that each proposed tower would cause harm to this heritage asset, at a high level of less than substantial harm. Her comments are repeated here.

"The dominating effect I have found from both schemes in relation to the [Borough High Street Conservation Area] *and the listed buildings along St*

Thomas Street is also stark here. The developments would be located behind the west wing. The proximity and juxtaposition would also be particularly incongruous as the flank elevations of the developments would be located behind its central pediment, but at a slight offset and angle…

Similarly, the offset and the parallelogram form of the 2021 scheme would have a very uncomfortable relationship with the pediment and would be discordant and distracting… The proximity and scale would also have a looming impact from within the western quadrangle area, again in both schemes.

Again, the point is made by the Appellant that visual competition or distraction is not always necessarily adverse and that the assessment must be rooted in whether that effect would cause harm to the significance. As with other assets, including the BHSCA, the contrast between old and new, in the forms as proposed, would clearly have a discordant effect which would erode the qualities identified. In light of the significance drawn upon by Guy's Hospital from its setting, that impact is harmful to significance.

Guy's Hospital already has a number of tall buildings surrounding it, in light of its proximity to the Shard Quarter. This has been established for a number of years, following the arrival of the railways and through 20th century additions, including the Guy's Hospital tower and the (now demolished) Fielden House. The effects of the current tall developments are apparent from within the forecourt, when looking east, and from the quadrangles. The vastness of the Shard is particularly apparent and as a whole the juxtaposition and scale of these tall buildings has an uncomfortable relationship with Guy's Hospital, harming its setting. I consider that the proposed schemes would have a greater effect given their proximity to the west wing and the interaction with the pediment.

Moreover, the area behind the western wing remains unaffected by tall developments due to the historic scale of the townscape behind it remaining intact. This area gives some relief when in the forecourt which would be eroded by both schemes which would have a flanking and tunnelling cumulative effect.

As a place of worship, quiet contemplation and reflection, the Chapel interior is not a brightly lit space, but the ambience, particularly from the light cast through the stained-glass windows, is important and it is an inherent design intention which forms part of the significance of the Chapel. Given that both schemes would be positioned immediately adjacent to these windows, there would be a significant loss of light (43% and 46% reduction respectively). This would curtail the light qualities inside the Chapel, filtered through the stained-glass windows and the experience this brings, causing harm to significance.

In light of the nature and grading of these assets, and the combination of harms to setting behind Conybeare House and the west inner quadrangle, plus the impact upon the Chapel and the ability to appreciate it, both schemes would cause a high level of LTSH."

192. The western sides of the Hospital's quads are presently unaffected by tall development, due to the historic scale of the townscape behind it, which would be affected by the proposed tall building. The visuals from the HTVIA for the

current application are included below, showing how the top of the tall building would rise above the roofline within the two quads.

193. The top three floors of the proposal would be visible directly above the Chapel. The effect of this proposal on the Hospital has been reduced during the application revisions by a small reduction in its height over the parapet line, cutting back the south-eastern corner to simplify its profile when viewed from the quad, and changing the colour of the top floor.



View 16 of Guy's Hospital West Wing Quad



View 18 of Guy's Hospital North Quad



View 19 looking westward along St Thomas Street

194. The composition of the eastern elevation is arranged around the Chapel's central pediment, which is welcome change from the appeal schemes. The proposed design gives the top-most floor the appearance of a mansard with dormer windows that reflect the composition of the façade bays. The five window arrangement intentionally echoes the Chapel's own fenestration. The mansard design also has the effect of reducing the impact of the new development in this view, reducing the overall scale visible over the parapet to two floors plus a more recessive mansard storey.

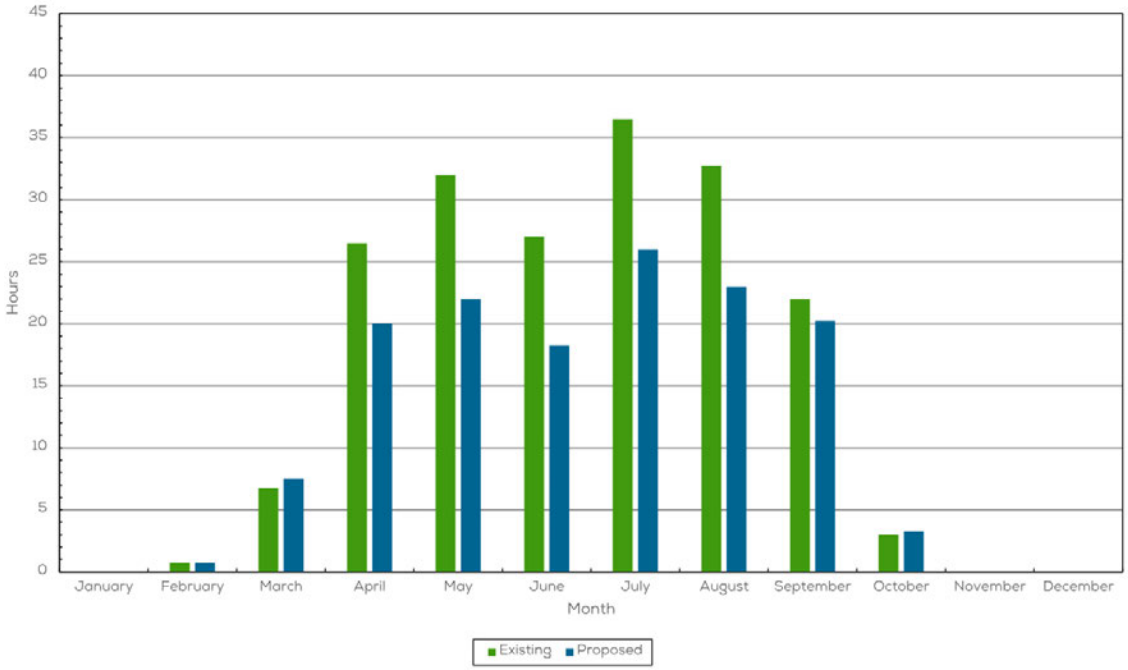
195. The submitted scheme responded to the officers' pre-application advice on the number and square design of the dormer windows to better reflect the Chapel's proportions. The two top storeys of the south-eastern extension were cut back (again recommended by officers) to reduce its visibility in these views.

196. A light study was provided to assess the impact of the proposal on light reaching the Chapel's three large stained glass windows at first floor level which face towards the application site and are close to the boundary. This study goes beyond the typical BRE daylight and sunlight guidance that is regularly used to consider the impacts on residential neighbours, and uses different tests to calculate the quantum of light (daylight and sunlight) reaching the outside of the windows at hourly intervals. These are then averaged across each month. The three windows receive the highest levels of light between May and July, and between 2pm to 4pm when sunlight reaches the windows. The study concludes there would be an average 49% loss of overall light levels. The proposal would block some sunlight, but not all sunlight in any month.



Photo of the interior of the Chapel with its three stained glass windows

197. The greatest predicted loss of light would be in the summer afternoons. Each of the three windows would be affected differently, so the greatest sunlight loss varies – for one window the largest loss is in July and August (9-10 hours lost across each month of the 33-35 hours currently received), another window it is May and August (9 hours lost each month of the 34 and 39 hours currently received), and for the last window it is May and July (14 hours lost each month of the 40 and 44 hours currently received). One of the graphs in the study is copied below to show the relative reduction in sunlight hours by month across the year, with existing luminance hours in green, and proposed in blue with the proposed development in place.



Graph showing the predicted sunlight hours for window 1 across the year

198. As has been quoted above, for the appeal schemes the Inspector acknowledged the reduced light to the stained glass windows and included it in the harm to the Hospital. Officers consider for the current scheme, the similar

reductions in light to the Chapel windows would also cause harm to the significance of the grade II* listed building.

199. There is no harm to the listed statue of Sir Thomas Guy and their listed railings nor their setting. The statue is centrally located in the Guy's Quad and is appreciated in the round but principally on axis form the north on St Thomas Street. While the proposed development could be viewed from this location, it does not interfere with the viewer's appreciation of this important statue preserved in its original setting. In effect it would be no different from the Guy's Hospital tower also visible from this location.

200. The applicant considers the proposal would cause a low level of less than substantial harm to Guy's Hospital. Historic England's consultation response refers to the considerable harm to the Hospital from the proposal. HE says this would be firstly from it appearing above the unbroken roofline of the west wing, undermining the architectural meaning of the central pediment feature and the symmetrical composition of the Hospital. Secondly, it would cause a loss of light to the stained glass window of the Hospital chapel. The Georgian Group also commented on the application and the mid-high level of harm on the scale of less than substantial harm to Guy's Hospital. The GLA stage 1 responses noted less than substantial harm to a middle extent because *"Views 17, 18 and 19 show the most notable impact with the Grade II* 18th century hospital, currently framed against clear sky; the proposed development backdrops this west wing of the hospital in the axial view and detracts from the appreciation of its form and silhouette in this key view."*

201. Officers consider the impact on the grade II* listed Guy's Hospital quads and in particular the setting of the Chapel and the Chapel's windows, the harm arising due to this proposal is considered to be in the middle range of less than substantial harm.

202. In respect of the grade II* listed buildings 9, 9a and Mary Sheridan House on the northern side of St Thomas Street, these buildings are directly opposite the site and their settings would be affected by the tall building and changes along St Thomas Street (see HTVIA view 19 above). The appeal decision described these building as follows and found a moderate level of less than substantial harm from the previous schemes:

"St Thomas Church at no 9a is located on the other side of St Thomas Street, on the site of the original St Thomas Hospital which was associated with the priory. It is a former parish Church built in the Queen Anne style with a square 4-storey tower. Collectively, Nos 9-15 form a fine brick terrace set back in the street, with a forecourt and railings to the boundary with the pavement. No 9 forms the former Treasurers House and is a grand 3-storey property with 7 bays. It is more distinguished in architectural detail, being larger and grander than nos 11-15 and the buildings opposite, while still retaining architectural restraint as found elsewhere. It is also built in a Queen Anne style. Nos 11-13 were also built for the hospital as houses for the receiver and minister and No 15 as the house of the Apothecary to the hospital. All are polite in architectural terms and illustrate the social hierarchy of the time as well as the evolution of the hospital and having a functional relationship. Individually, all these assets have architectural and historic interest, as identified above.

In all of the above assets, the settings effectively 'nest' with each other. The significance derived from setting, is as I have explained above for the listed terrace. In that regard, the impacts of each of the schemes would also be similar in terms of the towering juxtaposition and harm to the composition of the 18th/19th assets. In the case of No 9a, the scale and proximity of both of the proposed schemes would compete for attention in the skyline with the Church Tower, distracting from this as a focal point."

203. The harm to the appreciation of these listed buildings is principally to their settings as a result of its visual dominance in relation to these heritage assets. There would be some harm arising due to the new visibility of the proposal over the rooftops of the listed buildings on the southern edge of St Thomas Street. However the separation across the road and the fact that the new development would not interact directly with these highly significant buildings in views from St Thomas Street, means that their appreciation from St Thomas Street is largely unchanged. The scale of the tall building would continue to compete for attention in the skyline with the Church Tower at 9A St Thomas Street, and reduces the visibility of the Church Tower in views from the north (e.g. HTVIA view 3 from outside Glazier's Hall). It is therefore considered that there is harm to their setting, and is of the low level of less than substantial harm.

204. The Old King's Head Public House is grade II listed and faces the site across the narrow Kings Head Yard. When considering the appeal schemes which each proposed new public realm at the western part of the site (in front of the pub), the Inspector commented as follows:

"This is a grade II listed building, dating from 1881 and built in a Tudor Revival style but with a 16th century bust of King Henry VII fixed to the centre of the upper floor. It represents a good and typical example of Victorian architecture. It also replaced an earlier timber framed building.

The significance of this asset derives in a large part from its location on Kings Head Yard, characteristic of the distinctive urban grain of BHS. I saw at my visit that the open space afforded by the yard was in active use by customers of the PH.

Consistent with my findings on this area for the BHSCA, the loss of enclosure gained from the yard through the creation of Kings Head Square would cause harm to its significance. Again the scale and intimacy as a building in a back alley would be lost due to the scale of the proposed buildings. The harm would be at the low end of the LTSH scale for both schemes."

205. The significance of this listed pub remains as described by the Inspector. In the current scheme, no public realm is proposed at the western end of the site. The existing servicing yard would be kept along with the western end of the Victorian hop screen onto the yard. This would keep most of the existing arrangement of the site and public house at ground and first floor, and the enclosed nature of the yard that forms part of the significance of the listed pub. Retaining the Victorian screen in front of the pub addresses the Inspector's comment about the previous schemes' loss of enclosure harming the listed

building's significance, and instead helps to retain the scale and intimacy of the yard.

206. At the upper levels the proposed office building would extend to be much closer to the pub and widened across more of the pub's width. This would make the office building more prominent and noticeable from within the pub and from within the yard outside the pub.



Visuals showing on the left the view along the yard looking east, and on the right the view along the yard looking west

207. The applicant considers there to be no harm to this grade II listed building. The pub has objected to the proposal in term of its heritage harm from the massing of the proposal, the loss of daylight which it states would likely result in a redundant public house and residential space that would not sustain nor enhance the significance of the grade II heritage asset, nor its viable use consistent with its conservation and economic vitality. The pub is north-facing and sits within its yard context facing the servicing yard and two-storey Victorian screen at close distance, and the 1980s main building beyond, which impact on the existing daylight and sunlight levels, especially into the ground and first floor of the public house. The yard setting and its immediate neighbours and context would be largely preserved. The BRE daylight guidance does not recommend daylight levels for a public house. Officers consider there is some harm from added height and massing of the tall building, which is considered to be a low level of less than substantial harm, principally to its setting. Other proposed changes include a green pocket of new public realm to the east of the pub (which would be gated at night) and resurfacing of the yard to improve its quality and accessibility. These would be public benefits within the setting of the listed building.

208. For the grade II listed building in the St Thomas Street group of the Georgian terrace nos. 4-16 and the adjacent Bunch of Grapes public house, the impact of

the tall building on the Georgian terrace has been considered earlier as part of the conservation area, and concluded at the mid level of less than substantial harm to these listed buildings. Officers acknowledge that the Georgian terrace buildings have been substantially altered over time and their significance lies principally in their front elevations. The pub is of a similar architecture to the Georgian terrace, double width and typical public house frontage. It retains some original internal features, and has been extended and altered over time. Its significance is mainly in its front and rear façades and its plan-form, which are unaffected by this proposal, and it forms a group with the Georgian terrace.

209. The tall building would be visible above the consistent roofline of this terrace, removing the current clear sky. It would be in contrasting architecture, materials and colour. Although the proposal is lower than both appeal schemes, the prominent addition and difference in scale between the terrace and the tall building would again harm its setting.

210. The applicant considers the proposed works would lead to less than substantial harm to the Georgian terrace, which would be outweighed by the public benefits. Consultees consider the harm to be within the less than substantial harm scale. Historic England refers to the proposal rising above the unbroken roofline, undermining the clearly defined formal architecture found on St Thomas Street, and there being less than substantial harm to the significance of some listed buildings within the conservation area. The Georgian Group considers the harm would be at the low-mid end of the less than substantial harm scale. The GLA stage 1 report notes that the HTVIA views show "*how the current 18th century character of the street is impacted by the high extent of visibility of the proposed development, which overtops and backdrops this Georgian terrace, detracting from the appreciation of its parapet and silhouette. A middle extent of less than substantial harm is therefore caused."*

211. Officers consider the level of harm to this terrace including the pub from the proximity and massing of proposed tall building to be a middle level of less than substantial harm. The LBC proposal includes a programme of restoration and sensitive alteration of the Georgian terrace to continue their use (as affordable workspace) to a modern specification, and to provide level access to the front doors. These are a heritage benefit and public benefit respectively, to be weighed with the heritage harm to the setting from the tall building. The harm to the pub also needs to weighed in the planning balance.

212. The proposal would not harm the grade II listed K2 telephone box on the north side of St Thomas Street. While the tall building would be visible when standing on Borough High Street in front of the grade II listed Post Office, it would be seen to one side of the stone façade, with sufficient separation to still allow the Post Office to be appreciated. There would be no harm to this heritage asset.

213. The group of grade II listed buildings along the eastern side of Borough High Street – nos. 41 to 57 – form a distinctive group in the conservation area. Their significance arises from their historic detailing and materials, common heights and narrow burgage-plot proportions. This group includes two listed building (nos. 53/A and no. 55) as well as five locally listed buildings (nos. 41,43, 49, 51 and 57). This group is appreciated dynamically as one travels east along

Southwark Street. The appeal decision did not reference the impacts on these buildings specifically, but noted the "*incongruous presence of the developments*" would be felt along Borough High Street where both towers would "*loom over and distract from the 3-4 storey buildings*" with a "*stark juxtaposition*" with the more human-scale historic buildings would dominate in the views. The proposed tall building would again be visible above these terraces of listed building (as shown in HTVIA views 13 and 14 above). The applicant considers there would be no harm to this group. Officers consider the impact of the development on this transient view of these listed buildings to be on the mid-to-low level of less than substantial harm to the significance of these listed buildings. This is attributed mainly due to the significance of the group and the degree of impact of the upper three/four storeys of the tall building and its southern flank visible over the group. The impact is mitigated to a degree by the narrow proportions of the development when viewed from this location and the degree of visibility.

214. In the appeal schemes, the Inspector concluded the earlier proposals would not prevent the tower of the grade II* listed Church of St George the Martyr from remaining a focal point, and so found no harm. The lower height of the current proposal means it would preserve the setting of the grade II* listed Church of St George the Martyr.

215. Listed buildings outside the borough that were considered in the appeal include St Paul's Cathedral (grade I listed), The Monument (grade I listed) and St Magnus the Martyr (grade I listed) within the City. The proposal would not be visible above St Magnus nor the buildings within the setting of The Monument, and so would preserve the setting of these two historic buildings.

216. The site is within the wider setting consultation areas of two LVMF views, the London Panoramas from Parliament Hill and Kenwood towards the grade I listed St Paul's Cathedral. The Inspector's conclusion of the taller appeal schemes causing no harm to St Paul's is noted. Visuals of the proposal as seen from LVMF view 2A.1 from Parliament Hill to St Paul's Cathedral show that the extended building would sit in front of and near the base of the much larger Guy's Hospital tower beyond. It would have no impact on the legibility of St Paul's in this view, the skyline, nor harm the backdrop of this townscape view. Similarly the visuals of the view from Kenwood viewing gazebo to St Paul's Cathedral show the proposed extension would be seen completed against the massing of Guy's Hospital tower and the wider townscape, and would not materially affect the legibility of St Paul's nor the skyline in this protected view. There would no harm to the significance of St Paul's Cathedral that it derives from its setting.

217. With the reduced height and scale of the proposal compared with the appeal schemes, the current proposal would not affect the setting of the Tower of London World Heritage Site (and the listed buildings within it), its Outstanding Universal Value nor of the wider Tower Conservation Area in the London Borough of Tower Hamlets.

218. To conclude on listed buildings, the applicant has different opinions on whether the proposal causes harm to those of officers, Historic England (as well as the GLA and Georgian Group). The table below summarises the harms found.

Listed building	Harm found by the applicant	Harm found by the council	Harm found by HE
Southwark Cathedral	No	Yes – low end of LTSH	Yes – any harm would be very limited
George Inn	No commentary given	No	No commentary given
St Paul's Cathedral	No commentary given	No	No
Guy's Hospital	Yes – low level of LTSH	Yes – middle range of LTSH	Yes – considerable LTSH
9, 9a and Mary Sheridan House	No	Yes – low level of LTSH	Referenced in terms of conservation area harm
Old King's Head Public House	No	Yes – low level of LTSH	Referenced in terms of conservation area harm
Nos. 4-16 St Thomas Street and the adjacent Bunch of Grapes public house	Yes – low level of LTSH	Yes – middle range of LTSH	Referenced in terms of conservation area harm
K2 phone box	No	No	No commentary given
Post Office	No	No	No commentary given
Nos. 41 to 57 Borough High Street	No	Yes – mid-to-low level of LTSH	Referenced in terms of conservation area harm
Church of St George the Martyr	No commentary given	No	No commentary given
St Magnus the Martyr	No commentary given	No	No commentary given
The Monument	No commentary given	No	No commentary given
Tower of London	No commentary given	No	No

Other heritage assets

219. There are several recently locally listed buildings and structures within the vicinity of the site. Most such as nos. 19, 27-29, 39, 41, 43, 51 Borough High Street and Kings Head House are within the Borough High Street Conservation Area, and the upper floors of the tall building would appear above these locally listed buildings. The development does not harm these locally listed buildings. Consideration of the impact on their setting in the context of the conservation area is considered above.

220. The Shard is locally listed. The proposed 11-storey building would remove the visibility of The Shard's lower floors in views along Southwark Street and Borough High Street (as shown by HTVIA views 12 and 13 above), however sufficient upper floors would remain visible to leave it readily identifiable, and it would very much remain the pinnacle of the area.

As has been included earlier on, the scheme would enhance the locally listed Keats House, and would demolish most of the locally listed façade along Kings Head Yard. Overall, the proposal is considered to comply with policy P21 of the Southwark Plan.

LBC application

221. The proposed listed building consent (LBC) works proposed in application ref. 24/AP/3804 to the grade II listed Georgian terrace look to renovate and restore some of the features that were removed or added in the 1980s redevelopment of the site. The main issue to be considered in respect of the listed building consent application is whether the proposal would enhance, preserve or cause harm to significance of this grade II listed heritage asset. This assessment should be carried out giving regard to all relevant planning policies, and the Act. The assessment of the LBC covers the following key considerations:
    - Consultation responses, and how the application addresses the concerns raised;
    - Understanding the significance and the proposal; and
    - Assessment of harm to significance.

222. In terms of consultation, Historic England considers the work to raise no significant issues, and the letter of authorisation from the National Planning Casework Unit has been received to allow the council to decide the application. No comments were received in response to the site and press notices.

223. In terms of understanding the significance and the proposal, paragraph 207 of the NPPF requires the applicant together with the local planning authority to identify the architectural or historic significance of a designated heritage asset and to record the effect of the proposal on that architectural or historic significance. The architectural or historic significance of any heritage asset includes its internal and external historic features and its setting. In addition to the façades of a listed building its features of significance could include its roof, its plan form, decorative internal features like original cornices, skirtings and fireplaces and important structures like floor beams, staircases or chimneys.

224. The listed Georgian terrace was built in 1819 for St Thomas's Hospital as homes for surgeons and physicians. The buildings in the terrace have a coherent architectural character in the buff brick, fenestration and roof line, and are set behind railings with stepped access across the front lightwell. The terrace has undergone significant alterations to the floorplans, roofs and mostly rebuilt at the rear, part of the 1980s works to link the terrace internally with long corridors and link into the main office building at the rear and eastern side. There are historic staircases at nos. 4, 8 and 14 but few other historic internal features.

225. The appeal Inspector made the following comment about the terrace: "*While the architectural significance has therefore been compromised, the listed terrace still has special architectural interest, primarily in terms of the façade facing St Thomas Street and its historic significance is also important*." This remains the case. The setting within a group of related, and well-preserved Georgian buildings along this western end of St Thomas Street adds to its significance.

226. When assessing the impact of a proposal on the significance of a listed building, paragraph 210 of the NPPF requires the local planning authority to take account of:

> a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
> b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
> c) the desirability of new development making a positive contribution to local character and distinctiveness.

227. The NPPF states that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). The NPPF also requires the local planning authority to consider whether a proposal would result in harm to the significance of a heritage asset and to decide whether that harm would be "substantial" or "less than substantial". Any harm should require clear and convincing justification and can arise from the loss of historic fabric or features of significance, as well as impact on the setting of a heritage asset.

228. The proposed LBC works would have a direct effect on the listed buildings. The scope of proposed works to the Georgian terrace is much reduced compared with the approved LBC applications of the appeal schemes, and include fewer improvements than the more comprehensive renovation schemes. Officers acknowledge that these buildings were significantly altered in the 1980s, and the proposals include measures to reinstate some of the lost traditional features. Understanding what remains of the historic fabric within the walls, ceilings, floors etc would need to be explored further by the applicant team as these may have been covered over in the 1980s works.

229. The proposed works are assessed as follows:

- The internal corridors created in the 1980s which link through the terrace would remain (unlike the appeal schemes) and the modern partition walls and doors replaced in most areas. Although not the beneficial change of reinstating the historic floorplans within the allowed appeal schemes, this internal change would preserve the existing arrangement. The fabric to be removed from the buildings is mostly partitions and internal doors from the 1980s or more recently, and is acceptable.
- The reintroduction of useable front doors would be a heritage benefit, and providing level accesses into the building is supported. The alterations to make these entrances accessible would be a public benefit, and further details would be secured by condition to ensure

appropriate materials are used and any associated changes to the lightwell railings can be assessed.

- The glazed roof to enclose the atrium at the rear would sit on the rear wall of the terrace before sloping upward to the extended building. This feature would not be visible in public views. The roof springs from the largely reconstructed rear facades of the Georgian terrace and, through the use of glazing, intends to roof over this atrium space with a lightness of touch – not a structural connection or the suggestion of the new development attached to the top of the listed buildings which would be inappropriate. The detailed design of the glazed atrium roof would be developed in greater detail in due course. The structural loading and design quality of the glazed roof would rely to a great degree on the architectural detailing of this feature – options of a clear-glazed roof or lighter ETFE alternative were considered during the course of the application. Accordingly a 1:5 / 1:10 scale architectural detail condition is recommended for the listed buildings in order to ensure that the proposals will conserve and architectural and historic significance of the Georgian terrace.
- By removing the rear link's roof, the rear roof slope of no. 8 would be re-instated as a small heritage benefit to this building. Details and materials to be agreed by conditions.
- The Georgian terrace would no longer be linked through to the main building with internal doors at the upper levels, so that it regains more of its former independence and some element of its original floorplan.
- A new eternal stair with cycle channel down to the front lightwell would replace the existing stairs. Further details of its design and materials would be secured by condition given the prominence of this feature.

230. These works would enhance the quality of the office workspace they accommodate and enlarge rooms by removing partitions, allowing these buildings to remain in use. As has been mentioned in the earlier affordable workspace section of the assessment, these listed buildings would need to be fitted out and sufficiently renovated to become high quality affordable workspace, e.g. by replacing the secondary glazing to reduce drafts, replacing the lighting and plant. If no lift is to be incorporated into the building in a later LBC application, accessible toilet facilities and kitchen would need to be included at ground level.

231. The proposed LBC works would preserve (and cause no harm to) the architectural and historic significance of these grade II listed heritage assets. They include heritage benefits including localised repair and restoration of features which would contribute to the sustainability of these important listed buildings. The LBC proposal demonstrates that it conforms with the Listed Building and Conservation Areas Act (1990) as amended. It complies with planning policy to preserve and enhance the heritage asset, provide good design and with no issues raised by statutory consultees. Conditions are proposed to secure further information and ensure suitable finishes to these historic buildings. The improvements to the listed terrace would be heritage benefits of the scheme, which would be weighed in the planning balance.

Conclusion on heritage impacts

232. Elements of the scheme are positive changes that would enhance the character of the conservation area and significance of heritage assets, such as the improvements to Keats House and replacement of the entrance building. However there would be harms to the Borough High Street Conservation Area from the tall building and removal of most of the locally listed Victorian screen. The level of harm is considered to be a middle level of less than substantial harm to the character and appearance of this conservation area.

233. To conclude on the listed building impacts, it is considered that the proposal, due to its scale, bulk and height would cause harm to listed buildings on the site and around the site. The proposal would cause:
    - a low level of less than substantial harm to grade I listed Southwark Cathedral;
    - a middle level of less than substantial harm to grade II* listed Guy's Hospital;
    - a low level of less than substantial harm to grade II* listed 9, 9a and Mary Sheridan House;
    - a low level of less than substantial harm to grade II listed The Old King's Head pub;
    - a middle level of less than substantial harm to grade II listed Georgian terrace on the site and adjoining Bunch of Grapes pub, and it is noted there would be heritage benefits from the proposed LBC works; and
    - a mid-to-low level of less than substantial harm of the grade II listed buildings on the eastern side of Borough High Street (nos. 41-57).

234. The harms mean the scheme does not comply fully with London Plan policy HC1 about heritage conservation, Southwark Plan policies P17 on tall buildings (as part 3.2 seeks to conserve and enhance the significance of heritage assets), P19 on listed buildings (which states only development that conserves or enhances their special significance will be permitted), P20 about conservation areas (where development will only be granted where it preserves or enhances the character or appearance of the conservation area), and P21 about conservation of the historic environment (including unlisted buildings of townscape merit) of Southwark Plan. Policies D9 part C1.d, P17, P19, P20 and P21 each require any harm to the significance of heritage assets to be clearly and robustly justified. These heritage harms are reduced compared with those of the appeal schemes, but must be given careful consideration. The NPPF allows for heritage harms to be weighed against public benefits of a scheme.

235. The NPPF places great weight on the desirability of conserving or enhancing designated heritage assets and their settings, and to avoid causing harm. Local planning authorities are guided to assess the degree of the harm and to only consider it if it can be convincingly justified. Decision-makers are guided to consider the level of harm and the justification in the balance. The NPPF goes on to stipulate that only public benefits (or heritage benefits) can be considered in the balance. As set out in the later planning balance section, officers are satisfied that the public benefits (such as the additional jobs in high quality office space, the affordable workspace, public realm improvements, landscaping and quality of design) arising from the scheme outweigh the heritage harms identified.

Public realm, landscaping and trees

236. The provision of high quality public realm that is accessible, encourages walking and cycling, with landscaping that is appropriate for its context and includes street trees and green infrastructure is supported by policies such as Southwark Plan policies P13 (in parts 4, 5, 6 and 7), P14, P59, P60 and P61, and London Plan policies D8, G1, G5, G6 and G7. Tall buildings are required to provide functional space and have a positive relationship with the public realm by policies D9 of the London Plan and P17 of the Southwark Plan.

237. This proposal seeks to extend and retrofit the existing building, while keeping the listed Georgian terrace and Keats House façade as historic assets and the general street alignment of the St Thomas Street frontage, the alignment of the Kings Head Yard frontage and an on-site servicing yard. This leaves limited opportunities to create new ground level public realm on the site with these constraints.

238. An area of public realm (16m x 3.8m, 60sqm) would be created at the main entrance on St Thomas Street, allowing for a step-free access and two planters, each with a tree in a raised planter and seat. A “pocket garden” (14m x 2.5m, 30sqm) is proposed on the Kings Head Yard frontage as another small area of new public realm, with tree planting within a double-height recess. It would be secured by shutters within the frame at night for security reasons. These two areas would add green pockets of space onto a site which currently has no greening on its frontages, and in an area with few public spaces.

239. Other landscaping proposals on the site are planted terraces and balconies on the upper floors of the extended building, which would not be publicly accessible. No public access is proposed within or at the top of the building. As has been explained earlier in this report, the applicant states this is because the scale and nature of the proposal, with its approach with maximum retention of the existing structures and limiting building occupancy with fire safety requirements. The lack of public access to upper parts of the development is acceptable with these constraints in mind.

240. A total of 10 trees are shown for the ground level within the site, and another 31 trees to the roof terraces. The landscaping design and species selection have taken into consideration the different microclimates within the site of the shaded north-facing area and south-facing terraces that would be more exposed to the wind. It has considered the need to maintain neighbour privacy, the maintenance requirements and resilience to climate change. The applicant provided responses to the urban forester’s queries, and the details of the landscaping in terms of the plant species, soil volumes etc would be secured by conditions.

241. The scheme would also resurface the length of Kings Head Yard alongside the site to improve this public realm and improve its accessibility. This would be secured by a planning obligation. There may be potential to plant off-site street trees and planters in front of the site on St Thomas Street within the public highway, but these would require TfL agreement and sufficient space between

utilities. The obligation regarding these highway works would include flexibility to include these greening measures if they are practical and are agreed by TfL.

242. Considering the constraints on this site, its heritage assets, retaining much of the existing structure/footprint of the buildings on-site (as part of the sustainability focus of this proposal), keeping a small servicing yard and appropriate street frontages, there is limited potential to create new public realm. The two areas of new public realm created would be useable and welcomed spaces with greening, and the Kings Head Yard highway improved. On balance and recognising these constraints, the scheme is considered to make sufficient functional spaces and positive measures for landscaping within the site and alongside the site. The lack of public access within the building, nor to its roof top are in part due to the retention-first approach and the limited numbers allowed inside for fire safety reasons.

Green infrastructure, ecology and biodiversity

243. The submitted ecological impact assessment sets out the ecological surveys, preliminary bat roost assessment of buildings and trees, and evening emergence bat surveys for the site undertaken in 2024, and the potential impact on designated sites in the area. It found palm trees in pots, small areas of shrubs in planters and vegetation at ground and roof levels of the site, which would be removed in the proposal. The buildings were assessed to be of low suitability to support roosting bats, and to offer negligible potential flight paths and foraging habitats. The site is unlikely to support significant populations of birds, but the roofs may provide nesting habitat for common urban species. No important ecological features off-site (such as the River Thames) are anticipated to be affected by the proposal. The proposed landscaping in the scheme of green roofs and tree planting would provide additional “stepping stone” habitat to link across the other sites, and provide a source of pollen, nectar and seeds. Bird boxes would be incorporated in the development, and bat boxes/tubes could be included. Proposed conditions would secure further details of these measures. A lighting strategy would be developed to prevent unnecessary light spill and a condition for a wildlife-friendly lighting scheme is proposed.

244. The proposal has a predicted urban greening factor (UGF) of 0.307, from the proposed tree planting, terrace planting and green roofs. This meets and exceeds the 0.3 UGF target score required by London Plan policy G5 for commercial development, and is a welcome aspect of greening this site despite retaining much of the built form.

245. The proposed terraces’ planting species would be chosen with regard to neighbour privacy, wind protection and the available sunlight. Separate to the amenity spaces, the 526sqm green roof planting species would be chosen for those that can cope with the aspect, elevation and exposure to provide different natural habitats. The landscaping strategy suggests different planting characters and indicative species. On top of the highest roof plant a bio solar roof is proposed.

246. In England, Biodiversity Net Gain (BNG) is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act

1990 (inserted by the Environment Act 2021). This statutory framework is referred to as 'biodiversity net gain' in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.

247. The proposed development does not fall within any of the BNG exemptions or any transitional arrangements and is therefore required to deliver BNG on site. Planning authorities must take into account how the Biodiversity Gain Hierarchy (set out in set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015) has been applied and, if it has not been applied, the reason or absence of a reason when determining the application.

248. The Biodiversity Gain hierarchy sets out a list of priority actions:
- first, in relation to on-site habitats which have a medium, high and very high distinctiveness, the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects; and
- then, in relation to all on-site habitats which are adversely affected by the development, the effect should be compensated by prioritising the enhancement of existing on-site habitats, creation of new onsite habitats, allocation of registered off-site gains and finally the purchase of biodiversity credits.

249. The Biodiversity Net Gain design stage assessment submitted by the applicant shows that the mandatory 10% BNG can be achieved and exceeded on site. This is in accordance with the Biodiversity Gain Hierarchy.

250. The data below has been taken from the Biodiversity Net Gain Metric and Biodiversity Gain Plan documents submitted with the application. The survey of the site for the type, distinctiveness, condition and extent of each habitat (urban trees and introduced shrubs) gave a total of 0.23 baseline habitat units. These would be removed by the proposed development so that all 0.23 habitat units would be lost, and some shrub planting has been removed in recent years as it was causing maintenance problems. There is no irreplaceable habitat on the site and it is of little to no biodiversity value.

251. The proposed landscaping plans would provide urban trees, intensive green roof, biodiverse green roof, and ground planters on the site. The planting schedule would include native species and species of benefit to wildlife. The on-site measures propose to deliver an increase of 0.35 area based biodiversity units to 0.57, which equates to a net percentage change of 153.32%. To clarify, any street tree planting done on St Thomas Street highway (off site) would be in addition to the on-site BNG and is not included in these figures.

252. Planning regulations require an assessment of whether the proposed habitat works to deliver BNG on-site would deliver a significant increase in the biodiversity value of the site, compared to the pre-development biodiversity value. The distinctiveness, condition and size of the biodiversity habitat to be delivered are all considerations which must be balanced. Non-significant enhancements are habitat enhancements whose loss would not significantly decrease the development's biodiversity value.

253. Government guidance (PPG Biodiversity, 2024) on determining whether BNG to be delivered on a development site is "significant" sets out five factors. These are set out below and the following assessment has been undertaken by the council's ecologist to determine whether the development is significant or non-significant.

Does the proposed habitat delivered contain	Assessment
Habitats of medium or higher distinctiveness in the biodiversity metric.	The following area-based habitats are being created which have a distinctiveness of medium: - Biodiverse green roof - Urban trees.
Habitats of low distinctiveness which create a large number of biodiversity units relative to the biodiversity value of the site before development.	The low distinctiveness habitat intensive green roof is proposed to deliver 0.07 units.
Habitat creation or enhancement where distinctiveness is increased relative to the distinctiveness of the habitat before development.	N/A
Areas of habitat creation or enhancement which are significant in area relative to the size of the development.	Urban trees are proposed to deliver 0.1547 hectares of a total site area of 0.35 hectares.
Enhancements to habitat condition e.g. from poor or moderate to good.	N/A

254. The BNG to be provided as part of this development is considered to be significant as set out in the above table. A planning obligation would be required to secure the biodiversity gain for 30 years. The national Biodiversity Gain Condition would be imposed on the permission. A monitoring fee would be required to cover the cost of periodic monitoring over 30 years. A Biodiversity Net Gain Plan and Habitat and Management and Monitoring Plan would be required post-approval to set out the management arrangements. These requirements have been included within the heads of terms below.

255. Subject to these conditions and obligations, the greening and biodiversity measures incorporated within the proposal means it would comply with London Plan policies G1, G5, G6 part D, and G7, as well as policies P13 parts 6 and 7, P59, P60 and P61 of the Southwark Plan.

Archaeology

256. The site is within the North Southwark and Roman Roads archaeological priority area (APA), which is a tier 1 APA, in the most significant category. Policies HC1 of the London Plan and P23 of the Southwark Plan seek to

conserve archaeological assets. An archaeological desk-based assessment was provided with the application.

257. Prior to the construction of the 1980s building which occupies most of the site, some excavation work was undertaken but as the submitted assessment report indicates, there is a potential for material to survive on site in the form of deeply cut features below the present building and in areas less impacted by its construction. The existing basement on the site, both beneath the Georgian terrace and the larger basement excavated in the 1980s would be retained in the proposal. The basement impact assessment and structural statement contains images to show the existing structure, its basement and piles to indicated how much disturbance has occurred previously on site. The archaeological survival on the site will have been much reduced by these earlier works. The building and excavations in the 1980s will have removed and destroyed the great majority of the archaeological interest of the site. Some of the revealed archaeology in the 1980s was recorded in a “rescue” excavation by archaeologists and included Iron Age pottery, Roman buildings, a possible medieval chapel likely associated with St Thomas’s Hospital and human remains. Any remaining archaeological survival on the site is likely to be negligible beneath the 1980s building, low at the edges of the site, and moderate beneath the listed terrace. Truncated post-medieval remains and possible truncated prehistoric and Roman remains may be affected.

258. New foundations would be required to support the proposed extension, for lift pits and underpinning. These would remove any archaeological remains in these areas. The basement impact assessment suggests that 16 more piles would be needed near the centre of the site and the south-eastern corner to support the proposal, and strengthening of the foundations under the facades. The applicant proposes that archaeological monitoring of the initial ground investigation would clarify the potential for remains. Mitigation could include targeted excavation and recording, a watching brief during groundworks. A programme of archaeological observation and recording and then excavating remains, should they survive is recommended. It may be necessary to apply a variety of techniques to understand remains present on site and ensure their recording, according to their significance. The council’s archaeologist recommends mitigation and reporting conditions, as well as the associated financial contribution for monitoring and advising on these archaeological matters.

259. The works to the listed Georgian terrace on the frontage to St Thomas Street mean these buildings should be subject to archaeological recording prior to the works being undertaken.

260. This further archaeological investigation work, mitigation and recording would be secured by conditions. A planning obligation would secure a financial contribution for archaeological monitoring and advice. Subject to these conditions and obligation, the proposal would comply with policies HC1 of the London Plan and P23 of the Southwark Plan.

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

261. Policy D6 of the London Plan requires developments to be designed to ensure there would be sufficient daylight and sunlight to new and surrounding houses that is appropriate for its context. Policy D9 states that daylight and sunlight conditions around a proposed tall building(s) and neighbourhood must be carefully considered. Policy P56 of the Southwark Plan "Protection of amenity" states that development will not be permitted where it causes an unacceptable loss of amenity to present or future occupiers or users, taking into account the impacts on privacy, outlook, sense of enclosure, odour, lighting, daylight, sunlight and microclimate. The adopted Residential Design Standards SPD expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight. The residential neighbours are on Borough High Street along the site's western boundary, Kings Head Yard to the south, and St Thomas Street to the immediate west of the Georgian terrace and on the northern side of the street including within the recently completed Shard Place. The student housing in Orchard Lisle House on White Hart Yard is to the south-east of the site and in Iris Brooks House further south.

262. In the appeal schemes, the surrounding properties would have seen generally small reductions in daylight, and reference was made to the greater losses to the student housing on White Hart Yard. The appeal decision referred to the inquiry evidence clearly demonstrating an adverse effect to a small number of these student units to varying degrees ranging from minor-major, and how the applicant and council gave different weight to this harm. The Inspector gave limited weight to the harm, considering that the living conditions of the students would be adversely affected however, the number of overall units which would be affected would be minimal. While the current scheme has a different massing and lowered height, the impacts on the student housing has been considered with this appeal weight in mind.

Outlook and privacy

263. The Residential Design SPD requires developments to achieve a separation distance of 12m at the front of a building and any elevation that fronts a highway, and a minimum of 21m separation at the rear of buildings in order to prevent harmful overlooking between residential units. Many of the neighbouring properties that back onto the site are sited less than 21m away from the existing buildings, and less than 12m away across Kings Head Yard.

264. In the existing situation, the Borough High Street neighbouring properties back onto the western boundary of the site, looking across the servicing yard to the existing office building at distances of 10.3-11m. The existing office building has windows across the full width of the western elevation. In the proposed scenario, these distances would reduce to 8.0-8.7m at first floor upwards because of the proposed extension and with an increase in the area of glazing on each floor. The proposal does not include any mitigation on this side. Given the existing relationship, the reduced separation distance is considered not to cause a material loss of privacy to these neighbours, and the typical office hours and days of use would likely continue so that neighbours have more

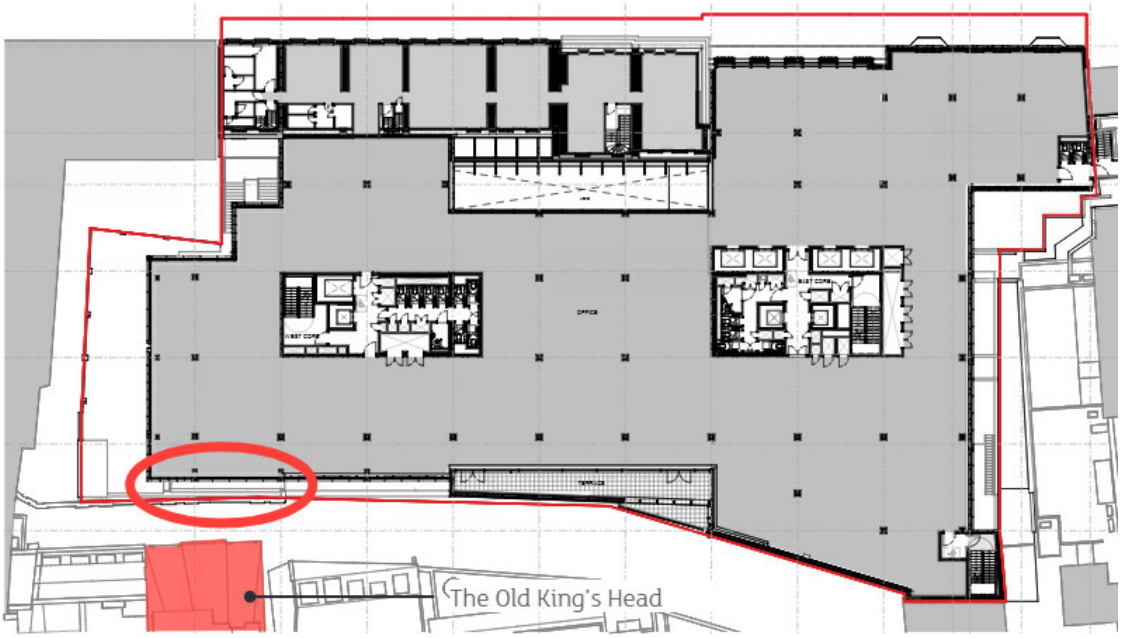
privacy in evenings and at weekends when they would most likely be at home. The balconies proposed on this western façade would be set at fifth floor level and above, to be set notably higher than the neighbouring windows and so prevent overlooking.

265. The narrow Kings Head Yard on the southern side of the site means the Old Kings Head façade is 3.7-3.9m from the existing site façade at ground and first floor levels where the pub's bar and function room are located. By retaining this end of the Victorian façade in the proposal, this relationship would continue in the proposed scheme. At second floor and third floor in the existing arrangement, the pub's façade is 8.4-8.7m from the facing office façade; as proposed this would reduce to 5.3-5.6m. As well as extending closer to the pub and increasing in height by several floors, the extended office building would grow approximately 2.5m west, so that it would extend across almost the full width of the pub and in front of its windows.

266. The second and third floors of the pub are its residential accommodation, and therefore there would need privacy measures to be incorporated into the proposed building's design (at first to third floors) to prevent clear views into these windows. While there are a few windows on the pub's eastern, southern and western façades, the northern façade provides the main outlook and daylight to the habitable rooms. The applicant has suggested possible design measures within the detailed design of the façade in this corner to reduce the overlooking, such as fixed internal or external louvres, or translucent glazing.



Existing layout at second floor



Proposed layout at second floor showing the southern and western extensions, and the Old King's Head public house in red



Section of the proposal and Old King's Head public house



Images to show the relationship with the Old King's Head pub and area of the proposal coloured red needing mitigation in the façade design

267. The reduced separation distance, increased height and the widening of the building westwards mean it would make the proposed building more prominent in the outlook of the pub from its main habitable rooms that face onto the site. This would cause harm to the amenity of the pub's residential parts. This harm will need to be weighed in the planning balance, along with the loss of daylight detailed later in this section.

268. When compared to the appeal schemes, the 2018 scheme did not extend in front of the Old King's Head pub. In the 2021 scheme, the proposed ground, first and second floors were in a curved recess, at least 7.5m from the pub's windows, and at third floor was 4.1m away from the pub. The Inspector considered a condition would have been necessary to secure details of privacy measures to protect this and other neighbours' privacy, without finding the harm to the pub to be a reason for dismissing the appeal. The current scheme extends the building across a greater amount of the pub's frontage.

269. The other properties on the southern side of Kings Head Yard are in commercial use, and their amenity would not be significantly affected by the increased height and massing on the application site. The student housing in Orchard Lisle House on White Hart Yard is 11m away from the site, although the closest wing faces westwards, rather than onto the site (which is to the north-west). This orientation of the two buildings means the proposal would not cause a material loss of privacy. The north-facing side of Orchard Lisle House which faces onto the site is 23m away from the site.

270. The Guy's and St Thomas' NHS Foundation Trust submitted its concerns about overlooking and sense of enclosure to the hospital, particularly from the terraces, although it acknowledges the 100m separation to the hospital. There are no balconies or roof terraces on the eastern side of the building at first and third floor levels, the fourth floor and eighth floor terraces would be above the height of the adjacent Hospital building, and would not lead to a material reduction in privacy to this closest building. It is not considered necessary to condition tall screens to these terraces. The roof areas that are not shown to

be terraces would have a condition to prevent them being used as terraces. In terms of the sense of enclosure, the increased height of the building close to the shared boundary is not considered to material reduce the outlook and quality of the hospital's office spaces. There would not be a material loss of privacy given the existing facing windows of the existing main office building. The rear outside space along the shared boundary is an emergency access pathway, and not an amenity space. The overshadowing to the main quad is considered in the overshadowing section below.

271. Turning to the St Thomas Street neighbours, the rear windows of residential part of The Grapes pub face south across the beer garden and the site's car park. The windows are approximately 11.4m from the northern side of the 1980s building. This separation would be reduced slightly to 10.3m as part of the proposed extensions. The 2.5m wide extension westwards from first floor level and higher would mean the proposed building overlaps with approximately half the width of the pub. Along with the new five storeys proposed on top, the extended building would become more prominent in the outlook from these windows. No privacy measures are proposed in the scheme. The reduced separation distance to the pub's residential space is considered not to cause a material loss of amenity, as the residential rooms on this side of the pub are a kitchen and a bathroom. The residential parts have outlook across St Thomas Street which would be unaffected by the proposal, so that on balance there is not considered to be material harm to the amenity of this property.

272. The residential windows in the St Thomas Church tower are approximately 15m across the highway from the Georgian terrace, and those in Shard Place 35m away from the closest part of the application site. These separation distances would remain sufficient to prevent a material loss of privacy and an overbearing impact on outlook with the extended main building, extended Keats House and entrance building, the roof terraces and balconies in place.

Daylight

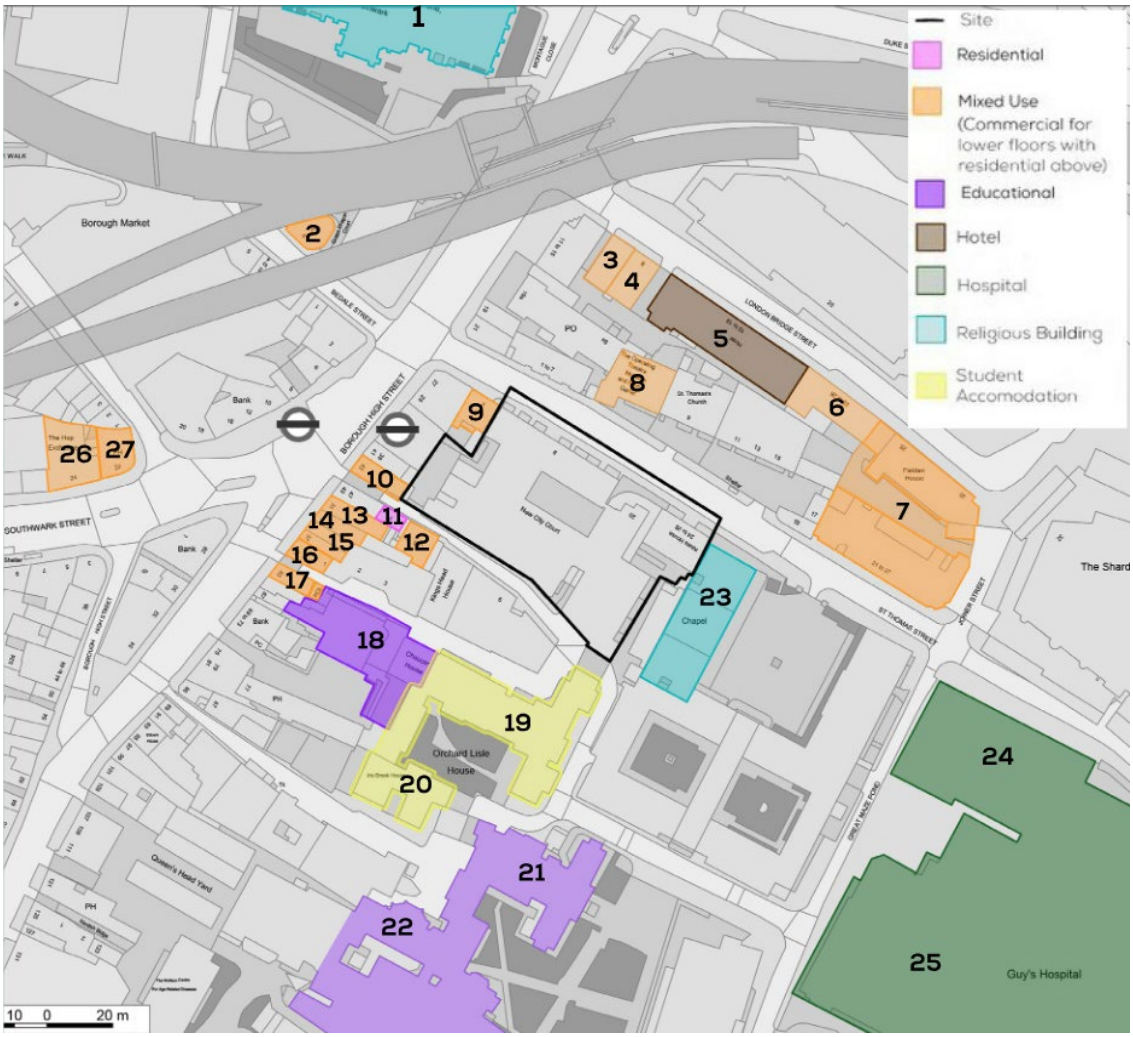
273. The application includes a daylight, sunlight and overshadowing report. The daylight tests used are based on the Building Research Establishment's (BRE) guidance on daylight and sunlight. The BRE guidance from 2022 sets out the rationale for testing the daylight impacts of new development through various tests and focuses on residential properties.

274. The first test is the Vertical Sky Component (VSC) test which considers the potential for daylight by calculating the angle of vertical sky at the centre of each of window serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE has determined that the existing VSC daylight figure can be reduced by 20% of the existing value before the loss is noticeable.

275. The second test that can be used is the No Sky Line (NSL) test which assesses the proportion of the room where the sky is visible, and plots the change in the "no sky line" between the existing and proposed situation. It advises that if

there is a reduction of more than 20% in the existing area of sky visibility, daylight distribution within a room may be affected.

276. The sensitive properties around the site that were considered for daylight testing are shown on the image below. The daylight, sunlight and overshadowing assessment was included in the application. It assessed the impact of the proposal on approximately 3,098 windows and nearly 900 rooms of 27 surrounding properties. Nearby properties like the Hospital, Shard Place and the Cathedral have many hundreds of tested windows and rooms.



277. Some of these 27 properties pass the BRE guidelines for daylight and sunlight (so that any losses would not be noticeable), so they were not tested further. These properties include: Southwark Cathedral and its annex; 8 Bedale Street; 4-6 and 8 London Bridge Street; London Bridge Hotel; 20-26 London Bridge Street; Shard Place; nos. 51, 57, 59-61 Borough High Street; Shepherd's House; Henriette Raphael House; the Southwark Wing and Tower Wing of Guy's Hospital, and; nos. 22 and 24 Southwark Street.

278. The properties which did not pass the BRE guidelines are set out in more detail below. The VSC results and NSL results are set out in the two tables below, and categorise the scale of the losses when greater than 20%.

VSC results					
Address	**Number of windows tested**	**Windows that pass**	**20.1-29.9% loss**	**30-39.9% loss**	**40%+ loss**
St Thomas Church	**8**	**6** (75%)	**0** (0)	**2** (25%)	**0** (0)
2 St Thomas Street (The Grapes)	**1**	**0** (0)	**0** (0)	**1** (100%)	**0** (0)
43 Borough High Street	**8**	**0** (0)	**6** (75%)	**2** (25%)	**0** (0)
53-55 Borough High Street	**5**	**5** (100%)	**0**	**0**	**0**
63a Borough High Street	**22**	**20** (91%)	**1** (5%)	**1** (5%)	**0**
3 Kings Head Yard	**8**	**2** (25%)	**0** (0)	**6** (75%)	**0** (0)
Old King's Head public house	**22**	**0** (0)	**1** (5%)	**0** (0)	**21** (95%)
Orchard Lisle House	**107**	**36** (34%)	**27** (25%)	**40** (37%)	**4** (4%)
Chaucer House	**82**	**32** (39%)	**38** (46%)	**8** (10%)	**4** (5%)
Iris Brook House	**58**	**58** (100%)	**0**	**0**	**0**
Guys Hospital Chapel	**23**	**12** (52%)	**0**	**0**	**11** (48%)

NSL results					
Address	**Number of rooms tested**	**Rooms that pass**	**20.1-29.9% loss**	**30-39.9% loss**	**40%+ loss**
St Thomas Church	**4**	**4** (100%)	**0** (0)	**0** (0)	**0** (0)
2 St Thomas Street (The Grapes)	**1**	0 (0)	1 (100%)	0 (0)	0 (0)
43 Borough High Street	**7**	**4** (57%)	**3** (43%)	**0** (0)	**0** (0)
53-55 Borough High Street	**4**	**2** (50%)	**2** (50%)	**0**	**0**
63a Borough High Street	**0**	**-**	**-**	**-**	**-**
3 Kings Head Yard	**3**	**3** (100%)	**0** (0)	**0** (0)	**0** (0)
Old King's Head public house	**7**	**2** (29%)	**0** (0)	**1** (14%)	**4** (57%)
Orchard Lisle House	**97**	**31** (32%)	**4** (4%)	**4** (4%)	**58** (60%)

Chaucer House	**0**	**-**	**-**	**-**	**-**
Iris Brook House	**53**	**48** (91%)	**5** (9%)	**0** (0)	**0**
Guys Hospital Chapel	**3**	**2** (67%)	**0**	**1** (33%)	**0**

279. The assessment below will focus on the windows and rooms that fail the VSC criteria (5.5% of all the windows tested) or the NSL test (11% of all rooms tested).

280. For the properties that would experience a reduction in daylight of more than 20%:

- St Thomas Church – has residential use at second to fifth floors. The rooms are served by multiple windows, so although there are VSC losses of 31.7-39.2% to some windows, the retained values at 21.6-25.2% are good, daylight levels to the rooms remain good and the daylight distribution test is passed.

- 2 St Thomas Street (The Grapes public house) – has a flat at third floor above the pub. One window in the top floor facing this which serves a kitchen was tested, which would see a 38.9% reduction, with the VSC value dropping from 27.5% to 16.8%. The daylight distribution to this room would reduce from 69.2% to 50%. The daylight to the flat's other habitable rooms on the northern elevation would not be affected by the proposal, and overall would retain a good level of daylight.

- 43 Borough High Street – has flats above the ground floor. All windows would fail the VSC test, seeing existing VSC values of 17.4-29.9% reduce to 12.3-22.5%. Three rooms fail the NSL test, however daylight distribution would be retained to at least 66% of their areas. The approved plans of this property suggest these rear rooms to four flats are bedrooms and one bathroom, with the flats having their living kitchen dining rooms at the front on Borough High Street, which would not be affected by the proposal. The reduction in daylight to the bedrooms is considered not to harm the overall amenity of these residential properties.

- 53-55 Borough High Street – has flats above the ground floor. All the windows pass the VSC test, and two rooms pass the NSL test. The two rooms that fail the NSL face onto the site, and retain good daylight distribution of 69 and 70% of the room areas. The loss of daylight distribution would not cause harm to the residential quality.

- 63A Borough High Street – two out of 22 windows would fail the VSC test (reducing from values of 7.9% to 5.3% for a ground floor window, and from 10.8% to 8.6% for a first floor window). These windows are on the White Hart Yard façade, facing at close distance the rear projection of the neighbouring Borough High Street building. No test for daylight distribution was undertaken as the floor plans are not known. This level

of reduction is considered not to cause a material reduction in the residential quality.

- Old King's Head pub – the tested windows on the front of the pub mostly comprise of groups of multiple smaller panes that together make a larger window for four of the six front rooms at second and third floors. These floors provide the residential element of the pub, with three bedrooms, two living rooms and an office on the front of the building, and one bedroom at the side. The applicant team was given access to the property to understand the layout and room uses. The Old King's Head pub owner has objected to the application, including to the loss of daylight. The front elevation windows when tested as individual panes would see significant reductions in VSCs from their existing values of 13.3-25.6% down to 0.8-11.8%; these reductions represent 48-94% losses. When combined to consider the VSC for the whole room, the losses across the front rooms remain significant (53.9-82.9%) with low retained VSC values within the range of 2.3-11.8%. Five of these front rooms would also see a substantial reduction in daylight distribution, with losses of 38.4% to 93.3%. These daylight losses would not be mitigated, and would be a noticeable reduction in daylight. There would be harm to the amenity of this home by the significant loss of daylight to these habitable rooms which form the majority of the home. While the harm to this home is not considered sufficient to refuse the application, it must be considered in the planning balance, as set out in a later topic of this report. Reducing the scale of losses would require the proposal to be revised, set back and/or reduced in height.
- It is noted that the daylight losses from the current scheme are greater than either appeal scheme despite being lower because it is closer and wider to the Old King's Head. For comparison, in the 2018 scheme, the test results showed the pub would have seen noticeable reductions in VSC to two of its 23 windows (of 30-39%) and all rooms would pass the NSL daylight distribution test. In the 2021 scheme, the pub would have seen noticeable VSC daylight reductions to 21 of its 23 windows (categorised as 6 windows with a 20-29% reduction; 3 window 30-39% reductions and 12 at 40%+), but all of its rooms kept good daylight distribution. The ES classed these reductions as adverse and of moderate significance. The Inspector made no comment on the daylight impacts to this pub and no comments from the pub's address were received to the previous applications.

- 3 Kings Head Yard – has a maisonette at second and third floors which has been assessed. 6 of the 8 windows would see a noticeable reduction in VSC of 30.1% to 34.7%, to have retained VSC of 10.2-14.4%. The assumed living room is served by three affected windows and two more which retain good VSC levels of 19-21.8%. This living room and two bedrooms retain good daylight distribution. The reduction in daylight to this flat is considered not to be a material reduction in its quality.

- Chaucer House – is in educational use as the London School of Commerce further education centre. From outside the building it is clear that multiple windows serve the rooms. Some first floor windows have

low existing VSC values of 1.9-2.6%, meaning the reduction to 1.2-1.8% is high percentage loss, although the change in the amenity of these rooms would be minimal. Other first floor windows retain relatively good VSC values of 16.8-18.4%. At second and second floor levels most of the windows with reduction of more than 20% retain good VSC values of 19-23%. The proposal would not cause harm to the amenity of this education building.

- Orchard Lisle House – student housing. 36 of the 107 tested windows would pass the VSC test, and 71 fail, which are spread across ground to fifth floor levels. The ground level windows have existing VSC values of 12.9-16.7%, in the proposed scenario these would fall to 8.1-14.4%. The greatest percentage reductions are at first and second floors with up to 41.2% loss; most windows retain VSC values between 15-21% however. Further up the building the retained VSC levels are better with most VSC values over 17% on the third, fourth and fifth floors. It is often the same windows that have a loss of daylight distribution as well; due to the small size of these student rooms, a reduction in distribution is a high percentage loss. The earlier appeal schemes would have caused loss of daylight to this student housing, as an adverse effect (ranging from minor to major). The Inspector's report states *"I ascribe limited weight to the harm, between the Council's moderate weighting and the Appellant's very very little weighting. The living conditions of the students would be adversely affected however, the number of overall units which would be affected would be minimal."* The appeal decision states "*the Secretary of State agrees that limited weight should be attributed to the harm by way of the reductions in daylight and sunlight to Orchard Lisle House and Brook House*." The reduction in daylight to these student homes is not considered a reason for refusal, and will be given limited weight in the planning balance.

- Iris Brooks House – student housing. All rooms pass the VSC test and all but 5 rooms pass the NSL test. Those that fail would see reductions up to 28% in NSL, although they retain daylight to at least 63% of the room area. Having considered these results, and the appeal decision comments, this noticeable reduction in daylight distribution to 5 student rooms is considered not to cause material harm to their quality, nor to the overall quality of this building.

- Guy's Hospital Chapel – the standard test results of VSC and NSL indicate there would be a reduced level of daylight and daylight distribution to the ground floor of the Chapel. As a non-residential building there are no guidelines as to what this religious building should expect for its daylight levels however, but the reduced daylight is not so significant to prevent the continued use of the Chapel. As set out earlier in the heritage topic of this report, additional tests were carried out about the amount of light reaching the Chapel's stained glass windows, and the overshadowing from the proposal would harm the significance of this part of the grade II* listed Guy's Hospital.
- The Guy's and St Thomas' NHS Foundation Trust raised concerns about loss of daylight to the Hospital's offices and rear courtyards. The office windows in the western wing of the Hospital have not been tested and

the BRE guidance gives no daylight standards for offices. This was not a matter considered in the appeal schemes. The overshadowing to the main northern quad is set out below. The site is to the north-west of the Hospital's two other quads and so would not cause significant overshadowing.

Sunlight

281. For the sunlight tests, 906 windows of nearby properties that face within 90 degrees of south were tested. Of these 905 pass (99%) the annual probable sunlight hours test, with one window failing for winter sunlight. The one window that fails is within 2 St Thomas Street (The Grapes public house's residential accommodation) would see a noticeable reduction in winter sunlight hours from 16% down to 4% to be slightly below the 5% recommended in the BRE guidance, but it retains annual sunlight hours of 29% in excess of the 25% referenced in the guidance. The reduction in light to Guy's Hospital Chapel has been considered in the heritage assessment section.

APSH Reductions					
Address	**Number of windows tested**	**Pass APSH**	**20-29.9% loss**	**30-39.9% loss**	**40%+ loss**
St Thomas Church	**4**	**4** (100%)	**0**	**0**	**0**
2 St Thomas Street (The Grapes)	**1**	**0** (0%)			**1 winter** (100%)
43 Borough High Street	**8**	**8** (100%)	**0**	**0**	**0**
53-55 Borough High Street	**5**	**5** (100%)	**0**	**0**	**0**
63A Borough High Street	**5**	**5** (100%)	**0**	**0**	**0**
Old King's Head public house	**1**	**1** (100%)	**0**	**0**	**0**
3 Kings Head Yard	**2**	**2** (100%)	**0**	**0**	**0**
Iris Brook House	**18**	**18** (100%)	**0**	**0**	**0**
Guy's Hospital Chapel	**12**	**12** (100%)	**0**	**0**	**0**

Overshadowing of amenity spaces

282. Officers note that the GLA stage 1 response states "*In terms of environmental impacts, the daylight/ sunlight impacts are within acceptable limits, the proposals would also have a negligible impact in respect of overshadowing to surrounding public amenity spaces*."

283. The submitted overshadowing assessment was based upon the originally submitted scheme, and not the later alterations that slightly reduced the height

of the building by 1m. It looked at the open spaces in front of 9 and 15 St Thomas Street, Guy's Hospital Courtyard, the London Bridge station plaza, The News Building plaza, the ground floor of Shard Place, Southwark Cathedral and the garden of the Bunch of Grapes public house. The transient overshadowing study showed that all of these open spaces (with the exception of Southwark Cathedral where the proposal's shadow does not reach), would be potentially affected by the proposal, and so the sun hours on ground method was used to test the overshadowing on 21st March as the spring equinox.

284. The sunlight to most of these spaces would not be affected on 21st March, with only The News Building Plaza and the area in front of 9 St Thomas Street experiencing reductions. The News Building Plaza would see a reduction from 29% of its area receiving at least two hours of sunlight, down to 28%, which would not be a noticeable reduction and not materially affect the quality and usability of this space.

285. The area in front of 9 St Thomas Street would see a reduction from 100% of its area receiving at least two hours of sunlight, to 15% with the proposal. By the applicant's calculations the area falls slightly short of the 2 hours marker, receiving 1.9hrs of sun on 21st March to half of its area, and three days later on 24th March this area would receive 2 hours of sun to half of its area. This area is paved in front of the listed former Church, and is used for outdoor seating for the restaurant and storage. This shortfall of a few days from the test date of 21st March is considered not to harm the amenity of this commercial property.

Light pollution

286. The proposed external lighting would be designed to accord with the Institution of Lighting Professionals Guidance to reduce obtrusive light, to avoid spill into neighbouring residential properties. External lighting with the exception of security lighting, would be switched off between 11pm and 7am. A lighting plan condition is proposed.

Solar glare

287. No specific solar glare information was provided with the application. Given the orientation of the building, the shading of the lower floors of the southern elevation by surrounding buildings, the three sections of the southern façade and the façade design which incorporates the profiled metal cladding and shading devices to the windows (primarily to reduce overheating), the tall building is unlikely to cause significant solar glare issues for neighbour amenity or highway safety. Network Rail raise no objection for the nearby rail lines. The proposal is considered to accord with London Plan policy D9 part C.1.g.

Noise and vibration

288. The site would continue to be in office use and the main entrance would be located in the same location to the existing, and with entrances reinstated in the Georgian terrace. This arrangement and the additional number of office workers on the site are considered to not lead to a material increase in noise and disturbance to neighbouring properties. The servicing yard would remain

in use, continuing the existing relationship with neighbours, and as part of the delivery and servicing plan the hours of use would be controlled. The St Thomas Street highway works would be within the public highway, and allow for a limited number of refuse collections from the site, in a similar location to where the on-street loading bay was located before TfL's pavement extension during the pandemic. The hours of use by the development would be controlled through the delivery and servicing plan, although it is public highway and be for TfL to set time restrictions for vehicle use.

289. The creation of additional roof terraces and balconies would create more outside spaces at the higher levels of the building, some of which are close to neighbouring properties, or in the case of the top terrace are large enough to accommodate groups of people. A condition to restrict the hours of terrace use to only 7am to 10pm on Mondays to Fridays and 10am to 5pm on Saturdays is proposed in the interest of preventing noise and disturbance to neighbour amenity. The public realm created next to the St Thomas Street pavement would not raise neighbour amenity issues. The Kings Head Yard pocket would be gated at night to help prevent antisocial behaviour and prevent disturbance to neighbours.

290. The area experiences noise from traffic, the railway and aircraft. An acoustic report was provided, which sets out the background sound levels for the two frontages of the site, the resulting plant operating noise limits for the proposed plant to comply with. At this stage the precise specification of the plant is not known, so a condition is proposed to require further details, along with any mitigation needed to achieve these noise levels. The council's environmental protection team has reviewed this report and is satisfied it can inform the design and plant requirements. A plant noise condition is proposed to protect neighbour amenity.

Conclusion on neighbour amenity

291. The extensions to the main building would reduce the separation distance to adjoining residential properties on the north, west and southern sides. Measures to maintain privacy to the Old King's Head pub residential floors would be secured by condition, but its outlook would reduce. Most of the daylight, sunlight and overshadowing impacts from the extensions would not cause harm to the amenity of surrounding properties. There would be significant outlook and daylight impacts to the residential accommodation of the Old King's Head pub, which would cause harm to the amenity of this home. This harm will be added into the planning balance in the consideration of this application. Conditions are proposed regarding plant noise and hours of uses of the terraces and balconies, to protect neighbour amenity. Subject to proposed conditions, the proposal would mostly comply with policy P56 of the Southwark Plan, with the exception of the impact on the Old King's Head pub.

Transport and highways

292. London Plan policy T1 seeks to achieve a strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041. Policy T2 requires developments to deliver improvements to support the 10 "Healthy

Streets indicators", reduce the dominance of vehicles and be permeable by foot and cycle. Further policies in the London Plan set out how developments should be integrated with transport capacity and connectivity, the cycle parking and car parking standards for different land uses, and the management of safe deliveries and servicing. Southwark Plan policy P45 requires healthy developments, P50 seeks to minimise highways impacts and maintain safety, while policies P49, P51, P53, P54 and P55 set out further requirement for different modes of transport.

Site layout

293. As has been explained earlier in this report, the site layout would remain similar to the existing due to the retained buildings and servicing yard, and the height constraint of the arched entrance to Kings Head Yard. The pedestrian entrance would remain in the centre of the St Thomas Street frontage, and the front doors to the Georgian terrace would provide new entrances. Most cyclists would access the parking from the yard side, through the servicing yard and by lift or stairs down to the basement parking. Light vans would be able to use the servicing yard, accessed off Borough High Street and Kings Head Yard. Larger vehicles that cannot fit through size restriction of the yards, such as the refuse vehicle, would access the site on the St Thomas Street side.

294. The site has a PTAL of 6b, the highest level. The site is within a controlled parking zone, London Bridge (F) which operates between the hours of 08:00 and 18:30, Mondays to Saturdays. TfL was consulted on the application as the scheme is a referrable development and as TfL is the highway authority of St Thomas Street and Borough High Street. The council is the highway authority for Kings Head Yard and White Hart Yard on the southern side of the site.

Trip generation

295. The submitted transport assessment details the trip generation for the proposed development. No car parking is proposed on this site which has the highest PTAL level, meaning that the majority of trips would be by sustainable modes. The number of trips by mode and morning or evening peak in the existing and proposed scenarios are set out on the table below. The transport policy team does not anticipate any negative impacts on the transport network from the increased number of staff, visitors, deliveries etc from the extended buildings. TfL does not expect an adverse impact on the public transport networks from these increases.

Mode of travel	Existing AM Peak (08:00 – 09:00) total trips	Proposed AM Peak (08:00 – 09:00) total trips	Existing PM Peak (17:00 – 18:00) total trips	Proposed PM Peak (17:00 – 18:00) total trips
Public Transport	318	613	317	613
Taxi	0	1	0	0

Motorcycle	3	0	2	0
Car/van	8	0	7	0
Passenger	1	0	1	0
Bicycle	41	80	35	68
On foot	91	178	28	55
Total	**461 trips**	**871 trips (+410)**	**390 trips**	**736 trips (+347)**

User trip generation

296. The scheme proposes improvements to accommodate its increased numbers of pedestrians, cyclists and vehicles. It proposes highway works to St Thomas Street to provide for the development's servicing by large vehicles, to improve the pedestrian environment in front of the site on an already busy pavement, and a financial contribution to TfL's plans for this western end of the street. The Kings Head Yard highway would also be improved, as it would be used by servicing vehicles and cyclists to the site, and to make it suitable for wheelchair and buggy users. The ground levels and gradients to be used at the site boundaries ensure it ties in with the highways.

297. A travel plan was provided which summarises the site's accessibility by walking, cycling and public transport. It was amended in response to consultation comments. A travel plan co-ordinator would be appointed in the completed scheme to implement the measures and monitor travel patterns. An aim is suggested to increase cycle mode share through hard measures (providing secure parking, changing rooms, showers, drying room, lockers, a users group), and measures like a staff inductions, travel packs and marketing. A detailed travel plan along with its monitoring and reviews over five years would be agreed by condition, and monitoring fee obligation.

Servicing and deliveries

298. The submitted outline delivery and servicing plan sets out:
    - Using an off-site freight consolidation centre to reduce the number of servicing vehicles to the site. The light vans from the consolidation centre would be small enough to fit through the Borough High Street archway accesses to reach the servicing yard, and can turn around on site.
    - Two loading bays would be provided in the servicing yard to deal with the expected peak number of servicing vehicles of two per hour, and space to turn around within the site.
    - As a refuse collection vehicle cannot get into the yards because of its size, and the nearest on-street loading bay is 100m away (which is not practical for waste collection), the applicant proposes an inset loading pad on the widened pavement in front of the Georgian terrace for waste vehicle use only, at night when there are fewer pedestrians around.

When the loading bay is not in use, it would be useable by pedestrians as part of the pavement. These highway works would need to be agreed by TfL as the highway authority for St Thomas Street, and has been discussed during the application.

- A booking system for the "direct to site" deliveries that would not come through the consolidation centre, e.g. from local suppliers or fresh goods. These would only be between 6am and 6pm.
- The timed management of deliveries of 6am to 6pm to avoid peak hours, no night-time deliveries to prevent disturbance to residential neighbours, and to avoid the busiest time for The Old King's Head public house (as its patrons use the yard).
- The use of cargo bikes would be promoted, with no time restrictions proposed, and can use the rear servicing yard.

299. The applicant has proposed that no deliveries would take place overnight, and deliveries during peak hours would be minimised. No deliveries would take place between 6pm and 11pm, when there is overspill from the adjacent public house on Kings Head Yard. Between 6am and 6pm, there would be no more than two delivery and servicing vehicles per hour. This amounts to 20 vehicles per day maximum (however the applicant proposes consolidation to bring this down to 5 vehicles per day). This would be an increase of 10-12 vehicles per day from the existing scenario.

Existing Daily LGV Trips	Proposed Daily LGV Trips	Proposed Daily LGV Trips (with consolidation)	Existing Refuse Collection	Proposed Refuse Collection
8-10 trips	20 trips maximum (+10 to 12 on existing)	5 trips (-3 to 5 on existing)	2 x weekly	3 x weekly (+1 on existing)

Delivery/servicing trip generation

300. Details such as where the off-site consolidation centre is located and the operator are missing from the outline version, so a developed plan would need to be provided. The document and layout of the servicing yard were amended in response to consultee comments. The works to bring the existing servicing yard access up to standard would be included in the highway works along Kings Head Yard. The servicing plan would be monitored, deliveries logged and the data provided to the council to demonstrate compliance. A delivery and servicing management cash deposit would be paid for this major development (and returned if there are no issues), and a fee taken for the purposes of monitoring whether this is accorded to or not. These elements will be secured within the s106 agreement.

301. Subject to these controls, and the associated highway works on both roads being secured the proposal would comply with London Plan policy T7 and Southwark Plan policy P50.

Refuse storage and arrangements

302. The operational waste management strategy explains that the waste from the offices would be separated into waste, recycling, glass and food waste, and brought to the ground floor store by the facilities team or tenants (both the main building and affordable workspace). Collection would be by a commercial waste contractor twice or three times a week from the store at the rear of the Georgian terrace to a waiting vehicle on St Thomas Street (due to the size restriction on the yard), which is the same as the current scenario.

303. It is noted that a similar on-street servicing arrangement of the 2018 scheme was considered at the public inquiry, as TfL raised objection to it. There would have been conflict with pedestrian movements on the busy St Thomas Street pavement, albeit mitigated in part by the consolidation strategy. The Inspector noted "*there would be no alternative within the design parameters and constraints of that specific scheme. If the scheme design could have incorporated it, it would. That is not to say that the strategy does not have drawbacks, as it clearly does, however I am satisfied that the 2018 proposal would secure the best possible strategy that it is able to do.*" Therefore the servicing was found to accord with the London Plan and Southwark Plan policies, and it was not a reason for the appeal being dismissed. The current scheme is for a much reduced quantum of office space with fewer servicing trips.

304. The servicing would form part of the delivery and servicing plan obligation. With this in place, the proposal would comply with London Plan policies SI7 and T7, and Southwark Plan policy P62.

Car parking

305. The 10 car parking spaces on the site would be removed in the proposal. No car parking is proposed, and no electric vehicle charging points are proposed. The GLA and TfL responses consider there to be insufficient disabled parking, however as the site is in PTAL 6b, the proposed car-free development is accepted by officers. A disabled parking bay would not be required due to the excellent PTAL of this site.

306. As per Southwark Plan policy P54, on-street parking permits would not be available for businesses in current or future CPZs. This would be restricted by a planning obligation.

307. The proposal complies with London Plan policy T6 and Southwark Plan policy P54 which look to restrict car parking. The on-street blue badge space on Kings Head Yard would remain for public use, although it is a long route around to the front doors of the site and they would likely be suspended during the construction phase of the proposal.

Cycle parking and cycling facilities

308. The cycle parking underwent amendments to respond to feedback from the transport policy team and TfL, and the arrangement has been agreed by both. There are currently 50 cycle parking spaces on site, this would be increased to 320 long-stay spaces. This meets the London Plan minimum cycle standards

for the whole floorspace, recognising that this is a retention and extension scheme.

309. There are height restrictions by using the existing basement as the beams running across the ceiling reduce the head height from 3m to 2.3m at regular intervals. This prevents vertical double stackers being used throughout the basement, instead only semi-vertical stackers can fit within these constrained areas. The 320 spaces include 5% accessible Sheffield stands (16 spaces), 10% Sheffield stands (32 spaces), 67% two-tier stands (214 spaces), 8% semi-vertical stands (26 spaces) and 10% folding bike lockers (32 spaces). The design of the stores complies with the London Cycle Design Standards (LCDS). There would be staff changing rooms and showers provided in the basement of the main building, accessed by lift and cycle stairs. For the Georgian terrace, a ground floor cycle store, and cycle stair down to the basement stores would be provided.

Office floorspace	London Plan requirement	Southwark Plan requirement
Uplift (11,174 sqm GIA)	151 spaces (212%)	252 spaces (127%)
Total floorspace (23,937 sqm GIA)	320 spaces (100%)	536 spaces (59.7%)
Total provision	**320 spaces**	

Long-stay cycle parking

	Sheffield stands	Accessible Sheffield stands	Two-tier racks	Semi-vertical stands	Folding bike lockers
Number	32	16	214	26	32
Percentage	10%	5%	67%	8%	10%
Total provision	**320 spaces**				

Stand type split

310. The proposal provides a net increase of 18 LCDS-compliant short-stay cycle parking spaces. Given the existing short-stay cycle parking provision in the vicinity of the site, this is considered adequate to meet the demands generated by the development. Two additional spaces (1 Sheffield stand) would be provided on St Thomas Street as part of a relocated bay of Sheffield stands. The applicant is removing the existing Sheffield stands on Kings Head Yard, which are difficult to use due to their tight spacing, and replacing with 16 LCDS-compliant Sheffield stands.

Office floorspace	London Plan requirement	Southwark Plan requirement
Uplift (11,174 sqm GIA)	12 spaces (150%)	46 spaces (39.1%)
Total floorspace (23,937 sqm GIA)	14 spaces (128.6%)	97 spaces (18.6%)
Total provision	**18 spaces**	

Short stay cycle parking

311. TfL does not consider a cycle hire docking station contribution is needed. Conditions are proposed to secure the on-site cycle parking shown, and further details of the ramps to the stairs down into the basement parking. Subject to these conditions and the highway works to be secured in a planning obligation, the proposal as extensions to an existing office is considered to comply with policies T5 of the London Plan and P53 of the Southwark Plan.

Highway works

312. The applicant's Healthy Streets assessment has informed the proposed off-site highway works, including the resurfacing of the recently widened St Thomas Street pavement, tree planting and sustainable urban drainage. The planting around the entrance to the site (and shown indicatively within the highway) would help make the street more attractive to pedestrians too. These works to TfL's highway would need to be agreed with TfL, and any tree planting co-ordinated with the utilities beneath; a planning obligation would secure the works. The applicant has assessed the increased pedestrian flows at the St Thomas Street/Borough High Street junction where the pavement is very narrow at this busy corner. The observed flows were 3,624 per hour in the evening peak and the proposal would add 57 more people in the peak hour, which would not have a material impact. TfL requested a financial contribution towards its Healthy Streets project to have a cycle contra-flow track, which would improve cycle access to the site and help mitigate the impact on the busy junction. The applicant has agreed to TfL's contribution of £135,507 (indexed).

313. Works to improve the Kings Head Yard highway would be secured, improving it for pedestrians and cyclists, and acknowledging the role the yard would play in the site's servicing and connectivity. These would include upgrading the existing vehicle crossover into the service year to current SSDM standards, repaving the footway and new kerbing, reconstructing the carriageway along the entire length of the site using granite stone setts, repairing any damage from construction, and installing replacement street lighting. The s278 agreement with the council as highway authority would be secured as a planning obligation.

Other transport matters

314. An outline construction environment management plan (CEMP) and an outline construction logistics plan (CLP) were provided suggesting the programme would take 27 months. These would need to be developed with the key contractors once the timing, phasing and method of the demolition and construction works are better known. Deliveries would need to be done primarily from the St Thomas Street side given the size restrictions on the yards, with the demolished 1980s frontage building provided an access point and a loading bay/pit lane suggested on the recently widened pavement – these would need TfL's agreement. Maintaining safe pedestrian, cycle and vehicle access on this busy road would be necessary, including for the neighbouring hospital. Conditions are proposed to secure a final DEMP, DLP, CEMP and CLP for road safety and environmental reasons.

Environmental matters

Construction management

315. An outline construction environment management plan was provided, and a final version would be secured by a condition. This would need to detail the measures to protect air quality and minimise dust levels, to protect the environment and neighbour amenity.

Water resources

316. The proposal would use the existing potable water connection with the Thames Water network. Water efficient fittings and appliances would be incorporated to help reduce water use in the extended offices. Foul and surface water drainage would connect to the combined sewer (see later section on sustainable drainage). Thames Water requested conditions be included about waste water capacity, water network infrastructure, and a piling method statement which have been included in the recommendation. Informatives based on Thames Water's comments are also proposed, which provide further advice to the applicant.

Flood risk

317. London Plan policy SI12 requires developments to minimise and mitigate flood risk. Southwark Plan policy P68 prevents increasing flood risk on or off site. The NPPF states that planning decisions must take into account the current and long-term implications for flood risk in order to minimise the vulnerability of communities and improve resilience. Where development is necessary in higher risk areas, development should be made safe for its lifetime without increasing flood risk elsewhere. Certain steps need to be followed when reaching a planning decision on development in higher risk areas, with risks managed through suitable adaptation measures. The advice of flood risk management authorities also needs to be taken into account. The Environment Agency (EA) and council's flooding team as the lead local flood authority were consulted on the planning application.

318. The site is within flood zone 3 and within an area benefitting from the Thames flood defences. Zone 3 is at highest risk, which indicates a high probability of flooding. The site is in zone 3a as it is outside the functional floodplain. While the site is protected by the River Thames tidal flood defences up to a 1 in 1,000 (0.1%) chance in any year, the EA's most recent flood modelling (December 2017) shows that the site is at risk if there were to be a breach in the defences. It is at risk of fluvial flooding from the River Thames and from surface water, and at low risk of flooding from sewers, groundwater and artificial sources.

319. A sequential test forms part of a flood risk assessment (either strategic or site-specific). It directs development towards the least vulnerable areas for flood risk by assessing the risk from all sources of flooding, now and in the future, taking account of the impacts of climate change. The flood risk assessment

should apply the sequential test. If this has shown that there are no reasonably available, lower-risk sites, suitable for the proposed development, the exception test should be applied.

320. The site was not assessed as part of the council's Strategic Flood Risk Assessment (2017). The applicant has provided a site-specific flood risk assessment for the planning application which sets out the sequential test.

321. NPPF paragraph 181 states development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;

b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;

c) it incorporates sustainable drainage systems, unless there is evidence that this would be inappropriate;

d) any residual risk can be safely managed;

e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

322. The site is currently in office use, and in the proposed scheme would continue in office use, which is categorised as a "less vulnerable" use and is suitable for flood zone 3a. Office occupants would be mainly there in daytime working hours and be awake to take emergency action if needed (i.e. no residential sleeping accommodation). The existing basement would be retained. Flood resistant and resilient measures would be incorporated, such as the ground floor level of the extended building (5.00m AOD) being above the height of the maximum breach water level (4.75m AOD), and flood resilient doors being included on the Kings Head Yard frontage. The listed Georgian terrace would not be altered from its current flood levels and would retain its existing flooding risk and existing office use. The sustainable urban drainage measures are detailed in the drainage section below.

323. The building management team would sign up to the EA's flood warning system to receive flood warnings and flood alerts to give occupiers advance warning. A flood warning plan to set out the emergency response is required by a condition. The escape route along St Thomas Street would have shallow flood water less than 30cm deep, as a low hazard for occupants to exit the building, as a route out along Kings Head Yard would have deeper water.

324. The EA considers the submitted flood risk assessment provides an accurate assessment of the tidal and fluvial flood risks associated with the proposal. The council has considered the submitted FRA when deciding this application in accordance with paragraph 181 of the NPPF. Conditions to require the development to be built in accordance with the agreed flood risk assessment, and a flood warning and evacuation plan are proposed to address the flooding risk for the expanded offices. The proposal is considered to accord with London Plan policy SI12 and Southwark Plan policy P68.

Sustainable urban drainage

325. The site within a critical drainage area and at low to medium risk of surface water flooding. Kings Head Yard immediately next to the site has a high risk of surface water flooding. The scheme would remove the courtyard within the site and a basement lightwell on the eastern part of the site which are at medium and low risk respectively, with new drainage provision to mitigate this risk. To address the risk from Kings Head Yard, the applicant's flood risk assessment suggests that permanent flood resilient doors are included on its southern elevation to prevent flood water entering the building.

326. The run-off from the site has been calculated, excluding the Georgian terrace which would retain its existing drainage. To achieve the greenfield rate for the rest of the site, measures such as a rainwater harvesting system, green roofs and a blue roof on the 10th floor would be provided and an attenuation tank in the basement (sized at 210 cubic metres). With the extent of the existing buildings across the site, it is not possible to include rain gardens, swales, ponds or permeable surfacing. The scheme would connect to the public sewers.

327. The lead local flood authority requested further information on different stages of the drainage hierarchy from the applicant, which was provided and found to be acceptable, subject to conditions regarding the final SuDS design and verification of the drainage system. With these conditions in place, the proposal is considered to accord with policy P68 of the Southwark Plan.

Land contamination

328. The site is currently mostly covered by the office buildings with small areas of paving and tarmac. The office use of the site would continue. Limited groundworks are proposed to add foundations to support the additional building. The EA requested conditions be included regarding a phase one preliminary risk assessment, verification report, unexpected contamination and sustainable drainage protecting controlled waters. The council's environmental protection team also recommended a similar condition to secure such details. These conditions would ensure the proposal complies with policy P64 of the Southwark Plan.

Air quality

329. The site is within the borough air quality management area, and an air quality assessment was submitted which was reviewed by the council's environmental protection team. During the demolition and construction stages, the construction environmental management plan would include measures to control dust, vehicle and plant emissions. With this mitigation in place, the construction phase effects should not be significant. For the completed development, there would be no significant increase in traffic flows to/from the site. The existing car parking on the site would be removed, and there would be no generator or combustion plant. Therefore, there are not expected to be adverse air impacts during operation of the completed development. The

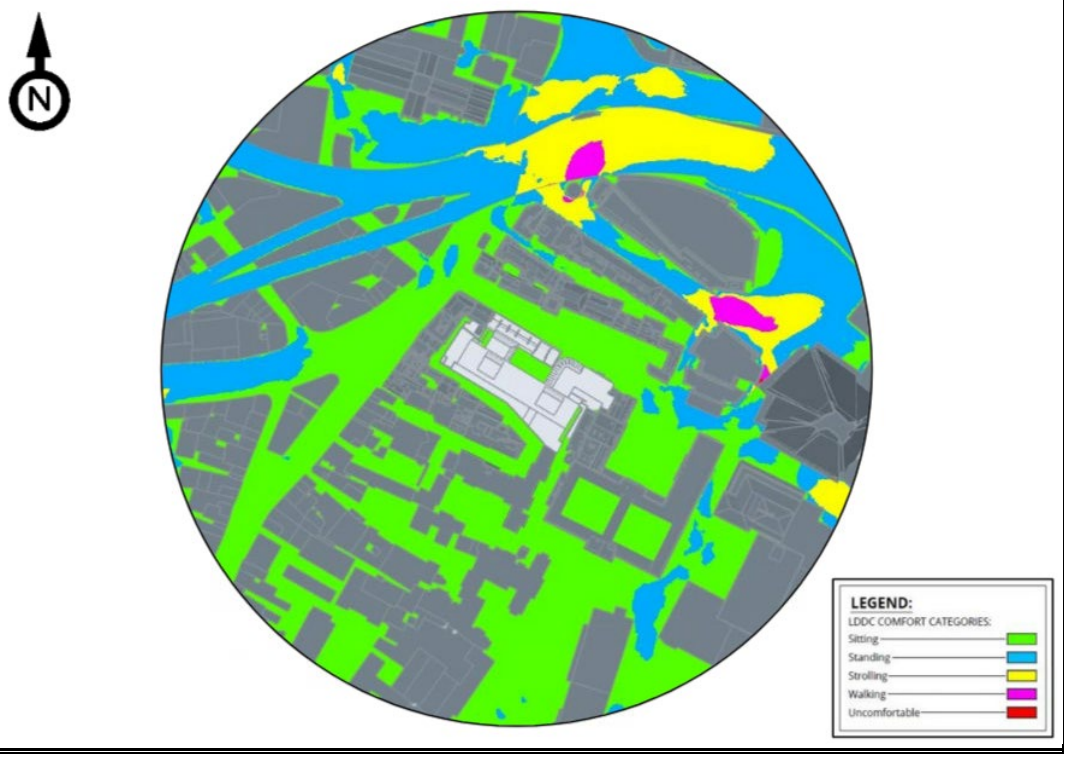
proposed development is expected to have minimal impact on local air quality due to low trip generation and the absence of combustion plants. The development is considered to be “air quality neutral” and “air quality positive” according to the London Plan Guidance.

330. With CEMP mitigation measures in place for the demolition and construction stage, the air quality effects are considered to be acceptable and the proposal would comply with London Plan policy SI1 and Southwark Plan policy P65.

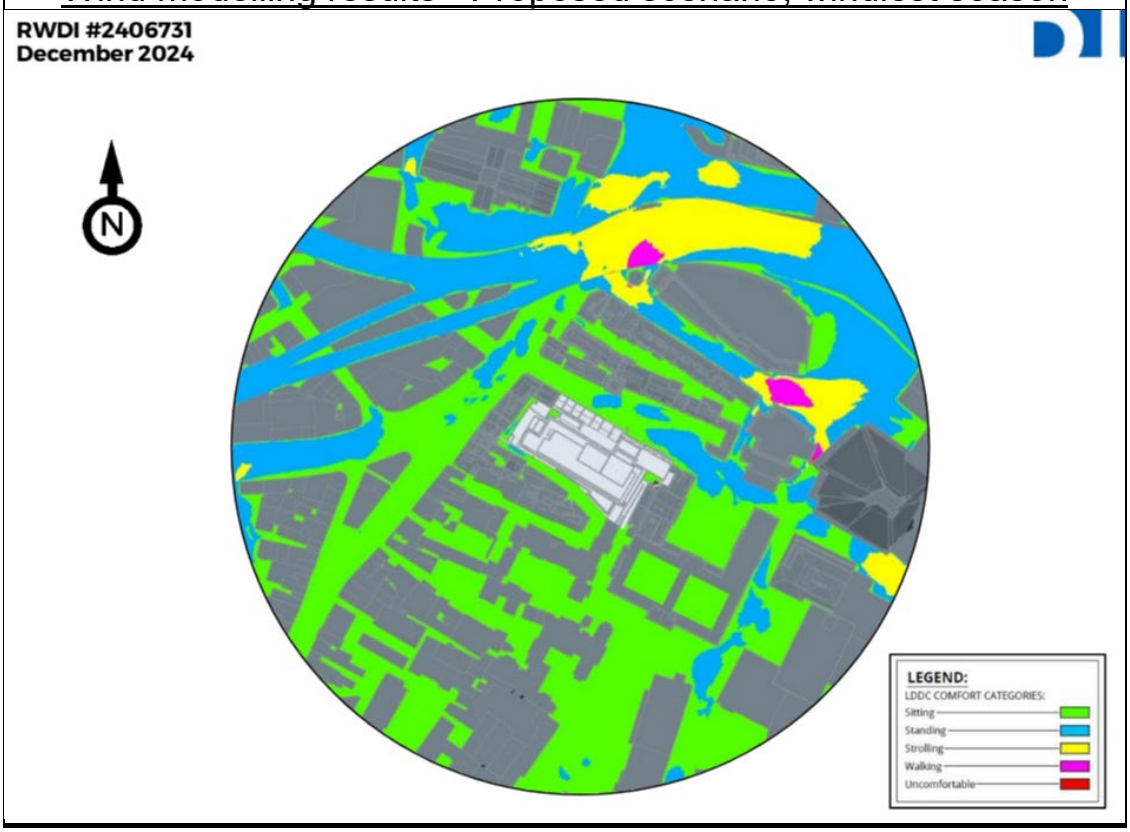
Wind

331. The submitted wind microclimate assessment shows the computer modelling of the predicted wind comfort levels at ground level and on the roof terraces, and the potential for any strong winds that raise safety issues. It considers the cumulative scenario with approved developments in the area. In the proposed scenario in the windiest season (winter), wind levels would increase from “sitting” comfort (shown in green below) to “standing” comfort (shown in blue) along St Thomas Street and a patch on Kings Head Yard, and remain appropriate for the highway use. The windier areas around The Shard and News Building would remain.

Wind modelling results - Existing scenario, windiest season



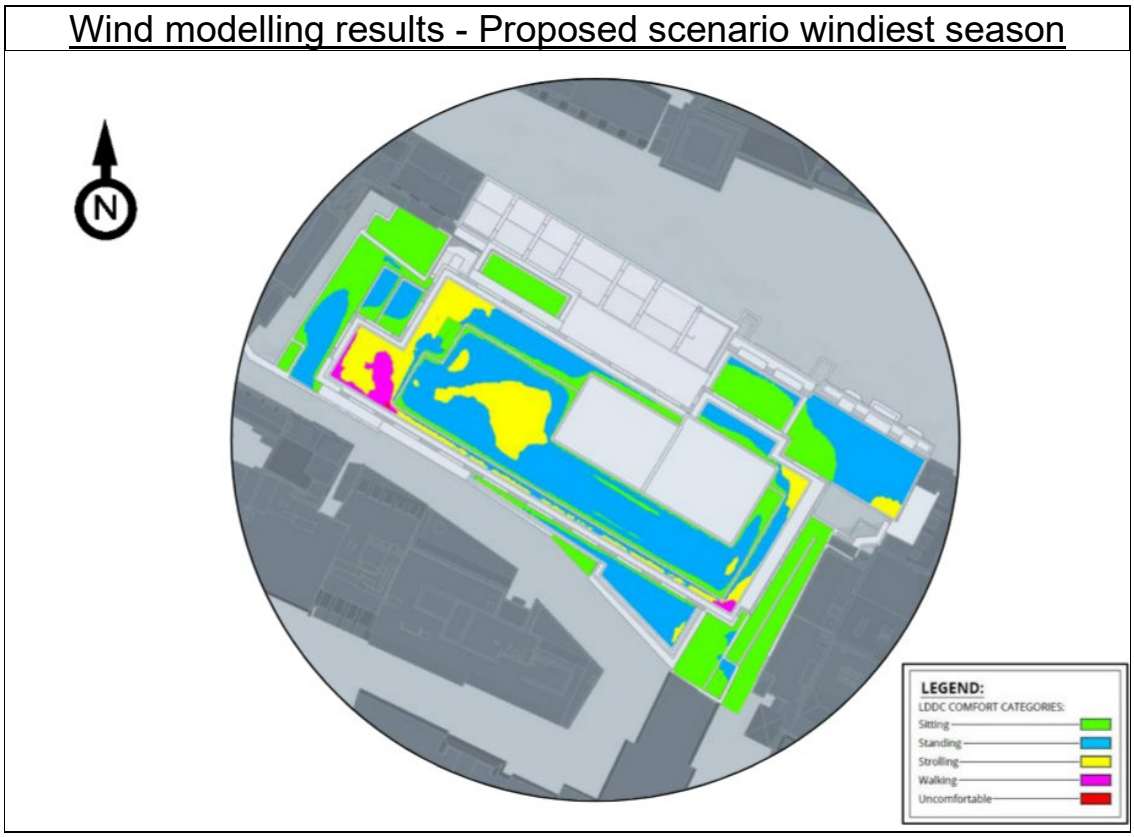
Wind modelling results - Proposed scenario, windiest season



332. In terms of strong winds, none are predicted around the site and those found around The Shard and News Building would remain and are not as a result of the proposal. These wind levels would be similar in the cumulative scenario.

333. The proposed roof terraces on the building would have “sitting” and “standing” wind conditions in the summer season when the terraces would be most used. Higher wind speeds of “strolling” and “walking” would occur on the top floor roof terrace, and so would be windier than desired and include strong winds. These are shown in yellow and purple on the diagram below and need mitigating. For example, 1.5m balustrades at the western and southern sides of the terraces, planters and small tree planting are likely to be effective at reducing wind speeds. The precise location of seating on the terraces would be informed by these landscaping measures. So as not to add further massing in views from Guy’s Hospital and to address the highest wind speeds being at the western end of the terrace, these measures should be focused at that end. A condition to require further details of the wind mitigation measures is proposed, with the impact on heritage assets forming part of the reason for the condition.

Wind modelling results - Proposed scenario windiest season



334. Subject to the condition, the proposal is considered to sufficiently address the wind effect element of the tall buildings policy D9 part C.3)a) and D8 part J of the London Plan to provide appropriate wind speeds for public realm, and P17 part 3.3 of the Southwark Plan.

Energy and sustainability

335. London Plan policy SI 2 “Minimising greenhouse gas emissions” requires all developments to be net zero carbon with a minimum on-site reduction of 35% against the Part L 2021 baseline. The policy sets out that non-residential development should achieve a 15% reduction in emissions through energy efficiency measures. Southwark Plan policy P70 “Energy” parts 4 and 5, require major non-residential development to achieve a minimum 40% reduction through on site savings, beyond the Part L baseline. Where it is demonstrated this cannot be fully achieved on-site, any shortfall should be provided through a financial contribution.

336. London Plan policy SI 3 “Energy infrastructure” requires major developments to connect to existing heat networks, and policy SI 4 “Managing heat risk” requires the energy strategy for a major development to demonstrate how it will reduce the potential for internal overheating and reduce reliance on air conditioning, in line with the cooling hierarchy.

337. An energy strategy has been submitted in accordance with the energy hierarchy (be lean, be clean, be green, be seen). The submission aims to meet the energy and sustainability policy requirements outlined in the London Plan

and the Southwark Plan, while also considering the updated Building Regulations, specifically Part L Volume 2 (conservation of fuel and power) and the newly introduced Part O on overheating.

338. A key principle driving the proposal is a focus on refurbishment and retention of the existing buildings where possible, alongside partial demolition and upward extensions. This approach marks a departure from previous schemes for the site that proposed demolishing the 1980s building, and instead looks to prioritise sustainability by minimising demolition waste and reusing materials on-site (this is discussed further in the circular economy section below).

Be Lean (use less energy)

339. The 'be lean' tier of the energy hierarchy mandates that development reduce energy demand through passive design and energy-efficient measures to minimise consumption and enhance energy performance. The energy strategy submitted for this application demonstrates that the development would incorporate both passive and active design measures, such as:

- A window g-value of 0.35 has been selected for the new windows on the main building's facade to help minimise overheating and reduce reliance on mechanical cooling.
- Exposed concrete slabs are incorporated to provide high thermal mass, helping to moderate cooling loads.
- The façade has been designed with low air permeability to minimise leakage.
- The new building fabric, along with refurbished exposed walls and roofs where possible, would be well-insulated with high quality insulation.
- Openable windows remain on the Georgian terrace to maximise the potential for natural ventilation throughout the year.
- The glazing ratio has been optimised to reduce solar heat gain while maintaining access to natural daylight.
- Shading devices are designed to be effective based on the solar orientation of the façade.
- Low energy lighting through the use of LEDs and use of control systems to detect occupants and control light output.
- Mechanical ventilation would be used for fresh air and energy savings, efficient cooling and advanced system controls for effective operation.

340. Overall, through these 'be lean' measures, the scheme is expected to achieve a 22% reduction in regulated carbon emissions. This exceeds the minimum 15% reduction on Building Regulations required by London Plan policy S12 through energy efficiency measures.

Be Clean (supply energy efficiently)

341. London Plan policy SI 3, part D, stipulates that major development proposals within heat network priority areas should include a communal low-temperature heating system. Similarly, Southwark Plan policy P70 part 7, outlines that major developments should be designed to incorporate decentralised energy, following the hierarchy outlined below:

1. Connect to an existing or planned decentralised energy network; then
2. Be future-proofed to connect to a planned decentralised energy network; or
3. Implement a site-wide low carbon communal heating system; and
4. Explore and evaluate the potential to oversize the communal heating system for connection and supply to adjacent sites and, where feasible be implemented.

342. The application site is located in a heat network priority area. The nearest existing heat network is at Elephant Park located 1400m southwest of the site. The nearest future heat network will be located at London Bridge, approximately 100m from the application site.

343. Since mid-September 2024, the applicant has engaged proactively with 1energy team who will be the operator of the London Bridge DHN. Based on the delivery programme for the future heat network, the construction of the first phase is expected to be completed in Autumn 2029. This is after the anticipated completion year of the proposed New City Court development, which is 2028, so there is unlikely to be a viable connection at first occupation. Therefore, it is not currently proposed for the scheme to connect to any local district heat network. However, provision for a future connection to a viable heat network would be secured within the development. The lower ground floor plan indicates a location for a future district heating plant room, if required. Clarity was sought from the applicant on how the building design will be future proofed to enable this connection. The applicant has confirmed that sleeves and riser space will be provided to allow future connection to an energy network, linking the lower ground plant space to the roof.

344. Noting the above, there are no carbon savings assumed through 'be clean' measures onsite. An obligation has been agreed with the applicant to secure a DHN energy strategy to demonstrate how the development would be designed and built so that all parts of it would be capable of connecting to any future district heat network. This meets the requirements of policy SI 3 of the London Plan.

Be Green (use low or carbon zero energy)

345. The 'be green' tier of the hierarchy requires development to maximise opportunities for renewable energy by producing, storing and using renewable energy on-site. With respect to the 'be green' tier of the hierarchy, following a review of potential low carbon technologies, the applicant proposes the following technologies be included within the development:
    - Air source heat for active cooling and back up energy source.
    - Photovoltaic (PV) panels on the extended building.

346. The energy statement and accompanying roof plans show that 93sqm of PV panels would be mounted on the roof of the 11th floor of the development. Site constraints have been identified which have guided the location and quantum of PV panels. The applicant was asked to clarify the feasibility of installing PV on additional roof terraces and levels. A solar façade exercise was conducted to maximise PV provision, but it determined that efficiencies would be too low

due to overshadowing and a negative carbon payback from the upfront embodied carbon. The northern and eastern roof terraces, in particular, are expected to experience some overshadowing by nearby buildings due to their orientation, making them less likely to yield significant carbon savings. It has been concluded that only 11th floor roofs are those suitable for PVs.

347. The energy statement outlines that heat pumps are being proposed in the form of a (centralised) VRF system.

348. These 'be green' measures would reduce carbon emissions by 14%. The applicant has demonstrated that opportunities for renewable energy on-site have been maximised.

Be Seen (monitor and review)

349. Introduced as part of the London Plan 2021, 'be seen' is the newest addition to the GLA's energy hierarchy. It requires developments to predict, monitor, verify and improve their energy performance during end-use operation. The development's energy performance would be monitored, verified and reported on through to post construction in accordance with the GLA's Be Seen Monitoring platform. This monitoring would be secured through the section 106 agreement.

Total carbon savings

350. Through the measures outlined above, in accordance with the energy hierarchy set out by policies SI 2 and P70, the proposed development will achieve a combined regulated carbon saving of 36% (22% be lean, 0% be clean, 14% be green) over Part L (2021). The performance of the development at each stage of the energy hierarchy is summarised in the table below:

Stage of the hierarchy	Total regulated emissions (tonnes)	Carbon savings (tonnes)	Percentage savings
Part L 2021 Baseline	93.9	-	-
Be Lean	73.4	20.6	22%
Be Clean	73.4	0.0	0%
Be Green	59.8	13.6	14%
Cumulative savings	-	34.2	36%
Shortfall on-site carbon savings	-	59.8	-

Table showing the carbon reduction measures at each stage of the hierarchy

351. The GLA guidance highlights the challenges of achieving the policy requirements for on-site carbon reductions for non-residential developments due to the inclusion of low-carbon heating in the new Part L baseline. Despite this, the development meets the overall minimum on-site reductions required by the London Plan however, it falls short of the Southwark Plan's non-residential

development requirements of 40% on-site savings. The reuse of much of the 1980s structure and Keats House façade, and retaining the listed Georgian terrace are constraints on the regulated emissions savings this scheme can achieve.

352. As set out in the Southwark Plan policy P70, the shortfall in on-site reduction of carbon emissions of 59.8 tonnes per year to achieve net zero would be met by an off-site payment in-lieu, calculated at an offset cost of £95 for every tonne of carbon dioxide emitted per year over a period of 30 years. This has been calculated at £170,430 which would be secured via a planning obligation within the section 106 agreement.

Whole life cycle and carbon capture

353. London Plan policy SI 2, part F, states that "*Development proposals referable to the Mayor should calculate whole life cycle carbon emissions through a nationally recognised whole life-cycle carbon assessment and demonstrate actions taken to reduce life-cycle carbon emissions*". Southwark Plan policy P70 reinforces the need to calculate whole life cycle carbon emissions through a nationally recognised assessment and demonstrate the actions taken to reduce life cycle carbon emissions. A whole life-cycle carbon (WLC) assessment assesses the embodied and operational emissions associated with redevelopment.

354. "Embodied carbon" refers to the carbon emissions associated with the extraction and manufacturing of materials and products, as well as their in-use maintenance and replacement. It also includes the emissions from end-of-life demolition, disassembly, and disposal, along with the transportation related to all these stages. "Operational carbon" is the carbon dioxide associated with the in-use operation of the building. This usually includes carbon emissions associated with heating, hot water, cooling, ventilation and lighting systems, as well as those associated with cooking, equipment and lifts. WLC assessments are monitored at the pre-application, submission and post-construction stages.

355. The proposal's retrofitting approach to reuse much of the existing building fabric would reduce the amount of waste from demolition and the amount of new materials needed to be brought to site. The project has given careful consideration of the new materials to be used in the extension. The submitted WLC assessment for the planning application evaluates both the operational and embodied carbon of the proposal throughout its life cycle, including construction, use, and deconstruction. If a development's carbon emissions are below the GLA's targets, it means the project is performing better in terms of sustainability and meeting or exceeding the expected environmental standards.

356. The proposed development is targeting <521 kgCO2e/sqm GIA in upfront carbon emissions (A1-A5 which covers materials and construction). This is lower than the GLA aspirational benchmark of 600 kgCO2e/sqm GIA, and reflects the benefit of reusing the existing foundations, basement and concrete frame of the 1980s building. For the in use and end of life carbon emissions, the development is targeting <394 kgCO2e/sqm GIA which is below the GLA

benchmark but slightly higher than the aspirational target of <370 kgCO2e/sqm GIA. The scheme is targeting 900 kgCO2e/sqm GIA for carbon over life emissions, which is also less than the GLA aspirational benchmark.

357. In summary, the WLC assessment sets out that the proposed development is exceeding the GLA benchmarks and the aspirational targets for both upfront carbon and end of life cycle modules. This is a welcomed aspect of this proposal.

358. The WLC assessment sets out that the design team would continue to explore opportunities to further decarbonised the proposed development. A condition requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions would be imposed which would pick up any further reductions. Subject to this condition, the proposal would meet and is likely to exceed the requirements of London Plan policy SI2 part F and Southwark Plan policy P70 part 6.

Circular economy

359. London Plan policy SI 7 “Reducing waste and supporting the circular economy” part B states that referable applications should promote circular economy outcomes and aims to be net zero-waste. In addition, Southwark Plan policy P62 “Reducing waste” states that a circular economy statement should accompany planning applications referable to the GLA.

360. A detailed circular economy statement has been submitted with the application, which sets out strategic approaches, specific commitments and the overall implementation approach. The statement sets out that the circular economy decision tree from the GLA’s Circular Economy Statements LPG (2022) has been followed to determine the approaches for existing buildings on site.

361. The design has been guided by retrofit first principles to maximise the potential for the existing buildings to minimise waste. The table below sets out the approach to the existing buildings on site:

Circular economy approach	**Existing building / structure**	
Retain and retrofit	Georgian terrace	These listed buildings are proposed to be retained in full, restored and refurbished.
Partial retention, refurbishment and extend	Keats House	The historic façade would be retained, the concrete structure behind refurbished with a roof extension above.
Redevelop, with partial demolition	1980s office building	It is proposed that these buildings partially demolished to retain the foundation, basement and concrete frame with 5-storey upward extension and side extensions.

Table summarising the project’s approach to the circular economy

362. The pre-demolition audit identifies the potential for reusing materials such as bricks from the demolition of external facades, as well as tiles, flooring, glass, sanitary ware, lighting, ceiling panels, and kitchenettes. The statement outlines the limitations of reusing certain materials, such as construction materials, due to their age, lower quality, and the potential for asbestos contamination.

363. The audit assesses the condition of materials for reuse and provides options for recycling or disposal. It confirms that the residual value of the on-site materials would be maximised, with existing materials reused either on- or off-site, in accordance with the waste hierarchy. New, robust materials would prioritise those from the BRE Green Guide to Specification.

364. Where materials cannot be re-used, these would be recycled where possible. Specific targets committed to by the applicant (in line with the circular economy principles, and London Plan policy S1 7) include:
    - diverting at least 95%, with an aspirational target of 99%, of the demolition waste from going into landfill which meets the GLA target requirement of 95%;
    - making beneficial use of at least 95% of excavation waste;
    - diverting at least 95% of the construction waste from landfill; and ensuring that a minimum of 20% of the total value of the selected products and materials include recycled and/or reused content.

365. The proposal has successfully addressed the requirements of London Plan policy SI7, Southwark Plan policy P62, and has referenced the GLA's guidance in producing the circular economy statement. A condition is proposed requiring post-construction reporting. Subject to the proposed condition, the proposal would comply with policies SI7 of the London Plan and P62 part 4 of the Southwark Plan.

Overheating and cooling

366. London Plan policy SI 4 "Managing heat risk" and policy P69 "Sustainability standards" of the Southwark Plan set out the cooling hierarchy that should be followed when developing a cooling strategy for new buildings. The six-step hierarchy is as follows:
    1) Reduce the amount of heat entering a building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
    2) Minimise internal heat generation through energy efficient design; then
    3) Manage the heat within the building through exposed internal thermal mass and high ceilings; then
    4) Passive ventilation; then
    5) Mechanical ventilation; then
    6) Active cooling systems (ensuring they are the lowest carbon options).

367. The following paragraphs explain how the development has been designed following this six-step process.

368. While the orientation of the extended building has been primarily determined by the shape and characteristics of the site, which limit the ability to reduce heat

entering the building, aspects of the design have been considered with thermal comfort in mind. The design prioritises the availability of natural light to reduce reliance on artificial lighting. It incorporates energy-efficient lighting systems and advanced lighting controls. Heat generation would be minimised through the efficient layout of communal pipework, with high levels of insulation for the ductwork to minimise losses in heating and hot water distribution, ensuring overall energy efficiency.

369. Internal heat gains would be minimised by amending the glazing ratio of the facades and incorporating shading devices, with a particular focus on the south-facing orientation, to reduce solar gain while ensuring internal daylight levels are sufficient. The development aims to achieve low air permeability to reduce leakage.

370. Good floor-to-ceiling heights are proposed, and the exposed concrete slabs provide high thermal mass which would help manage heat within the building to moderate the cooling loads of the new development.

371. As set out in London Plan policy SI 4, passive ventilation would be prioritised, taking into account external noise and air quality in determining the most appropriate solution. Openable windows are provided at every office floor in the main building, as well as in the Georgian terrace, to maximise potential of natural ventilation throughout the year.

372. When required, mechanical ventilation would be provided by a mixed mode system utilising efficient heat pumps with heating, cooling and heat recovery capabilities.

373. Due to these steps taken in accordance with the cooling hierarchy, the need for active cooling to avoid overheating risk throughout the year would be reduced. When required, an efficient air source heat pump with chiller across the whole development would provide cooling.

374. The project has adhered to the cooling hierarchy and aims to minimise the required use of energy-intensive cooling systems. The results of the overheating assessment show that the new build aspects of the scheme pass the criteria in all scenarios with the inclusion of mechanical ventilation and active cooling via heat pumps. For the Georgian terrace, due to the reliance on natural ventilation, not all rooms pass. These are historic buildings, which limit their ability to meet the criteria and recognising they are already in office use, greater flexibility can be afforded to these buildings in terms of compliance with overheating criteria.

375. The energy demands of the proposed cooling measures have been incorporated into the energy assessment, with the resulting carbon emissions summarised above. Subject to the proposed conditions and obligations related to the energy aspects, the issue of overheating has been adequately addressed for this office development, and the proposal comply with policies SI 4 and P69.

BREEAM

376. Southwark Plan policy P69 requires developments to achieve a BREEAM rating of 'excellent' for non-residential development such as this. The policy also outlines that schemes should achieve a BREEAM rating of 'excellent' in non-domestic refurbishment for conversion, extension and change of use over 500sqm.

377. The proposals to refurbish the listed Georgian terrace would be assessed using the BREEAM Refurbishment and Fit-out 2014 method, and is targeting an 'excellent' rating. The extended building would be assessed using the BREEAM New Construction v6.1 method, and is also targeting an 'excellent' rating with an aspiration of achieving an 'outstanding' rating. The two pre-assessments have been provided to show where credits are targeted and showing how the scores of 83.7% and 78.5% are high enough to both achieve an 'excellent' rating. The extended building may achieve an 'outstanding' rating as its score is close to 85% at this initial design stage and potential credits to exceed this level have been identified. The Georgian terrace has also identified potential credits to achieve an 'outstanding' rating. Conditions are proposed for the achievement of at least an 'excellent' rating for both buildings to ensure compliance with Southwark Plan policy P69. These conditions require the applicant to submit a post-construction review for each building to demonstrate the standard has been met.

Water efficiency

378. Water efficient fittings and appliances would help to limit water use in these offices, and credits would be targeted through the two BREEAM assessments. The foul water drainage from the site would increase (nearly double), and water demand increase; Thames Water have requested conditions be included. Subject to these conditions, the proposal would comply with Southwark Plan policy P67.

TV, radio and telecoms networks

379. The scale of the proposal, within the same area as the taller Shard Quarter, Guy's Tower and The Shard is unlikely to disrupt TV and radio reception across a wide area. Arqiva has considered the effects on TV and radio operation and raises no objection in this regard. The council's CCTV team has reviewed the submission and finds it would not impact on the current system and network, but asked that roof space be provided to allow future re-route or expand the council network. This was proposed to be a planning obligation, but the applicant has not agreed to as it is not a policy requirement. This is not a reason to refuse the scheme.

Digital connectivity infrastructure

380. London Plan policy SI6 on digital connectivity infrastructure requires the provision of sufficient ducting for full fibre connectivity to all end users. Southwark Plan policy P44 requires delivery of fibre to the premises broadband

or equivalent technology for future occupants and users. No information has been provided on this, therefore a condition is proposed to secure further details to ensure both the Georgian terrace and extended building are provided with fibre broadband.

Aviation

381. London Plan policy D9 in part C2f requires that tall buildings should not interfere with aviation, including during their construction. With the 11-storey height of the proposal, to the west of The Shard, Shard Quarter and Guy's Tower which are much taller buildings, this proposal is unlikely to affect air traffic. On previous applications for taller towers, Heathrow Airport, NATS and the Civil Aviation Authority were consulted, so these organisations were consulted again but did not comment. NATS raised no objection.

Planning obligations

382. Policy IP3 of the Southwark Plan advises that planning obligations can mitigate adverse impacts of a development. The council's Section 106 Planning Obligations SPD sets out in detail the type of development that qualifies for planning obligations. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:

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

Planning Obligation	Mitigation	Applicant Position
Affordable workspace	Delivery of affordable workspace on site within the Georgian terrace, at least 1,132sqm area (with layout and specification to be agreed), at least 25% discount on market rent, capped service charge, for a minimum of 30 years. To submit a marketing strategy for agreement. To be operated by an approve workspace operator. To be given to access to shared servicing yard and refuse store. To provide annual reporting.	Agreed
Archaeology technical support contribution	£17,270 (indexed).	Agreed
BNG	Securing the significant increase, HMMP (pre-comm habitat management and monitoring plan for 30 year), and a fee for the on-going monitoring of £12,874 (indexed).	Agreed
Business relocation strategy	Compliance with the submitted business relocation strategy.	Agreed

Construction phase jobs and training	To require the submission of an employment, skills and business support plan to detail the methodology, targets, mechanism and local supply chain activity. To deliver 23 sustained jobs to unemployed Southwark residents, 23 short courses and 5 construction industry apprentices. Reporting of achieved figures. Financial contribution for any shortfalls. The maximum Employment and Training Contribution is £141,100 (£126,500 against sustained jobs, £4,600 against short courses, and £10,000 against construction industry apprenticeships). To allow procurement opportunities for local businesses.	Agreed
End use jobs and training	To deliver 70 sustained jobs for unemployed Southwark residents To require a skills and employment plan, identifying suitable sustainable employment opportunities and apprenticeships for unemployed borough residents in the end use of the development, the mechanism, key milestones, identifying training gaps, and methods to encourage applications from unemployment residents. Financial contribution of up to £385,000 (based on £5,500 per job) if fail to achieve these job figures. To allow procurement opportunities for local businesses.	Agreed
CHP connection and carbon offset financial payment	Future proofing for its connection to the district CHP. Carbon offset payment based on 59.8 tonnes at £95/year for 30 years = £170,430 (indexed) to achieve the zero carbon policy requirement.	Agreed
Be Seen – on-going monitoring and post-installation review	Post-construction monitoring and reporting.	Agreed

Highway works and transport contributions	Contribution of £135,507 (indexed) for TfL's Healthy Streets scheme for St Thomas Street. Highway works on St Thomas Street to be secured through a s278 agreement with TfL for the loading bay, cycle parking – and potential for street tree planting if the detail can be agreed with TfL. Highway works on Kings Head Yard to be secured through a s278 agreement with the council to: 1) Upgrade the existing vehicle crossover into the service yard on Kings Head Yard to current SSDM standards. 2) Repave footway including new kerbing on Kings Head Yard using sandstone/yorkstone natural stone paving material and 300mm wide granite kerbs. 3) Reconstruct Kings Head Yard carriageway along the entire length of the development site using mixed greys of granite natural stone setts. 4) Repair any damage to the highway within the vicinity of the site due to construction activities for the Development including construction work and the movement of construction vehicles. 5) Replacement street lighting on Kings Head Yard (currently attached to the building to be demolished). CPZ parking permit restriction for commercial floorspace (unless a blue badge holder). Legible London financial contribution of £22,000 (indexed) to provide two new signs and update four signs in the area. Delivery and servicing plan – to detail the consolidation strategy and other aspects of deliveries, servicing and refuse collection, including restricting	Agreed

	their hours. To secure a monitoring plan, monitoring fee of £2,790, and comply with that for the monitoring period, to pay the cash deposit (£52,630) that the council can retain if the monitoring is not undertaken or the number of vehicles exceeds the baseline figure after an initial warning. Travel plan monitoring fee of £2,790 (indexed).	
Public realm	On site delivery of the areas of public realm prior to first occupation. Provide on-going public access, manage and maintain. 24/7 access to the St Thomas Street public realm, and opening hours of public realm on Kings Head Yard side to be limited as it would be gated off at night.	Agreed
Admin and monitoring fees	The administration fee of £20,000. Local economy technical support fee £3,710 (indexed). Setting out the submission fees for future s106 details applications. The D/CEMP monitoring fee for EPT £16,115.	Agreed

383. In the event that the section 106 agreement is not concluded by 31 October 2025, the committee is asked to authorise the director of planning and growth to refuse permission, if appropriate, for the following reason:

In the absence of a signed legal agreement there is no mechanism in place to mitigate against the adverse impacts of the development (e.g. highways impacts and carbon emissions) nor to secure development plan compliance (such as delivery of on-site affordable workspace, biodiversity net gain, carbon offset contributions, jobs and training in construction and end use, public realm, delivery and servicing management, travel plan, financial contributions and monitoring fees). It is therefore contrary to policies E3 Affordable workspace, E11 Skills and opportunities for all, SI2 Minimising greenhouse gas emissions, D8 Public realm, D9 Tall buildings, T4 Assessing and mitigating transport impacts, and DF1 Delivery of the Plan and Planning Obligations of the London Plan (2021); P17 Tall buildings, P28 Access to employment and training, P31 Affordable workspace, P49 Public transport, P50 Highway impacts, P70 Energy, IP2 Transport infrastructure, IP3 CIL and section 106 planning obligations of the Southwark Plan (2022); and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD.

Mayoral and borough community infrastructure levy (CIL)

384. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material "local financial

consideration" in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration however, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport invests in London as a whole. Southwark's Borough CIL will provide for infrastructure that supports growth in Southwark.

385. The site is located within Southwark CIL Zone 1 and MCIL2 Central London Zone. The proposal with over 100sqm of new build is a CIL chargeable development. Based on the submitted CIL Form 1 dated 11 June 2025, the gross amount of CIL is approximately £3.59 million, consisting £2.45 million of Mayoral CIL and £1.14 million of Borough CIL. It should be noted that this is an estimate, and the floor areas on approved drawings will be checked and the "in-use building" criteria would be further investigated, after planning approval has been obtained.

Other matters

386. A utilities statement was provided, setting out how the existing gas connection would be disconnected, while the sewerage connections, potable water connection and electricity connections would remain. UKPN's consultation response comments on matters of detail have been sent onto the applicant.

387. The submitted basement impact assessment and structural statement refer to known structures and utilities under and near to the site, including Jubilee Line Underground tunnels, which the construction of the extension would need to take account of. London Underground's comments have informed a proposed condition.

Planning balance

388. The proposed planning application scheme would cause harms to heritage assets (the Borough High Street Conservation Areas, several listed buildings and locally listed building) and to neighbour amenity. The scheme therefore does not comply fully with policies in the Southwark Plan and London Plan about tall buildings, conservation areas, listed buildings and locally listed buildings, and in the Southwark Plan about protecting neighbour amenity.

389. There would be a middle level of less than substantial harm to the Borough High Street Conservation Area from the tall building and removal of most of the Victorian screen (which is locally listed and would be mostly demolished). The scale, bulk and height would cause harms to listed buildings on the site and around the site including:

- a low level of less than substantial harm to grade I listed Southwark Cathedral;
- a middle level of less than substantial harm to grade II* listed Guy's Hospital;
- a low level of less than substantial harm to grade II* listed 9, 9a and Mary Sheridan House;
- a low level of less than substantial harm to grade II listed The Old King's Head pub;

- a middle level of less than substantial harm to grade II listed Georgian terrace on the site and adjoining Bunch of Grapes pub;
- a mid-to-low level of less than substantial harm of the grade II listed buildings on the eastern side of Borough High Street (nos. 41-57).

390. There would be harm to the amenity of the residential part of The Old King's Head public house, from the loss of daylight and reduced outlook from its habitable rooms due to the proximity of the extended building and its massing. Further residential neighbours would see a reduction in daylight levels.

391. Where there are heritage harms of the "less than substantial" range, the NPPF states in paragraphs 212 and 215 that:
"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."

"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."

392. Given the less than substantial harms to various heritage assets, this weighing exercise needs to be carried out. The harms must be considered in the planning balance with the public benefits the proposal would bring. The harms are a function of the scale and massing of the proposal, due to the quantum of additional office space being proposed on this site. The package of benefits is also related to the scale of the proposal, for example a smaller scheme would not provide so many on-site office jobs and as much affordable workspace.

393. The benefits from the planning proposals and listed building renovation are as follows:
    - Delivery of c. 11,200sqm of additional, high quality office space at this centrally located and accessible site.
    - Improvement to the quality of the existing office space on the site by the substantial renovation works to the main building, improved entrance, enhanced cycle facilities for staff, and addition of amenity spaces.
    - Delivery of on-site affordable workspace (1,132sqm).
    - Provision of jobs and training within the completed scheme, as an increase of approximately 700-940 jobs compared with the existing offices and include 70 jobs for local people. This would come with an increase in local spending from the additional workers.
    - Provision of jobs and training opportunities during the construction stage – including 23 sustained jobs, 23 short course and 5 apprentice opportunities for local people.
    - The sustainability-focus of retrofitting and retaining much of the 1980s structure to reduce the carbon intensity of the proposal, in an extended building that would achieve at least BREEAM "excellent".
    - The updated plant and improved fabric performance of the facades would reduce the carbon emissions compared with the existing use,

however the overall 36% on-site reductions on Part L falls short of the minimum 40% policy requirement.

- Delivery of greening and biodiversity improvements on site, achieving and slightly exceeding the UGF policy requirements and a 153% improvement on BNG.
- Provision of two areas of public realm on site with seating, tree planting and greening.
- Highways improvements to St Thomas Street to replace the tarmac treatment of the widened pavement and potentially include landscaping. Highways improvement to Kings Head Yard to bring it to SSDM standards and improve its accessibility. Financial contributions towards transport improvements for TfL's Healthy Streets project for St Thomas Street and Legible London updates.
- The heritage benefit of the renovation of the Georgian terrace to make it ready for occupation for affordable workspace, and to make the front doors level-access.
- Approximately £3.59m of CIL payments to the council and for Mayoral CIL.

394. Officers note that in the appeal schemes, the heritage harms of the proposals were weighed with the public benefits of those previous schemes. The appeal decision set out the weight the Inspector gave weight to the following benefits in each scheme:

Benefits of the earlier appeal scheme(s)	**Weighting given to 2018 scheme by Inspector**	**Weighting given to 2021 scheme by Inspector**
Heritage benefits from the restoration of the Georgian terrace	Significant	Significant
Delivery of employment floorspace	Significant	Significant
Delivery of affordable workspace	Significant	Significant
Delivery of the affordable retail and hub space in the 2018 scheme	Limited and moderate	-
The retail, food and drink and leisure spaces	Moderate	Moderate
Creation of jobs during construction and operation stages	Significant	Significant
Opening up the Underground entrance within the site	Substantial	Substantial
Highway works and transport improvements	Moderate	Moderate
Provision of public realm	Limited	Very limited
Public garden within or on top of the tower	Significant	Significant
Carbon reduction measures and BREEAM 'outstanding' rating	Very limited	Limited
CIL contributions	Moderate	Moderate

Table of weighting given to the benefits of the appeal schemes, as set out in the appeal decision

395. Officers have been mindful of these weightings when considering the revised package of public benefits in the current application, although as the proposals are different, the number and scale of benefits is often reduced and the scale of

restoration of the Georgian terrace has been reduced. The benefits from the current scheme are considered by officers to attract the following weighting:

Benefits of the scheme	Weighting
Delivery of high quality employment floorspace (as an uplift, and renovation of the existing space with improved facilities)	Significant
Delivery of on-site affordable workspace	Significant
Creation of additional jobs at operation stage, including opportunities for local people	Significant
Creation of jobs during construction stage, including opportunities for local people	Moderate
Sustainability focus of retrofitting much of the existing structure, improved fabric performance, replacement plant, achieving BREEAM excellent	Moderate
Provision of two small areas of public realm	Limited
Greening, UGF and BNG improvements	Moderate
Highway works and transport improvements	Moderate
Heritage benefits from the renovation of the Georgian terrace	Moderate
CIL contributions	Moderate

Table of weighting given to the benefits from the current scheme

396. The scheme would help deliver key aspects of the Southwark Plan in terms of employment, and complies with the development plan policies in most topics. This package of public benefits from the proposal is considered by officers to be sufficient to outweigh the heritage harms found to the conservation area, listed buildings and locally listed building, and the harm to neighbour amenity that cannot be mitigated. On balance therefore, the planning application is recommended for approval.

Community involvement and engagement

397. A Statement of Community Involvement (SCI) and the completed Development Consultation Charter's (DCC) engagement summary were provided with the planning application. They summarise the pre-application public consultation undertaken by GPE before submitting the applications, the feedback received, and provide some information on the existing users of the site and uses around the site.

398. GPE's pre-application engagement with the community was informed by the council's DCC for a scheme of this "large scale major applications higher range" scale. The applicant held four public drop-in events (attended by 18 people) in October and December 2024 with the emerging and developed proposals. Copies of the exhibition boards which included CGIs and images of the draft proposal have been included in the SCI. These events were advertised by two flyers sent to over 1,600 addresses in the area, by door-knocking and leafletting sessions around the Hospital, station and Borough High Street, by adverts in Southwark News, social media and signage on the site, and by contacting those on the project mailing list. Letters were sent to political and community stakeholders such as the Hospital, Living Bankside, Southwark Cathedral and ward councillors across two wards. Eight meetings

were held with stakeholders and local councillors. A project website was set up in October 2024, which received over 1,900 visits.

399. Only 5 responses from the public were received by the applicant to these consultation surveys, 2 at the October stage and 3 at the December stage. Common topics raised in the feedback related to the affordable workspace offer (supportive and neutral responses), high-quality office space (support and neutral), the retrofit approach (a mix of support, neutral and disagreement), the impact on historic assets (support for responding to the heritage of St Thomas Street), the improvement to Kings Head Yard (most in support and one neutral), questions on the construction impacts, and comments about including more trees and retail. Comments from stakeholder groups in the area referenced the economic benefits, affordable workspace, uses, public realm improvements, impacts on views and heritage assets, the safety impacts of using the yard entrance for vehicles and cyclists, and construction impacts. The applicant's responses to the feedback are set out in the SCI.

400. The pre-application engagement was conducted in accordance with the DCC and the Early Engagement Strategy submitted during the pre-application discussions. A range of printed and digital media were used, offering in-person, telephone and online information.

401. The applicant engaged with the council's pre-application service between April and December 2024 and attended the Design Review Panel in November 2024. The council's written pre-application advice has been published on the planning register. The applicant also undertook pre-application discussions with the GLA, Historic England and TfL.

402. Once the applications were valid, the council advertised the planning application with by 8 site notices, press notice and letters to approximately 700 surrounding properties. The LBC application was advertised by the site notices and press notice. Steps were taken to contact those who had commented on the earlier applications and appeals. Re-consultation was carried out with relevant organisations on the amendments made in May 2025. Appendices 5 and 6 set out the consultation undertaken and where responses were received. The comments received are summarised below.

Consultation responses from members of the public and local groups/organisations

403. The groups and organisations who commented on the earlier applications and appeals were consulted. The responses received raise issues that have been included in the assessment section in terms of the design, scale, tall building policy, heritage impacts, neighbour amenity impacts, servicing, construction impacts.

404. One objection from the public was received raising the following summarised issues:

- Overdevelopment against the local plan and high street regeneration. More office massing here does not add anything to the high street, nor bring retail which is significantly lacking in this area.

- Poor architectural design. A building that has lasted less than 50 years surrounded by others that have lasted for more than 100 needs more long-term design and thought before it is replaced by one that may not last even 30 years. The design does nothing to add to the architecture of Southwark and will date as quickly as the 1980s design. The new entrance building makes no contribution compared with the old entrance. An original heritage frontage should be rebuilt or a more interesting modernist approach that completely contrasts.
- Too high and impact on the conservation areas. The heights are unnecessary. A 5-storey upward extension continues the journey of over-massing in Southwark and overbearing impact on conservation areas. A maximum 2-storey addition would be more in keeping. It will make the Kings Head Yard cavernous and unwelcome as well as impact on the old medical theatre building opposite and the Guy's Hospital quad, damaging this entire conservation area and listed buildings.
- Harm to the conservation area. The demolition of the Kings Head Yard facade does not respect conservation nor any link to the past. The designs of the frontages bear no relation to the past.
- Restoration of the listed buildings frontages is welcomed but there is insufficient consideration of heritage in terms of public realm.
- No real consideration for restoring the interiors of the listed buildings; more could be done to invest in these and restore features.
- Out of keeping with character of area.
- Development too high.
- Conflict with local plan.
- Close to adjoining properties.
- Loss of light.
- Inadequate access, parking provision and public transport provisions.
- Increase in traffic.
- Increase in pollution.
- More open space needed.
- Strain on existing community facilities.
- General dislike of proposal.

405. The other responses received from four institutions and landowners in the local area raise objection, concerns or comments. Each are summarised in the paragraphs below.

406. Guy's and St Thomas Foundation – the Foundation owns several properties around the site including Francis House, Iris Brook House and Orchard Lisle House on the yards side. It supports the principle of redevelopment that would bring about positive benefits including improvements to the public realm on Kings Head Yard, increased office accommodation which may attract life sciences companies, and restoration of the listed buildings. The Foundation made representations on the earlier application regarding servicing impacts, construction and amenity, loss of daylight and sunlight, and proposed amenity spaces. It welcomes some of the changes made with the current proposal, however still raise concerns regarding:
    - Servicing. The yards are primarily used for pedestrian access, including students to the housing and to the vaccination centre, so raise safety

concerns for visitors and students on this narrow street alongside servicing vehicles.
- Construction phase impacts of noise and air quality. The Foundation asks to be consulted on the CEMP.
- The proposed amenity spaces are smaller than previous schemes, and landscaping would further assist with overlooking and noise impacts.

407. Southwark Cathedral – raises areas of concern. It recognises that the current scheme includes a significant reduction in the height, scale and mass of the proposal relative to past applications, however concerns remain in relation to the likely adverse impacts. These areas of concern include:
    - Harmful impact on the heritage significance and historic townscape setting of the grade I listed Cathedral, harm to the setting of other listed buildings, and harm to the role of the church as part of the special character and appearance of the Borough High Street Conservation Area. The Cathedral is a landmark building in the national context. It derives heritage significance from its physical fabric and its setting in the immediate townscape and wider surroundings including both sides of the river. Views and glimpses of the Cathedral are important and part of the distinctive townscape experience. Further built development within its setting would affect its heritage significance, with the growing cluster of tall buildings at London Bridge continuing to harden the built backdrop and rising rooflines that challenge the historic visual presents of the Cathedral. The proposal would infill existing sky gap at the end of London Bridge when viewed from the north, the sky gap next to the tower of the Cathedral when viewed from the north bank to either lose or disrupt the distinctive silhouette of the Cathedral's roof form. The highest grade I designation of the Cathedral calls for greater weight and importances to be applied to the protection of its heritage significance, in line with the NPPF, and harm to the significance requires clear and convincing justification. The impact of new developments on how the listed building is used in different ways by different groups of people, the sunlight and daylight into the building and its precincts, the effects of noise, traffic and illumination, and the visual experience gained out from the walkway of the tower must be borne in mind. Concern that the applicant's heritage assessment (which concludes no harm to the significance of the Cathedral) seriously underplays the impact on the significance and setting of the Cathedral.
    - Concern that the applicant's heritage assessment underplays the direct impacts of this scheme on the conservation area. The proposal would impact on the character and appearance of the conservation area and shared townscape setting of the Cathedral, causing harm to the understanding and appreciation of the grade I listed building. The proposal would represent a significant change to the local townscape and have a pronounced effect on the character of views within the conservation area. The nature and extent of this change is clearly demonstrated through a number of the verified visualisations. The upper storeys of the proposed taller building would appear for the first time on the skyline and break the roofline silhouette of a number of historic buildings within the immediate vicinity/foreground of these local views. Such change and the overbearing visual impact of new built form at such a contrasting/disproportionate height and scale would be adverse for the

existing townscape character and condition, and harmful to the significance of the conservation area and the setting of nearby listed buildings.

- Harmful impact on the quality and character of key local and longer distance views of the Cathedral in conjunction with the new taller building. It would detract from its important historic and visual landmark status on the south bank and more immediate townscape, and also intrude on the distinctive silhouette and sky backdrop of its tower and roofline. The site forms part of the townscape/skyline back drop for the Cathedral when viewed from the LVMF Southwark Bridge river prospect.
- Resulting in a reduction in the extent and quality of public realm works within the London Bridge area. This scheme does not deliver the same permeability and public realm as previous schemes, and the amenity space are for occupier use only, in an area where the existing public realm condition is incredibly constrained.
- Lack of clarity in the application on the potential planning obligations and benefits that could be delivered. Query the construction routes to keep vehicles away from local sensitivities and manage the environmental impact.

408. Team London Bridge – TLB responds to applications that have the potential to deliver significant impact in the local area. TLB's responses aim to encourage investment that can help realise the priorities set by businesses in the area with particular focus on: public realm and greening; area identity; land use and active frontage; transport, servicing and network management; and environmental, social and governance.

409. TLB has considered the future of the site in response to earlier iterations of the plans for the site, during the development of the New Southwark Plan and responded to the pre-application consultation. The site's location means it provides significant opportunities to bring positive and welcome changes to London Bridge. The proposals will bring welcome improvements to the area. TLB welcome the improvements to buildings which are retained and the benefits brought by the refurbishment of a significant terrace of Georgian buildings on St Thomas Street. Opportunities are taken to replace some existing buildings which add little to the identity of the area, with contemporary office space. There are also significant benefits in terms of the use of embodied carbon from making more use of existing buildings. They are significantly improved on the earlier proposals, with a reduced impact on the conservation area.

410. TLB provide further comments, summarised as follows:

- Public realm and area identity: The character of Kings Head Yard makes an important and unique contribution to local identity, along with other inns and yards off Borough High Street. TLB worked with Better Bankside and the council to produce the "Inns and Yards Toolkit" to support better recognition and investment of these spaces. There is opportunity to add to the character of the yard through the detailing of the balconies, to create a distinct "placemark" to add to local character. Kings Head Yard needs to work as both a well-used through route and a place to linger and be designed and manged to minimise the risk of anti-social behaviour, which is a persistent problem. Security would be

assisted by having a well-used entrance to the building from Kings Head Yard, a managed loading area, and the screen at night. TLB welcome the reduced scale of the building from previous iterations, which more effectively addresses the context in which it faces. TLB welcome the improvements to the St Thomas Street frontage brought by replacing the entrance building, and welcome the refinements to this building. TLB think the developer has made concerted and sensitive efforts to deliver the Southwark Plan's Area Vision for London Bridge that development should "*support the creation of a distinctive world class environment through a mix of innovative new architecture, restored heritage and quality public realm that provides greenery and connectivity*".

- Greening: welcome the UGF and achieving greenfield run off rates, but question the feasibility of the additional greening shown in the busy pavement.
- Land use and active frontage: support the office use and welcome the affordable workspace to deliver benefits for the area.
- Transport, servicing and network management: acknowledge the site is constrained by the existing road layout but this proposal is an opportunity to agree a final plan for St Thomas Street functions, tie in with the council's Streets for People Delivery Plan for this area, and the ambition for a contraflow cycle lane. The widened pavement could be re-considered to better enable walking, cycling, waste and servicing on St Thomas Street. TLB would suggest a working group to look at this as details develop, and building in flexibility into the proposal to allow future access from the front. TLB welcome the intended reduction in the number of servicing vehicles by using off-site consolidation. The success will depend on the details of the provider's vehicles, frequency and timings. Using Kings Head Yard as a main servicing route requires continued sharing of a confined space with pedestrians and cyclists. TLB welcome the cargo bike promotion strategy. TLB has some concerns about the proposal for a loading bay across the pavement of St Thomas Street for waste collection, which could create conflicts on this busy pedestrian route. An off pavement location would be preferable. It will require strict management and should be done at periods that are not busy. For cycle access and parking, cyclists entering and leaving Kings Head Yard from Borough High Street risk being in conflict with heavy footfall and vehicular traffic at peak times, and vehicles using the narrow yard however, the proposed arrangement matches the existing arrangement. An alternative access to secure cycle parking off St Thomas Street could be preferable. The plans do not make provision for docked and dockless cycle hire, when managing dockless bikes is becoming an increasing priority.
- Sustainability: welcome the range of measures on sustainability performance, consider it should deliver BREEAM "outstanding", and could form part of a district heat network.

411. Wellesley Capital Investment Ltd – the owners and occupiers of The Old King's Head public house object for the following summarised reasons and ask the application be refused:
    - Daylight/sunlight impacts. The upper floors of the pub are in residential use. The proposal would result in severe losses in VSC and NSL, with

the proposal failing to meet the BRE guidelines and having substantial adverse impacts. The impact would break the occupiers' common law rights to enjoy light. Previous misapplication of the BRE methodology by the applicant's light advisers (GIA) misled councillors in a London Borough of Hammersmith and Fulham case. Ask for the daylight/sunlight assessment in relation to the severe loss of natural light to the spaces within the pub and residential space above to be reviewed by officers. The applicant's daylight report calculations and the judicial review decision of the London Borough of Hammersmith and Fulham case where the BRE guidance was not correctly applied are appended. The objector has commissioned its own review of the applicant's daylight information, which considers it clear that the monstrous bulk and mass would substantially minimise natural light to this neighbour, with reduced VSC and NSL values that are severe losses. This fails to meet the BRE guidelines and the extreme losses of light to well-lit rooms are a contravention of Southwark's policies. The scheme must be amended to allow sufficient light into the neighbouring rooms to allow them to enjoyed. Reference is made to two London cases to ensure the correct due diligence and fair reporting is applied.

- Heritage impact. The pub is not included in the section drawing/visual, which is needed to ensure this grade II listed building is given the detailed assessment it rightly deserves and with the narrowing of Kings Head Yard in this area. The proposal would sit 7-storeys above the 3-storey buildings in the Yard, and 8-storeys above the residential space in the pub. The heritage significance and use of the pub building must be given appropriate weight. The impact on daylight, sunlight and sense of enclosure would have a disastrously negative impact on the use of the internal spaces, and outlook from the front windows of the pub. Such a negative impact would plunge the public house and its residential spaces into darkness. This is likely to result in what could be a redundant public house and residential space that would not sustain or enhance the significance of the grade II heritage asset, nor its viable use consistent with its conservation and economic vitality. The decision made must take account of the requirements of paragraph 210 a) and b) of the NPPF. Urge officers to review the detail with the heritage assessment and HTVIA to take into account of importance and significance of the listed Old King's Head.
- No public access is being provided at or near the top of the tall building, and so fails to comply with policy P17.
- Residential amenity and separation distances. The proposal would bring the office building closer to the pub building. Ask officers to review the separation distance and if the 12m minimum between is not being achieved, the upper floors above three storeys need to be significantly set back or removed to retain the existing levels of amenity (privacy, overbearing impact, outlook, sunlight and daylight).

Consultation responses from external and statutory consultees

412. Active Travel England – has no comment.

413. Arqiva – is responsible for providing the BBC, ITV and the majority of the UK's radio transmission network and is responsible for ensuring the integrity of Re-Broadcast Links. Arqiva has considered whether this development will have an adverse effect on its operations and have concluded that it has no objection.

414. City of London – has no comment.

415. Conservation Area Advisory Group – CAAG joins with the Georgian Group to recommend the refusal of this application. This application is for an important part of one of Southwark's most precious heritage areas. Any map of the assets of this area will show its great significance to Southwark and how rich the historic townscape is in this area. CAAG's principal concerns are the dramatic alteration of the setting of the grade II* Guy's Hospital, the loss of light and space to the venerable St Thomas Street and the overbearing impact to the attractive and historic Kings Head Yard.

416. Many elements of this proposal are in conflict with the Borough High Street Conservation Area Appraisal which states:
    - "*St Thomas Street is a relatively complete C18th/early C19th setting*…"
    - "*The forecourt and buildings of Guys Hospital are notable as a complete piece of townscape*".
    - "*King's Head Yard is a pedestrian link through to the hospital*." "*The King's Head pub 1881 is listed and the approach to it through an arch is evocative of its origins*."

    This application fails to conserve and enhance the significance of these designated heritage assets and make a positive contribution to wider townscape character. The application is for a tall building that will harm rather than enhance the conservation area. Council policy states "*Tall buildings should be located within regeneration areas*." The site is not within a regeneration zone and is not appropriate for a tall building. The application will significantly diminish and damage, rather than enhance, the conservation area largely because of its height and bulk and the resulting impact of this on the surrounding, important, mainly listed, buildings and its fine 18th and 19th century townscape.

417. While the much taller Shard and adjacent tall buildings to the east and north form a backdrop, the existing office building, sited relatively centrally in this site and at its present five storeys, is largely hidden and has a limited impact on the important period buildings and spaces around it. The panel thought the 11-storey building now proposed is much too high and would transform what is left of the historic scene on St Thomas Street and the lovely quadrangle at Guy's Hospital and the historic and characterful Kings Head Yard. The panel thought a maximum of one additional storey on the present building, with a significant set-back on both sides, particularly the Kings Head Yard side, is all that could reasonably be considered. The creation of an atrium behind the Georgian houses on St Thomas Street seemed like a possible good idea.

418. Panel members noted that the proposed scheme would also have a serious impact on the historic and characterful Kings Head Yard. Noting comments in the Conservation Area Appraisal such as the "*former inn yards have strong townscape value in containing spaces*", "*The King's Head Yard pub 1881 is listed and approach through an arch is evocative of its origins*" and "*The*

northern side of King's Head Yard includes 2 storey colonnaded commercial buildings." The additional five storeys proposed on top of the existing building, and now extended in this scheme right up to the yard for much of its length, will loom unacceptably over and transform the scale and character of the space, while offering no significant interaction with it. The existing colonnaded and gabled curving run of two-storey building (which is of a scale appropriate to the yard) will disappear, leaving a much taller structure, extending right up to the historic yard, completely at variance with its nature, character and long history.

419. The yard space offers a big opportunity for the siting of bars, restaurants and possibly small shops along its length, making use of its character and the predominantly pedestrian nature of the space. The proposed building offers nothing to enliven and achieve the potential public benefit and vibrancy of this space in a popular and very central London area. The planned office use of the ground floor with its windows facing directly onto the yard, will do nothing to enhance the character, liveliness or night-time security of the space, which provides pedestrian access to its facilities and to the hospital for both staff and visitors from the High Street and the nearby tube station and bus stops. Its balconies appear unlikely to be used for more than occasional (smoking?) purposes during office hours. Its lightwells emphasise the building's separation and lack of interaction with the space.

420. The proposals for the redevelopment of Keats House were not thought contentious by CAAG. The proposed entrance building represents an improvement on the existing curved and arched structure. The general vertical arrangement of windows and piers seem in character with the adjoining listed terrace. Possible reservations relate to the buildings detailing and materials, particularly to appropriate selection of bricks etc. which need to be carefully chosen and relate well to the period terrace.

421. CAAG conclude that this application should be refused, particularly because of the inappropriateness of the size and height of the proposed office block and its impact on the area and on the grounds of the damage it will do to the setting of the surrounding conservation area and its important historic townscape and listed buildings.

422. Environment Agency – has no objection subject to conditions being included to prevent an unacceptable risk to the environment. The conditions relate to securing a preliminary risk assessment, verification report, unexpected contamination, no infiltration of surface water drainage, and no piling using penetrative methods without agreement. The submitted flood risk assessment provides an accurate assessment of the tidal and fluvial flood risks associated with the proposal. The council should consider the submitted FRA when deciding this application. Recommend that flood resistant and resilient measures are incorporated into the design and construction.

423. Georgian Group – provides advice to the council on its statutory remit of buildings dating from 1700 to 1840, and refers to three heritage assets. The Group recommends the council refuse this planning application. There would be less than substantial harm caused to Guy's Hospital at the mid-high level of the scale. The less than substantial harm to Borough High Street Conservation Area would be at the mid-level of the scale. The harm to the nos. 4-8 and 12-

16 St Thomas Street would be at the low-mid level of the scale. The Group reminds the council that in determining these applications, it should bear in mind the statutory duty of section 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

424. 1) Guy's Hospital is a grade II* listed complex of buildings which are an important surviving example of an 18th century hospital. The complex consists of the central entrance block by Thomas Dance (1728), east wing by James Steere (1738-41) originally but rebuilt following bomb damage in the Second World War and the Chapel and west wing by Richard Jupp (1774-7). The site has a formal arrangement with a large forecourt facing onto St Thomas Street and the quadrangles behind. The significance of the building does not only lie in its architectural appearance, but the planning of the site and the legibility of historic circulation routes and relationships between certain spaces. The setting of the building makes a considerable contribution to its significance. The setting of Guy's Hospital makes a considerable contribution to the significance of this grade II* heritage asset. The complex is intentionally laid out to form the front courtyard and two quadrangles behind, the experience of transitioning through these spaces and the building contributes to the setting and therefore significance of the building.

The proposal would have a harmful impact on the setting of Guy's Hospital owing to its height and positioning. The proposal would compete with the existing buildings on the site and have a negative impact on the experience of moving through the Hospital site and views within the site. This impact is evident views 16, 17 and view 18. The building would challenge the primacy of the west elevation of the North Quad where it sits directly behind the pediment on the façade.

425. 2) Borough High Street Conservation Area: Sub Area 4 – St Thomas Street of the conservation area is particularly relevant to this application. It is defined as 'Georgian Southwark' within the Conservation Area Appraisal and the early 18th century character of St Thomas Street is noted as being well preserved. This character is particularly evident from views from the east and west along the south side of St Thomas Street where the roofline is consistent, enhancing the character.

The proposed building would have a harmful impact on the significance of the Borough High Street Conservation Area through the impact on the character of sub area 4. This character is experienced through views down St Thomas Street from both the east and west where the consistent roofline of the terrace can be appreciated. HTVIA views 9, 10, 19 and 20 all show the harmful impact the building would have on the ability to appreciate the character of St Thomas Street and Guy's Hospital. The impact the development would have on Guy's Hospital is also applicable to owing to its inclusion within the conservation area.

426. 3) Nos. 4-8 and 12-16 St Thomas Street: The terrace of early 19th century former dwellings is grade II listed and makes a positive contribution to the Borough High Street Conservation Area and the character of St Thomas Street. It is noted that the buildings have been subject to internal alterations

during the 1980s which has had an impact on the surviving fabric and works are the subject of the separate LBC application. The office building would cause harm to the setting of the early 19th century terrace along St Thomas Street owing to the impact it would have on the consistent roofline along the south side of St Thomas Street. This harmful impact would alter the character of sub area 4 of the Borough High Street Conservation Area.

427. GLA – considers the planning application does not yet comply with the London Plan but that the possible remedies could address these deficiencies. London Plan policies on office development, urban design, heritage, sustainable development, transport and environmental issues are relevant. The GLA is supportive of the partial redevelopment of the site and uplift in office space, the provision of affordable workspace, the level access and sense of arrival to the development, the positive addition of the pocket garden on Kings Head Yard, UGF, the whole life-cycle carbon and circular economy aspects. The GLA notes the architecture has developed well since the GLA pre-application to give a more unified appearance.

While the proposal is supported in principle, the GLA considers the application does not fully comply with these policies, as summarised below:

- Land use principles: The proposal for the partial redevelopment of the site to provide additional office floorspace within the CAZ is strongly supported in land use terms. The provision of affordable workspace is welcomed and should be secured within the s106 agreement.
- Urban design and heritage: The proposed layout is supported and the site is within an area identified as suitable for tall buildings. The building would be prominent in local views, in contrast with the historic scale and character of the historic terraces in the immediate vicinity. Less than substantial harm has been identified to several heritage assets which would need to be weighed against the public benefits of the scheme. The GLA considers there to be a low-middle extent of less than substantial harm to the Borough High Street Conservation Area. A middle extent of less than substantial harm would occur to Guy's Hospital, nos. 4-16 St Thomas Street and to the Bunch of Grapes public house. A low level of less than substantial harm would occur to nos. 9, 9A, 11-13 and no. 15 St Thomas Street, the Southwark Street group and Borough High Street group. Very low levels of less than substantial harm would occur to Southwark Cathedral, the Post Office, Riverfront group, and the Thrale Street Conservation Area.
- Sustainable development: The proposal would result in a 36% reduction in carbon emissions against Part L which falls short of the zero carbon target, but is in excess of the minimum target. A carbon offset payment and "be seen" monitoring provisions should be secured within the s106 agreement. The partial retention of the existing structures is strongly supported and the circular economy and whole life carbon approaches are fully compliant with London Plan policy.
- Transport: Improvements to active travel routes should be committed to. A contribution to the adjacent cycle route should be secured. The impact on pedestrian flows should be clarified and mitigation secured as required. There is insufficient disabled parking identified and electric charging spaces should be provided. Cycle parking storage should be amended to be LCDS compliant. There are issues around servicing that

need to be addressed. A delivery and servicing plan and travel plan need to be secured. Further discussion is required regarding construction logistics.

- Environmental issues: The development would provide an UGF score of 0.307 and achieve biodiversity net gain of 172%, which is fully supported. The air quality strategy is fully compliant, subject to the imposition of conditions.

428. Historic England – These new plans for New City Court represent a more modest scale of development than the previous schemes for the site, and as such would no longer affect highly significant heritage sites in the wider vicinity such as the Tower of London World Heritage Site. However, the scheme would still fail to respond to the character and appearance of the Borough High Street Conservation Area through its overbearing scale, massing, and acontextual design. It would cause considerable harm to the conservation area and a number of its component listed buildings, particularly Guy's Hospital. HE is therefore unable to support the proposal and strongly recommend that amendments are made to the scheme to reduce the harm and better respond to the national and local planning policy.

429. HE has significant concerns with the proposal due to considerable harm it would cause to the Borough High Street Conservation Area and its component listed buildings, especially Guy's Hospital. HE considers these proposals would conflict with national and local planning policy, and is therefore unable to support them at this time. While HE recognises that the site has potential for redevelopment, it also notes that it is constrained by its location in the backland of London's most important historic high streets, and bounded to the east by one of London's principal sets of classical 18th century public buildings. HE therefore strongly recommends that design changes are explored through refinements to the proposed building's scale, massing and façade treatment, alongside the retention of the historic façade along Kings Head Yard.

430. 1) Conservation Area:

- The proposals would affect three of the four sub areas of the Borough High Street Conservation Area. Although the scheme would largely redevelop within the existing footprint, its height would be at odds with the prevailing scale of buildings (mainly between three and five storeys) lining Borough High Street and along St Thomas Street. In views of Borough High Street from Southwark Street/Stoney Street (HTVIA view 14) the proposals would be a large and incongruous presence, undermining the high quality and fine grain of its townscape. The jarring juxtaposition would be emphasised by the very close proximity of the proposal, set just behind the largely continuous frontages of buildings on the high street. This would erode the perception of the high street buildings as evolving from ancient burgage plots and invert their hierarchy by introducing a taller building in the backland of smaller frontage buildings. Although Guy's Tower and the Shard Quarter building have harmed the views from Borough High Street, these appear at a greater distance, preserving the "breathing space" which allows the depth of the urban grain and spatial hierarchy of the high street to be appreciated.

- In views along Kings Head Yard, the loss of most of the hop store façade would erase a vestige of the hop trade infrastructure which was such a key part of 19th century Borough's commercial activity and remains a characterful presence in the conservation area. Its demolition would reduce the Victorian character of Kings Head Yard, undermining the conservation area's significance and the complementary surroundings of the listed The Old King's Head public house. The adverse impact to both assets would be compounded by the larger height and predominantly glazed character of the replacement building which would loom above Kings Head Yard and the pub, detracting from the enclosed character of this part of the conservation area.
- In views along St Thomas Street (HTVIA views 19 and 20), the proposals would be seen rising above its currently unbroken roofline of predominantly listed buildings, undermining the clearly defined formal architectural character found in this part of the conservation area. It would erode the sense of arrival at the conservation area, and its almost uniform human-scale of architecturally distinguished historic buildings quite distinct from the high-rise built environment to the north and east. In these views, the proposals would detract from the visual prominence of the tower of the former Church of St Thomas, a key part of its architectural interest as a grade II* listed building, reducing its role as an important landmark in the conservation area.
- For these reasons, the proposals would harm the character and significance of the Borough High Street Conservation Area. The harm would be considerable, even if "less than substantial" in the language of the NPPF. The proposal would also harm the significance of some of the listed buildings within the conservation area; the harm would be less than substantial, but of a lower degree.

431. 2) Guy's Hospital.

- From the forecourt (HTVIA views 17 and 18), the scheme would appear directly behind the west wing, rising above its currently unbroken roofline. The proposal would appear to rise out of the central pediment, undermining the architectural meaning of its crowning feature, and the axial arrangement of the forecourt. From both the forecourt and the rear courtyards (view 16), the visibility of the proposal above the roofline would erode the carefully balanced symmetrical composition and collegiate character of the Hospital, and the sense seclusion from these enclosed spaces. The fenestration arrangement of the proposed development, while seeking respond positively to the architecture below, would draw more attention to the new development, distracting and competing with the west wing.
- The submitted daylight and sunlight assessment concludes that the proposal would have a "moderate adverse effect" to the natural light within the ground floor. It therefore appears likely that the proposed extension would lead to a reduction of natural light through the stained-glass windows of the Hospital Chapel, reducing an appreciation of its interior and eroding the environmental qualities

that make the chapel such a special place for contemplation and reflection.

- The presence of the proposed building above the west wing of Guy's Hospital would harm its significance by detracting from both its architectural and historic interest. The harm would again be less than substantial, but given the importance of the building's composition to its significance, the degree of harm would be considerable; and would be compounded by the likely loss of light within the Chapel.

432. 3) Cathedral:
    - In the assessed views of Southwark Cathedral from Montague Close (views 5 and 6) the proposals would be just visible in glimpsed views from Montague Close. It would have a negligible impact on its setting and any harm would be very limited.

433. 4) Tall building policy:
    - At double the height of the prevailing scale of buildings surrounding the site, and of a design that does not relate to the clearly defined character found in this part of the conservation area, HE would strongly question whether the proposals would satisfy the P17 policy tests of a tall building having "*a height that is proportionate to the significance of the proposed location and the size of the site*", and "*respond positively to the local character and townscape*". While close to the Shard Quarter, there remains a sense of separation between the tall buildings cluster and conservation area as noted in the appeal decision (section 13.55). It was concluded that the appeal schemes "*would be experienced as a 'bleeding in' to the conservation area of the modern skyscraper developments*". It is HE's opinion, that this 'bleeding in' would still be apparent through the overbearing scale and design of the current proposals.
    - The principle of a tall building on site will ultimately be a matter for the council. However, in HE's view, the acceptability of a tall building within any part of the Borough High Street Conservation Area (much less a part of it that is central to its character and appearance where it would cause considerable harm), should be strongly resisted.

434. 5) Suggested amendments:
    - In line with paragraphs 208 and 219 of the NPPF, HE strongly recommends that design changes are pursued to minimise its visibility from Guy's Hospital, and to better preserve/enhance the character of the conservation area. This could be achieved by setting back the upper floors on the Borough High Street and Guy's Hospital sides so they are less assertive and more recessive. Simplifying the design of the east elevation would help reduce its impact when viewed from the Guy's Hospital forecourt. HE suggests that opportunities to reflect daylight back into the Hospital Chapel through the elevational treatment are considered.
    - HE recommends that the hop sample room facade is retained and incorporated into the design to better preserve the yard's intriguing and intimate historic character when experienced on the approach to and within Kings Head Yard. HE would welcome opportunities to

further enliven the yard through the creation of active frontages along the facade.

435. 6) Heritage benefits:

- The harm HE has identified requires clear and convincing justification, and would need to be weighed against the public benefits of the application in accordance with paragraphs 213 and 215 of the NPPF respectively.
- These current plans for the listed terrace are much more restrained than the previous schemes, and the addition of a courtyard roof to their rear elevations would further erode the legibility of their historic plan form.
- While the proposed activation of (currently inactive) front doors, and the proposed replacement entrance building along St Thomas Street would be beneficial to the streetscape, the heritage benefits would be very limited in HE's view.
- These would derive from proposals which would cause considerable harm to one of London's finest conservation areas and one of its principal sets of classical 18th century public buildings.

436. For the listed building consent application ref. 24/AP/3804, HE considers that the works raise no significant issues, and that the council should determine that application in accordance with national and local planning policy and with the council's specialist conservation advice. HE has drafted the necessary letter of authorisation for the council to determine the application as it sees fit and have referred this to the National Planning Casework Unit (NPCU). The council will be able to issue a formal decision as the NPCU has returned the letter of authorisation.

437. London Fire Brigade – has no observations to make. Comments about access to water and fire brigade access have been shared with the applicant.

438. London Underground – has no objection in principle, but there are a number of potential constraints on the redevelopment of a site situated close to underground tunnels and infrastructure. LU request that planning permission be subject to conditions to be discharged in a phased manner, regarding infrastructure protection prior to enabling works, demolition, sub-structure construction and superstructure construction. LU has also asked for an informative to be included.

439. Metropolitan Police – asks for discussions with the applicant on the details and recommends pre-commencement and pre-occupation conditions regarding Secured by Design.

440. NATS – has considered the proposal from an air traffic safeguarding aspect and has no objection.

441. Network Rail – has no comment.

442. Port of London Authority – provided comments. The PLA's key interest is on the health of the river and enabling effective use of the River Thames alongside development. Consideration should be given to the potential use of the river

through the supply chain for the transportation of construction materials and waste where possible. The Southwark Plan and London Plan support the use of passenger transport piers (within the London Bridge Area Vision AV.11, policies P25 and SI15 respectively), however the submitted travel plan does not refer to the close proximity of river bus services. The applicant should consider measures to encourage river bus use, such as promotion of pedestrian and cycle access, healthy streets approach or developer-led piers. The PLA would like to see further consideration and promotion given to the use of the River Bus as an alternative form of sustainable transport, given the proximity to the River Thames and in particular London Bridge City Pier.

443. Thames Water – request conditions regarding waste water capacity, water network infrastructure, piling method statement, and informatives based on Thames Water's comments would provide further advice to the applicant. In response the applicant provided further information and has been in discussion with Thames Water directly.

444. TfL – made comments, summarised into 7 topics as follows.

1) Healthy Streets Transport Assessment

- The application is supported by a full Healthy Streets Transport Assessment, however there is no commitment to any improvements.
- TfL is concerned about increased pedestrian flows and pressure on the St Thomas Street/Borough High Street junction, which is already extremely busy. The Pedestrian Comfort Level assessment provided does not include this junction. Disappointed the new direct entrance from the Underground station that was included in previous schemes isn't included, as this would have helped relieve pressure on this junction.
- TfL aspires to deliver a contraflow cycle track along St Thomas Street, along with other Healthy Streets improvements, such as footway widening. Presently, St Thomas Street is one-way only for cyclists and vehicles; a contraflow track would greatly improve cycle access to the development. TfL requests £200,000 towards the Healthy Streets scheme on St Thomas Street, in line with policies T3 and T4 and other approved developments in the area. This would also help towards mitigating the impacts on the busy junction.
- Further discussion surrounding the landscape proposal for St Thomas Street is required to ensure that it does not undermine the recent footway widening scheme and/or the Healthy Streets scheme. This could be done via the s278 process, with the wording to have flexibility if the detail is not agreed prior to Stage 2 referral.
- A contribution to Legible London (£22,000) would provide two new signs and four existing sign map refreshes.

445. 2) Public transport impacts

- From the trip generation provided, TfL does not expect a residual impact on the public transport network. Other developments in the St Thomas Street cluster have contributed towards bus infrastructure, however TfL considers a contribution towards Healthy Streets to mitigate impacts on walking and cycling is vital.

446. 3) Cycle parking
- Cycle parking does meet the minimum quantity standards in policy T5.
- Design amendments will be required prior to determination to align meet the London Cycle Design Standards to address areas of non-compliance. The mix of stands is not suitable, their spacing and those within the servicing area etc.

447. 4) Car parking
- The site is proposed to be car-free, which is in line with policy T6. One disabled parking space is proposed on-street, which does not strictly meet the policy requirement.
- An audit of (and improvements if required) routes from the front doors of the development to bus stops and station entrances within the vicinity, in terms of accessibility.
- Electric vehicle charging for the car parking should be provided.

448. 5) Deliveries and servicing
- Further discussion surrounding the on-street loading bay is ongoing with council officers. Although on-street servicing is not ideal, TfL accept the site constraints means that a degree of on-street loading for larger vehicles is required, and so accept the loading bay on St Thomas Street. This will need to be delivered via the s278 agreement with TfL.
- TfL has concerns with the proposed consolidation of the servicing arrangement, which while welcomed and required to minimise vehicle movements in this very busy and constrained area, it has not been demonstrated how this will be possible. Therefore it is unclear whether suitable space for servicing has been provided. Further details of the off-site freight consolidation strategy are needed.
- Deliveries should occur outside of peak hours, with shared deliveries and use of cargo bikes maximised, liaising with Team London Bridge and other businesses in the area.
- A delivery and servicing plan should be secured through condition.

449. 6) Construction logistics
- The construction proposals include an off-carriageway pit lane with a pedestrian gantry on St Thomas Street, which is acceptable in principle, subject to agreement of the detailed layout via the TfL licensing process, marshalling, and provision of swept path analysis. Question why the length of loading bay is needed for a peak of 12 vehicles a day. Peak travel hours should be avoided and restricted given the high pedestrian flows.
- Requested information on the deliveries via van on Kings Head Yard.
- Requested information on how the relocation of Sheffield stands and bollards for the pit lane.
- Asked for a stronger commitment to use of cargo cycles.
- Co-ordination with other developments coming forward in the area would be needed.
- Cycle parking for contractors should be provided from the outset, along with changing facilities and lockers etc.

- TfL strongly encourages the use of construction contractors who are registered on the Fleet Operator Recognition Scheme at a minimum silver level. TfL also encourages the developer to adhere to the CLOCS standard.
- A construction logistics plan should be secured through condition.

450. 7) Travel plan
    - A full travel plan should be conditioned, including measures to encourage active and sustainable travel and with more ambitious targets to encourage cycling.

451. UKPN – provided detailed comments on the proximity to a substation. These comments were passed to the applicant team as they relate to Party Wall Act, access requirements, underground cables etc.

452. Other consultees such as the Civil Aviation Authority, Heathrow Airport, Historic Royal Palaces, London Borough of Tower Hamlets, Natural England and the Victorian Society did not respond.

Consultation responses from internal consultees

453. CCTV team – the proposal would not impact the current CCTV system and network, and ask for provision of roof space to enable future re-routing or expansion of the council network.

454. Environmental protection team – considers the submitted noise assessment report is sufficient to inform the design and plant requirements (with a proposed plant noise condition). The proposed development is expected to have minimal impact on local air quality due to low trip generation and the absence of combustion plants. The air quality impact would be minimised by the implementation of a CEMP (with a proposed condition). A land contamination condition is also recommended for a preliminary risk assessment, a phase 2 intrusive investigation and to cover any unexpected contamination.

455. Flooding and drainage team – requested more information on the location of the proposed rainwater harvesting system, blue roofs, attenuation tank and connections, the calculations for the runoff rates, flow control, attenuation volume, and maintenance. This was provided by the applicant in three rounds of further information, to the drainage team's satisfaction and two drainage conditions are proposed.

456. Highways development management – has no issues from a highways perspective. Some of the alterations to adopted highway would occur on St Thomas Street and the applicant would be required to enter in section 278 agreement with TfL to implement the highway improvement scheme. The existing carriageway surface on Kings Head Yard is uneven and to enhance public realm within the vicinity of the site, resurfacing would be required using mixed greys of granite natural stone setts. The applicant would be required to enter into section 278 agreement to implement highway improvement scheme on Kings Head Yard. Street lighting units are current mounted on the building façade on Kings Head Yard. Temporary street lighting as part of construction

management plans would need to be provided on Kings Head Yard during development works. The proposed conversion of the basement level does not affect the integrity of the existing adopted highway in terms of supporting structures. An approval in principle both temporary and permanent for highway retaining structures would be required if the basement walls and foundations are affected during demolition of any part of the existing structure.

457. Local economy team – are supportive of the proposal with an uplift in employment space and provision of on-site affordable workspace. The team provided the figures for the construction phase and end phase jobs and training opportunities that have informed the proposed planning obligations.

Re-consultation

458. With the amendments made to the proposed design in May 2025, re-consultation was carried out with some consultees and those who had commented on the planning application. The one objection received from a near owner and from another Hospital organisation are summarised below, as well as the responses from external consultees which include significant concerns from Historic England.

459. Wellesley Capital Investment Ltd – the amendments are not sufficient to overcome the previous objection and adverse impact on The Old King's Head. Ask that the objections be given thorough consideration and the redevelopment reconsidered.
    - In terms of daylight impacts, there would be substantial losses of VSC and daylight distribution within the pub. The testing by Wellsley's own surveyors found 50 of the 53 windows would experience a reduction in VSC of at least 20% (50 windows with more than a 40% loss), 9 of the 10 rooms tested would experience a reduction in VSC of at least 20% (5 rooms with over a 40% loss). The daylight distribution would be reduced to 6 of 10 rooms, 5 with greater than 40% loss. This breaches the occupiers' common law rights to enjoy light.
    - Heritage impact on the grade II listed pub. Feel the pub is not given significant weight in the HTVIA addendum. The proposal would sit 7-storeys higher than the 3-storey yard buildings and 8-storeys above the residential spaces on the second floor of the pub. The impact on daylight and sense of enclosure would have a disastrously negative impact on the use of the internal spaces and outlook from the front windows. It would plunge the public house and its residential space into darkness, and likely result in a redundant public house and residential space that would not sustain nor enhance the significance of the grade II heritage asset, nor its viable use consistent with its conservation and economic vitality. Note that Historic England object to the amended scheme, with considerable harm to the conservation area and its component listed buildings, to conflict with national and local planning policies. If granted, it is reasonable to suggest the decision will not have taken account of the requirements of paragraph 210 a) and b) of the NPPF (which require the LPA to take account of: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable use consistent with their conservation, and; the positive

contribution that the conservation of heritage assets can make to sustainable communities including their economic vitality), and urge officers to review the details and take account of the importance and significance of the Old King's Head and surrounding listed buildings.

- Lack of public access at or near the top of the tall building means the scheme does not comply with policy P17.
- Residential amenity impact by not having any set back from Kings Head Yard, and is below the minimum 12m between front elevations in the Residential Design Standards SPD. The proposed upper floors above three storeys need to be significantly setback if not removed to comply with the minimum and retain the existing amenity from privacy, overbearing impact, outlook, daylight and sunlight.

460. Guy's and St Thomas' NHS Foundation Trust – the Trust's priority is ensuring that there are no harmful impacts from the development on the operations and day-to-day functions of its assets.
    - Loss of privacy and amenity for patients and occupiers of the offices and hospital to the east of the site, sense of enclosure. It is not clear what boundary treatments are proposed to the terraces. The separation is approximately 100m from the site to the hospital, however given the proposed height and adjacency to the hospital with sensitive occupiers, the proposal must protect the amenity of the existing occupiers and prevent unacceptable overlooking or sense of enclosure. Ask for a condition to ensure privacy screening be installed prior to use of the terraces. A condition should be included to prevent other roof spaces being used as terraces.
    - Servicing impacts: as that the servicing via Kings Head Yard be conditioned. Asks for clarification on where the inset loading bay would be (to not have a negative impact on emergency vehicle access to the Hospital), and that hours of use be conditioned.
    - Impact on daylight and sunlight to the chapel, but others areas of the hospital and its courtyards have not been tested.

461. Georgian Group – the amendments do not address the Group's previous comments and reinforces its earlier response.

462. Historic England – considers that the HTVIA indicates the amendments would result in a very minor change to the overall appearance of the proposed development in these key heritage views. They would not reduce the impact nor resulting harm to the Borough High Street Conservation Area nor Guy's Hospital to any meaningful extent. HE notes that the updated daylight and sunlight report for Guy's Chapel continues to identify a "moderate adverse" to natural light within the ground floor which is consistent with the original assessment. On the basis of the updated information, HE considers the level of harm to be broadly consistent with that identified in its original advice letter. HE continues to have significant concerns with these proposals due to considerable harm they would cause to the Borough High Street Conservation Area and its component listed buildings, especially Guy's Hospital. HE considers these proposals would conflict with national and local planning policy, and is therefore unable to support them at this time. While HE recognises that the site has potential for redevelopment, it also notes that it is constrained by its

location in the backland of London's most important historic high streets, and bounded to the east by one of London's principal sets of classical 18th century public buildings. HE strongly recommends that further design changes are explored through refinements to the proposed building's scale, massing and façade treatment, alongside the retention of the historic façade along Kings Head Yard.

463. Thames Water – requested conditions and informatives.

464. TfL – provided further comments on three topics following the revised and additional information provided:
- Healthy Streets contribution: The St Thomas Street Healthy Streets scheme aims to improve the walking and cycling environment, including through providing a cycle lane. Request a contribution of £135,507.
- Cycle parking: Has no further comments on the latest cycle parking revisions.
- Delivery and servicing: Welcome that the cycle stands have been removed from the servicing area. Note that deliveries will be timed to avoid 8-9am and 5-6pm. Servicing should be limited to 10am-4pm (outside of network peak hours) to reduce potential impacts on the TLRN, pedestrians and cyclists. Request that a cap on servicing numbers is applied to ensure that there is no detrimental impact of servicing on Kings Head Yard or Borough High Street, with a bond if the numbers go above the agreed amount.

Community impact and equalities assessment

465. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights.

466. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.

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

1. The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act

2. The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:

    - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
    - Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it

- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low

3. The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.

468. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

469. An Equalities Impact Assessment (EqIA) has been submitted with the planning application. The site is located within a ward that is very deprived with 8 of the 10 rankings among the 50% most deprived neighbourhoods in the country for overall deprivation in the English Indices of Deprivation. The ward scores particularly low for “barriers to housing and services” and “living environment” and scores well for “education, skills and training” and “employment”.

470. There is a higher proportion of people of working age in this ward (and responding lower percentages of children and older people), compared with the Southwark, London and national averages. Age related deprivation is an issue for the ward, with higher levels of poverty than the Southwark and national average. In the ward, 12.3% of residents are disabled for the Equalities Act purposes, which is lower than the Southwark, London and national average.

471. The equality impacts identified from the planning proposal include:
- The proposed office scheme has limited potential to have direct impacts on children and young people, but by providing additional employment in the extended offices may have a positive impact on these dependent groups.
- The main entrance to the office would be revised to give a sloped access (removing the existing stairs and ramp) within the public realm. The extended building would have step-free floorplans, and provide accessible toilets and two accessible showers in the basement as part of the cyclist facilities. Lift access to all floors of the extended office building would be provided. These accessibility improvements would be a positive impact on older people and those with disabilities.
- Seating is incorporated within the public realm and communal roof terraces. This would be of benefit for those with disabilities, age or the pregnancy and maternity protected characteristics.
- Whether an alternative means of access between the floors of the Georgian terrace would be included is being reviewed by the applicant, and may require a further listed building consent for those extra works. Without a lift, the internal access would remain as it currently is with an improvement of removing the external step up to each front door.
- The existing car parking spaces on site would be removed; these may be used by older, disabled, or pregnant people. The proposed scheme would remain accessible by a range of public transport means, and has nearby blue badge parking.

- An on-street blue badge parking space would be removed during the construction phase, removing this facility on a temporary basis. This space is currently available for use by those with the disability protected characteristic.
- No notable differential or disproportionate impacts have been identified on individuals with the protected characteristics of race, gender reassignment, marriage or civil partnership, religion or belief, sex, or sexual orientation.

472. The temporary loss of the existing office space during the construction work would affect the businesses and individuals who currently work in the offices. No high proportion has been identified of any particular protected group currently work in the offices on the on-site, and therefore the loss of the existing offices during the demolition and construction phases do not raise a particular equalities impact. Some may businesses may choose to return to the completed building at the end of the construction works.

473. The proposed renovation and extension scheme incorporates inclusive design features for the future staff and visitors to the site, which would improve on the existing. The jobs and training which the extended offices would provide would improve opportunities for people with a range of protected characteristics to be equipped with the skills and knowledge to access the employment opportunities, to return to work, to be and stay financially independent, and to start or grow a business. The affordable workspace would provide employment opportunities, including for those with protected characteristics such as race, disability, gender and sex. The proposal would provide new accessible public realm. One on-street blue badge would be removed temporarily during construction, and signage to alterative blue badge parking would be needed during this period. Car parking spaces would be removed from the site, however it is located in a central London location with ready connections for walking, cycling and various accessible public transport modes.

Human rights implications

474. This planning application and listed building consent application engage certain human rights under the Human Rights Act 1998 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.

475. The planning application has the legitimate aim of proposing the redevelopment of the site, retaining parts of the existing structure and extending it to provide further office accommodation. The listed building consent application has the legitimate aim of renovating and carrying out works to the grade II listed Georgian terrace. The rights potentially engaged by these applications, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

Positive and proactive statement

476. The council has published its development plan on its website together with advice about how applications are considered and the information that needs to

be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

477. The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and submissions that are in accordance with the application requirements. The applicant engaged in the pre-application service for this scheme, and written feedback was provided (ref. 24/EQ/0078) in December 2024. Additional information and amendments were requested during to the applications' assessment to allow a positive recommendation of both applications.

Positive and proactive engagement: summary table

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

CONCLUSION

478. The current scheme is the third to be proposed on this site and follows on from the 2018 and 2021 proposals that were the subject of a public inquiry. It is significantly different to the two earlier schemes that were dismissed by the Secretary of State, in its approach to retaining the existing structure and its lower height and massing. This change in approach is welcomed.

479. The proposed alterations and extensions would deliver high quality office space, an increase in office space (which is supported in this CAZ and Opportunity Area location) and would deliver additional jobs on the site. The affordable workspace within the Georgian terrace as 10% of the uplift in floorspace is another public benefit.

480. The proposed extensions would result in an 11-storey tall building. As established in the appeal decision, the site is within an area where a tall building would be acceptable in principle, and the site is at a point of landmark significance. The height is now proportionate to the significance of the location. It would sit higher than its immediate context of this historic part of Borough High Street, although its massing, architecture and lower floors respond well to the local character and streetscape - but it would cause heritage harms. It

would not harm protected views. Two small areas of public realm are provided, with the site constrained by the retained building, the heritage assets and servicing yard. The lower parts of the proposal to extend Keats House, replace the entrance building and retain part of the Kings Head Yard façade are welcomed elements of the proposal and would deliver a high quality design.

481. Elements of the scheme are positive changes that would enhance the character of the Borough High Street Conservation Area and significance of heritage assets, such as the improvements to Keats House and replacement of the entrance building. There would be harms to the conservation area from the tall building and removal of most of the Victorian screen. The level of harm is considered to be a middle level of less than substantial harm to the character and appearance of this conservation area. For the listed building impacts, it is considered that the proposal's scale, bulk and height would cause less than substantial harms to listed buildings on the site and around the site (Southwark Cathedral, Guy's Hospital, 9, 9a and Mary Sheridan House, The Old King's Head public house, the Georgian terrace, and the nos. 41-47 Borough High Street).

482. Other areas of planning assessment on green infrastructure, archaeology, transport and highways, environmental matters, sustainability, networks, digital connectivity and aviation find the proposal to accord with policies, subject to conditions and securing planning obligations to ensure policy compliance and secure mitigation.

483. Objections to the planning application were made by the nearby Old King's Head pub (about the harm to its residential amenity and the listed building). Objections in terms of heritage harms to the Borough High Street Conservation Area and nearby listed buildings were made by the Georgian Group and the Conservation Area Advisory Group. Significant concerns were raised by Historic England, and Southwark Cathedral raised concerns. The small amendments made during the application were insufficient to overcome these objections and concerns. The less than substantial harms were noted by the GLA in its Stage 1 response. Team London Bridge consider the proposal would bring welcome improvements to the area, and gave comments on the public realm, greening, active frontages, servicing and sustainability. Guy's and St Thomas Foundation supports the principle of the redevelopment but raises concerns with servicing, construction phase impacts, and amenity impacts. Guy's and St Thomas' NHS Foundation Trust raised concerns about the loss of privacy and amenity from the tower and its terraces, servicing impacts and daylight/sunlight impacts.

484. The planning application would cause harm to the setting of nearby listed buildings and to the character of the Borough High Street Conservation Area. The proposal would cause harm to the amenity of a neighbouring property from the loss of outlook and daylight to the residential accommodation within The Old King's Head pub. Other residential neighbours would experience some loss of daylight. These harms cannot be mitigated without significant amendments to the current scheme and have been given careful consideration when reaching a recommendation on this scheme. As set out in the planning balance section of the assessment above, the package of planning benefits

from the proposal have been considered and on balance has been found to outweigh these heritage and neighbour amenity harms.

485. Therefore for the planning application ref. 24/AP/3803:

1. The proposal is recommended for approval, subject to conditions (see the recommendation in appendix 1), the completion of a section 106 legal agreement and referral to the Major of London for Stage 2; and
2. That the Planning Committee in making its decision has due regard to the potential equalities impacts that are outline in this report; and
3. In the event that the requirements of paragraph 1 above are not met by 31 October 2025, the Director of Planning and Growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 383 of this report.

486. For the LBC application, the proposal demonstrates that it conforms with the Listed Building and Conservation Areas Act (1990) as amended and updated. It complies with current policy to preserve and enhances the heritage asset and its setting, provide good design, and has no issues raised by statutory consultees. It is therefore recommended that Listed Building Consent for the works in application ref. 24/AP/3804 be granted subject to conditions (see the recommendation in appendix 2).

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Resource Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 1017 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Recommendation for the planning application (draft decision notice)
Appendix 2	Recommendation for the LBC application (draft decision notice)
Appendix 3	Relevant planning policy
Appendix 4	Planning history of the site and nearby sites
Appendix 5	Consultation undertaken
Appendix 6	Consultation responses received

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth
Report Author	Victoria Crosby, Team Leader, Strategic Applications Team
Version	Final
Dated	8 July 2025
Key Decision	No

CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	**Comments Sought**	**Comments included**
Strategic Director, Resources	No	No
Strategic Director, Environment, Sustainability and Leisure	No	No
Strategic Director, Housing	No	No
Date final report sent to Constitutional Team		9 July 2025

APPENDIX 1

Recommendation for the planning application

This document shows the case officer's recommended decision for the application referred to below.
This document is not a decision notice for this application.

Applicant	GPE (St Thomas Street) Limited	**Ref. Number**	24/AP/3803
Application Type	Major application		
Recommendation			

Draft of Decision Notice

for the following development:

Redevelopment of the site to include:
- Redevelopment of the existing 1980s office building with partial demolition (including demolition of the St Thomas Street entrance building and the King's Head Yard facade); the construction of side extensions and upward extension to add 5 storeys and create a 10-storey office building plus plant, balconies and roof terraces;
- Redevelopment of Keats House (nos. 24-26 St Thomas Street) with retention of the historic frontage and construction of a roof extension to add one storey of office floorspace;
- Restoration and refurbishment of the listed Georgian terrace (nos. 4-16 St Thomas Street) to create level front entrances to the offices, internal alterations and new glazed roof to the rear courtyard (with separate LBC application ref. 24/AP/3804);
- Associated public realm and highway works to St Thomas Street and King's Head Yard, cycle parking and all ancillary works.

New City Court 4-26 St Thomas Street London SE1 9RS

In accordance with application received on 23 December 2024 **and Applicant's Drawing Nos.**:

Time limit for implementing this permission and the approved plans

1. The development shall be carried out in accordance with the following approved plans:

TO BE CHECKED
[Proposed Main Building
STY-ORM-ZZ-0-DR-A-12200 – Proposed Ground Floor Plan Rev C03
STY-ORM-ZZ-1-DR-A-12201 – Proposed First Floor Plan Rev C02
STY-ORM-ZZ-2-DR-A-12202 – Proposed Second Floor Plan Rev C02
STY-ORM-ZZ-3-DR-A-12203 – Proposed Third Floor Plan Rev C02
STY-ORM-ZZ-4-DR-A-12204 – Proposed Fourth Floor Plan Rev C02
STY-ORM-ZZ-5-DR-A-12205 – Proposed Fifth Floor Plan Rev C02

STY-ORM-ZZ-6-DR-A-12206 – Proposed Sixth Floor Plan Rev C02
STY-ORM-ZZ-7-DR-A-12207 – Proposed Seventh Floor Plan Rev C02
STY-ORM-ZZ-8-DR-A-12208 – Proposed Eighth Floor Plan Rev C02
STY-ORM-ZZ-9-DR-A-12209 – Proposed Ninth Floor Plan Rev C02
STY-ORM-ZZ-10-DR-A-12210 – Proposed Tenth Floor Plan Rev C02
STY-ORM-ZZ-11-DR-A-12211 – Proposed Eleventh Floor Plan Rev C02
STY-ORM-ZZ-LG-DR-A-12249 – Proposed Lower Ground Floor Plan Rev C03
STY-ORM-ZZ-AA-DR-A-12415 – Proposed Section AA Rev C02
STY-ORM-ZZ-BB-DR-A-12420 – Proposed Section BB Rev C02
STY-ORM-ZZ-CC-DR-A-12425 – Proposed Section CC Rev C02
STY-ORM-ZZ-CC-DR-A-12426 – Proposed Section DD Rev C02
STY-ORM-ZZ-NO-DR-A-12600 – Proposed North Elevation Rev C02
STY-ORM-ZZ-EA-DR-A-12601- Proposed East Elevation Rev C02
STY-ORM-ZZ-EA-DR-A-12602 – Proposed East Beak Alley Elevation Rev C02
STY-ORM-ZZ-SO-DR-A-12603 – Proposed South Elevation Rev C02
STY-ORM-ZZ-WE-DR-A-12604 – Proposed West Elevation Rev C02
STY-ORM-ZZ-WE-DR-A-12605 – Proposed West Courtyard Elevation Rev C02
STY-ORM-ZZ-ZZ-DR-A-20000 – Bay Study Axonometric Key Rev C01
STY-ORM-ZZ-NO-DR-A-20001 – Typical North Elevation Rev C02
STY-ORM-ZZ-NO-DR-A-20002 – St Thomas Street – Full Entrance
STY-ORM-ZZ-SO-DR-A-20003 – Kings Head Yard – Typical Ninth Floor Rev C02
STY-ORM-ZZ-SO-DR-A-20004 – Kings Head Yard – Typical South Elevation
STY-ORM-ZZ-SO-DR-A-20005 – Kings Head Yard – Ground Floor Balconies

Georgian Terraces
STY-ORM-ZZ-LG-DR-A-40300 – Georgian Terrace LG Rev C01
STY-ORM-ZZ-LG-DR-A-40301 – Georgian Terrace G Rev C01
STY-ORM-ZZ-LG-DR-A-40302 – Georgian Terrace L1 Rev C01
STY-ORM-ZZ-LG-DR-A-40303 – Georgian Terrace L2 Rev C01
STY-ORM-ZZ-LG-DR-A-40304 – Georgian Terrace L3 Rev C01
STY-ORM-ZZ-LG-DR-A-40305 – Georgian Terrace LR Rev C01

Landscape Drawings
MRG-242-STY-GA-LG-000 – GA Lower Ground Floor Plan – rev 00
MRG-242-STY-GA-00-000 – GA Ground Floor Plan – rev 03
MRG-242-STY-GA-01-000 – GA Terraces Level 1 – rev 03
MRG-242-STY-GA-02-000 – GA Terraces Level 2 – rev 00
MRG-242-STY-GA-03-000 – GA Terraces Level 3 – rev 03
MRG-242-STY-GA-04-000 – GA Terraces Level 4 – rev 03
MRG-242-STY-GA-05-000 – GA Terraces Level 5 – rev 03
MRG-242-STY-GA-06-000 – GA Terraces Level 6 – rev 03
MRG-242-STY-GA-07-000 – GA Terraces Level 7 – rev 00
MRG-242-STY-GA-08-000 – GA Terraces Level 8 – rev 03
MRG-242-STY-GA-09-000 – GA Terraces Level 9 – rev 03
MRG-242-STY-GA-10-000 – GA Terraces Level 10 – rev 03
MRG-242-STY-GA-RF-000 – GA Terraces Level Roof – rev 03
MRG-242-STY-GR-00-000 – Grading Plan Ground Floor – rev 03
MRG-242-STY-GS-00-000 – Sections Ground Floor – rev 03
MRG-242-STY-GS-RF-000 – Sections Roof Terraces – rev 03]

Reason:
For the avoidance of doubt and in the interests of proper planning.

2. The development hereby permitted shall be begun before the end of three years from the date of this permission.

Reason: As required by Section 91 of the Town and Country Planning Act (1990) as amended.

3. APPROVED DEVELOPMENT
The quantum of built floorspace for the development shall be as specified below.
The uses within the main building and Keats House hereby permitted are limited to the following maximum floor areas and at the identified floor levels

o Office (Class E(g)(i)) - basement to 10th floor - 22,124sqm GIA
o Ancillary plant and servicing space at basement, ground, 10th floor and roof levels.
The use within the Georgian terrace hereby approved are limited to the following maximum floor areas and at the identified floor levels:
o Office (Class E(g)(i)) - lower ground to level 02 - 1,813sqm GIA

No car parking space shall be provided in the development.

The development must be undertaken in accordance with this description of development and quantum of built floorspace.

Reason:
To ensure that the development is carried out in accordance with the approved drawings and documents.

Permission is subject to the following Pre-Commencements Condition(s)

4. LONDON UNDERGROUND INFRASTRUCTURE
1. Before the enabling works stage begins on site, no works shall be carried out until the following have been submitted to and approved in writing by the Local Planning Authority (in consultation with TfL Infrastructure Protection).

a) Details of any proposed boreholes or bored piles shall be submitted to LUL and their written approval obtained. Driven piles will not be permitted in the vicinity of LUL's tunnels or other subsurface structure.
b) Before commencing construction, the development must be shown to take no support from LUL land or property or to detrimentally change the loading on them.
c) Accommodate the location of the existing London Underground structures and tunnels.
d) demonstrate that there will at no time be any potential security risk to LUL property or structures;
e) provide a Conceptual Design Statement explaining the construction methodology for the overall development;
f) Site specific Risk Assessments and Method Statements (RAMS) for any activities which TfL may deem to be a risk to London Underground (LU).

Individual RAMS should be issued a minimum of 6 weeks prior to the individual activity commencing.

2. Before the demolition stage begins, no works shall be carried out until the following have been submitted to and approved in writing by the Local Planning Authority (in consultation with TfL Infrastructure Protection).

a) Details of any changes in loading to LU's infrastructure because of the permanent works as well as temporary works. Ground movement impact assessment will be required, and asset monitoring may be required. Tunnel, track monitoring for the duration of works if required.
b) Provide detailed design and sequencing of demolition works.
c) provide an impact assessment on TfL assets for the overall development, which should determine if monitoring works on TfL asset are required. If monitoring works are required, instruments are required to be installed on TfL assets with sufficient baseline readings before the start of demolition phase;
d) Before commencing demolition, the development must be shown to take no support from LUL land or property or to detrimentally change the loading on them.
3. Before the sub-structure construction stage begins, no works shall be carried out until the following have been submitted to and approved in writing by the Local Planning Authority (in consultation with TfL Infrastructure Protection).

a) A Ground Movement assessment shall demonstrate to LUL that movement of LU assets due to long-term and short-term loading and reloading will be within acceptable limits. From this Ground Movement Assessment, the development must be shown to take no support from LUL land or property or to detrimentally change the loading on them. It shall be demonstrated to LUL if any monitoring of LU assets shall be required and subsequently installed with a monitoring regime agreed.
b) prior to commencement of each phase of the development, provide details of foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent);

c) Before work commences on site an assessment of railway noise and vibration shall be carried out and appropriate protective measures shall be taken to protect the users of the property and of other properties potentially affected as a result of the current development against noise and vibration.

4. Before superstructure work begins on site, no works shall be carried out until the following have been submitted to and approved in writing by the Local Planning Authority (in consultation with TfL Infrastructure Protection).

a) A Ground Movement assessment shall demonstrate to LUL that movement of LU assets due to long-term and short-term loading and reloading will be within acceptable limits. From this Ground Movement Assessment, the development must be shown to take no support from LUL land or property or to detrimentally change the loading on them. It shall be demonstrated to LUL if any monitoring of LU assets shall be required and subsequently installed with

a monitoring regime agreed.
b) provide details on the use of tall plant/scaffolding;
c) It shall be demonstrated to TfL's satisfaction that no drainage will flow on to LU's land and no existing LU drainage ditches or pipes will be connected to or impaired.

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan (2021) Policy T3 (Transport capacity, connectivity and safeguarding) and 'Land for Industry and Transport' Supplementary Planning Guidance (2012).

5. SITE CONTAMINATION

Prior to the commencement of development (excluding above ground level demolition and site clearance) (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved in writing by the Local Planning Authority (in consultation with the Environment Agency):

1. A preliminary risk assessment which has identified:
- all previous uses
- potential contaminants associated with those uses
- a conceptual model of the site indicating sources, pathways and receptors

- potentially unacceptable risks arising from contamination at the site

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site

3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken. The strategy shall detail all proposed actions to be taken to bring the site to a condition suitable for the intended use together with any monitoring or maintenance requirements. The scheme shall also ensure that as a minimum, the site should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the Local Planning Authority. The scheme shall be implemented as approved.

Reason: To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution in line with the NPPF (Chapter 15). The site is located over a Secondary Aquifer, and it is understood that the site may be affected by historic contamination. To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with the National Planning Policy Framework (2024); Policy P56 (Protection of amenity) and Policy P64 (Contaminated land and hazardous substances) of the Southwark Plan (2022).

6. DLP and DEMP

A) Demolition works shall not begin until a Demolition Logistics Plan to manage all freight vehicle movements to and from the site during demolition of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London and Guy's and St Thomas' Hospital). The Demolition Logistics Plan shall include:

a. the management of all freight vehicle movements to and from the site during demolition of the existing buildings;

b. loading and unloading of plant and materials including vehicle turning areas;

c. storage of plant and materials;

d. programme of works (including measures for traffic management and cyclist and pedestrian comfort and safety);

e. provision of boundary hoarding, behind any visibility zones of construction traffic routing;

f. hours of operation;

g. means to prevent deposition of mud on the highway;

h. location and height of any crane(s) and scaffolding;

i. any closures of on-street parking bays and proposed signage to nearby blue badge spaces;

j. any other matters relevant to this particular site including liaising with developers and construction teams of neighbouring sites (through the Local Planning Authority and Transport for London), in order to identify and address potential cumulative highway effects during the demolition phase.

k. relevant measures from the Mayor of London's Construction Logistics Plan Guidance, and specifically address the comfort and safety of vulnerable road users through compliance with the Construction Logistics and Cyclist Safety (CLOCS) Standard for Construction Logistics, Managing Work Related Road Risk;

l. as a minimum, all haulage contractors should be FORS Silver (or equivalent) registered and use the highest rated Direct Vision Standard lorries as possible.

B) Demolition works shall not begin until a Demolition Environmental Management Plan has been submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London). The Plan shall include:
- A detailed specification of demolition works including consideration of all environmental impacts and the identified remedial measures, including continuous automated monitoring of noise, vibration and airborne particulates;
- Engineering measures to eliminate or mitigate identified environmental impacts e.g. acoustic screening, sound insulation, dust control, emission reduction, location of specific activities on site, etc. on nearby residential and commercial occupiers (including without limitation Guy's and St Thomas' Hospital);
- Arrangements for direct responsive contact for nearby occupiers with the site management during demolition and/or construction (signage on hoardings, newsletters, resident's liaison meetings);
- A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme;
- Site traffic - Routing of in-bound and outbound site traffic, one way site traffic, lay off areas, etc.;
- Site Waste Management Plan - Accurate waste identification, separation, storage, registered waste carriers for transportation and disposal to appropriate destinations (the burning of waste on the site at any time is specifically precluded).
To follow current best construction practice, including the following:
- Southwark Council's Technical Guide for Demolition & Construction 2016, available from http://southwark.gov.uk/air-quality/the-main-causes-of air pollution;
- S61 of Control of Pollution Act 1974;
- The London Mayors Supplementary Planning Guidance 'The Control of Dust and Emissions During Construction and Demolition', The Institute of Air Quality Management's 'Guidance on the Assessment of Dust from Demolition and Construction' and 'Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites',
- BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites',
- BS 7385-2:1993 Evaluation and measurement for vibration in buildings.
- Guide to damage levels from ground borne vibration, BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings - vibration sources other than blasting
- Relevant Stage emission standards to comply with Non-Road Mobile Machinery (Emission of Gaseous and Particulate Pollutants) Regulations 1999 as amended & NRMM London emission standards http://nrmm.london/
- Relevant CIRIA and BRE practice notes.

C) The demolition shall not be carried out otherwise than in accordance with the approved Demolition Logistics Plan and approved Demolition Environmental Management Plan. The approved Plans shall be implemented as approved and periodically reviewed following audits of its implementation. Results of these audits will be made available to the Local Planning Authority and Transport for London upon request. The approved Plans shall be retained for the duration of the demolition and site clearance of the development.

Reason: To ensure that demolition works do not have an adverse impact on public safety, transport network, neighbour amenity or equalities by securing mitigation. To ensure compliance with the National Planning Framework (2024), Policies T1 (Strategic approach to transport), T4 (Assessing and mitigating transport impacts), T7 (Deliveries, servicing and construction) and SI 1 (Improving air quality) of the London Plan (2021) and Policies P50 (Highways impacts), P56 (Protection of amenity), P62 (Reducing Waste), P64 (Contaminated land and hazardous substances), P65 (Improving air quality) and P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan (2022).

7. CEMP

No development shall take place, (except for demolition, enabling works, site clearance and site investigations), until a written CEMP has been submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London and Guy's and St Thomas' Hospital). The CEMP shall oblige the applicant, developer and contractors to commit to current best practice with regard to construction site management and to use all best endeavours to minimise off-site impacts, and will include the following information:

o A detailed specification of construction works at each phase of development including consideration of all environmental impacts and the identified remedial measures;

o Site perimeter continuous automated noise, dust and vibration monitoring;

o Engineering measures to eliminate or mitigate identified environmental impacts e.g. hoarding height and density, acoustic screening, sound insulation, dust control measures, road cleaning including wheel washing, emission reduction measures, location of specific activities on site, etc.;

o A scheme for protecting nearby residents and commercial occupiers (including without limitation Guy's and St Thomas' Hospital) and pedestrians and cyclists from noise, dust and other environmental effects during construction;

o Arrangements for a direct and responsive site management contact for nearby occupiers during demolition and/or construction (signage on hoardings, newsletters, residents liaison meetings, etc.)

o A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme;

o Site traffic - Routing of in-bound and outbound site traffic, one-way site traffic arrangements on site, location of lay off areas, etc.;

o Site waste management plan - Accurate waste stream identification, separation, storage, registered waste carriers for transportation and disposal at appropriate destinations (the burning of waste on the site at any time is specifically precluded);

o Any other matters relevant to this particular site including liaising with developers and construction teams of neighbouring sites (through the Local Planning Authority and Transport for London), in order to identify and address potential cumulative environmental effects during the construction phase.

o A commitment that all NRMM equipment (37 kW and 560 kW) shall be registered on the NRMM register and meets the standard as stipulated by the

Mayor of London;
o The detailed design and method statements (AIP) for any proposed foundations and basements structures (temporary and/or permanent) retaining the highway shall demonstrate accordance with CG 300 'Technical Approval of Highway Structures'. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London);
o To follow current best construction practice, including the following:-

o Southwark Council's Technical Guide for Demolition & Construction at http://www.southwark.gov.uk/construction
o Section 61 of Control of Pollution Act 1974,
o The London Mayors Supplementary Planning Guidance 'The Control of Dust and Emissions During Construction and Demolition',
o The Institute of Air Quality Management's 'Guidance on the Assessment of Dust from Demolition and Construction' and 'Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites',
o BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Noise',
o BS 5228-2:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Vibration'
o BS 7385-2:1993 Evaluation and measurement for vibration in buildings. Guide to damage levels from ground-borne vibration,
o BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings - vibration sources other than blasting,
o Relevant Stage emission standards to comply with Non-Road Mobile Machinery (Emission of Gaseous and Particulate Pollutants) Regulations 1999 as amended & NRMM London emission standards http://nrmm.london/

All construction work shall be undertaken in strict accordance with the approved CEMP and other relevant codes of practice, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with the Policy SI 1 (Improving air quality) of the London Plan (2021), Policy P56 (Protection of amenity), Policy P62 (Reducing Waste), Policy P64 (Contaminated land and hazardous substances), Policy P65 (Improving air quality) and Policy P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan (2022), and the National Planning Policy Framework (2024).

8. CLP
No construction works (excluding demolition, enabling works, site clearance and site investigations) shall commence until a Construction Logistics Plan (CLP) has been submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London). The CLP shall include details of:
a. the management of all freight vehicle movements to and from the site

during construction of the development;
b. loading and unloading of plant and materials including vehicle turning areas;
c. storage of plant and materials;
d. sourcing of materials;
e. programme of works (including measures for traffic management and cyclist and pedestrian comfort and safety);
f. provision of boundary hoarding, behind any visibility zones of construction traffic routing;
g. hours of operation;
h. means to prevent deposition of mud on the highway;
i. location and height of crane(s) and scaffolding, including crane aircraft safety lighting;
j. any closures of on-street parking bays and proposed signage to nearby blue badge spaces;
k. any other matters relevant to this particular site including liaising with developers and construction teams of neighbouring sites including without limitation Guy's and St Thomas' Hospital (through the Local Planning Authority and Transport for London), in order to identify and address potential cumulative highway effects during the demolition and construction phase.

The CLP shall be prepared in accordance with the Mayor's CLP Guidance, add further detail to the submitted outline construction management plan and shall specifically address the safety of vulnerable road users through compliance with the CLOCS Standard.

As a minimum, all haulage contractors should be FORS Silver (or equivalent) registered and use the highest rated Direct Vision Standard lorries as possible.

The development shall be constructed in accordance with the relevant approved CLP. The CLP shall be implemented as approved and periodically reviewed following audits of its implementation. Results of these audits will be made available to the Local Planning Authority and Transport for London upon request. The CLP shall be retained for the duration of the construction process for the development.

Reason: To ensure the development does not raise highway safety matters and addresses equalities impacts by securing mitigation. To ensure that construction works do not have an adverse impact on public safety, transport network, neighbour amenity or equalities by securing mitigation. To ensure compliance with the National Planning Framework (2024), Policies T1 (Strategic approach to transport), T4 (Assessing and mitigating transport impacts), T7 (Deliveries, servicing and construction) and SI 1 (Improving air quality) of the London Plan (2021) and Policies P50 (Highways impacts) and P56 (Protection of amenity) of the Southwark Plan (2022).

9. PROTECTION OF HERITAGE ASSETS

A. Prior to the commencement of any demolition, Method Statement(s) for the protection of the Georgian terrace, for the protection of the Keats House

facades to be retained, and for the protection of the Conybeare House facade during the Keats House eastern side facade demolition shall be submitted to and approved in writing by the Local Planning Authority.
B. Prior to the commencement of any construction (excluding demolition, enabling works, site clearance and site investigations), Method Statement(s) for the protection of the Georgian terrace, for the protection of the Keats House facades to be retained, and for the protection of the Conybeare House facade after the Keats House eastern side facade demolition shall be submitted to and approved in writing by the Local Planning Authority.

The Method Statement(s) submitted under (A) and (B) of this condition shall detail how these heritage assets are to be protected and supported during the works, and include the design of any internal and external scaffolding and any temporary roof (including details of all fixings into historic fabric and protection at building interfaces). The works shall not be undertaken otherwise than in accordance with the approved Method Statements.

Reason: In order to ensure the special historic qualities of the listed buildings and Keats House façades are protected, to accord with the National Planning Framework (2024), Policies P19 (Listed buildings and structures), P20 (Conservation areas) and P21 (Conservation of the historic environment and natural heritage) of the Southwark Plan (2022).

10. SUDS
No works (excluding demolition, enabling works, site investigations and site clearance) shall commence until full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS) have been submitted to and approved in writing by the Local Planning Authority, including detailed design, size and location of attenuation units, blue roof(s), and details of flow control measures. The strategy should achieve a reduction in surface water runoff rates during the 1% Annual Exceedance Probability (AEP) event plus climate change allowance, as detailed in the Drainage Strategy prepared by AKII (dated 23/01/2025). The applicant must demonstrate that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows. The site drainage must be constructed to the approved details and retained as such.

Reason: To minimise the potential for the site to contribute to surface water flooding in accordance with Southwark's Strategic Flood Risk Assessment (2017), Policy SI 13 (Sustainable drainage) of the London Plan (2021) and Policy P68 (Reducing flood risk) of the Southwark Plan (2022).

11. TREE PLANTING
Prior to works commencing (excluding demolition works, site clearance, site investigations, excavation and piling), full details of all proposed tree planting totalling 10 trees at ground level and 31 trees on the terraces shall be submitted to and approved in writing by the Local Planning Authority. This will include tree pit cross sections, soil volumes, planting and maintenance specifications, use of guards or other protective measures and confirmation of location, species, sizes, nursery stock type, supplier and defect period.

Details of a management plan, responsibilities and maintenance schedules shall be submitted to and approved by the Local Planning Authority.

This shall include an irrigation schedule for all trees to ensure successful establishment.

For stem girths of up to 20cm the schedule shall be a minimum of three years, and five years for stem girths greater than 20cm. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the Local Planning Authority.

All tree planting shall be carried out in accordance with those details and at those times. All trees and shrubs will conform to the specification for nursery stock as set out in British Standard 3936 Parts 1 (1992) and 4 (1984). Advanced Nursery stock trees shall conform to BS 5236 and BS: 4428 Code of practice for general landscaping operations; BS 8545:2014 Trees: from nursery to independence in the landscape; BS: 5837 (2012) Trees in relation to demolition, design and construction; BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 03:2022 (EN) - Tree Planting Standard, and Trees and Design Action Group guidance.

If within a period of five years from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, or becomes, in the opinion of the local planning authority, seriously damaged or defective, another tree of the same species and size as that originally planted shall be planted at the same place in the first suitable planting season., unless the local planning authority gives its written consent to any variation.

Reason: So that the Council may be satisfied that the proposed tree planting scheme in accordance with the National Planning Policy Framework (2024) Chapters 12 (Achieving well-designed places), Chapter 14 (Meeting the challenge of climate change), and chapters 15 & 16 (Conserving and enhancing the natural and historic environment); Policy G7 (Trees and Woodlands) of the London Plan (2021); Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P56 (Protection of Amenity), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan (2022).

12. DIGITAL CONNECTIVITY INFRASTRUCTURE

Prior to commencement of any works (with the exception of demolition to lower ground level, enabling works, site clearance and archaeological investigations), detailed plans shall be submitted to and approved in writing by the Local Planning Authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development. The development shall be carried out in accordance with the approved plans and maintained as such for the lifetime of the development.

Reason: To provide high quality digital connectivity infrastructure to contribute to London's global competitiveness, in accordance with the National Planning

Policy Framework (2024); Policy SI 6 (Digital connectivity infrastructure) of the London Plan (2021); and Policy P44 of the Southwark Plan (2022).

13. PILING METHOD STATEMENT
No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the Local Planning Authority (in consultation with Thames Water). Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. To protect the underground water utility infrastructure, in accordance with London Plan (2021) Policy SI 5 (Water infrastructure) and Southwark Plan (2022) Policy P67 (Reducing water use).

14. ARCHAEOLOGICAL BUILDING RECORDING
Before any work hereby authorised begins, including demolition, the applicant shall secure the implementation of a programme of archaeological building recording works [to Historic England level three as detailed in 'Understanding Historic Buildings'] in accordance with a written scheme of investigation which shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In order that the applicants record buildings of archaeological interest to ensure the preservation of archaeological remains by record in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework (2024).

15. ARCHAEOLOGICAL MITIGATION
Before any work hereby authorised begins, (excluding any demolition to lower ground floor slab level, core/structural strengthening above slab level, site clearance and site investigation works) the applicant shall secure the implementation of a programme of archaeological mitigation works in accordance with a written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority. The works shall be carried out in accordance with the approved mitigation.

Reason: In order that the details of the programme of works for the archaeological mitigation are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework (2024).

16. CYCLE STAIR RAMPS
Prior to the commencement of development (excluding demolition, enabling works, site clearance, site investigations, excavation and piling), details (1:50 scale drawings) of the cycle ramps to be provided to the stairs at the St Thomas Street frontage and from the servicing yard to the cycle stores shall be submitted to and approved in writing by the Local Planning Authority. The cycle ramps shall be constructed in accordance with the approved details and be provided for staff in accordance with the drawings hereby approved.

Reason: To ensure that satisfactory safe and convenient bicycle parking is provided and retained for the benefit of the users and occupiers of the building in order to encourage the use of alternative means of transport and to reduce reliance on the use of the private car in accordance with the National Planning Policy Framework (2024); Policy T5 (Cycling) of the London Plan (2021); and Policy P53 (Cycling) of the Southwark Plan (2022).

Permission is subject to the following Grade Condition(s)

17. HARD AND SOFT LANDSCAPING
Prior to commencement of development (excluding demolition works, site clearance, site investigations, excavation and piling), detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings and including details of the enclosed pocket garden on Kings Head Yard, the balconies and terraces shall be submitted to and approved in writing by the Local Planning Authority. The site shall be landscaped strictly in accordance with the approved details in the first planting season after completion of the development. Details shall include:

1) proposed parking, access, or pathway layouts, materials and edge details;

2) location, type and materials to be used for hard landscaping including specifications, where applicable for:
a) permeable paving
b) tree pit design and soil volumes
c) underground modular systems
d) sustainable urban drainage integration
e) use within tree Root Protection Areas (RPAs);

3) typical cross sections;

4) a schedule detailing sizes and numbers/densities of all proposed trees/plants;

5) specifications for operations associated with plant establishment and maintenance that are compliant with best practise; and

6) types and dimensions of all boundary treatments.

The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use. Any trees, shrubs, grass or other planting that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the equivalent stem girth and species in the first suitable planting season.

Unless required by a separate landscape management condition, all soft landscaping shall have a written five-year maintenance programme following planting.

Works shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction; BS3998: (2010) Tree work - recommendations, BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 03:2022 (EN) - Tree Planting Standard.

Reason:
So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 12, 15 and 16 of the National Planning Policy Framework (2024); Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P56 (Protection of Amenity), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan (2022).

Permission is subject to the following Grade Condition(s)

18. BIODIVERSE ROOFS
Details of the biodiversity (green/brown) roof(s) shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site. The biodiversity (green/brown) roof(s) shall be:

Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm,

Or, extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) - meets the requirements of GRO Code 2014,

Laid out in accordance with roof plans hereby approved; and

Planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (focused on minimum 75% wildflower planting, and no more than a maximum of 25% sedum coverage).

The biodiversity (green/brown) roof shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency.

The biodiversity roof(s) shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the green/brown roof(s) and the Local Planning Authority agreeing the submitted plans, and once the green/brown roof(s) are completed in full in accordance to the agreed plans.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity as well as contributing to the Urban Greening Factor requirements of the London Plan (2021) with the aim of attaining a minimum score of 0.3 for commercial developments in accordance with the National Planning Policy Framework (2024); Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), and Policy G6 (Biodiversity and access to nature) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

19. BIRD BOXES

Details of swift bird boxes and open fronted bird boxes shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works (excluding core/structural strengthening works) commencing on site.

No less than four swift bird boxes and three open fronted bird boxes shall be provided and the details shall include the exact location, specification and design of the boxes. The boxes shall be installed on mature trees or on buildings prior to the first occupation of the site.

The bird boxes shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the nest/roost features and mapped locations and the Local Planning Authority agreeing the submitted plans, and once the nest/roost features are installed in full in accordance to the agreed plans.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with National Planning Policy Framework (2024); Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity and access to nature) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

20. INVERTEBRATE ENHANCEMENTS

(i) Details of bee bricks and/or invertebrate hotels shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works (excluding core/structural strengthening works) commencing on site.

No less than 2 bee bricks and/or invertebrate hotels shall be provided and the details shall include the exact location, specification and design of the habitats.

(ii) Full details of the features and mapped locations to meet the requirements of (i) shall be submitted to and approved in writing by the Local Planning Authority

(iii) Evidence shall be submitted in writing to the Local Planning Authority to show that the features have been installed in full in accordance with part (ii)

(iiii) The bee bricks and/or invertebrate hotels shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained and maintained in perpetuity

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with the National Planning Policy Framework (2024); Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), and Policy G6 (Biodiversity and access to nature) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

21. BAT ROOSTING FEATURES
(i) Details of bat tubes, bricks or boxes shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works (excluding core/structural strengthening works) commencing on site.

No less than 6 bat tubes, bricks or boxes shall be provided and the details shall include the exact location, specification and design of the habitats.

(ii) Full details of the roost features and mapped locations to meet the requirements of (i) shall be submitted to and approved in writing by the Local Planning Authority.

(iii) Evidence shall be submitted in writing to the Local Planning Authority to show that the roost features have been installed in full in accordance with part (ii).

(iiii) The bat tubes, bricks or boxes shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained and maintained in perpetuity.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with the National Planning Policy Framework (2024); Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity

and access to nature) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

22. SECURED BY DESIGN

a) The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific security needs of the development, in accordance with the principles and objectives of Secured by Design. Details of these measures shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of any above ground development and shall be implemented in accordance with the approved details prior to occupation.

b) Prior to first occupation of the development a satisfactory Secured by Design inspection must take place and the resulting Secured by Design certificate submitted to and approved in writing by the Local Planning Authority.

Reason: In pursuance of the Local Planning Authority's duty under Section 17 of the Crime and Disorder Act (1998) to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention, in accordance with the National Planning Policy Framework (2024); Policy D11 (Safety Security and Resilience to Emergency) of the London Plan (2021); and Policy P16 (Designing out Crime) of the Southwark Plan (2022).

23. WIND MITIGATION

Prior to the commencement of any construction works above grade (excluding core/structural strengthening works), details of wind mitigation measures to achieve suitable wind conditions for the roof terraces based on the Lawson Comfort Criteria for 'sitting' and 'standing' shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be installed prior to the first use of each roof terrace, and shall be maintained and retained as such thereafter.

Reason: In the interests of amenity and safety, and to protect the character of the conservation area and the setting of nearby listed buildings, in accordance with Policy D9 (Tall buildings) of the London Plan (2021); Policy P14 (Design quality), Policy P17 (Tall buildings), Policy P19 (Listed buildings and structures), Policy P20 (Conservation Areas) and Policy P56 (Protection of amenity) of the Southwark Plan (2022).

24. MAIN BUILDING PRIVACY MEASURES

Prior to the commencement of any construction works above grade for the main building (excluding core/structural strengthening works), details of how the windows in the south-western corner of the tall building (facing to the south) at first, second and third floors of the tower building are to be designed with obscured glazing, screens or some other means to maintain the privacy of the neighbouring residential properties, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried

out in accordance with these details and maintained as such in perpetuity.

Reason: In the interest of neighbour amenity, to comply with Policy P56 (Protection of amenity) of the Southwark Plan (2022).

25. MOCK UP SAMPLE PANELS

Sample section facade visual "mock ups" as representative bays of the tall building's facades constructed to 1:1 scale shall be presented on site and approved in writing by the Local Planning Authority before any construction work above grade of the approved main building. The visual "mock ups" shall be constructed in the proposed materials and finishes and shall include a representative bays of the tall building approximately 3m wide by 3.7m high showing the floors, typical window and fins. The development shall not be carried out otherwise than in accordance with any such approval given.

Reason: In order to secure high standards of design. To comply with the National Planning Framework (2024), Policies D4 (Delivering good design) and D9 (Tall buildings) of the London Plan (2021), and Policies P14 (Design quality), P17 (Tall buildings), P19 (Listed buildings and structures), P20 (Conservation areas) and P21 (Conservation of the historic environment and natural heritage) of the Southwark Plan (2022).

26. MAIN BUILDING DETAILS

Prior to the commencement of any construction works of the main building (including the St Thomas Street entrance building, the Kings Head Yard façade and tall building), the following details shall be submitted to and approved in writing by the Local Planning Authority:

A) 1:200 contextual drawings of the elevations showing the locations of the relevant features listed in part B); and

B) 1:10 or 1:5 scale elevation, plans and cross-sections including:

1. facades including the different bay detailings around the building,
2. windows,
3. doors,
4. parapets,
5. balcony/terrace screens and balustrades,
6. louvres,
7. level 10 amenity room, lobby and core structure,
8. level 10 pergola,
9. frame to the Kings Head Yard facade and means of securing the pocket park and night time
10. the interfaces between existing structure and new construction
11. the rooftop plant enclosure.

The development shall not be carried out otherwise than in accordance with the approved details and retained thereafter.

Reason: In order that the Local Planning Authority may be satisfied as to the design and its relationship with heritage assets. To comply with the National Planning Framework (2024), Policies D4 (Delivering good design) and D9

(Tall buildings) of the London Plan (2021), Policies P14 (Design quality), P17 (Tall buildings), P19 (Listed buildings and structures), P20 (Conservation areas) and P21 (Conservation of the historic environment and natural heritage) of the Southwark Plan (2022), and have regard to the "Inns and Yards Toolkit" guidance.

27. MAIN BUILDING SAMPLES

Prior to the commencement of any construction works above grade (excluding core/structural strengthening works) for the main building (including the St Thomas Street entrance building, the Kings Head Yard facade and tall building), samples of all facing materials and 1m x 1m sample panels of the cladding, brickwork and stone, glass and metal work, and atrium roof shall be submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with the approved details.

Reason: In order that the Local Planning Authority may be satisfied as to the design and detailing to ensure a high quality finish. To comply with the National Planning Framework (2024), Policies D4 (Delivering good design) and D9 (Tall buildings) of the London Plan (2021), Policies P14 (Design quality), P17 (Tall buildings), P19 (Listed buildings and structures), P20 (Conservation areas) and P21 (Conservation of the historic environment and natural heritage) of the Southwark Plan (2022).

28. KEATS HOUSE DETAILED DRAWINGS

Prior to the commencement of any works for Keats House (except for demolition, site clearance and site investigations), the following details shall be submitted to and approved in writing by the Local Planning Authority:
a. 1:10 and 1:20 scale details of all fenestration including dormers;
b. 1:10 and 1:20 scale details of all doors;
c. 1:10 and 1:20 scale details of the parapet and roof extension; and
d. 1:10 and 1:20 scale details of the string courses and cornicing to the western side elevation.

The development shall not be carried out otherwise than in accordance with the approved details.

Reason: In order that the Local Planning Authority may be satisfied as to the design and details, and how they relate to the historic facades to comply with Policies P20 (Conservation areas) and P21 (Conservation of the historic environment and natural heritage) of the Southwark Plan (2022).

29. KEATS HOUSE MATERIALS

Prior to the commencement of any works for Keats House above grade (excluding demolition, site clearance and site investigations), the following details shall be submitted to and approved in writing by the Local Planning Authority:
a. samples of all facing materials including the roof, parapets, brick, window frames and doors,
b. 1sqm sample panel of brickwork, mortar and pointing for the western

elevation,
c. Samples of the brick, stone and other materials for the external repairs to the historic façades.

The development of Keats House shall not be carried out otherwise than in accordance with the approved details.

Reason: In order that the Local Planning Authority may be satisfied as to the design and details, and how they relate to the historic facades, to comply with Policies P20 (Conservation areas) and P21 (Conservation of the historic environment and natural heritage) of the Southwark Plan (2022).

Permission is subject to the following Pre-Occupation Condition(s)

30. VERIFICATION REPORT
Prior to occupation of the development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the Local Planning Authority (in consultation with the Environment Agency). The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a 'long-term monitoring and maintenance plan') for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, if appropriate, and for the reporting of this to the Local Planning Authority. Any long-term monitoring and maintenance plan shall be implemented as approved.

Reason: To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with the NPPF (Chapter 15) and Policy P64 (Contaminated land and hazardous substances).

31. FLOOD WARNING AND EVACUATION PLAN
Prior to any occupation of the development hereby approved a Flood Warning and Evacuation Plan shall be submitted to and approved in writing by the Local Planning Authority. The plan should state how occupants will be made aware that they can sign up to the Environment Agency Flood Warning services, and of the plan itself. The plan should provide details of how occupants should respond in the event that they receive a flood warning, or become aware of a flood. The report should be proportionate and risk based in terms of sources of flooding. Once approved, the measures shall remain for as long as the development is occupied.

Reason: To ensure that the development is designed to ensure safety of the building users during extreme flood events, to mitigate residual flood risk and ensure safety of the future occupants of the proposed development and to provide safe refuge and ensure safety of the future occupants of the proposed

development in accordance with the National Planning Policy Framework (2024); Policy P56 (Protection of amenity) and Policy P68 (Reducing flood risk) of the Southwark Plan (2022).

32. SUDS VERIFICATION

Prior to first occupation of the offices hereby approved a drainage verification report prepared by a suitably qualified engineer shall been submitted to and approved in writing by the Local Planning Authority. The report shall provide evidence that the drainage system (incorporating SuDS) has been constructed according to the approved details and specifications (or detail any minor variations where relevant) as detailed in the Drainage Strategy prepared by AKII (ref: dated 23/01/2025) and shall include plans, photographs and national grid references of key components of the drainage network such as surface water attenuation structures, flow control devices and outfalls. The report shall also include details of the responsible management company, and the site shall be maintained in accordance with those approved details.

Reason: To ensure the surface water drainage complies with Southwark's Strategic Flood Risk Assessment, Policy SI 13 (Sustainable drainage) of the London Plan (2021) and Policy P68 (Reducing flood risk) of the Southwark Plan (2022).

33. LANDSCAPE MANAGEMENT PLAN

Prior to the occupation of the development or any phase of the development, whichever is the sooner, a landscape management plan, including long term design objectives to meet BNG requirements, management responsibilities and maintenance schedules for all landscape areas shall be submitted to and approved by the Local Planning Authority. Details of an irrigation schedule shall be provided for all trees to ensure successful establishment.

For stem girths of up to 20cm the schedule shall be a minimum of three years, and five years for stem girths greater than 20cm. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

If within a period of five years from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, or becomes, in the opinion of the local planning authority, seriously damaged or defective, another tree of the same species and size as that originally planted shall be planted at the same place in the first suitable planting season., unless the local planning authority gives its written consent to any variation.

Works shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 8545 (2014) Trees: from nursery to independence in the landscape; BS3998: (2010) Tree work - recommendations; BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 01:2021 (EN) -Tree Pruning Standard; EAS 03:2022 (EN) - Tree Planting Standard.

Reason: So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework (2024); Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P56 (Protection of Amenity), Policy P57 (Open Space), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan (2022).

34. BREEAM - GEORGIAN TERRACE

a) The development hereby approved to refurbish the listed Georgian terrace shall achieve a BREEAM rating of 'Excellent' or higher, and achieve at least the BREEAM excellent standard for the 'Wat 01' water category or equivalent (commercial development) in the BREEAM Pre-Assessment hereby approved.

b) Before the first occupation of the Georgian terrace following completion of the approved works, the submission to BRE Post Construction Review documents (or other verification process agreed with the Local Planning Authority), and evidence of the submission to BRE, shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed 'Excellent' standard at as outlined within the submitted BREEAM pre-assessment have been met.

c) Once certification of the Post Construction Review has been completed by BRE, the certified Post Construction Review including the certificate for the Georgian terrace shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed 'Excellent' standard at as outlined within the submitted BREEAM pre-assessment have been met.

Reason: To ensure the proposal complies with the National Planning Policy Framework (2024); Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London Plan (2021); Policy SI 5 (Water Infrastructure) of the London Plan (2021) and Policy P69 (Sustainability standards) and Policy P70 (Energy) of the Southwark Plan (2022).

35. BREEAM - MAIN BUILDING

a) The development hereby approved to extend and refurbish the main building shall achieve a BREEAM rating of 'Excellent' or higher, and achieve at least the BREEAM excellent standard for the 'Wat 01' water category or equivalent (commercial development) in the BREEAM Pre-Assessment hereby approved.

b) Before the first occupation of the extended building hereby permitted, the submission to BRE Post Construction Review documents (or other verification process agreed with the Local Planning Authority), and evidence of the submission to BRE, shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed 'Excellent' standard at as outlined within the submitted BREEAM pre-assessment have been met.

c) Once certification of the Post Construction Review has been completed by BRE, the certified Post Construction Review including the certificate for the extended building shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed 'Excellent' standard at as outlined within the submitted BREEAM pre-assessment have been met.

Reason: To ensure the proposal complies with the National Planning Policy Framework (2024); Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London Plan (2021); Policy SI 5 (Water Infrastructure) of the London Plan (2021) and Policy P69 (Sustainability standards) and Policy P70 (Energy) of the Southwark Plan (2022).

36. WHOLE LIFE CARBON

Prior to the occupation of the development the post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template must be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance.

The Post-Construction Assessment should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to occupation of the development.

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in compliance with the National Planning Policy Framework (2024); Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London Plan (2021) and Policy P70 (Energy) of the Southwark Plan (2022).

37. CIRCULAR ECONOMY

Prior to the occupation of the development, a Post Construction Monitoring Report should be completed in line with the GLA's Circular Economy Statement Guidance. The Post Construction Monitoring Report shall be submitted to the GLA, currently via email at: circulareconomystatements@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to occupation of the development.

Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials in accordance with Policy P62 (Reducing waste) of the Southwark Plan (2022).

38. THAMES WATER - WATER NETWORK

The development shall not be occupied until confirmation has been provided to the Local Planning Authority that:
either - all water network upgrades required to accommodate the additional demand to serve the development have been completed;
or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied.

Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.

Reason: The development may lead to no/low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development.

39. THAMES WATER - WASTE WATER CAPACITY
The development shall not be occupied until confirmation has been provided to the Local Planning Authority that:
either:- 1. All necessary upgrades to the combined waste water network to accommodate additional flows from the development have been completed;

or 2. A phasing plan for development and infrastructure, agreed with Thames Water and the Local Planning Authority, is in place.

Where such a plan exists, no occupation shall occur other than in accordance with the approved phasing schedule.

Reason: Network reinforcement is likely to be required to support the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. To accord with London Plan (2021) Policy SI5 Water infrastructure and Southwark Plan (2022) Policies P67 (Reducing water use) and IP1 (Infrastructure).

40. URBAN GREENING FACTOR
a) Prior to first occupation of the development hereby consented, an interim report/letter (together with any supporting evidence) from a suitably qualified landscape specialist shall be submitted to and approved in writing by the Local Planning Authority. The report/letter shall confirm that sufficient progress has been made in terms of detailed design, procurement and construction to be reasonably well assured that the development hereby approved will, once completed, achieve the agreed UGF score of 0.307.
b) Within six months of first occupation of the development hereby permitted, a post construction certificate prepared by a suitably qualified landscape specialist (or other verification process agreed with the Local Planning Authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed UGF score of 0.307 has been met.

Reason: To ensure the proposal complies with the National Planning Policy Framework (2024); Policy G5 (Urban Greening) of the London Plan (2021); Policies P13 (Design of Places), P14 (Design Quality), P60 (Biodiversity), P61 (Trees) and P69 (Sustainability standards) of the Southwark Plan (2022).

41. PROVISION OF CYCLE STORAGE
Before the first occupation of the development hereby approved, the cycle

facilities (including cycle storage, showers, changing rooms, lockers, stairs with cycle ramp and lift access) as shown on the drawings hereby approved STY-ORM-ZZ-00-DR-A-12200 C03 Proposed planning ground floor plan, STY-ORM-ZZ-00-DR-A-12249 C03 Proposed planning lower ground floor plan and St. Thomas Yard Planning Updated cycle parking document June 2025 shall be provided and made available to the users of the development, unless other such details are submitted to and approved by the Local Planning Authority prior to the relevant works being carried out. Thereafter, such facilities shall be retained and maintained in perpetuity.

Reason: To ensure that satisfactory safe and secure bicycle parking is provided and retained for the benefit of the users and occupiers of the building in order to encourage the use of alternative means of transport and to reduce reliance on the use of the private car in accordance with the National Planning Policy Framework (2024); Policy T5 (Cycling) of the London Plan (2021); and Policy P53 (Cycling) of the Southwark Plan (2022).

Permission is subject to the following Compliance Condition(s)

42. PERMITTED USES WITHIN USE CLASS E
Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 and any associated provisions of the Town and Country Planning General Permitted Development Order (including any future amendment of enactment of those Orders) and notwithstanding the uses within Class E, the development hereby approved shall be used only for use Class E (g)(i) office purposes only unless otherwise agreed by way of a formal application for planning permission.

Reason: In accordance with the application details and in order to ensure that the site provides the proposed office space for this site within the Central Activities Zone, Opportunity Area and town centre in line with the submitted application, to comply with London Plan (2021) Policies GG2, SD1, SD4, SD5, SD6 and E1, and Southwark Plan (2022) Policies ST1, ST2, SP4, P30 and the AV.11 London Bridge Area Vision.

43. NO OBSCURING OF WINDOWS
Unless agreed pursuant to a condition of this permission, the window openings to the development hereby approved (including Keats House and the Georgian terrace) shall be clear glass and shall not be painted, covered or otherwise obscured or obstructed without prior written consent of the Local Planning Authority.

Reason: In order that the Local Planning Authority may be satisfied as to the design of these buildings, in the interest of their appearance and the frontages remain active and retaining a relationship with the public realm and streets in accordance with policies D4 (Good quality design) of the London Plan (2021), and Policies P14 (Design quality), P19 (Listed buildings and structures) and P20 (Conservation areas) of the Southwark Plan (2022).

44. RESTRICTION ON THE INSTALLATION OF TELECOMMUNICATIONS EQUIPMENT
Notwithstanding the provisions of Schedule 2, Part 16 The Town & Country Planning (General Permitted Development) Order 2015 (as amended or re-enacted) no external telecommunications equipment or structures shall be placed on the roof or any other part of a building hereby permitted.

Reason: In order to ensure that no telecommunications plant or equipment which might be detrimental to the design and appearance of the building, the visual amenity of the conservation area, and setting of listed buildings is installed on the roof of the building in accordance with the National Planning Policy Framework (2024); Policy D4 (Good design) and Policy HC1 (Heritage conservation and growth) of the London Plan (2021); Policy P56 (Protection of amenity), Policy P14 (Design quality), Policy P19 (Listed buildings and structures), Policy P20 (Conservation areas) and Policy P13 (Design of places) of the Southwark Plan (2022).

45. RESTRICTION ON THE INSTALLATION OF ROOF PLANT
No roof plant, building maintenance unit, equipment or other structures, other than as shown on the plans hereby approved or approved pursuant to a condition of this permission, shall be placed on the roof or be permitted to project above the roofline of any part of the buildings as shown on elevation drawings.

Reason: In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building the visual amenity of the conservation area, and setting of listed buildings in accordance with the National Planning Policy Framework (2024); Policy D4 (Delivering good design) and Policy HC1 (Heritage conservation and growth) of the London Plan (2021); Policy P13 (Design of places), Policy P14 (Design quality), Policy P19 (Listed buildings and structures), Policy P20 (Conservation areas) and Policy P56 (Protection of amenity) of the Southwark Plan (2022).

46. FIRE SAFETY
The development hereby approved shall be carried out in accordance with the recommendations of the Outline Fire Safety Strategy dated December 2024 by Ashton Fire and Fire Statement Form dated December 2024 unless a revised Fire Statement is submitted to and approved in writing by the Local Planning Authority prior to the relevant works being carried out.

The development hereby approved shall incorporate a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building. The development shall be carried out in accordance with these details and maintained as such in perpetuity.

Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with Policies D5 (Inclusive design) and D12 (Fire safety) and of the London Plan (2021).

47. PROVISION OF REFUSE STORAGE
The refuse stores (including holding areas) shall be provided in accordance with the approved drawings, be made available for use prior to the occupation of the development and retained as such thereafter.

Reason: To ensure that the refuse will be appropriately stored within the site thereby protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance in accordance with Sections 8 Promoting healthy and safe communities and 12 Achieving well-designed places of the National Planning Policy Framework (2024), and Policies P56 (Protection of amenity) and P72 (Reducing waste) of the Southwark Plan (2022).

48. UNEXPECTED CONTAMINATION
If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved, verified and reported to the satisfaction of the Local Planning Authority.

Reason: There is always the potential for unexpected contamination to be identified during development groundworks. To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with the National Planning Policy Framework (2024) Chapter 15 and Policy P64 (Contaminated land and hazardous substances) of the Southwark Plan (2022).

49. SURFACE WATER DRAINAGE/INFILTRATION
No drainage systems for the infiltration of surface water drainage into the ground are permitted other than with the express written consent of the Local Planning Authority (in consultation with the Environment Agency), which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Reason: To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants. This is in line with the National Planning Policy Framework (2024) (Chapter 15), and Policy P64 (Contaminated land and hazardous substances) of the Southwark Plan (2022). Infiltrating water has the potential to cause remobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of groundwater.

50. PILING
Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority (in consultation with the Environment Agency), which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the development does not harm groundwater resources in line with the National Planning Policy Framework (2024) Chapter 15, and Policy P64 (Contaminated land and hazardous substances) of the Southwark Plan (2022).

51. COMPLIANCE WITH FLOOD RISK ASSESSMENT
The development hereby permitted shall be carried out in accordance with the approved Flood Risk Assessment by AKT II Ltd dated December 2024 unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure the development is designed safely in reference to flood risk in accordance with the National Planning Policy Framework (2024); Policy SI 12 (Flood risk management) of the London Plan (2021); and Policy P68 (Reducing flood risk) of the Southwark Plan (2022).

52. HOURS OF USE OF TERRACES
Other than for maintenance purposes, repair purposes or means of escape, the terraces and balconies hereby approved shall be open to office workers only, and shall not be used outside of the following hours: 07:00 - 22:00 on Mondays to Fridays and 10:00 - 17:00 on Saturdays.

Reason:
To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance in accordance with the National Planning Policy Framework (2024) and Policy P56 (Protection of amenity) of the Southwark Plan (2022).

Permission is subject to the following Special Condition(s)

53. ARCHAEOLOGICAL REPORTING
Within one year of the completion of the archaeological work on site, an assessment report detailing the proposals for the off-site analyses and post-excavation works, including publication of the site and preparation for deposition of the archive, shall be submitted to and approved in writing by the Local Planning Authority, and the works detailed in the assessment report shall not be carried out otherwise than in accordance with any such approval given. The assessment report shall provide evidence of the applicant's commitment to finance and resource these works to their completion.

Reason: In order that the archaeological interest of the site is secured with regard to the details of the post-excavation works, publication and archiving to ensure the preservation of archaeological remains by record in accordance with Policy P23 Archaeology of the Southwark Plan (2022), Policy HC1 (Heritage conservation and growth) of the London Plan (2021) and the National Planning Policy Framework (2024).

54. LIGHTING SCHEME

1) Prior to occupation or prior to the installation of external lighting (whichever is first), a lighting design strategy for biodiversity and neighbour amenity shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall:
a) identify those areas/features that are particularly sensitive for residential amenity and for bats (and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging); and
b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not harm residential amenity and not disturb or prevent bats using their territory or having access to their breeding sites and resting places.

2) Prior to the new development being first occupied, a lighting plan shall be submitted to and approved by the Local Planning Authority, demonstrating compliance with part 1).

3) All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the Local Planning Authority.

Reason: To ensure compliance with the Habitats Regulations and the Wildlife & Countryside Act (1981), (as amended), and because bats are known to be active in vicinity of the development site. To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of light intrusion, in accordance with the National Planning Policy Framework (2024) and Policy P56 (Protection of amenity) of the Southwark Plan (2022).

55. PLANT NOISE

The Rated sound level from any plant, together with any associated ducting shall not exceed the Background sound level ($L_{A90\ 15min}$) at the nearest noise sensitive premises. Furthermore, the plant Specific sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific sound levels shall be calculated in full accordance with the methodology of BS4142:2014 +A1:2019.

Prior to the plant being commissioned a validation test shall be carried out following completion of the development. The results along with details of any

acoustic mitigation measures shall be submitted to and approved in writing by the Local Planning Authority. The plant and equipment shall be installed, constructed and operated in accordance with the approval given and shall be permanently maintained thereafter.

Reason: To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the National Planning Policy Framework (2024); Policy P56 (Protection of amenity) and Policy P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan (2022).

56. TRAVEL PLAN

a) Upon reaching 50% occupancy of the development, the applicant shall submit in writing and obtain the written approval of the Local Planning Authority to a Travel Plan, written in accordance with TfL best guidance at the time of submission, including a baseline travel survey and setting out the proposed measures to be taken to encourage the use of modes of transport other than the car by all users of the building, including staff and visitors.

b) At the end of the first year of operation of the approved Travel Plan, a detailed survey showing the methods of transport used by all those users of the development to and from the site and how this compares with the proposed measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise in accordance with any such approval given.

c) At the end of the third year of operation of the approved Travel Plan, a detailed survey showing the methods of transport used by all those users of the development to and from the site and how this compares with the proposed measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise in accordance with any such approval given.

c) At the end of the fifth year of operation of the approved Travel Plan a detailed survey showing the methods of transport used by all those users of the building to and from the site and how this compares with the proposed measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise in accordance with any such approval given.

Reason: In order that the use of non-car-based travel is encouraged in accordance with the National Planning Policy Framework (2024); Policy T4 (Assessing and mitigating transport impacts), T5 (Cycling) and Policy T6 (Car parking) of the London Plan (2021); Policy P49 (Public transport), Policy P50 (Highway impacts), Policy P51 (Walking), Policy P53 (Cycling) and Policy P54

(Car parking) of the Southwark Plan (2022).

Informatives

1 The proposed conversion of the basement level appears to not affect the integrity of the existing adopted highway in terms of supporting structures, however an AIP (Approval In Principle) both temporary and permanent for highway retaining structures will be required if the basement walls and foundations are affected during demolition of any part of the existing structure.

Prior to development works commencing on site (including any demolition) a joint condition survey should be arranged with Southwark Highway Development Team to catalogue condition of streets, drainage gullies and street furniture. Please contact the team via highwaysdm@southwark.gov.uk

2 The applicant is advised to contact London Underground Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; excavation; construction methods; security; boundary treatment; safety barriers; landscaping and lighting. The consultation response made by London Underground is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

3 The Environment Agency recommends that flood resistant and resilient measures are incorporated in to the design and construction of the development proposals, where practical considerations allow, using guidance contained within the Department for Communities & Local Government (DCLG) document 'Improving the flood performance of new buildings: flood resilient construction'.

The developer should be aware of the potential risks associated with the use of piling where contamination is an issue. Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters. The EA recommend that where soil contamination is present, a risk assessment is carried out in accordance with EA guidance 'Piling into Contaminated Sites'. The EA will not permit piling activities on parts of a site where an unacceptable risk is posed to controlled waters.

4 The developer can request information to support the discharge of the waste network condition by visiting the Thames Water website at thameswater.co.uk/preplanning.

The applicant is advised to read the TW guide 'working near our assets' to ensure the workings will be in line with the necessary processes which need to be follow if considering working above or near TW pipes or other structures.

https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes For further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Please note where network modelling is required, Thames Water will need confirmation of outline planning permission, a development phasing plan, and evidence of land ownership to be submitted to devcon.team@thameswater.co.uk . Modelling can take 9-12 months to complete and will not commence until these have been provided.

Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Water's pipes. The developer should take account of this minimum pressure in the design of the proposed development.

There are water mains crossing or close to the development. The proposed development is located within 15m of a strategic water main. Thames Water do not permit the building over or construction within 3m of water mains. If significant works are planned near TW mains (within 3m), TW will need to check that the development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services TW provide in any other way.

Public sewers are crossing or close to the development. Build over agreements are required for any building works within 3 metres of a public sewer and, or within 1 metre of a public lateral drain. This is to prevent damage to the sewer network and ensures TW have suitable and safe access to carry out maintenance and repairs. Please refer to TW guide on working near or diverting TW pipes. Please ensure to apply to determine if a build over agreement will be granted.

As required by Building Regulations part H paragraph 2.36, Thames Water requests that the applicant should incorporate within their proposal protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. TW would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

TW would expect the developer to demonstrate what measures will be

undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

APPENDIX 2

Recommendation for the LBC application

This document shows the case officer's recommended decision for the application referred to below.
This document is not a decision notice for this application.

Applicant	GPE (St Thomas Street) Limited	**Ref. Number**	24/AP/3804
Application Type	Listed Building Consent		
Recommendation			

Draft of Decision Notice

for the following development:

Listed building consent for the restoration, rebuilding and refurbishment of the listed terraces for office use (nos. 4-16 St Thomas Street) including: Making good of atrium roof, entrance building and link building interface; Internal alterations within the terrace to reinstate the plan form and reconfiguration of circulation space on each floor; Reinstatement of front doors along St Thomas Street. (Related planning application ref. 24/AP/3803.)

New City Court 4-26 St Thomas Street London SE1 9RS

In accordance with application received on 23 December 2024 **and Applicant's Drawing Nos.**:

Existing Plans

Proposed Plans

Other Documents

1. The consent shall be carried out in accordance with the following approved plans and documents:
   STY-ORM-ZZ-LG-DR-A-40300 – Georgian Terrace LG Rev C01
   STY-ORM-ZZ-LG-DR-A-40301 – Georgian Terrace G Rev C01
   STY-ORM-ZZ-LG-DR-A-40302 – Georgian Terrace L1 Rev C01
   STY-ORM-ZZ-LG-DR-A-40303 – Georgian Terrace L2 Rev C01
   STY-ORM-ZZ-LG-DR-A-40304 – Georgian Terrace L3 Rev C01
   STY-ORM-ZZ-LG-DR-A-40305 – Georgian Terrace LR Rev C01
   STY-ORM-ZZ-LG-DR-A-40226 – Georgian Terrace Section AA Rev C01
   STY-ORM-ZZ-LG-DR-A-40227 – Georgian Terrace Section BB Rev C01
   STY-ORM-ZZ-LG-DR-A-40228 – Georgian Terrace Section CC Rev C01
   STY-ORM-ZZ-LG-DR-A-40229 – Georgian Terrace Axonometric 1 Rev C01
   STY-ORM-ZZ-LG-DR-A-40230 – Georgian Terrace Axonometric 2 Rev C01

STY-ORM-ZZ-LG-DR-A-40231 – Georgian Terrace Atrium Rev C01
STY-ORM-ZZ-LG-DR-A-40220 – Demolition and Proposed Lower Ground Floor Rev C02
STY-ORM-ZZ-LG-DR-A-40221 – Demolition and Proposed Ground Floor Rev C02
STY-ORM-ZZ-LG-DR-A-40222 – Demolition and Proposed First Floor Rev C02
STY-ORM-ZZ-LG-DR-A-40223 – Demolition and Proposed Second Floor Rev C02
STY-ORM-ZZ-LG-DR-A-40224 – Demolition and Proposed Third Floor Rev C02
STY-ORM-ZZ-LG-DR-A-40225 – Georgian terrace roof plan Rev C01
STY-ORM-ZZ-CC-DR-A-12426 – Proposed Section DD Rev C01
STY-ORM-ZZ-NO-DR-A-12600 C02 Proposed north elevation
STY-ORM-ZZ-LG-DR-A-40229 – Georgian Terrace Axonometric 1 C01
STY-ORM-ZZ-LG-DR-A-40230 – Georgian Terrace Axonometric 2 C01

Reason: For the avoidance of doubt and in the interests of conserving the architectural and historic significance of the listed building.

Time limit for implementing this permission and the approved plans

2. The development hereby permitted shall be begun before the end of three years from the date of this permission.

Reason: As required under Section 18 of the Planning (Listed Buildings & Conservation Areas) Act (1990) as amended.

Permission is subject to the following Pre-Commencements Condition(s)

3. SCHEDULE OF WORK TO INTERIORS
Prior to commencement of each element of the following works, a Method Statement and Schedule of Works and drawings for the repair and relocation (where applicable) for the following historic fabric shall be submitted to and approved by the Local Planning Authority in writing;
i) Removal and making good of existing modern partitions
ii) Remodelling of existing WC / Kitchen areas
iii) Removal of internal modern fittings including secondary glazing (where applicable)
iv) Removal and installation of M&E services

The works shall not be carried out otherwise than in accordance with any such approval given.

Reason: In order to ensure that the proposed works are in the interest of the special architectural or historic qualities of the listed building in accordance with Chapter 16 (Conserving and enhancing the historic environment) of the National Planning Policy Framework (2024); Policy HC1 (Heritage conservation and growth) of the London Plan (2021) and; Policy P19 (Listed buildings and structures) of the Southwark Plan (2022).

4. DETAIL DRAWINGS - EXTERIOR WORKS

Prior to commencement of each element of the following works, the following details shall be submitted to the Local Planning Authority for its approval in writing:
1:5/10 section detail-drawings through:
A) the front door entrance level changes, including any alterations to the railings, and specifying the materials.
B) the replacement roof to no. 8 St Thomas Street.
C) the replacement painted metal stairs and cycle channel in front of no. 4 St Thomas Street.

The works shall not be carried out otherwise than in accordance with any such approval given.

Reason: In order to ensure that the design and details are in the interest of the special architectural or historic qualities of the listed building in accordance with the National Planning Policy Framework (2024); Policy HC1 (Heritage conservation and growth) and Policy D4 (Delivering good design) of the London Plan (2021); Policy P13 (Design of places), Policy P14 (Design quality) and Policy P19 (Listed buildings and structures) of the Southwark Plan (2022).

5. DETAIL DRAWINGS - GLAZED ROOF
Prior to commencement of any element of the following works, the following details shall be submitted to the Local Planning Authority for its approval in writing 1:5/10 section detail-drawings of the glazed roof to the atrium, including all connections to the rears and flanks of the listed buildings. The works shall not be carried out otherwise than in accordance with any such approval given.

Reason: In order to ensure that the design and details are in the interest of the special architectural or historic qualities of the listed building in accordance with the National Planning Policy Framework (2024); Policy HC1 (Heritage conservation and growth) and Policy D4 (Delivering good design) of the London Plan (2021); Policy P13 (Design of places), Policy P14 (Design quality) and Policy P19 (Listed buildings and structures) of the Southwark Plan (2022).

6. ROOF TILE SAMPLE
Prior to any demolition at roof level, material samples of the new roof tiles to the rear roof of no. 8 St Thomas Street to be used in the carrying out of this consent shall be submitted to and approved in writing by the Local Planning Authority. The works shall not be carried out otherwise than in accordance with any such approval given.

Reason: In order to ensure that the proposed works are in the interest of the special architectural or historic qualities of the listed building in accordance with Chapter 16 (Conserving and enhancing the historic environment) of the National Planning Policy Framework (2024); Policy HC1 (Heritage conservation and growth) of the London Plan (2021) and; Policy P19 (Listed buildings and structures) of the Southwark Plan (2022).

Permission is subject to the following Compliance Condition(s)

7. MAKING GOOD
All new internal/external works and finishes and works of making good shall match existing original work adjacent in respect of materials used, detailed execution and finished appearance, except where indicated otherwise on the drawings hereby approved or as required by any condition(s) attached to this consent.

Reason: In order to ensure that the design and details are in the interest of the special architectural or historic qualities of the listed building in accordance with the National Planning Policy Framework (2024); Policy D4 (Delivering good design) of the London Plan (2021); Policy P13 (Design of places), Policy P14 (Design quality) and Policy P19 (Listed buildings and structures) of the Southwark Plan (2022).

APPENDIX 3

Planning policies and material considerations

Appeal decisions

1. The appeal decisions on the four appeal schemes (detailed further in appendix 4 as an important part of the planning history of the site) form material considerations for the current applications. The two planning applications refs. 18/AP/4039 and 21/AP/1361 were dismissed by the Secretary of State, and the two listed building consents refs. 18/AP/4040 and 21/AP/1364 were allowed.

National Planning Policy Framework 2024

2. The revised National Planning Policy Framework ('NPPF') was revised on 12 December 2024 and sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental. Paragraph 231 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications. The relevant chapters from the Framework for the planning application are as follows, and chapter 16 is relevant to the LBC application:

- Chapter 2 Achieving sustainable development
- Chapter 6 Building a strong, competitive economy
- Chapter 7 Ensuring the vitality of town centres
- Chapter 8 Promoting healthy and safe communities
- Chapter 9 Promoting sustainable transport
- Chapter 10 Supporting high quality communications
- Chapter 11 Making effective use of land
- Chapter 12 Achieving well-designed places
- Chapter 14 Meeting the challenge of climate change, flooding and coastal change
- Chapter 15 Conserving and enhancing the natural environment
- Chapter 16 Conserving and enhancing the historic environment.

The London Plan 2021

3. On 2 March 2021, the Mayor of London published the London Plan. The spatial development strategy sets a strategic framework for planning in Greater London and forms part of the statutory Development Plan for Greater London. The relevant policies for the LBC application are D4 and HC1, and for the planning application are:

- Policy GG1 - Building strong and inclusive communities
- Policy GG2 - Making the best use of land
- Policy GG3 - Creating a healthy city
- Policy GG5 - Growing a good economy
- Policy GG6 - Increasing efficiency and resilience

- Policy SD1 Opportunity Areas
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, other strategic functions and residential development in the CAZ
- Policy SD6 Town centres and high streets
- Policy SD7 Town centres: development principles and Development Plan Documents
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering good design
- Policy D5 Inclusive design
- Policy D8 Public realm
- Policy D9 Tall buildings
- Policy D10 Basement development
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire safety
- Policy D14 Noise
- Policy S1 Developing London's social infrastructure
- Policy S6 Public toilets
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E3 Affordable workspace
- Policy E8 Sector growth opportunities and clusters
- Policy E11 Skills and opportunities for all
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries
- Policy HC6 Supporting the night-time economy
- Policy G1 Green infrastructure
- Policy G4 Open space
- Policy G5 Urban greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy SI 1 Improving air quality
- Policy SI 2 Minimising greenhouse gas emissions
- Policy SI 3 Energy infrastructure
- Policy SI 4 Managing heat risk
- Policy SI 5 Water infrastructure
- Policy SI 6 Digital connectivity infrastructure
- Policy SI 7 Reducing waste and supporting the circular economy
- Policy SI 10 Aggregates
- Policy SI 12 Flood risk management
- Policy SI 13 Sustainable drainage
- Policy T1 Strategic approach to transport

- Policy T2 Healthy Streets
- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car parking
- Policy T6.2 Office Parking
- Policy T6.5 Non-residential disabled persons parking
- Policy T7 Deliveries, servicing and construction
- Policy T9 Funding transport infrastructure through planning
- Policy DF1 Delivery of the Plan and planning obligations.

The Southwark Plan 2022

4. The Southwark Plan was adopted on 23 February 2022. The plan provides strategic policies, development management policies, area visions and site allocations which set out the strategy for managing growth and development across the borough from 2019 to 2036. The site is within the London Bridge Area Vision, AV.11. The strategic vision and strategic policies of the Southwark Plan set targets for the CAZ and Opportunity Area:

5. The relevant policies of the Southwark Plan for the planning application are:
    - ST1 Southwark's Development Targets
    - ST2 Southwark's Places
    - SP2 Southwark Together
    - SP3 Great start in life
    - SP4 Green and inclusive economy
    - SP5 Thriving neighbourhoods and tackling health equalities
    - SP6 Climate emergency
    - P13 Design of places
    - P14 Design quality
    - P16 Designing out crime
    - P17 Tall buildings
    - P18 Efficient use of land
    - P19 Listed buildings and structures
    - P20 Conservation areas
    - P21 Conservation of the historic environment and natural heritage
    - P22 Borough views
    - P23 Archaeology
    - P24 World heritage sites
    - P26 Local list
    - P28 Access to employment and training
    - P30 Office and business development
    - P31 Affordable workspace
    - P33 Business relocation
    - P35 Town and local centres
    - P43 Outdoor advertisements and signage
    - P44 Broadband and digital infrastructure
    - P45 Healthy developments

- P46 Leisure, arts and culture
- P47 Community uses
- P49 Public transport
- P50 Highways impacts
- P51 Walking
- P53 Cycling
- P54 Car Parking
- P55 Parking standards for disabled people and the physically impaired
- P56 Protection of amenity
- P60 Biodiversity
- P61 Trees
- P62 Reducing waste
- P64 Contaminated land and hazardous substances
- P65 Improving air quality
- P66 Reducing noise pollution and enhancing soundscapes
- P67 Reducing water use
- P68 Reducing food risk
- P69 Sustainability standards
- P70 Energy
- IP1 Infrastructure
- IP2 Transport infrastructure
- IP3 Community infrastructure levy (CIL) and Section 106 planning obligations
- IP6 Monitoring development.

6. The relevant policies of the Southwark Plan for the LBC application are:
    - P13 Design of places
    - P14 Design quality
    - P19 Listed buildings and structures
    - P20 Conservation areas
    - P21 Conservation of the historic environment and natural heritage.

7. The Southwark Plan responds positively to the NPPF, by incorporating area visions, development management policies and site allocations which plan for the long term delivery of housing. It responds to rapid change which is occurring in Southwark and London as a whole and responds positively to the changing context of the London Plan.

Supplementary Planning Document and other relevant documents

8. The London Plan planning guidance relevant to the proposal includes:
    - Accessible London SPG
    - Air quality neutral LPG
    - Air quality positive LPG
    - Been Seen Energy Monitoring LPG
    - Characterisation and growth strategy LPG
    - Circular economy statements LPG
    - Digital connectivity infrastructure LPG draft

- Energy Planning Guidance
- Fire safety LPG draft
- London View Management Framework SPG
- London World Heritage Sites SPG
- Optimising site capacity: A design-led approach LPG
- Public London Charter LPG
- Sustainable transport, walking and cycling LPG
- The control of dust and emissions in construction SPG
- Urban Greening Factor LPG
- Whole life carbon LPG.

9. Southwark Supplementary Planning Documents (SPDs):
    - Heritage SPD (2021)
    - Section 106 Planning Obligations and CIL SPD (2020)
    - 2015 Technical Update to the Residential Design Standards (2011) SPD
    - Borough High Street Conservation Area Appraisal (June 2006).

10. Draft Southwark SPDs:
    The council has recently consulted on three draft SPDs, two of which are relevant to the proposal:
    - Section 106 and CIL SPD to replace the adopted 2020 version. This SPD is due to the be considered at the 7 July 2025 Cabinet meeting, and so may be adopted prior to the Planning Committee meeting.
    - Climate and environment SPD.

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

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

APPENDIX 4

Relevant planning history of the site and nearby sites

Application site

1. Relevant planning history for the application site is summarised below.

Reference and Proposal	Status
17/EQ/0208 Redevelopment of the site for construction of an office building with public terrace and retail space (including changes to listed St Thomas Street terrace to provide retail units), relocation of Keats House and associated public realm and highway works.	Letter sent 19 December 2018
18/AP/2633 Request for an Environmental Impact Assessment (EIA) Scoping Opinion for the redevelopment of the site (comprising numbers 4-16, 20 and 24-26 St Thomas Street) including: Demolition of 20 St Thomas Street and construction of a new office tower building approximately 139m high (comprising double height ground floor reception and retail, 31 storeys of office space, and double height publicly accessible elevated garden and retail unit) totalling 31,200sqm of office and retail floorspace. Double basement for servicing, cycle storage, refuse storage and plant, with vehicle access from Kings Head Yard and two disabled parking spaces. Relocation of Keats House (24-26 St Thomas Street) facade 2m to the west in a new stand alone building. Alterations to and restoration of the listed terrace (8-14 St Thomas Street). Up to 1,800sqm of retail and office floorspace in the listed terrace and Keats House. A new access to the London Bridge Underground station. New ground level pedestrian routes and public realm throughout the site with hard and soft landscaping. Ancillary servicing, highway works and associated works.	Scoping opinion issued 4 October 2018
18/AP/3093 Retrospective Planning application for installation of 1 x new air handling unit and 2 x new air conditioning units to flat roof at the rear of second floor of the existing building following a removal of existing one air conditioning units and relocation of existing three air conditioning units on the same roof.	Granted 1 May 2019

18/AP/4039 Redevelopment to include demolition of the 1980s office buildings and erection of a 37 storey building (plus two basement levels) of a maximum height of 144m (AOD), restoration and refurbishment of the listed terrace (nos. 4-16 St Thomas Street) and change of use of lower floors to Class A1 retail, and redevelopment of Keats House (nos. 24-26 St Thomas Street) with removal, relocation and reinstatement of the historic façade on a proposed building, to provide a total of 46,374sqm of Class B1 office floorspace, 765sqm of Class A1 retail floorspace, 1,139sqm of Class A3 retail floorspace, 615sqm of leisure floorspace (Class D2), 719sqm hub space (Class B1/D2) and a 825sqm elevated public garden within the 37-storey building, associated public realm and highways improvements, provision for a new access to the Borough High Street entrance to the Underground Station, cycling parking, car parking, service, refuse and plant areas, and all ancillary or associated works. (Associated listed building consent application ref. 18/AP/4040). The application is accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, which can be viewed on the council website southwark.gov.uk using the reference number. Planning Inspectorate's reference APP/A5840/W/22/3290473 (and council's appeal reference APPEAL/22/0003)	Appeal dismissed 21 September 2023
18/AP/4040 Restoration, rebuilding and refurbishment of the listed terrace (nos. 4-16 St Thomas Street) including: Demolition of 1980s fabric across the rear elevation and demolition of the attached 1980s office building, and reinstatement of the rear elevation of the terrace and provision of shopfronts. Rebuild the second floor, roof and chimneys of no. 16, reskin the side façade and creation of ground floor entrances. Rebuild the roof and chimneys of no. 14. Removal and replacement of roof slates with natural slate to nos. 4-12. Opening up the ground floor passageway between nos. 8 and 10 by removing 1930s door, and reinstate two adjacent door openings on front elevation. Replacement of two second floor windows on front elevation. Replacement of secondary glazing to front elevation. Alterations to the front elevation of the lower ground level and vaults beneath the pavement. Internal alterations within the terrace to rearrange the ground and lower ground levels for retail units (with new stairs between) and upper levels for office units, reinstate the plan form, internal features and providing a staircase in no.12. Cleaning the brickwork, works to repair sash windows, restore the railings and first floor balconettes. (Listed building consent application. Associated planning application ref. 18/AP/4039) Planning Inspectorate reference APP/A5840/Y/22/3290477 (and council reference APPEAL/22/0001)	Appeal allowed 21 September 2023

20/EQ/0286 Pre-application advice for redevelopment to include demolition of the 1980s office buildings and erection of an office building, restoration and refurbishment of the listed terrace and works to Keats House, provision of retail floorspace, associated public realm and highways improvements, provision for a new LUL station access, cycle parking, car parking, service, refuse and plant areas, and all ancillary or associated works.	Letter sent 17 April 2021
21/AP/1361 Redevelopment to include demolition of the 1980s office buildings and erection of a 26-storey building (plus mezzanine and two basement levels) of a maximum height of 108.0m AOD, restoration and refurbishment of the listed terrace (nos. 4-16 St Thomas Street), and redevelopment of Keats House (nos. 24-26 St Thomas Street) with removal, relocation and reinstatement of the historic façade on a proposed building, to provide 46,442sqm GEA of Class E(g)(i) office floorspace, 358sqm GEA flexible office E(g)(i)/retail E(a) floorspace, 450sqm GEA Class E(b) restaurant/cafe floorspace and a public rooftop garden, and 5,449sqm GEA of affordable workspace within the Georgian terrace, Keats House and part of the tower, associated public realm and highways improvements, provision for a new access to the Borough High Street entrance to the Underground Station, cycling parking, car parking, service, refuse and plant areas, and all ancillary or associated works. (Associated listed building consent app 21/AP/1364). The application is accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, which can be viewed on the council website southwark.gov.uk using the reference number. Planning Inspectorate's reference APP/A5840/W/22/3290483 (and council's appeal reference APPEAL/22/0004 to view the appeal documents)	Appeal dismissed 21 September 2023

21/AP/1364 Listed building consent for restoration, rebuilding and refurbishment of the listed terrace (nos. 4-16 St Thomas Street) including: Demolition of 1980s fabric across the rear elevation and demolition of the attached 1980s office building, reinstatement of the rear elevation of the terrace, and recladding and partial rebuilding of rear walls. Rebuild roof and chimneys, reskin the side façade and front façade at top floor level of 1980s extension. Rebuild the roof and chimneys of no. 14. Removal and replacement of roof slates with natural slate to nos. 4-16. Opening up the ground floor passageway between nos. 8 and 10 by removing 1930s door, and reinstate two adjacent door openings on front elevation. Replacement of two second floor windows on front elevation. Replacement of secondary glazing to front elevation. Alterations to the front elevation of the lower ground level and vaults beneath the pavement. Internal alterations within the terrace to reinstate the plan form and the internal features, rearrange the circulation between the lower ground and upper levels (with reinstated stairs in between) for office use. Cleaning the brickwork, repointing, works to repair sash windows, restore the railings and first floor balconettes of the north façade. (Associated planning application ref. 21/AP/1361) Planning Inspectorate reference APP/A5840/Y/22/3290490 (and council's appeal reference APPEAL/22/0002)	Appeal allowed 21 September 2023
24/EQ/0048 Pre-application advice for the partial demolition, remodelling and extension of the existing 1980s office building and retention and refurbishment of the historic building along St Thomas Street to provide additional office accommodation (Class E) alongside landscaping enhancements, improved servicing arrangements and other associated works (meeting and written advice).	Letter sent 20 December 2024

25/AP/0051 Request for an EIA Screening Opinion for the redevelopment of the site including partial demolition, extension and renewal of the existing office building to provide additional high quality office space, the redevelopment of Keats House with the retention of the existing historic facade, and the restoration and refurbishment of the grade II listed Georgian terraces. Redevelopment of the site to include: - Redevelopment of the existing 1980s office building with partial demolition (including demolition of the St Thomas Street entrance buidling and the King's Head Yard facade) the contruction of side extensions and upward extension to add five storeys and create a ten storey office building plut plant, balconies, roof terraces and an office entrance on King's Head Yard -Revelopment of Keats House (nos 24-26 St Thomas Street) with retention of the historic frontage and constrution of a roof extension to add one storey of office floorspace -Restoration and refurbishment of the listed Georgian terrace (nos 4-16 St Thomas Street) to created level front entrances to the offices, internal alterations and new glazed roof to the rear courtyard -Associates public realm and highway works to St Thomas Street and King's Head Yard, cycle parking and all ancillary works	Negative screening opinion issued 30 January 2025

Adjacent sites

2. Conybeare And Keats House Guys Hospital, 24-26 St Thomas Street

19/AP/5519 Works to the party wall between Keats House (nos. 24-26 St Thomas Street) and Conybeare House, including: removal of link to Keats House, reinstatement of the string courses and cornice to Conybeare House, and refurbishment of existing fire escape. (Works associated with applications ref. 18/AP/4039 and 18/AP/4040 for adjoining New City Court 4-26 St Thomas Street, SE1 9RS).	Withdrawn
19/AP/5520 Works to the party wall between Keats House (nos. 24-26 St Thomas Street) and Conybeare House, including: removal of link to Keats House, reinstatement of the strong courses and cornice to Conybeare House, and refurbishment of existing fire escape.	Withdrawn
21/AP/2591 Works to the party wall between Keats House (nos. 24-26 St Thomas Street) and Conybeare House, including removal of links to Keats House and the following works to Conybeare House: - Restoration of the corner and side wall of Conybeare House, exposed from the moving of Keats House west; - The cornice partially returned along the exposed side wall of Conybeare House; - Removal of the non-original existing parapet and replace with new coping; - Installation of a rendered based to the newly exposed wall; - Refurbishment of existing fire escape in Conybeare House; - Erection of a green wall on the exposed elevation of Conybeare House to screen the fire escape, in front of which is a proposed new 750mm-deep planter for creeping foliage (associated application references 21/AP/2592 (listed building consent) and 21/AP/1361 and 21/AP/1364 for New City Court).	Withdrawn
21/AP/2592 Listed building consent: Works to the party wall between Keats House and Conybeare House, including: removal of link to Keats House, reinstatement of the string courses and cornice to Conybeare House and refurbishment of existing fire escape.	Withdrawn

APPENDIX 5

Consultation undertaken

Site notice date: 13/02/2025
Press notice date: 13/02/2025
Case officer site visit date: 13/02/2025
Neighbour consultation letters sent: 19/02/2025

Internal services consulted

LBS Archaeologist
LBS Building Control Division
LBS CCTV - Public Space Surveillance
LBS Community Infrastructure Team
LBS Design And Conservation Team
LBS Ecology Officer
LBS Environmental Protection Team
LBS Flood Risk Management & Urban Drainage Team
LBS Highways Development & Management
LBS Highways Licensing
LBS Local Economy
LBS Network Developments Construction Management Plans
LBS Planning Policy
LBS Transport Policy Team
LBS Urban Forester
LBS Waste Management Team

Statutory and non-statutory organisations

Active Travel England
Arqiva
Bankside Open Spaces Trust
Better Bankside
Borough Market
City Of London
Civil Aviation Authority
Environment Agency
Heathrow Airport Safeguarding
Historic England - Heritage
Historic Royal Palaces
London Borough Of Tower Hamlets
London Fire & Emergency Planning Authority
London Underground
Metropolitan Police Service (Designing Out Crime)
National Air Traffic Safeguarding Office
Natural England - London Region & South East Region
Network Rail
Port Of London Authority
Team London Bridge
The Georgian Group

The Victorian Society
Team London Bridge
Thames Water
Transport For London
UK Power Networks

Neighbour and local groups consulted:

Flat 48 Orchard Lisle House Talbot Yard London
Flat 40 Orchard Lisle House Talbot Yard
Flat 34 Orchard Lisle House Talbot Yard
Unit 7 Shard Arcade Joiner Street
Borough Suite Ground Floor 8 St Thomas Street London
Flat 21 4 - 6 London Bridge Street London
Flat 15 4 - 6 London Bridge Street London
Unit 310 Shard Arcade Joiner Street
Unit 306 Shard Arcade Joiner Street
Apartment 62 The Shard Residences The Shard 31 St Thomas Street
Flat 2 4 - 6 London Bridge Street London
Flat 2 Southwark Tavern 22 - 22A Southwark Street
Second Floor 21 St Thomas Street London
The Telephone Exchange London Bridge Street London
2 Railway Approach London Southwark
3A Kings Head Yard London Southwark
1 - 7 St Thomas Street London Southwark
2 - 3 White Hart Yard London Southwark
Upstairs At The Globe 8 Bedale Street London
Agora 2 - 4 Bedale Street London
Ground Floor 1 Talbot Yard London
Unit 4 Shard Arcade Joiner Street
Second Floor 3 Southwark Street London
Basement And Part Ground Floor 21 Borough High Street Southwark
7 Borough High Street Southwark SE1 9SU
John Trevor Williams Room Southwark Cathedral Montague Close
Tiverton Suite 8 St Thomas Street London
1 London Bridge Street London Southwark
Ground Floor 4 - 6 London Bridge Street London
Office 2.12 North East Georgian Wing New City Court 20 St Thomas Street
Office 2.6 North East Georgian Wing New City Court 20 St Thomas Street
Office 2.5 North East Georgian Wing New City Court 20 St Thomas Street
Office 2.1 North East Georgian Wing New City Court 20 St Thomas Street
Meeting Room 2.11 North East Georgian Wing New City Court 20 St Thomas Street
Suite 2 Ground Floor 9 St Thomas Street London
Suite 1 Ground Floor 9 St Thomas Street London
Third Floor 89 Borough High Street Southwark
Third Floor 85 - 87 Borough High Street Southwark
Basement Rear 85 - 87 Borough High Street Southwark
79 - 81 Borough High Street Southwark SE1 1NH
Second Floor Flat 69 - 73 Borough High Street Southwark
65 Borough High Street Southwark SE1 1NF
57 Borough High Street Southwark SE1 1NE
Flat 2 53 - 55 Borough High Street Southwark
Second Floor 47 - 49 Borough High Street Southwark
43 Borough High Street Southwark SE1 1LZ
Second Floor Rear 42 Borough High Street Southwark
First Floor Front 42 Borough High Street Southwark
Third Floor Evans Lombe House 38 Borough High Street
Flat 1 Town Hall Chambers 32 Borough High Street

28 Borough High Street Southwark SE1 1YB
Second Floor Birrane House 2 - 4 Southwark Street
Level 27A The Shard 32 London Bridge Street
Level 10 South The Shard 32 London Bridge Street
Suite 2513 Level 25 The Shard 32 London Bridge Street
Suite 2501 Level 25 The Shard 32 London Bridge Street
Office B Level 13 The Shard 32 London Bridge Street
Office A Level 13 The Shard 32 London Bridge Street
Pantry Level 24 The Shard 32 London Bridge Street
Suite 2408 Level 24 The Shard 32 London Bridge Street
Suite 2402 Level 24 The Shard 32 London Bridge Street
Meeting Room 4 Level 24 The Shard 32 London Bridge Street
Furniture Store 2 Level 24 The Shard 32 London Bridge Street
Area 2 Level 15 The Shard 32 London Bridge Street
South Level 19 The Shard 32 London Bridge Street
2 - 3 Stoney Street London Southwark
Flat 518 Orchard Lisle House Talbot Yard
Flat 318 Orchard Lisle House Talbot Yard
Room 29 Boland House St Thomas Street
Room 25 Boland House St Thomas Street
Room 4 Boland House St Thomas Street
Unit 313 Shard Arcade Joiner Street
Kings Food Guys Hospital Medical School Great Maze Pond
Flat 6 4 - 6 London Bridge Street London
Unit 15 Shard Arcade Joiner Street
Level 2 The Shard 32 London Bridge Street
Flat 4 1 Talbot Yard London
Unit 311 Shard Arcade Joiner Street
Flat 11 4 - 6 London Bridge Street London
Flat 68 Orchard Lisle House Talbot Yard
Flat 57 Orchard Lisle House Talbot Yard
Flat 55 Orchard Lisle House Talbot Yard
Flat 24 Orchard Lisle House Talbot Yard
Flat 8 Iris Brook House Talbot Yard
Flat 5 Iris Brook House Talbot Yard
Fourth Floor 5 - 7 Southwark Street London
Flat 515 Orchard Lisle House Talbot Yard
Flat 3 4 - 6 London Bridge Street London
Unit 1 21 St Thomas Street London
Flat 80 Orchard Lisle House Talbot Yard
Flat 74 Orchard Lisle House Talbot Yard
Flat 71 Orchard Lisle House Talbot Yard
Flat 62 Orchard Lisle House Talbot Yard
Flat 42 Orchard Lisle House Talbot Yard
Flat 30 Orchard Lisle House Talbot Yard
Montague Suite Ground Floor 8 St Thomas Street London
100 Fetter Lane London EC4A 1BN
70 Cowcross Street London EC1M 6EJ
1 Melior Place London SE1 3SZ
London Bridge London SE1 9DA
Flat 18 14 Keppel Row London
51 Southwark Street London SE11RU
King's College London 5-11 Lavington Street London
9A St Thomas Street London SE1 9RY
Third Floor 5-11 Lavington Street London
Church House 27 Great Smith Street London
140 London Wall London EC2Y 5DN
C/O 140 London Wall EC2Y 5DN
C/O 140 London Wall EC2M 5DN
Flat 7, 5 Plantain Place London SE1 1YN
8 Playhouse Court London SE1 0AT
33 Margaret Street London W1G 0JD
48 Dunsterville Way London Southwark
18 Great Guildford Street London Southwark
20 New Globe Walk Flat 4 London
Francis House 9 Kings Head Yard London
6 Fitzroy Square London W1T 5DX
Flat 9 Preston House Preston Close SE1 4NZ
8 Milton Close London Se15td
Flat 805 9 Steedman Street London
121 Guinness Court Snowsfields London

33 West Square Kennington London
13 John Maurice Close Flat 1 London
4 Ivory House East Smithfield London
Maltings Place London SE13LJ
15 Alscot Way London Se1 5xu
28 Bermondsey Wall West London SE16 4UB

16 Snowsfields London Southwark
9 Newspaper House 40 Rushworth St London
20 Farringdon Street London, EC4A 4AB, United Kingdom
177 Neckinger Estate London SE16 3QG
Flat 7, Eynsford House Crosby Row London

Flat 1 28 Clennam Street London

Southwark Cathedral Montague Close London
Guildable Manor Colechurch House London
Flat 510 Orchard Lisle House Talbot Yard
Apartment 60 The Shard Residences The Shard 31 St Thomas Street
Apartment 53 The Shard Residences The Shard 31 St Thomas Street
Flat 7 4 - 6 London Bridge Street London
Site Office The Shard 32 London Bridge Street
Managers Flat 8 Southwark Street London
2 Bridge Arcade Green Dragon Court London
Destination Health 8 St Thomas Street London
Flat 115 Matilda House St Katharines Way London
Manor Way Ruislip HA4 8HD
212 Helen Gladstone House Nelson Square London
Unit 14 Shard Arcade Joiner Street
Refectory Southwark Cathedral Montague Close
First Floor Flat 4 - 6 London Bridge Street London
Flat 81 Orchard Lisle House Talbot Yard
Basement And Ground Floor 8 London Bridge Street London
Basement 1 Talbot Yard London
5A Stoney Street London Southwark
Queen Elizabeth Room Southwark Cathedral Montague Close
Basement New City Court 20 St Thomas Street
Eze Castle Integration New City Court St Thomas Street
Southwark Suite 8 St Thomas Street London
Fourth Floor 3 London Bridge Street London
Ground Floor 3 Kings Head Yard London
Meeting Room 2.4 North East Georgian Wing New City Court 20 St Thomas Street
Suite 3 Ground Floor 9 St Thomas Street London
First Floor 9 St Thomas Street London
Ground Floor East Ebbark House 93 - 95 Borough High Street
Ground Floor North Ebbark House 93 - 95 Borough High Street
91 Borough High Street Southwark SE1 1NL
Ground Floor 89 Borough High Street Southwark
83 Borough High Street Southwark SE1 1NH
63 Borough High Street Southwark SE1 1NF
Third Floor 47 - 49 Borough High Street Southwark
Flat 1 43 Borough High Street Southwark
Basement Front 42 Borough High Street Southwark
Second Floor Front 42 Borough High Street Southwark
40 Borough High Street Southwark SE1 1XW
Flat 8 Town Hall Chambers 32 Borough High Street
Flat 2 Town Hall Chambers 32 Borough High Street
Flat 2 30 Borough High Street Southwark
27 - 29 Borough High Street Southwark SE1 1LY
First And Second Floor 21 Borough High Street Southwark
Basement And Ground Floor 19 Borough High Street Southwark
First Floor 19 Borough High Street

Southwark
Level 8 The Shard 32 London Bridge Street
Level 26 The Shard 32 London Bridge Street
Level 22 North The Shard 32 London Bridge Street
Level 11 South The Shard 32 London Bridge Street
Level 10 North The Shard 32 London Bridge Street
Store 2 Level 25 The Shard 32 London Bridge Street
Suite 2515 Level 25 The Shard 32 London Bridge Street
Suite 2503 Level 25 The Shard 32 London Bridge Street
Office C Level 13 The Shard 32 London Bridge Street
Phone Booth 3 Level 24 The Shard 32 London Bridge Street
Suite 2410 Level 24 The Shard 32 London Bridge Street
Management Suite Level 24 The Shard 32 London Bridge Street
Old Hospital Block 8A London Bridge Street London
Flat 218 Orchard Lisle House Talbot Yard
Flat 118 Orchard Lisle House Talbot Yard
Room 28 Boland House St Thomas Street
Room 27 Boland House St Thomas Street
Room 14 Boland House St Thomas Street
Room 7 Boland House St Thomas Street
Room 1 Boland House St Thomas Street
Unit 304 Shard Arcade Joiner Street
Third Floor 8 Southwark Street London
Flat 44 Orchard Lisle House Talbot Yard
Unit 12 Shard Arcade Joiner Street
Unit 314 Shard Arcade Joiner Street
Flat 41 Orchard Lisle House Talbot Yard
Sainsburys Guys Hospital Medical School Great Maze Pond
Club Mexicana The Moveable Feast 21 - 27 St Thomas Street
Flat 116 Orchard Lisle House Talbot Yard
Part Ground Floor 21 St Thomas Street
London
Flat 422 Orchard Lisle House Talbot Yard
3 Bridge Arcade Green Dragon Court London
Apartment 59 The Shard Residences The Shard 31 St Thomas Street
Flat 4 Southwark Tavern 22 - 22A Southwark Street
Apartment 54 The Shard Residences The Shard 31 St Thomas Street
Kings Head House Kings Head Yard London
Flat 54 Orchard Lisle House Talbot Yard
Mermaid Suite Ground Floor 8 St Thomas Street London
Unit 13 Shard Arcade Joiner Street
Flat 420 Orchard Lisle House Talbot Yard
Flat 16 4 - 6 London Bridge Street London
Flat 1 4 - 6 London Bridge Street London
Unit 2 1 Talbot Yard London
Unit 315 Shard Arcade Joiner Street
Living Accommodation Bunch Of Grapes 2 St Thomas Street
5 London Bridge Street London Southwark
Staff Accommodation Boland House St Thomas Street
Flat 5 Southwark Tavern 22 - 22A Southwark Street
Second Floor 6 Southwark Street London
Cunliffe Laboratories Guys Hospital Medical School Great Maze Pond
Ground Floor Right 5 - 7 Southwark Street London
Flat 4 1 White Hart Yard London
2 - 4 Bedale Street London Southwark
Barnham Suite 8 St Thomas Street London
The Old Operating Theatre Musuem And Herb Garret St Thomas's Church 9A St Thomas Street
Nwave Technologies Ltd 3 London Bridge Street London
3 London Bridge Street London Southwark
First Floor 9 Kings Head Yard London
St Thomas House Lower Ground Floor New City Court St Thomas Street

Office 2.14 North East Georgian Wing New City Court 20 St Thomas Street
Meeting Room 2.7 North East Georgian Wing New City Court 20 St Thomas Street
Meeting Room 2.5 North East Georgian Wing New City Court 20 St Thomas Street
Part Third Floor And Fourth Floor New City Court 20 St Thomas Street
Office A Basement 9 St Thomas Street London
Ground Floor Front 85 - 87 Borough High Street Southwark
Living Accommodation George Inn 77 Borough High Street
77 Borough High Street Southwark SE1 1NH
Third Floor Rear 51 Borough High Street Southwark
Second Floor 51 Borough High Street Southwark
50 Borough High Street Southwark SE1 1XW
Ground 47 - 49 Borough High Street Southwark
Third Floor 44 - 48 Borough High Street Southwark
First Floor Second Floor And Third Floor 39 - 41 Borough High Street Southwark
First Floor 38 Borough High Street Southwark
Second Floor Evans Lombe House 38 Borough High Street
Flat 3 Town Hall Chambers 32 Borough High Street
Third Floor 21 Borough High Street Southwark
Suite 45 To 47 The Hop Exchange 24 Southwark Street
Second Floor 19 Borough High Street Southwark
Level 9 The Shard 32 London Bridge Street
Level 18 The Shard 32 London Bridge Street
Suite 2505 Level 25 The Shard 32 London Bridge Street
Phone Booth 1 Level 24 The Shard 32 London Bridge Street
Suite 2411 Level 24 The Shard 32 London Bridge Street
Suite 2404 Level 24 The Shard 32 London Bridge Street
Meeting Room 2 Level 24 The Shard 32 London Bridge Street
Meeting Room 1 Level 24 The Shard 32 London Bridge Street
Basement 75 - 83 Borough High Street Southwark
Flat 319 Orchard Lisle House Talbot Yard
Unit 5 21 St Thomas Street London
Room 18 Boland House St Thomas Street
Room 15 Boland House St Thomas Street
Room 13 Boland House St Thomas Street
Room 11 Boland House St Thomas Street
Guys Bar Boland House St Thomas Street
Unit 10 Shard Arcade Joiner Street
Level 29 The Shard 32 London Bridge Street
Old Kings Head Inn Kings Head Yard London
Unit 5 Shard Arcade Joiner Street
6 Southwark Street London Southwark
Southwark Tavern 22 - 22A Southwark Street London
Flat 82 Orchard Lisle House Talbot Yard
Flat 69 Orchard Lisle House Talbot Yard
Flat 66 Orchard Lisle House Talbot Yard
Flat 15 Iris Brook House Talbot Yard
Flat 6 Iris Brook House Talbot Yard
Flat 3 Iris Brook House Talbot Yard
Unit 8 Shard Arcade Joiner Street
First Floor 3 Kings Head Yard London
Flat 514 Orchard Lisle House Talbot Yard
Unit 309 Shard Arcade Joiner Street
Flat 10 4 - 6 London Bridge Street London
Apartment 58 The Shard Residences The Shard 31 St Thomas Street
Service Entrance The Shard 31 St Thomas Street
Flat 3 Southwark Tavern 22 - 22A Southwark Street
Second Floor Flat 4 - 6 London Bridge Street London
Third Floor Flat 4 - 6 London Bridge

Street London
1 London Bridge Station Joiner Street London
Garry Weston Library Southwark Cathedral Montague Close
Leathermarket Suite 8 St Thomas Street London
Amazing Grace St Thomas's Church 9A St Thomas Street
Basement To First Floor 4 - 6 London Bridge Street London
St Thomas House Pitney Bowes Finance New City Court St Thomas Street
Second Floor New City Court 20 St Thomas Street
Office 2.20 North East Georgian Wing New City Court 20 St Thomas Street
Office 2.11 North East Georgian Wing New City Court 20 St Thomas Street
Office 2.10 North East Georgian Wing New City Court 20 St Thomas Street
Office 2.7 North East Georgian Wing New City Court 20 St Thomas Street
Office 2.4 North East Georgian Wing New City Court 20 St Thomas Street
Part First Floor South New City Court 20 St Thomas Street
Second Floor South East And West Wing New City Court 20 St Thomas Street
Second Floor 89 Borough High Street Southwark
Second Floor 85 - 87 Borough High Street Southwark
First Floor Front 85 - 87 Borough High Street Southwark
Flat 4 43 Borough High Street Southwark
London Bridge Station 31 Borough High Street Southwark
Flat 3 30 Borough High Street Southwark
Third Floor 11 - 15 Borough High Street Southwark
Level 8 Exluding North And East The Shard 32 London Bridge Street
Level 3 The Shard 32 London Bridge Street
South Hook Gas Company Limited The Shard 32 London Bridge Street
Level 27 The Shard 32 London Bridge Street
Level 17A The Shard 32 London Bridge Street
Level 11 North The Shard 32 London Bridge Street
Mathys & Squire Services Limited Level 15 The Shard 32 London Bridge Street
Suite 2517 Level 25 The Shard 32 London Bridge Street
Suite 2512 Level 25 The Shard 32 London Bridge Street
Suite 2507 Level 25 The Shard 32 London Bridge Street
Level 20 The Shard 32 London Bridge Street
Level 23 The Shard 32 London Bridge Street
Suite 2412 Level 24 The Shard 32 London Bridge Street
Area 1 Level 15 The Shard 32 London Bridge Street
Flat 119 Orchard Lisle House Talbot Yard
Room 23 Boland House St Thomas Street
Room 21 Boland House St Thomas Street
Room 20 Boland House St Thomas Street
Room 17 Boland House St Thomas Street
Room 3 Boland House St Thomas Street
Room 2 Boland House St Thomas Street
Tooley Suite Lower Ground Floor 8 St Thomas Street London
Flat 59 Orchard Lisle House Talbot Yard
3 Kings Head Yard London Southwark
Flat 4 Iris Brook House Talbot Yard
Fourth Floor 3 Southwark Street London
Flat 12 Iris Brook House Talbot Yard
Flat 9 4 - 6 London Bridge Street London
Basement St Thomas House St Thomas Street
Flat 72 Orchard Lisle House Talbot Yard
Flat 26 Orchard Lisle House Talbot Yard
Unit 305 Shard Arcade Joiner Street
Flat 63 Orchard Lisle House Talbot Yard
9 St Thomas Street London Southwark
Flat 33 Orchard Lisle House Talbot Yard
Flat 13 Iris Brook House Talbot Yard
30 London Bridge Street London Southwark
45 Borough High Street Southwark SE1 1NA
Fourth Floor 4 - 6 London Bridge Street

London
Apartment 57 The Shard Residences The Shard 31 St Thomas Street
Flat 6 Southwark Tavern 22 - 22A Southwark Street
Flat 1 Southwark Tavern 22 - 22A Southwark Street
First Floor 21 St Thomas Street London
Second Floor Front 8 Playhouse Court London
Third Floor St Margarets House 18 - 20 Southwark Street
Flat 37 Orchard Lisle House Talbot Yard
Flat 9 Iris Brook House Talbot Yard
Flat 22 4 - 6 London Bridge Street London
Flat 19 4 - 6 London Bridge Street London
Flat 7 Southwark Tavern 22 - 22A Southwark Street
Second Floor 9 Kings Head Yard London
6 Bridge Arcade Green Dragon Court London
Mandel Katz And Brosnan Llp The Shard 32 London Bridge Street
Science Gallery London Boland House St Thomas Street
43 Railway Approach London Southwark
First Floor And Second Floor Chaucer House White Hart Yard
Flat 1 1 White Hart Yard London
8 Bedale Street London Southwark
Quarter Bar And Lounge 8 - 18 London Bridge Street London
Chapter Room Southwark Cathedral Montague Close
Level Five And Part Four 3 London Bridge Street London
Rwe 20 New City Court St Thomas Street
Joiner Suite 8 St Thomas Street London
E D And F Man 3 London Bridge Street London
Office 2.15 North East Georgian Wing New City Court 20 St Thomas Street
Office 2.2 North East Georgian Wing New City Court 20 St Thomas Street
Meeting Room 2.12 North East Georgian Wing New City Court 20 St Thomas Street
Meeting Room 2.9 North East Georgian Wing New City Court 20 St Thomas Street
Meeting Room 2.2 North East Georgian Wing New City Court 20 St Thomas Street
Part Third Floor New City Court 20 St Thomas Street
Second Floor North East Georgian Wing New City Court 20 St Thomas Street
Third Floor 9 St Thomas Street London
All That Falafel Kiosk Borough High Street Southwark
Ground Floor South Ebbark House 93 - 95 Borough High Street
First Second And Third Floor Ebbark House 93 - 95 Borough High Street
First Floor 89 Borough High Street Southwark
Part Ground Floor 85 - 87 Borough High Street Southwark
Basement Front 85 - 87 Borough High Street Southwark
First Floor Rear 85 - 87 Borough High Street Southwark
59 - 61 Borough High Street Southwark SE1 1NE
Flat 3 53 - 55 Borough High Street Southwark
Third Floor Front 51 Borough High Street Southwark
Basement And Ground Floor 44 - 48 Borough High Street Southwark
Ground Floor Rear 42 Borough High Street Southwark
Basement And Ground Floors 39 - 41 Borough High Street Southwark
Basement And Ground 38 Borough High Street Southwark
Flat 6 Town Hall Chambers 32 Borough High Street
Flat 4 Town Hall Chambers 32 Borough High Street
14 Borough High Street Southwark SE1 9QG
Suite 1 To 3 The Hop Exchange 24 Southwark Street
Suite 24 To 26 The Hop Exchange 24 Southwark Street
The Peer Suite The Hop Exchange 24 Southwark Street
Third Floor Birrane House 2 - 4 Southwark Street
Matchesfashion Ltd Level 7 The Shard

32 London Bridge Street
Suite 2511 Level 25 The Shard 32 London Bridge Street
Suite 2509 Level 25 The Shard 32 London Bridge Street
Suite 2504 Level 25 The Shard 32 London Bridge Street
Office D Level 13 The Shard 32 London Bridge Street
Suite 2409 Level 24 The Shard 32 London Bridge Street
Reception Level 24 The Shard 32 London Bridge Street
1 Stoney Street London Southwark
Abm Facility Services Uk Limited 75 - 83 Borough High Street Southwark
Pret A Manger 11 Borough High Street Southwark
Flat 519 Orchard Lisle House Talbot Yard
Flat 418 Orchard Lisle House Talbot Yard
Room 16 Boland House St Thomas Street
Room 10 Boland House St Thomas Street
5 Bridge Arcade Green Dragon Court London
Flat 47 Orchard Lisle House Talbot Yard
Unit 3 Shard Arcade Joiner Street
Basement And Ground Floor 3 Southwark Street London
1B Southwark Street London Southwark
Apartment 56 The Shard Residences The Shard 31 St Thomas Street
Flat 51 Orchard Lisle House Talbot Yard
Part Basement 21 St Thomas Street London
Flat 17 4 - 6 London Bridge Street London
Flat 52 Orchard Lisle House Talbot Yard
Flat 49 Orchard Lisle House Talbot Yard
Flat 31 Orchard Lisle House Talbot Yard
Fourth Floor St Margarets House 18 - 20 Southwark Street
Unit 9 Shard Arcade Joiner Street
Unit 2 Shard Arcade Joiner Street
Flat 419 Orchard Lisle House Talbot Yard
Railway Arch 2F Montague Close London
11 - 15 St Thomas Street London
Southwark
Unit 4 21 St Thomas Street London
Flat 19 Orchard Lisle House Talbot Yard
Flat 67 Orchard Lisle House Talbot Yard
Flat 32 Orchard Lisle House Talbot Yard
Flat 23 Orchard Lisle House Talbot Yard
Flat 17 Iris Brook House Talbot Yard
Flat 11 Iris Brook House Talbot Yard
Flat 1 Iris Brook House Talbot Yard
Mulvaney Suite Lower Ground Floor 8 St Thomas Street London
Unit 11 Shard Arcade Joiner Street
Flat 18 4 - 6 London Bridge Street London
Flat 13 4 - 6 London Bridge Street London
Flat 12 4 - 6 London Bridge Street London
Flat 8 4 - 6 London Bridge Street London
Unit 307 Shard Arcade Joiner Street
Apartment 55 The Shard Residences The Shard 31 St Thomas Street
Gift Shop Southwark Cathedral Montague Close
Second Floor 8 Southwark Street London
The Medical Protection Society Ltd The Shard 32 London Bridge Street
Basement Lecture Room Chaucer House White Hart Yard
Living Accommodation 8 Bedale Street London
6 Bedale Street London Southwark
Edward Charles Boorman Room Southwark Cathedral Montague Close
Levels Seven To Seventeen 3 London Bridge Street London
Level Six 3 London Bridge Street London
St Thomas House Third Floor And Part Fourth Floor New City Court St Thomas Street
St Thomas House North East Wing First Floor New City Court St Thomas Street
Office 2.3 North East Georgian Wing New City Court 20 St Thomas Street
Meeting Room 2.10 North East Georgian Wing New City Court 20 St Thomas Street
Meeting Room 2.6 North East Georgian Wing New City Court 20 St Thomas Street
Second Floor 9 St Thomas Street

London
69 - 73 Borough High Street Southwark SE1 1NQ
Flat 3 63 Borough High Street Southwark
Flat 1 63 Borough High Street Southwark
55 Borough High Street Southwark SE1 1NE
Basement And Ground Floor 51 Borough High Street Southwark
First Floor 51 Borough High Street Southwark
First Floor Front Second Floor And Third Floor Flat 50 Borough High Street Southwark
Flat 3 43 Borough High Street Southwark
Third Floor 42 Borough High Street Southwark
34 Borough High Street Southwark SE1 1XU
Flat 9 Town Hall Chambers 32 Borough High Street
19A Borough High Street Southwark SE1 9SF
16 Borough High Street Southwark SE1 9QG
First Floor 11 - 15 Borough High Street Southwark
Foresight Group Llp Level 18 The Shard 32 London Bridge Street
Level 28 North West The Shard 32 London Bridge Street
Hca Outpatients And Diagnostics The Shard 32 St Thomas Street
Suite 2516 Level 25 The Shard 32 London Bridge Street
Suite 2510 Level 25 The Shard 32 London Bridge Street
Suite 2502 Level 25 The Shard 32 London Bridge Street
Suite 2413 Level 24 The Shard 32 London Bridge Street
Meeting Room 8 Level 24 The Shard 32 London Bridge Street
Meeting Room 7 Level 24 The Shard 32 London Bridge Street
Meeting Room 3 Level 24 The Shard 32 London Bridge Street
Executive Club Level 24 The Shard 32 London Bridge Street
Flat 14 Orchard Lisle House 14 Talbot Yard
Room 24 Boland House St Thomas Street
Room 6 Boland House St Thomas Street
Room 5 Boland House St Thomas Street
Unit 7 Three Crown Square 6 - 8 Southwark Street
Flat 421 Orchard Lisle House Talbot Yard
First Floor St Margarets House 18 - 20 Southwark Street
Flat 35 Orchard Lisle House Talbot Yard
Unit 3 21 St Thomas Street London
Second And Third Floor Apartments 3 Kings Head Yard London
Stoney Suite Ground Floor 8 St Thomas Street London
Level 30 The Shard 32 London Bridge Street
Flat 5 4 - 6 London Bridge Street London
Flat 70 Orchard Lisle House Talbot Yard
Flat 39 Orchard Lisle House Talbot Yard
4 Bridge Arcade Green Dragon Court London
Flat 78 Orchard Lisle House Talbot Yard
5 Green Dragon Court London Southwark
Winchester Suite Ground Floor 8 St Thomas Street London
Tanner Suite Lower Ground Floor 8 St Thomas Street London
Third Floor 6 Southwark Street London
Second Floor 5 - 7 Southwark Street London
4 Stoney Street London Southwark
Flat 45 Orchard Lisle House Talbot Yard
Flat 43 Orchard Lisle House Talbot Yard
Flat 38 Orchard Lisle House Talbot Yard
Flat 29 Orchard Lisle House Talbot Yard
Flat 22 Orchard Lisle House Talbot Yard
Flat 14 Iris Brook House Talbot Yard
Flat 7 Iris Brook House Talbot Yard
Magdalen Suite Lower Ground Floor 8 St Thomas Street London
Flat 512 Orchard Lisle House Talbot Yard
Unit 312 Shard Arcade Joiner Street
Level 1 The Shard 32 London Bridge Street
Part Basement 9 Kings Head Yard London
First Floor 6 Southwark Street London
Brindisa Kitchen Bar Jubilee Place Borough Market 8 Southwark Street

Ground Floor Chaucer House White Hart Yard
Flat 2 1 White Hart Yard London
Flat 1 1 Talbot Yard London
5 Bedale Street London Southwark
8 - 18 London Bridge Street London Southwark
Third Floor 3 Southwark Street London
Tutu Room Southwark Cathedral Montague Close
Maiden Suite 8 St Thomas Street London
14 St Thomas Street London Southwark
St Thomas House First Floor New City Court St Thomas Street
Office 2.16 North East Georgian Wing New City Court 20 St Thomas Street
Office 2.13 North East Georgian Wing New City Court 20 St Thomas Street
Meeting Room 2.1 North East Georgian Wing New City Court 20 St Thomas Street
Ktn Basement 9 St Thomas Street London
Fourth Floor 9 St Thomas Street London
Flat 4 53 - 55 Borough High Street Southwark
Flat 2 43 Borough High Street Southwark
Ground Floor Front 42 Borough High Street Southwark
Flat 10 Town Hall Chambers 32 Borough High Street
Ground Floor 30 Borough High Street Southwark
Flat 1 30 Borough High Street Southwark
9A Borough High Street Southwark SE1 9SU
First Floor 2 - 4 Southwark Street London
Fourth Floor Birrane House 2 - 4 Southwark Street
Teighmore Limited Level 7 The Shard 32 London Bridge Street
Level 22 South The Shard 32 London Bridge Street
Level 16 The Shard 32 London Bridge Street
Store 1 Level 25 The Shard 32 London Bridge Street
Level 31 The Shard 32 London Bridge Street
Level 32 The Shard 32 London Bridge Street
Level 21 The Shard 32 London Bridge Street
Suite 2407 Level 24 The Shard 32 London Bridge Street
Suite 2405 Level 24 The Shard 32 London Bridge Street
Suite 2403 Level 24 The Shard 32 London Bridge Street
Meeting Room 6 Level 24 The Shard 32 London Bridge Street
Meeting Room 5 Level 24 The Shard 32 London Bridge Street
Bar Level 24 The Shard 32 London Bridge Street
North Level 19 The Shard 32 London Bridge Street
Flat 219 Orchard Lisle House Talbot Yard
Room 30 Boland House St Thomas Street
Room 26 Boland House St Thomas Street
Room 22 Boland House St Thomas Street
Arches B C D And E Montague Close London
Flat 77 Orchard Lisle House Talbot Yard
First Floor 8 Southwark Street London
Flat 2 Iris Brook House Talbot Yard
Flat 14 4 - 6 London Bridge Street London
Unit 1 1 Talbot Yard London
10 Southwark Street London Southwark
Flat 73 Orchard Lisle House Talbot Yard
Flat 65 Orchard Lisle House Talbot Yard
Flat 36 Orchard Lisle House Talbot Yard
Flat 28 Orchard Lisle House Talbot Yard
Flat 27 Orchard Lisle House Talbot Yard
Second Floor Montague Chambers Montague Close
Flat 5 1 Talbot Yard London
Unit 6 Shard Arcade Joiner Street
Conference Rooms Southwark Cathedral Montague Close
Living Accommodation Old Kings Head Inn Kings Head Yard
Ground Floor And Part First Floor Keats House 24 - 26 St Thomas Street
Fifth Floor 5 - 7 Southwark Street London
Third Floor 5 - 7 Southwark Street

London
Basement 5 - 7 Southwark Street London
Flat 64 Orchard Lisle House Talbot Yard
Flat 61 Orchard Lisle House Talbot Yard
Flat 50 Orchard Lisle House Talbot Yard
Flat 20 Orchard Lisle House Talbot Yard
Science Gallery London Guys Hospital Medical School Great Maze Pond
3 Green Dragon Court London Southwark
Unit 1 Shard Arcade Joiner Street
Flat 4 4 - 6 London Bridge Street London
Unit 3 1 Talbot Yard London
Unit 302 Shard Arcade Joiner Street
Unit 301 Shard Arcade Joiner Street
Level 19 The Shard 32 London Bridge Street
New Hunts House & Henriette Rapheal Guys Hospital Medical School Great Maze Pond
Guys Hospital Medical School Boland House St Thomas Street
Fourth Floor 21 St Thomas Street London
Ground Floor Left 5 - 7 Southwark Street London
3 Three Crown Square 6 - 8 Southwark Street London
Telephone Call Box Outside 15 St Thomas Street London
The Coach House At The George White Hart Yard London
Third Floor Chaucer House White Hart Yard
Flat 3 1 White Hart Yard London
1 Bedale Street London Southwark
Flat St Thomas's Church 9A St Thomas Street
Arch 1049 7 Borough High Street Southwark
Fifth And Sixth Floors 5 - 7 Southwark Street London
5 Stoney Street London Southwark
St Thomas Suite 8 St Thomas Street London
Gt Maze Suite 8 St Thomas Street London
Ground Floor 9 Kings Head Yard London
Basement 3 Kings Head Yard London
8 St Thomas Street London Southwark
St Thomas House Part Fourth Floor New City Court St Thomas Street
Office 2.19 North East Georgian Wing New City Court 20 St Thomas Street
Office 2.18 North East Georgian Wing New City Court 20 St Thomas Street
Office 2.17 North East Georgian Wing New City Court 20 St Thomas Street
Office 2.9 North East Georgian Wing New City Court 20 St Thomas Street
Office 2.8 North East Georgian Wing New City Court 20 St Thomas Street
Meeting Room 2.8 North East Georgian Wing New City Court 20 St Thomas Street
Meeting Room 2.3 North East Georgian Wing New City Court 20 St Thomas Street
Office B Basement 9 St Thomas Street London
Third Floor Flat 69 - 73 Borough High Street Southwark
67 Borough High Street Southwark SE1 1NF
Flat 4 63 Borough High Street Southwark
Flat 2 63 Borough High Street Southwark
Flat 57 Borough High Street Southwark
Flat 1 53 - 55 Borough High Street Southwark
53 Borough High Street Southwark SE1 1NE
Flat 51 Borough High Street Southwark
Fourth Floor 47 - 49 Borough High Street Southwark
First Floor 47 - 49 Borough High Street Southwark
First Floor 44 - 48 Borough High Street Southwark
Second Floor 44 - 48 Borough High Street Southwark
First Floor Rear 42 Borough High Street Southwark
Flat 7 Town Hall Chambers 32 Borough High Street
Flat 5 Town Hall Chambers 32 Borough High Street
Suite 1 To 3 Basement Floor The Hop Exchange 24 Southwark Street
Leon 2 - 4 Southwark Street London
Third Floor 19 Borough High Street Southwark
Level 12 The Shard 32 London Bridge Street

The View From The Shard The Shard Joiner Street
Level 17B The Shard 32 London Bridge Street
Level 14 The Shard 32 London Bridge Street
Shangri La Hotel The Shard 31 St Thomas Street
Suite 2514 Level 25 The Shard 32 London Bridge Street
Suite 2508 Level 25 The Shard 32 London Bridge Street
Suite 2506 Level 25 The Shard 32 London Bridge Street
Post Room Level 24 The Shard 32 London Bridge Street
Phone Booth 2 Level 24 The Shard 32 London Bridge Street
Suite 2406 Level 24 The Shard 32 London Bridge Street
Furniture Store 1 Level 24 The Shard 32 London Bridge Street
Area 3 Level 15 The Shard 32 London Bridge Street
Bwb Consulting Ltd 11 - 15 Borough High Street Southwark
Room 19 Boland House St Thomas Street
Room 12 Boland House St Thomas Street
Room 9 Boland House St Thomas Street
Room 8 Boland House St Thomas Street
Flat 25 Orchard Lisle House Talbot Yard
Flat 60 Orchard Lisle House Talbot Yard
Ground Floor St Margarets House 18 - 20 Southwark Street
Flat 1 Boland House St Thomas Street
Unit 308 Shard Arcade Joiner Street
Unit 303 Shard Arcade Joiner Street
Flat 20 4 - 6 London Bridge Street London
Flat 46 Orchard Lisle House Talbot Yard
Flat 21 Orchard Lisle House Talbot Yard
Bunch Of Grapes 2 St Thomas Street London
Flat 18 Iris Brook House Talbot Yard
Flat 16 Iris Brook House Talbot Yard
Flat 10 Iris Brook House Talbot Yard
Flat 76 Orchard Lisle House Talbot Yard
First Floor 3 Southwark Street London
Second Floor St Margarets House 18 - 20 Southwark Street
First Floor 5 - 7 Southwark Street London
E2x Limited 1 London Bridge London
Duke Suite Ground Floor 8 St Thomas Street London
Flat 511 Orchard Lisle House Talbot Yard
Apartment 64 The Shard Residences The Shard 31 St Thomas Street
20 - 26 London Bridge Street London Southwark
Flat 79 Orchard Lisle House Talbot Yard
Flat 75 Orchard Lisle House Talbot Yard
Flat 58 Orchard Lisle House Talbot Yard
Flat 56 Orchard Lisle House Talbot Yard
Flat 53 Orchard Lisle House Talbot Yard
Flat 3 230 Long Lane London
The Victorian Society 1 Priory Gardens London
77 Guinness Court Snowsfields London

Re-consultation:

LBS CIL
LBS Highways
LBS Transport Policy Team
CAAG
Georgian Group
Historic England
Southwark Cathedral
Team London Bridge
Thames Water
Transport for London
Wellesley Capital Investment Limited

APPENDIX 6

Consultation responses received

Internal services

LBS Archaeology
LBS CCTV
LBS Community Infrastructure Levy Team
LBS Ecology
LBS Environmental Protection
LBS Flood Risk Management & Urban Drain
LBS Highways
LBS Local Economy
LBS Planning Policy
LBS Transport Policy
LBS Urban Forester
LBS Transport Policy

Statutory and non-statutory organisations

Active Travel England
Arqiva
City of London
Conservation Area Advisory Group
Environment Agency
Georgian Group
GLA
Historic England
London Underground
Metropolitan Police Service
NATS
Network Rail
Port of London Authority
Team London Bridge
Thames Water
Transport for London
UKPN

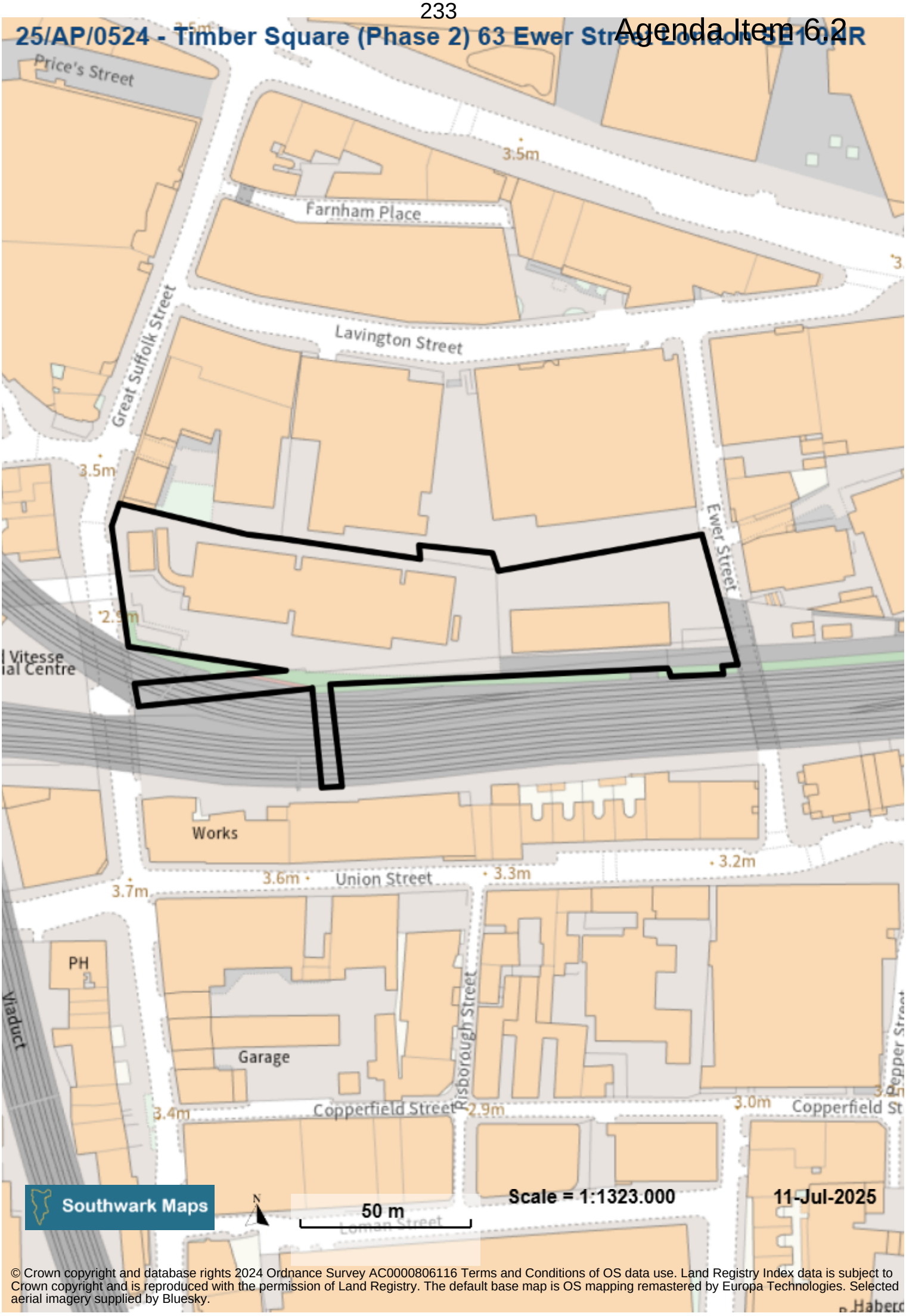
Neighbour and local groups:

Guys and St Thomas Foundation
Southwark Cathedral
Wellesley Capital Investment Limited, King's Head Yard London SE1 1NA
Second Floor 8 Vine Yard London

Re-consultation:

Georgian Group
Guy’s and St Thomas’ NHS Foundation Trust
Historic England
Thames Water
Transport for London
Wellesley Capital Investment Limited, King's Head Yard London SE1 1NA

25/AP/0524 - Timber Square (Phase 2) 63 Ewer Street London SE1 0AR



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Meeting Name:	Planning Committee (Major Applications A)
Date:	22 July 2025
Report title:	**Development Management planning applications:** 25/AP/0524 for Full Planning Application **Address:** Timber Square (Phase 2), 63 Ewer Street, London SE1 0NR **Proposal:** Partial demolition of the viaduct structure, remodelling and refurbishment and change of use of existing arches within the viaduct structure to flexible office, retail, gymnasium and restaurant uses (Class E) and flexible cultural, drinking establishment, live music venue, nightclub, cinema, and theatre uses (Sui Generis); construction of two buildings (ground plus-12 storey plus plant and ground plus 15-storey plus plant) for flexible office and indoor sport and recreation facilities (Class E); associated landscaping, new public realm, creation of new entrances and frontages, cycle parking, highways works, plant and equipment and all other associated works.
Ward(s) or groups affected:	Borough and Bankside
Classification:	Open
Reason for lateness:	Not applicable
From:	Director of Planning and Growth
Application Start Date: 26/02/2025	**PPA Expiry Date:** N/A
Earliest Decision Date: 28/05/2025	

RECOMMENDATIONS

1. That planning permission is granted subject to conditions, the applicant entering into an appropriate legal agreement, and referral to the Mayor of London.

2. In the event that the requirements of paragraph 1 above are not met by 22 February 2026 the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 129.

EXECUTIVE SUMMARY

3. Permission is sought for a new office-led scheme which makes better use of this site's potential. The proposed development would intensify the use of land to

support additional high-quality workspaces, promoting higher density development, in a location that is well-connected services, infrastructures and amenities by public transport, walking and cycling in line with London Plan and Southwark Plan policies.

4. The proposal would bring substantial public benefits including (but not limited to) the provision of flexible, high quality, Grade A office floorspace (bringing significant economic benefits), affordable cultural or workspace (or equivalent Payment In Lieu (PIL)), flexible Class E floorspace at ground level activating surrounding streets, a comprehensive landscaping scheme (achieving UGF 0.303 and BNG 3.78HU), incorporation of sustainable technologies (achieving BREEAM excellent rating), public realm improvements, a Section 106 package, and a CIL payment of approximately £15.1m.

PLANNING SUMMARY TABLES

Commercial			
Use class and description	**Existing GIA**	**Proposed GIA**	**Change +/-**
E (Office)	225	50,566	+50,341
E (Retail/restaurant/gymnasium)	1,565	361	-1,204
Sui Generis (Flexible cultural/ live music venue/ nightclub/ cinema/ theatre)	4,302 (parking and temporary site welfare)	968	-3,334

Carbon Savings	
Criterion	**Details**
CO2 Savings	5.1% improvement on Part L of Building Regs 2021

Greening and Sustainable Transport Infrastructure			
Criterion	**Existing**	**Proposed**	**Change +/-**
Urban Greening Factor	0	0.303	+ 0.303
Biodiversity Net Gain	0	3.78HU	+3.78HU
Short Stay Cycle Parking Spaces	0	110	+110
Long Stay Cycle Parking Spaces	0	690	+690

CIL and Section 106 (or Unilateral Undertaking)

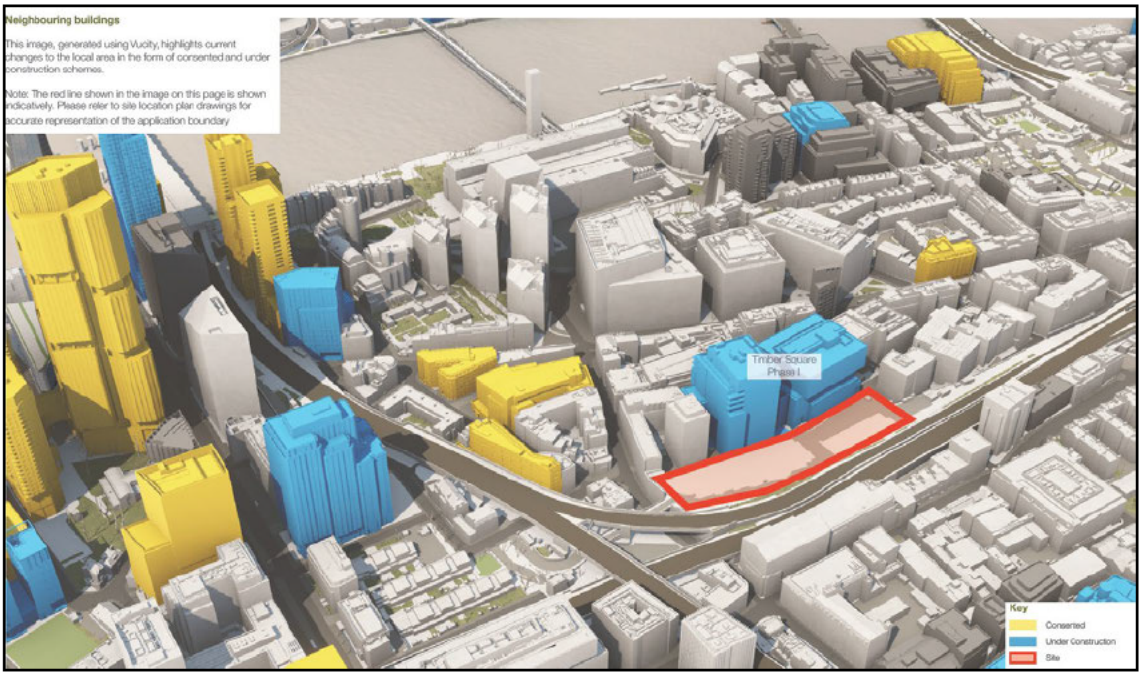
Criterion	Total Contribution
CIL (estimated)	£15,145,378 (£10.2 million Mayoral CIL and £4.9 million Borough CIL)
Section 106 Contribution	As per the 'Planning obligations' section of this report (£3,106,473.00 agreed, more to be confirmed)

BACKGROUND INFORMATION

Site location and description

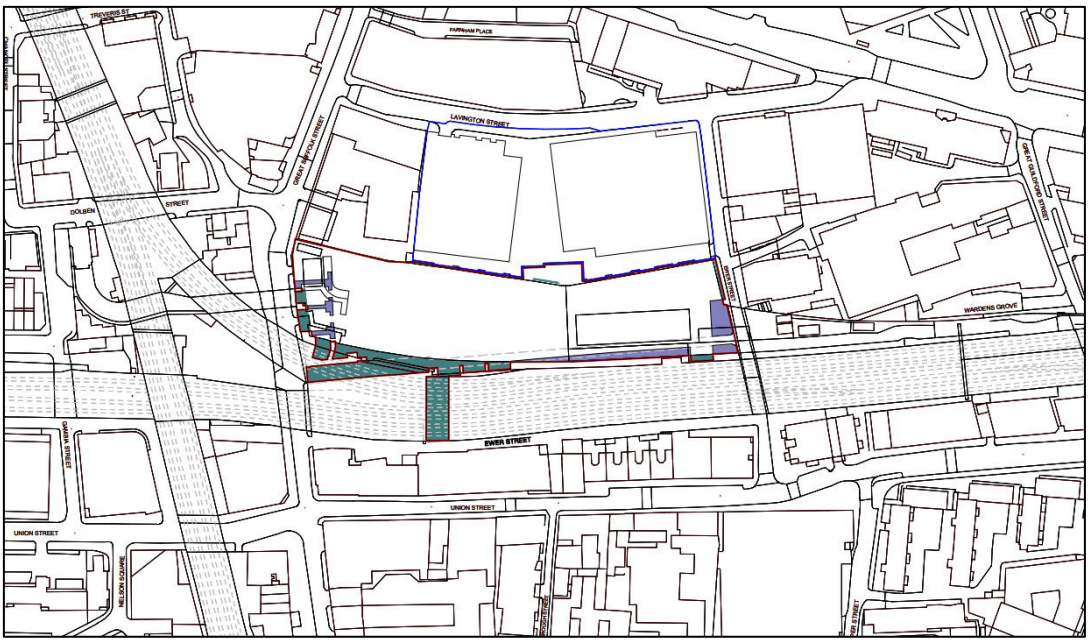
5. The Site is located between Great Suffolk Street and Ewer Street. The Site extends to circa 0.74 hectares (ha) in area. The Site is bordered to the north by an emerging office development (Phase I of the wider Timber Square development) and by student accommodation.

6. To the south of the Site, railway arches owned by the Arch Company ('ArchCo'), commercial property owners, lie adjacent to the Site at ground level, with the upper level bounded by the railway. To the east of the Site, is IQ Bankside, providing student accommodation and to the west of the Site, beyond Great Suffolk Street is a varied mix of industrial uses, residential, and other Class E uses.

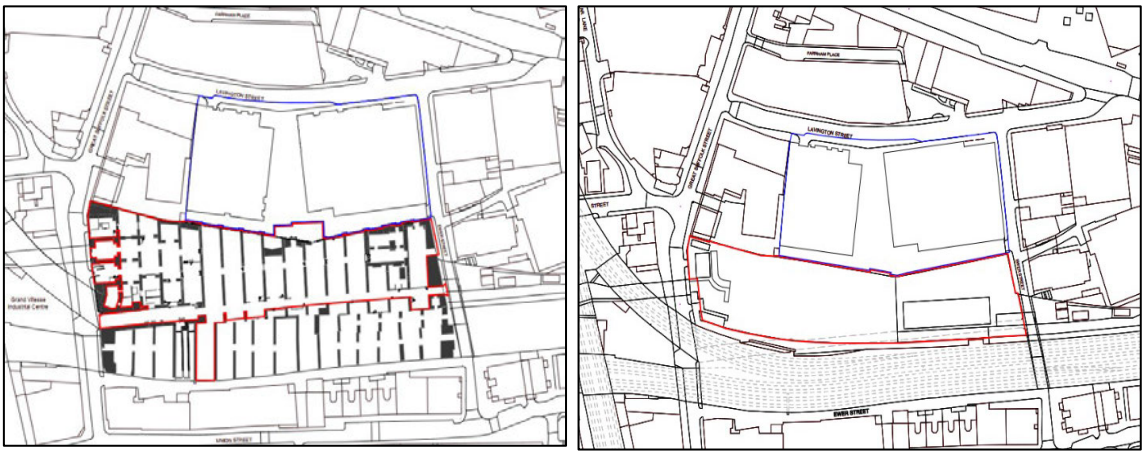


Site location in context

7. Three plans showing the location of the Site (Masterplan, Arches and the Podium) are set out below. The red line demonstrates the Application Site, and the blue line delineates land also within the applicant's ownership, adjacent to the Site.



Extract of Location Plan (Masterplan) – not to scale



Extracts of Location Plans (Arches and Podium) – not to scale

8. The Site was formerly the Ewer Street Goods Depot, which was built in 1899 to serve the South Eastern and Chatham Railway. The Site housed the Grande Vitesse Goods Depot until October 1960 and was used as a parcel depot until 1969. Between 1969 and 1983 the depot was used as sidings and by 1983, most of the structures associated with the Ewer Street Goods Depot had been removed.

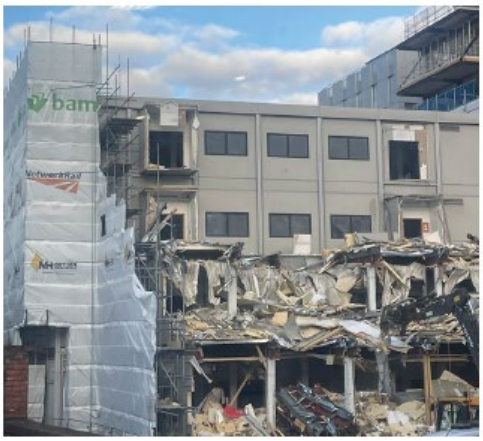
9. On top of the arches, temporary planning permission was granted in 2002 (02/AP/1153) to provide purpose-built office space, known as James Forbes House, for Network Rail's Thameslink programme. The time limit for this use was extended several times until it ceased operation in 2024. This structure has now been removed by Network Rail.

10. To the east is a 3-storey modular Maintenance Delivery Unit ('MDU') building and car park, which was built in 2011. Vehicular access to the car park and maintenance area is via the ramp from Dolben Street. This building is to be removed by Network Rail.

April 2024
The podium comprises Network Rails temporary cabins, which have been in place for circa 10 years. The two buildings to the north are being redeveloped as part of Timber Square Phase I.



November 2024
James Forbes House to the West has been removed by Network Rail. The Maintenance Delivery Unit remains and is to be removed by Network Rail.



Site images (up to November 2024)

11. The Site does not contain any listed buildings and is not located in a Conservation Area. The Screen Wall to the former Grande Vitesse Depot, a later nineteenth century two-storey brick end wall to the former railway depot, located on Great Suffolk Street, is identified on the Council's Local List.

12. The arches currently comprise a mix of uses, including former Network Rail office entrance, gym, car park, and temporary welfare facilities in connection with construction works for planning application 20/AP/1009. An overview of the Site's planning history is set out in appendix 3.

Details of proposal

13. The proposed development offers an opportunity to redevelop a currently underutilised site, and would comprise:

- Partial demolition of existing viaduct structure to create a central oculus or open space and to allow better circulation and development of structural elements and cores;

- Remodelling, refurbishment and change of use of existing arches to provide flexible uses;
- Creation of new public realm at ground and podium level;
- Introduction of a mix of uses, including retail and leisure, to create a diverse and vibrant destination;
- Development of two buildings (ground plus-12 storey plus plant and ground plus 15-storey plus plant) for flexible office and indoor sport and recreation facilities (Class E);
- Ancillary floorspace, including servicing facilities and cycle parking; and
- Complementing the existing Low Line, a walking route running alongside the Victorian railway viaduct connecting Bankside to London Bridge and Waterloo Station.

14. The proposals deliver 51,895 sqm GIA (54,160 sqm GEA), across a range of uses. It is comprised of four principal elements, as shown in the figure below:

- The Arches: land within the viaduct structure;
- The Podium: land on top of the viaduct structure; and
- The Office Development: development of two office buildings – known as the 'West Building' and the 'East Building' - on top of the viaduct but connected to the arches at ground floor.



Principal Elements of the Proposed Development

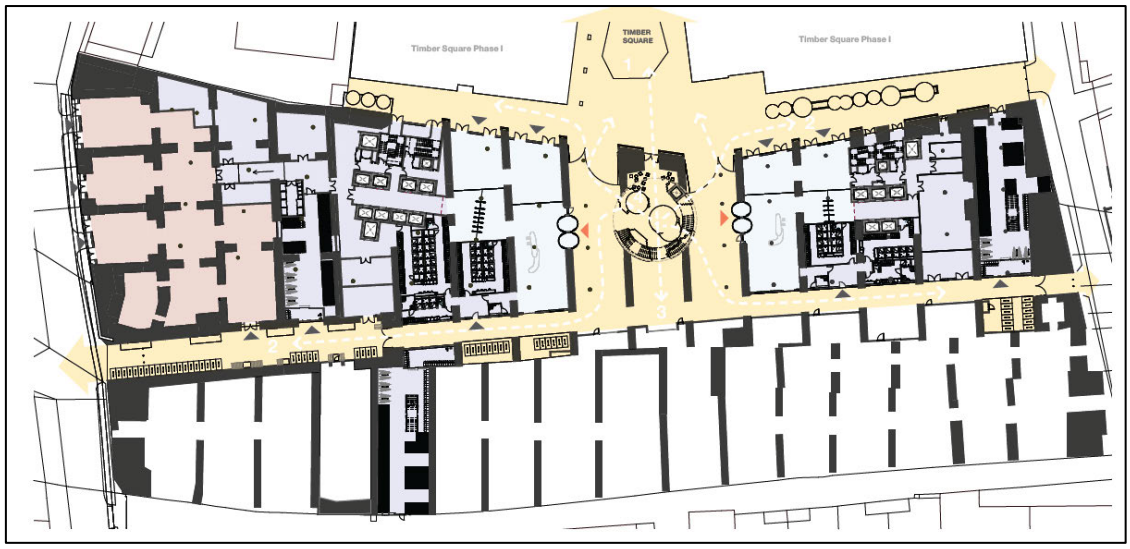
The Arches

15. The arches comprise a mix of uses that balance the functional requirements of the scheme whilst maximising opportunities for active frontages. Where possible, the quantum of activated uses within the arches has been maximised.

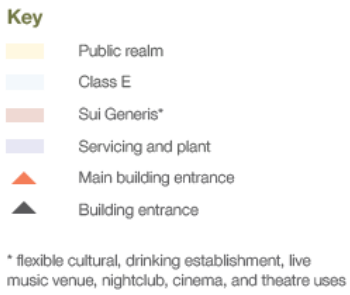
16. The central arches connecting onto the wider Timber Square Phase 1 public realm provide retail spaces, such as a café, with activity spilling out onto the public realm. In addition, the office entrances are proposed to face onto this central area.

17. The arches also contain critical plant that cannot be accommodated at podium level (such as the UKPN substation), and end-of-trip facilities for cyclists.

18. Due to the unique structural form of the arches, one of the larger arches (shown in red in the figure below) to the west of the Site would provide a more adaptive, creative and cultural space, with a range of potential opportunities. This space could be suitable as a gym (Class E), a restaurant (Class E), a nightclub (Sui Generis), a theatre space (Sui Generis), a drinking establishment (Sui Generis), a live music venue (Sui Generis), a cinema (Sui Generis), or a similar creative or cultural use (Sui Generis).



Proposed Land Uses within the Arches



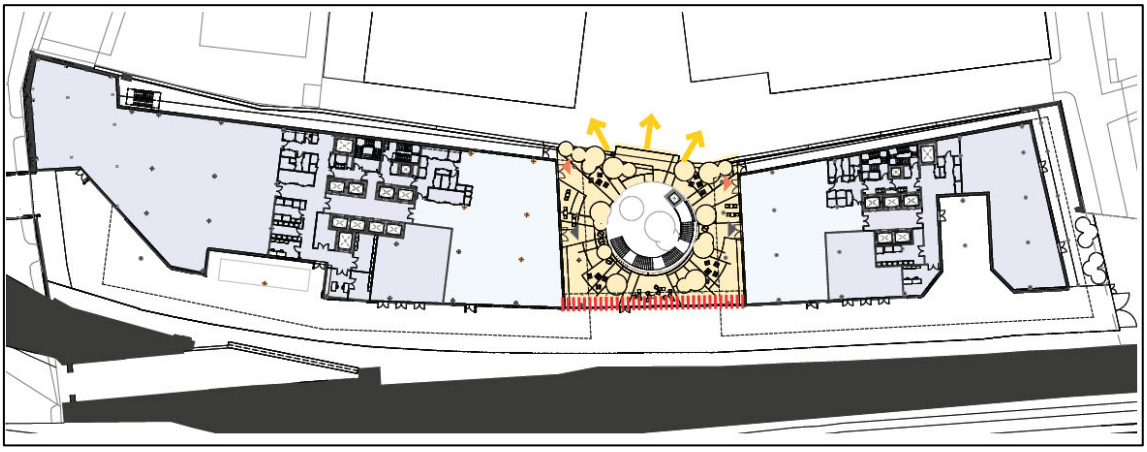


CGI of site north entrance (arches level)

The Podium

19. At podium level, there are opportunities for indoor sport and recreation facilities, alongside pop-up retail and other creative functions. These uses would be further enhanced by the public realm at podium level and would encourage visitors up to this level from ground floor. A significant proportion of the office back-of-house and plant for the Proposed Development is located at podium level.

20. Along the southern edge of the podium is a screened service road allowing for Network Rail access and servicing of the Proposed Development. Network Rail require access to the railway line for servicing with access provided up to the podium via a ramp from Dolben Steet, this route will be restricted and only used for servicing vehicles.



Proposed Land Uses within the Podium

Key

- Public realm
- Class E
- Servicing and plant
- Main building entrance
- Building entrance
- Visual connection to Timber Square
- Visual buffer from southern access road

* flexible cultural, drinking establishment, live music venue, nightclub, cinema, and theatre uses



Illustrative overview of podium garden

The Office Development

21. The two buildings above the podium level comprise high-quality office space, designed with flexibility and efficiency in mind. The building cores are positioned along the northern edge, allowing for expansive, unobstructed floorplates with views to the south, east, and west. This arrangement maximises natural light while enabling a range of workspace configurations.



CGI of office towers (looking north-west)

Retention of Railway Viaduct

22. Retention of the historic railway viaduct is a core principle of the scheme, and so the existing structure is being substantially retained. However, to facilitate development on this site, a selective amount of demolition is required. This demolition facilitates the creation of the central Oculus public realm and allows the building cores to reach ground level.

23. Non-structural elements within and around the arches, including internal walls, doors and steps, would be removed and / or remodelled as part of site clearance works. These works would be carefully undertaken to preserve key structural elements of the site.

Planning history of the site and adjoining or nearby sites.

24. A summary of the most relevant history is provided in appendix 3.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

25. The main issues to be considered in respect of this application are:
    - Principle of development and land use
    - Design and heritage
    - Residential amenity impact
    - Transport and highways
    - Waste management
    - Energy and sustainability
    - Environmental matters
    - Urban greening and biodiversity
    - Fire safety
    - Archaeology
    - Planning obligations (S.106 undertaking or agreement)
    - Mayoral and borough community infrastructure levy (CIL)
    - Consultation responses and community engagement
    - Community impact, equalities assessment and human rights

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

Legal context

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

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

Planning policy

29. The statutory development plan for the Borough comprises the London Plan 2021 and the Southwark Plan 2022.The National Planning Policy Framework 2024 and emerging policies constitute material considerations but are not part of the statutory development plan. A list of policies, which are relevant to this application are provided in Appendix 2. Any policies, which are particularly relevant to the consideration of this application, are highlighted in the report.

30. The site is subject to the following policy designations:
    - AV.02 Bankside and the Borough Area Vision

- NSP02 Site Bordering Great Suffolk Street and Ewer Street
- Bankside, Borough and London Bridge Strategic Cultural Area
- Bankside, Borough and London Bridge Opportunity Area
- Bankside and Borough District Town Centre
- Central Activities Zone
- Archaeological Priority Zone (North Southwark and Roman Roads)
- Flood Zone 3
- Air Quality Management Area

31. The site requirements for NSP02 are as follows.

Redevelopment of the site must:

- Provide at least the amount of employment floorspace (E(g), B class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater; and
- Provide ground floor active frontages with retail, community or leisure uses (as defined in the glossary) enhancing the Low Line walking route adjacent to the railway viaduct; and
- Provide new open space of at least 15% of the site area - 1,968m2.

Redevelopment of the site should:

- Provide new homes (C3) – estimated capacity 44.

ASSESSMENT

Principle of Development and Land Use

Principle of Development

32. The Proposed Development seeks to make the most efficient use of a currently underutilised Site in a highly sustainable and accessible location.

33. The site is located within the Bankside, Borough and London Bridge Opportunity Area and within the CAZ, where employment growth is supported. The site is also allocated within the Southwark Plan as a key development opportunity site within Bankside and The Borough Area Vision.

34. The principle of the Proposed Development meets the high-level objectives of the Development Plan and accords with the Government's overarching objectives to promote and support sustainable development.

Land Use

35. The Proposed Development comprises an office-led, mixed-use, development which would increase the quantum of employment generating uses in a sustainable location. Employment floorspace makes up more than 50% of the development in accordance with the Site Allocation.

36. The Proposed Development delivers the equivalent of 10% of the new employment floorspace as affordable floorspace, in line with Southwark Plan Policy P31. The applicant is currently working with officers to identify the most appropriate composition of the affordable workspace offer for this site. As it stands, it is likely that the applicant will offer 968sqm GIA of affordable cultural space on-site with the remainder of the offer being a payment in lieu (to create affordable workspace elsewhere in the borough). This is to be confirmed in future S106 legal agreement discussions.



Indicative location of affordable cultural/workspace (in yellow)

37. In addition, the Proposed Development delivers active frontages, through a range of retail and leisure uses in line with the requirements of the Site Allocation and supporting the strategic functions of the CAZ and Opportunity Area. Overall, the proposed land uses are in accordance with the Development Plan.

38. The Site Allocation states that the site should provide new homes. The principle of an employment-led development, containing a mix of uses on this Site, with no homes, is considered acceptable by officers. It would be difficult to incorporate housing onto the site, due to challenges and restrictions with design, access, servicing, operational factors, the potential impact on noise and vibration and the diminished quality of the resulting homes. With the exception of delivery of housing, the Proposed Development is in accordance with the Site Allocation.

Design and Heritage

General Layout

39. The design approach of this complex layered site is to transition from the impressive vault-like spaces of the viaduct onto the elevated platform where the new buildings are located. The instinct to activate the viaduct with retail and cultural uses is welcomed and the spaces are of a scale to create a destination.

The viaduct also offers the unique opportunity to connect with the 'Low Line' to the south. At the moment the public uses in the viaduct spaces are concentrated around the central approaches and the Phase 1 'public space' as well as the Great Suffolk Street frontage and the retained former Grande Vitesse façade.

40. The scheme incudes two new buildings proposed to be 'perched' on top of the viaduct and flanking a central ‘oculus’ – a large opening. The oculus is the focus of the site and is located on the axis of the Phase 1 Timber Square – a triangular public space at the heart of the site. The new buildings have been designed as metal and glass commercial buildings to contrast with the historic brick-built railway viaduct. At their base, the main structural columns puncture the vaulted viaducts, typically at the centre of each arch, in order to preserve as much as possible of the original structures. The juxtaposition of modern metal and glass buildings on a heavy masonry brick base is a natural fit for the site and reflects the industrial heritage of the Borough. It also helps to distinguish the historic viaduct from the new structures located delicately on top.

Urban Design (Height, Massing and Arrangement)

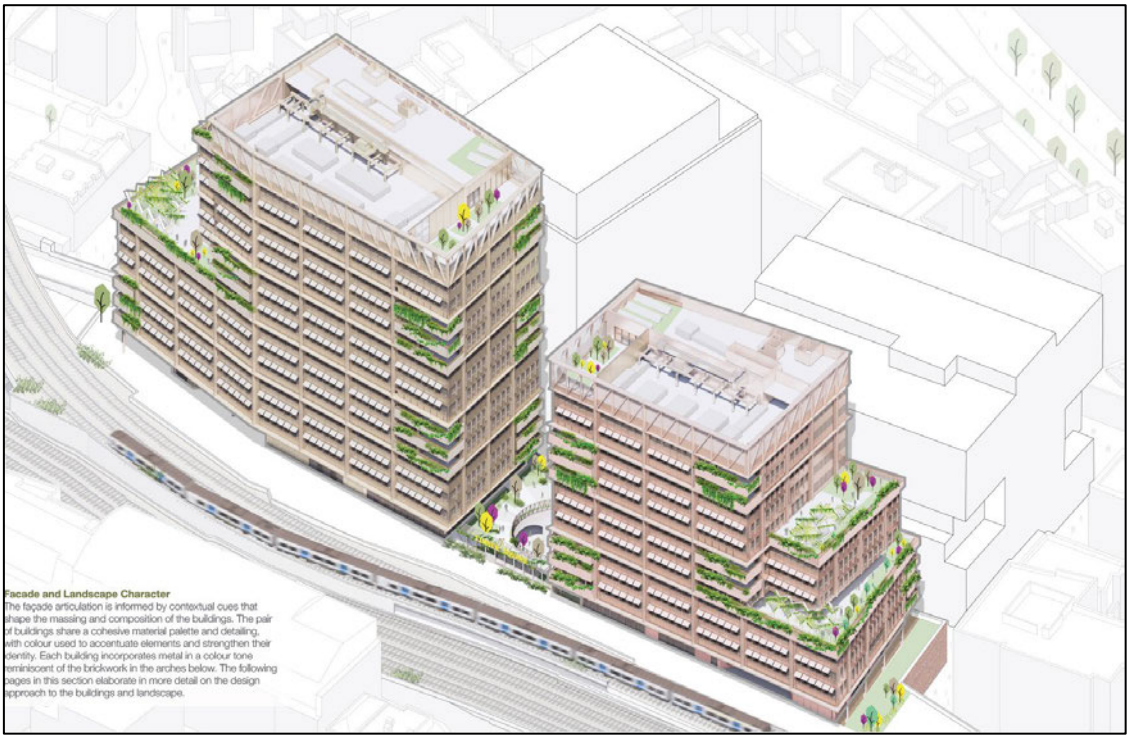
41. The two commercial buildings range in height from around 5 to 12 and 15 storeys (excluding the rooftop plant) in height respectively stepping up from the Great Suffolk and Ewer Street frontages and peaking at the centre where they are separated by an approximately 21m gap. This corresponds with the gap between the Phase 1 buildings. The stepped arrangement relates well to the surrounding streets at either end of the site and places the greatest height against the viaduct.

42. Looking at the local context within Lavington Street, by comparison both proposed buildings would rise above their immediate neighbours, with the increase in height of the West Building being particularly significant. Whilst there is some variety of storey heights, the street is characterised as generally mid-rise of between 22m (Europoint House) and 29m (Premier Inn). However, the wider context has changed to an extent with the more recent developments of the 16-storey Isis House (53m) at 67-69 Southwark Street on the junction with Lavington Street, and the 14-storey student housing block (41m) to the west of the site, at the rear of 15 Great Suffolk Street.

43. Generally, the two buildings proposed sit behind the implemented Phase 1 buildings which are of a similar height. Together with this site the proposal would create a cluster of 4 large commercial buildings based around a publicly accessible open space. This concentration of activity and of large commercial operators would bring added commerce and vitality to this part of the borough and could warrant a new focus on outward looking functions in and around the viaduct.

44. The proposed height, combined with the large building footprints, make for two substantial buildings within a densely built-up context. The main consideration on design, however, is how the height and massing are articulated and the overall scale perceived within the local context. Both buildings are extensively articulated to break up their volumes and to help ground them within their immediate context.

45. Above the base, the articulation of both blocks coupled with the elevational treatment work well to break down the apparent scale of the new buildings and introduce a comfortable scale at the top of the viaduct. Moreover, the two new buildings bring a clarity of form and a dynamic quality to the group.



Illustrative overview of office development

Heritage and Townscape Views

46. The HTVIA outlines the significance of heritage assets and the contribution of setting to that significance. It provides an assessment of the impact of the proposals upon setting and, therein, significance. Overall, no harm has been identified with respect to any of the identified heritage assets. The Proposed Development would have a direct impact on the Screen Wall to the Grande Vitesse Depot. However, the scheme has been carefully considered and is not considered to result in harm to heritage assets. In relation to the locally listed Screen Wall, the Proposed Development would be an enhancement, better revealing its significance, in line with the NPPF and local planning policy.

47. 70 Heritage Assets were identified within the Study Area of the HTVIA. Of the total 70 heritage assets, 13 statutorily listed structures, four conservation areas and 14 non-designated heritage assets were scoped in for full assessment due to the potential intervisibility with the proposed development, as informed by the Zone of Theoretical Visibility ('ZTV').

48. The Townscape Assessment has considered the Proposed Development within its urban context, including the buildings, the relationships between these, the different types of urban open spaces, including green spaces and the relationship between buildings and open spaces.

49. The townscape views and modelled views demonstrate that, the buildings will be visible from a number of locations including Redcross Gardens and Duke Street Hill at London Bridge's southern bridgehead. The views demonstrate that the buildings will appear in a layered form as two articulated blocks, mostly in the distant backdrop. In the view from Duke Street Hill, the buildings appear over the viaduct around half a mile away from the viewing point with the Grade I listed Cathedral in the foreground, beyond the viaduct and over the distant rooftops. There is no harm arising to the setting of the Cathedral in this view.

50. In terms of visual impact, whilst their siting at the rear of the site and the narrow and confined nature of the surrounding streets will mean that these buildings - designed to preserve the Lambeth Important Borough View form Brockwell Park - are not prominent from many nearby locations. As such it is considered that the proposed height and massing are appropriate in this context.

51. In the main approaches from Great Suffolk Street and Ewer Streets the lower reaches of the building reflect the established 'shoulder' height of the streets with the remainder of each building stepping up to the rear away from the viewer. In these views the main bulk of both buildings is masked by the street facing massing with the stepped profile of each block appearing like an appropriate and articulated massing.



CGI of proposed development looking south-east (from Dolben Street)

52. No harm would be caused to the prevailing visual amenity experienced by any of the receptor groups assessed, with beneficial impacts arising in three of the receptor groups. The beneficial changes to visual amenity would arise through

enhancements to the activation of the arches, landscaping, lighting, permeability and high-quality architectural design. Visual impacts in the wider area would either be very limited, where the proposals would be glimpsed amongst an existing mixed roofscape. The Proposed Development would not adversely affect strategic views.

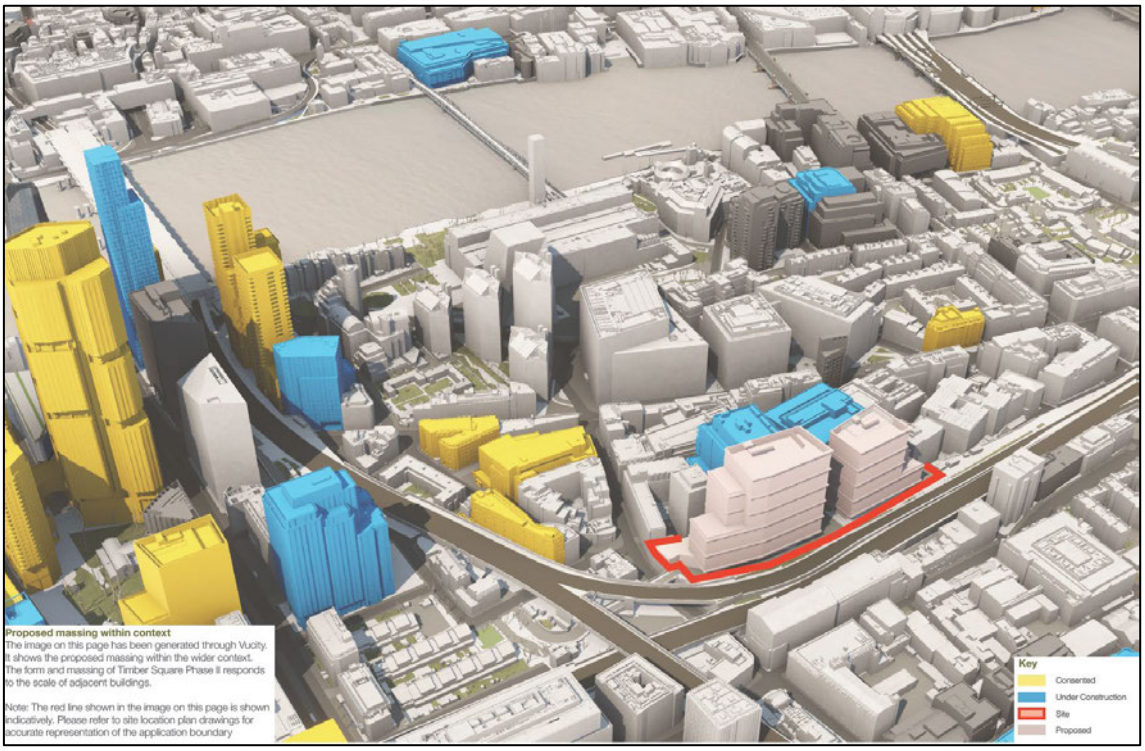
Tall Buildings

53. The Development Plan, including the London Plan and Southwark Plan, supports the principle of development of tall buildings in this location, subject to achieving specified criteria, as set out in Policy P17 of the Southwark Plan.

54. The HTVIA submitted in support of the Application considers the Proposed Development in the context of local and strategic views. In total, 20 accurate visual representations have been prepared by visualisation consultants, Cityscape. The location of the viewpoints has been informed by architectural and historic accounts of the area, an appraisal of the existing Site and surroundings, planning policy and agreed following consultation with officers.

55. No harm has been identified in respect of the prevailing character of any of the receptor groups assessed, with beneficial impacts arising in three of the receptor groups.

56. The HTVIA confirms that the Proposed Development would not be noticeable in the Borough View south from the centre of Millennium Bridge. The Proposed Development would conserve and enhance the significance of designated heritage assets.



Proposed massing within context

Quality of Design and Architectural Expression

57. The paired commercial buildings use a shared language of massing and architectural devices. They are distinguished only by their tone which has been tested for reflectance so as to not give rise to harm the railway operations. The focus of the development is the gap between the buildings in the view south from Lavington Street. Here balconies and terraces as well as the double-height glazed base of the buildings make the most of this prominent aspect of the development.

58. The south-facing facade of the building oversails the access route and accommodates the servicing spaces for the building. These railway-facing facades are appropriate for this function and ensure that all the public-facing spaces can be activated. Above the service zone the office space has been designed to include terraces for occupants both on the stepped roofs of the building as well as balconies overlooking the railway.

59. The architectural expression is well developed and includes façade bay studies and cross sections of the main facades, the oculus and construction through the viaduct, the balconies and terrace spaces, the plant enclosures as well as the landscaped terraces. This will help to embed the quality of design in the buildings, help to clarify the depth and articulation of the façade and demonstrate how the landscape could be delivered on these elevated locations.

Conclusion

60. The proposals would deliver a design of high-quality architecture that would be well-related to the surrounding context and would be compliant with the development plan.

Residential Amenity Impact

Daylight, Sunlight and Overshadowing

61. A Daylight, Sunlight and Overshadowing Report has been prepared by Point 2 which assesses the likely effects of the Proposed Development on daylight and sunlight amenity to the neighbouring residential properties and the overshadowing of public realm.

62. The assessments have first considered the effects of the Proposed Development against the criteria set out in the BRE guidelines. Where the criteria have not been met, consideration has been given as to whether the retained levels of daylight and sunlight can be considered appropriate given the affected buildings use, the Site’s urban location and the assigned policy designations. As the Site is in a Central Activities Zone, the London Bridge Opportunity Area and Bankside and Borough District Town Centre, lower levels of daylight and sunlight are expected.

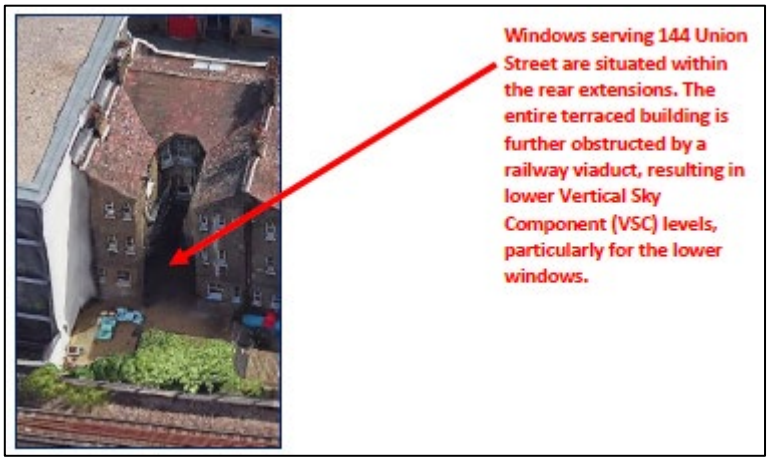
63. Results for the residential properties show that whilst some reductions

(compared to the existing condition) may be noticeable to the surrounding residential occupants (as they are beyond the BRE guidance), the levels of retained daylight and sunlight are adequate given the urban context.

64. The most impacted permanent residential buildings would be the Union Street buildings located south of the Site. Particularly the three-storey terrace comprising properties numbered 144-158 Union Street.

65. Whilst the percentage reductions are beyond the BRE guidelines, the affected windows will experience actual percentage reductions of approximately 1-5%. These reductions are not considered significant.

66. While the retained VSC levels are in some instances as low as approximately 3% (with others nearer 15%), they are not unexpected for this area and when in between the rear extensions. In addition, these levels are better than some observed in the immediate area, even in the absence of the Proposed Development.



Aerial image of 144 Union Street north facing windows (towards site)



Aerial image of 158 Union Street north facing windows (towards site)

67. When considering the urban context and the minimal actual impact relative to the baseline conditions, the proposed changes are deemed acceptable.

68. In terms of daylight distribution, both rooms will experience No-Skyline (NSL)

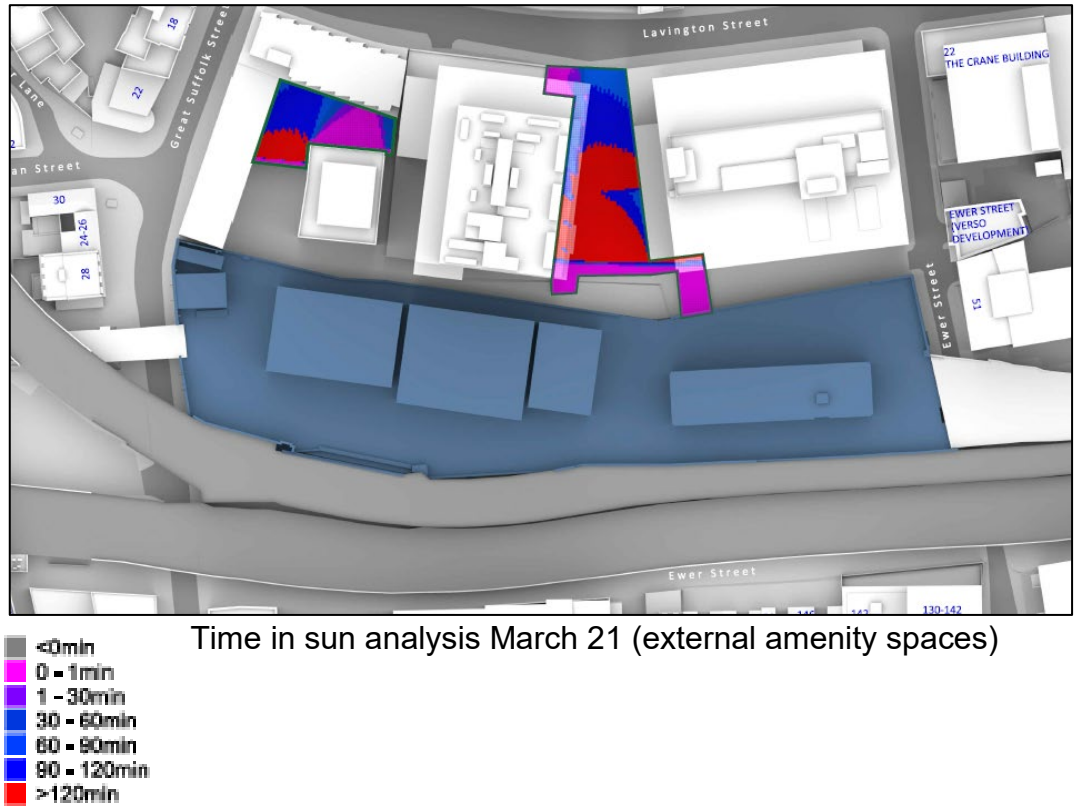
reductions above the suggested criteria outlined in the BRE guidelines. As noted in the preceding paragraphs, the existing daylight levels are already low for a residential property. This therefore also applies to the NSL levels, and it is therefore technically challenging to meet the BRE criteria in this instance. Overall, the limited daylight distribution levels are primarily a consequence of the existing U-shaped design of the rear extensions, rather than the impact of the Proposed Development itself and the effects can therefore be considered acceptable.

69. The annual Probable Sunlight Hours (APSH) assessment shows that all windows and rooms assessed will experience APSH alterations that are in line with the BRE guidelines criteria. The sunlight effects of the Proposed Development are therefore considered to be negligible.

70. Overall, the assessment demonstrates that the Proposed Development will result in only minor actual reductions to daylight levels to this flat, with retained VSC values that, while low, are already observed in this dense urban area. The daylight levels are largely influenced by the pre-existing design constraints of the property, including its U-shaped rear extension layout and obstruction by a railway viaduct, rather than the Proposed Development itself.

71. When considering the properties that are of a more transient nature (the apart-hotel and student accommodation buildings), the would experience greater impact than the permanent residential buildings, they are considered to also retain acceptable levels of daylight and sunlight given the urban context and use.

72. With regard to overshadowing, the existing amenity space within the student South Bank Chapter Living development will experience reductions beyond the BRE guidelines. However, whilst technically beyond the BRE guidelines, the actual additional overshadowing is considered minor adverse with roughly 30-60 minutes of additional overshadowing on 21 March. Furthermore, during the summer months, when these spaces are more frequently used, the additional overshadowing is minimal.



Time in sun analysis March 21 (external amenity spaces)

73. Given the Site's location adjacent to the operational railway, a Solar Glare Study has been prepared by Point 2 Surveyors, to assess the likelihood of any glare occurring from the Proposed Development to the surrounding motorists, cyclists, or train drivers. Overall, the Study concludes that any reflected sunlight is unlikely to cause any nuisance or disability glare to the nearby train drivers, motorists or cyclists in the surrounding area. The proposed development would therefore comply with the development plan with regards to daylight, sunlight and overshadowing.

Overlooking and Privacy

74. Generally, the proposed development would not be in close proximity to permanent residential buildings. Nearby conventional residential properties on Union Street, Ewer Street and Great Suffolk Street would be over 35m away with a notable height differential. Users of the proposed development would likely look outward and above surrounding buildings in most instances.

75. The chapter Southbank student accommodation building has some overlooking potential. This however is minimised as the service core of the west building would be positioned opposite (stair cores and bathrooms) which are not served by windows. Windows further west would maintain a minimum 20m distance and nearby outdoor spaces would be appropriately screened where necessary.



Office plan (service stack in purple, student accommodation outlined in red)

Noise and Disturbance

76. A Noise Survey and accompanying Noise Report has been prepared by Sandy Brown. The key noise sources at the site were noted as train traffic from all routes on the tracks to the South and West. Less dominant noise sources included distant traffic and occasional noise from a nearby construction site during daytime hours.

77. Measured ambient noise levels were in the range LAeq,15min 56 to 74 dB during the day, LAeq,15min 63 to 74 dB during the evening and LAeq,15min 50 to 69 during the night.

78. The results of the survey have been used to determine a set of background sound levels considered representative of those at the nearby receptors.

79. Based on the requirements of the Council, relevant plant noise limits at the worst affected existing noise sensitive premises have been established. These limits are cumulative and apply with all plant operating under normal conditions. The cumulative noise level from the operation of all new building services plant would not exceed these limits (see tables below).

Category	Day (07:00 – 19:00 hours)	Evening (19:00 – 23:00 hours)	Night (23:00 – 07:00 hours)
Specific noise limit	43	41	37
Rating level limit	53	51	47

External plant noise limits ($L_{Aeq,T}$, dB) at 1 m from receptor facade – weekday operation only

Category	Day (07:00 – 19:00 hours)	Evening (19:00 – 23:00 hours)	Night (23:00 – 07:00 hours)
Specific noise limit	41	40	37
Rating level limit	51	50	47

External plant noise limits ($L_{Aeq,T}$, dB) at 1 m from receptor facade – weekday and weekend operation

80. Usage of the outdoor spaces will be restricted to appropriate hours (08:00-22:00) and noise generating activities managed accordingly. The proposed development would therefore comply with the development plan with regards to noise and disturbance.

Transport and Highways

81. The Proposed Development has been designed with a focus on active and sustainable travel choices. The proposals seek to remove car parking from the site in its entirety and place a detailed focus on the journey and trip-end facilities for those arriving and departing the site by active travel modes. The Proposed Development seeks efficiencies with Timber Square phase 1 to further improve the local public realm and enhances opportunities for pedestrian connectivity and permeability in the local area. The Proposed Development will open the existing railway arches, currently inaccessible to the public, through a new colonnade route which enhances the adjacent Low Line.

82. the Proposed Development is forecast to result in a net increase of 675 trips in the AM peak and 688 trips in the PM Peak when considering James Forbes House as still in operation as was the case in Summer 2024. The majority of the increases are forecast to occur on the public transport network whilst a reasonable number of additional walking and cycling trips are forecast.

Mode	AM Peak Hour (08:00 – 09:00)			PM Peak Hour (17:00 – 18:00)			Daily		
	Arr	Dep	Total	Arr	Dep	Total	Arr	Dep	Total
Underground	218	-36	182	-98	185	87	15	80	94
Train	374	-62	312	-168	318	149	25	137	162
Bus	78	-13	65	-35	66	31	5	29	34
Taxi	2	0	2	-1	2	1	0	1	1
Motorcycle	12	-2	10	-5	10	5	1	4	5
Car Driver	0	0	0	0	0	0	0	0	0
Car Pass.	4	-1	3	-2	3	1	0	1	2
Bicycle	81	-13	67	-36	69	32	5	30	35
On foot	39	-6	32	-18	33	16	3	14	17
Other	2	0	2	-1	2	1	0	1	1
Total	**809**	**-135**	**675**	**-365**	**688**	**323**	**55**	**297**	**351**

Net change in trips (existing vs proposed - with James Forbes House)

83. Given the wide range of public transport services and the extensive destinations available from within close proximity of the site the impact is not considered to be significant. Also, within the context of the wider improvements to the walking and cycling networks that are inherent to the Proposed Development design and the Proposed Highway Works, the impact of the scheme upon these modes is considered to be positive and supplemented by improvements to the local pedestrian network.

84. The impact of the proposal upon the public highway is not considered to be significant owing to the fully car-free nature of the scheme and the use of existing infrastructure and accesses to enable development (servicing vehicle) access, minimising any disruption to the highway network both in implementation and operation. The impact of the scheme upon the transport networks is therefore considered to be negligible and compliant with the development plan.

Car Parking

85. The Proposed Development would be car-free. No Blue Badge Parking is proposed, given the proposed use and the Site's 6b PTAL rating. This is supported by officers.

Cycle Parking

86. 690 long-stay cycle parking spaces are proposed. This includes 435 cycle parking spaces in the West Building, and 243 cycle parking spaces in the East Building. In addition, 12 spaces related to the active uses would be provided within the East Building. The Cycle Storage Provision has been designed to London Cycle Design Standards ('LCDS'), with a distribution of stand type.

87. End-of-trip facilities - including dedicated showers, lockers, changing facilities and washrooms - would also be provided. Changing rooms would be divided equally between genders with an additional gender-neutral changing place within each building. Showers would be provided at a ratio of 6% reflecting the significant number of showers required when designing for such a dense cycle parking provision.



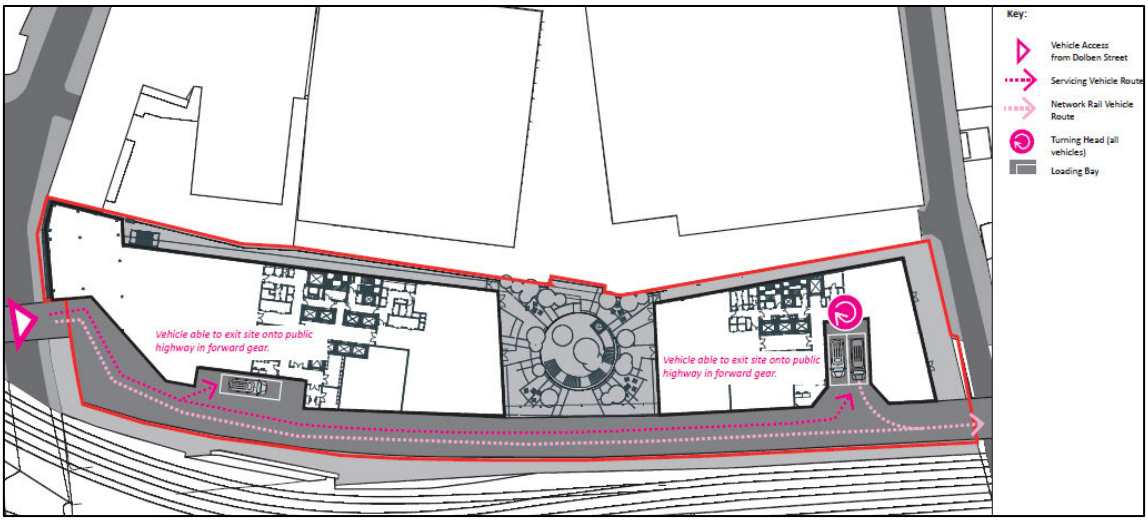
Plan showing end-of-trip facility locations

88. 55 Sheffield Stands are proposed across the Site. This includes, 4 Sheffield Stands are proposed within the Colonnade are provided as larger stands which would comfortably accommodate Cargo Bikes.

89. It is recognised that the Southwark Plan requires more cycle parking than the London Plan. However, due to the various site constraints related to the arches, it is considered appropriate to provide cycle parking in line with the London Plan standards and supplement this provision with additional folding bike locker storage. The Proposed Development is compliant with the London Plan standards. When considering the locker storage, the Proposed Development provides a total number of spaces compliant with the Southwark Plan.

Delivery and Servicing

90. The servicing strategy for the Site utilises the existing southern access road. Vehicles would be able to load and unload from the loading bays directly in the back of house servicing routes within the East and West Building. These servicing routes provide access to Goods Lifts which enable goods to be transferred active uses. A Servicing Plan is set out in the Transport Assessment.



Plan of servicing area at Podium level (via Dolben Street)

91. The Proposed Development accommodates three loading bays within the Site. A Delivery Management System for the Site would be in operation. This would seek to manage servicing and delivery vehicle activity, providing a booking system that ensures vehicle arrivals are distributed evenly across the day and that their dwell time within the loading bay is limited to the relevant capacity. As such, the strategy is considered to be in accordance with the development plan.

Waste Management

92. The Operational Waste Strategy for the Proposed Development has been designed in accordance with the waste hierarchy, as detailed in the accompanying Operational Waste Management Plan. The principal components of the waste strategy allow tenants and employees of the Proposed Development to prevent waste and reuse / recycle material.

93. Waste would initially be accommodated within individual tenant demises but separated into waste streams at source. It would then be transferred by tenants to the Waste Storage Area(s) where it would be consolidated into all necessary waste streams prior to collection. The Waste Storage Areas would be located as follows:

- West Building Waste Storage Area: located at Podium Level between the Goods Lift and the Western Loading Bay / Servicing Area; and
- East Building Waste Storage Area: located at Podium Level between the Goods Lift and the Eastern Loading Bay Servicing Area; and
- Retail Waste Store Area: located at Arches Levels to the rear of the Great Suffolk Street Active Use units.

94. Residual, Paper & Cardboard and Mixed Plastics waste would be stored within 1,100L Eurobins and Organic Waste within 140L Eurobins. To increase the efficiency of the Waste Storage Areas, ‘in-bin’ waste compactors would be used to minimise the total spatial requirements of bin storage. Waste would be collected privately from the Loading Bay’s at Podium Level, which are easily accessible to the Waste Storage Areas within the building via Goods Lifts. The

proposed development is therefore considered to comply with the development plan with regards to waste management.

Energy & Sustainability

Energy

95. In accordance with the London Plan, the Proposed Development aims to minimise CO^2 emissions to the atmosphere arising from the operation of, and within, the building, applying the energy hierarchy.

96. The Energy Statement estimates that the Proposed Development will achieve a 5.1% improvement over a notional building compliant with Part L 2021 of the Building Regulations. In addition, the proposed development will achieve a 7.5% improvement over the 'be lean' case through renewable energy technologies only ('be green').

97. As set out in the Energy Statement, initial calculations show the proposed strategies result in a 5,785 tonne CO2 savings, which results in an off-set payment of £549,604.

98. In line with 'be seen' requirements, early-stage operational energy has been calculated following CIBSE TM54 methodology. The results of this preliminary assessment show the Development's potential energy use intensity of 91.5 kWh/m2 total GIA.

99. The Proposed Development will achieve BREEAM Excellent certification with an aspirational target of BREEAM Outstanding under BREEAM 2018 New Construction. The Proposed Development will be assessed under the Commercial – Offices - General office scheme, and considered as shell and core development. The two office buildings will be certified separately, although at this stage, a single pre-assessment has been carried out due to the common design strategies and targets across the development. The pre-assessment also considers the flexible uses at ground floor, although this space cannot be formally certified under a BREEAM NC Offices Scheme.

100. Furthermore, the Proposed Development has been registered with NABERS UK DfP which means that more detailed energy modelling will be carried out in later stages of development for detailed performance prediction. The Proposed Development is seeking NABERS UK Design for Performance rate of 5* but has an aspirational target of 5.5* rating. The embodied carbon figures have been taken from the ICE Inventory of Carbon and Energy V4 2024.

101. In accordance with London Plan policy, the Proposed Development is supported by a Whole-Life Carbon Assessment and Circular Economy Statement.

Whole Life-Cycle Carbon

102. The upfront emissions of the proposed design for Timber Square Phase II [A1-

A5] are estimated to be 715 kgCO2e/m2 GIA (773 with contingency). The results show a 25% improvement when compared against the GLA benchmark for office developments (950 kgCO2e/m2).

103. Life-cycle embodied carbon emissions [A-C excl B6 & B7] are estimated to be 1,300kgCO2e/m2GIA (1393 with contingency). These results are approximately 7% below GLA benchmark.

104. The reductions in embodied carbon are achieved through informed design decisions and sustainability aspirations such as retaining the existing arches, avoiding the addition of a new basement, adopting a sensible grid span on a steel and CLT structure, careful specification of reused or low carbon materials, and limitation on additional finishes and elements in tenant areas which are likely to be replaced when fitted out.

105. Additional potential carbon savings, include the procurement of aluminium, steel, glass, and concrete mixes with higher proportions of cement replacement. The applicant will continue to investigate further improvements such as superstructure and substructure optimisations in the subsequent design stages.

106. The proposed development is considered to comply with the development with regards to energy and sustainability matters.

Environmental Matters

Flood Risk and SuDS

107. A Flood Risk Assessment has been carried out by Pell Frischmann in accordance with the requirements of the Development Plan. This confirms that the site is generally considered at low risk of flooding, with a potential low residual risk posed from flood defences breaches and surface water.

108. Whilst in Flood Zone 3, the Site benefits from the flood defences along the River Thames against flooding from fluvial and tidal sources, with the remaining risk to the Site posed from a residual risk event.

109. As defined by the PPG Sequential Test, it is required that the Proposed Development should be placed in an area at the lowest risk of flooding. The Site has been allocated for development within the Southwark Plan as a Site suitable for redevelopment, which requires the Sequential Test to be passed as part of strategic plan-making. As such, the Site is considered sequentially preferable, and the requirements of the Sequential Test have been passed.

110. Due to the location of the Site within Flood Zone 3 and the conclusion of the Sequential Test, the Site may also subject to an Exception Test. As laid out in Paragraph 164 of the NPPF, two additional elements need to be satisfied in order for the Site to pass the Exception Test. It needs to be demonstrated that;

- Development that has to be in a flood area will provide wider sustainability benefits to the community that outweigh flood risk; and

- The development will be safe for its lifetime, taking account of the vulnerability of its users, without increasing flood risk elsewhere, and where possible, will reduce flood risk overall.

111. The Site demonstrated wider sustainability benefits to the community through the general re-purposing of the existing land uses and re-use of developments on brownfield land. Further to this, the change in land use forms part of community focused development proposals providing local regeneration within the area. The PPG considers this a suitable wide sustainability benefit to the community and includes 'the re-use of suitable brownfield land as part of a local regeneration scheme' as an example of such benefit.

112. Based on EA modelling data, the Site is shown to be at a low risk of flooding from rivers and the sea up to the 2100 climate change epoch, with breach modelling flood levels to be above the proposed level for commercial development. As the proposals comprise a change of use and refurbishment to an existing property asset alongside additional new construction without changing the footprint of the existing Site, the proposals will not negatively impact flood risk on-Site or off-Site.

113. Further to the Site being located within a heavily developed section of London, with planning proposals including the re-development of existing aspects alongside the construction of a new raised building, keeping the existing structure of the buildings, it is considered feasible to provide new attenuation features within the scope of these proposals including the installation of green roofs, rainwater harvesting systems, tree pits and cellular storage tanks.

114. The above-mentioned aspects of the development provide sufficient information allowing the Site to pass the requirements of both the Sequential Test and Exception Test.

115. A Drainage Strategy has also been carried out, setting out how the Proposed Development would reduce surface water run-off through the use of SUDS. The drainage scheme is in accordance with the Development Plan as the Proposed Development can proceed without being subject to significant flood risk and complies with the development plan.

Air Quality

116. An Air Quality Report has been prepared by Cogan Environmental Consulting. This Report considers the potential air quality impacts of the Proposed Development upon the local area. The Proposed Development has been designed to minimise air pollution (for example through the provision of cycle infrastructure and being 'car free'), and through the energy strategy. The Proposed Development would be air quality neutral in terms of building and transport related emissions.

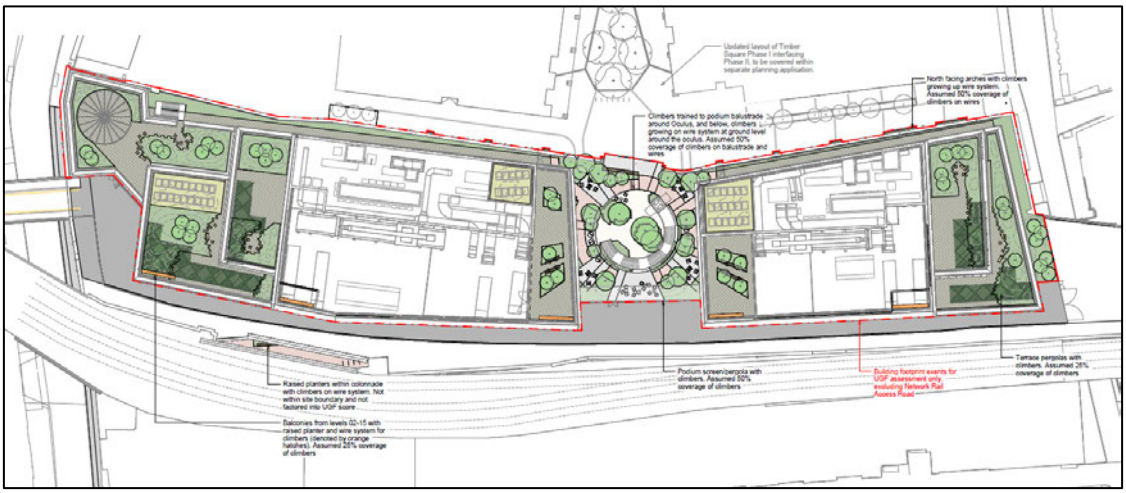
117. An Air Quality Positive Statement has also been provided within the Air Quality Report, demonstrating how air quality has been factored into the design development. The Statement concludes that the Proposed Development has been determined to be air quality neutral and the air quality effects are judged to

be ‘not significant’. This aligns with Policy P65 to ensure development achieves or exceeds air quality neutral standards.

Urban Greening and Biodiversity

118. The Proposed Development has been designed to deliver significant green infrastructure enhancements on Site. It provides an opportunity to enhance and complete the wider Timber Square development, linking and enhancing the existing public realm, creating new routes and connections, and opening up parts of the Site to the public that are currently inaccessible.

119. The Proposed Development would achieve a minimum Urban Greening Factor (‘UGF’) score of 0.3 (0.303), meeting London Plan and Southwark Plan requirements.



Plan of UGF measures

120. The site area included within the UGF calculation includes the land within the Applicant’s demise and does not include the service road to the south of the Site and the land to the north that comprises the below ground attenuation tank. This is because the Applicant is not able to introduce any greening in this location due to physical and title constraints. Therefore, it is reasonable to calculate UGF based on the refined site area. If considering the full extent of the Site (including the service road and area to the north for the attenuation tank), the Proposed Development would deliver a UGF score of 0.261. However, this figure is provided for information only.



CGI of the 'Oculus'

121. A Biodiversity Net Gain ('BNG') Report has been prepared by Greengage. This Report identifies that the Proposed Development is predicted to deliver 3.78 Habitat Units ('HU'), representing a net gain of 3.78 HU, when assessed against the baseline value of 0. Whilst this increase cannot be represented as a percentage increase due to the negligible baseline ecological value, it equates to 6.51 HU per hectare, which represents a significant enhancement to the Site in line with legislation and the Development Plan. The proposed development is therefore considered to comply with the development with regards to urban greening and biodiversity.

Fire Safety

122. In accordance with policy requirements, a Fire Safety Statement has been prepared by Hoare Lea. This Fire Statement demonstrates that the Proposed Development has considered fire safety principles from an early design stage and the Proposed Development will be compliant with Policy D5 and D12 of the London Plan.

123. The Fire Statement demonstrates that the proposals have considered fire safety at the earliest stage, and the further development of the fire strategy will be based upon these principles. The fire strategy will be further developed for submission to the Approving Authority at the appropriate time and will meet the functional requirements of the Building Regulations 2010, taking recommendations from BS 9999:2017 and the requirements of Policy D5 and D12 of the London Plan.

Archaeology

124. As the site is within the North Southwark and Roman Road Tier 1 Archaeological Priority Area ('APA'), an Archaeological Desk-Based Assessment and Report on an Archaeological Watching Brief have been prepared by MOLA.

125. The Archaeological Watching Brief revealed archaeological activity limited to the post medieval period is present on the site, however the interventions monitored were localised and sparse. Furthermore, the truncations seen from the railway arches appear localised and minimal suggesting preservation of archaeological deposits in between the arch spaces.

126. Future development would require further archaeological mitigation in the form of an archaeological evaluation by trial pitting or trenching in areas where there will be significant impact in the ground from future piling. This is to be secured via condition.

Planning obligations (S.106 agreement)

127. London Plan Policy DF1 and Southwark Plan Policy IP3 advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. These policies are reinforced by the Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:

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

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

Planning Obligation	Mitigation	Applicant Position
Affordable cultural space or workspace	To secure 10% of the uplift in office floorspace as affordable cultural space or workspace (or a PIL to fund AWS elsewhere in the borough).	Agreed
Construction phase jobs and training	a. Deliver 109 sustained jobs to unemployed Southwark residents, 109 short courses, and take on 27 construction industry apprentices	Agreed

	during the construction phase or meet the Employment and Training Contribution (if not achievable). b. Submission of an Employment, skills and business support plan.	
End use jobs and training, and local procurement	a. Deliver 339 sustained jobs for unemployed Southwark Residents at the end phase or meet any shortfall through the Employment in the End Use Shortfall Contribution (if not achievable). b. Provide skills and employment plan no later than six months prior to first occupation. c. Allow local businesses to tender for the procurement of goods and services generated by the development both during and after construction.	Agreed
Energy statement and carbon offset financial payment	a. Secure agreed carbon target (uplift over Part L). b. Secure futureproofed connection to DHN. c. Energy schedule (standard wording). d. Secure carbon off-set contribution (£549,604).	Agreed
Be Seen – on-going monitoring and post-installation review	Post-construction monitoring and reporting.	Agreed
Highway works and transport contributions	a. Sustainable transport interventions and improvements contribution (£500,000) b. Delivery and Servicing Management Plan Bond and Monitoring Fee (£2,790). c. Travel Plan monitoring fee (£2,790). d. Revocation of Parking Permits.	Agreed
CEMP monitoring	CEMP monitoring fee (£TBC).	

EPT monitoring	EPT monitoring fee (£56,868)	Agreed
Archaeology monitoring	Archaeology monitoring fee (£11,171).	Agreed

129. In the event that an agreement has not been completed by 22 February 2026, the committee is asked to authorise the director of planning and growth to refuse permission, if appropriate, for the following reason:

In the absence of a signed S106 legal agreement there is no mechanism in place to mitigation against the adverse impacts of the development through contributions and it would therefore be contrary to IP Policy 3 Community infrastructure levy (CIL) and Section 106 planning obligations of the Southwark Plan 2022; and Policy DF1 Delivery of the Plan and Planning Obligations of the London Plan 2021; and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD 2015.

Mayoral and borough community infrastructure levy (CIL)

130. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material 'local financial consideration' in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport invests in London as a whole, primarily Crossrail. Southwark's CIL will provide for infrastructure that supports growth in Southwark.

131. The proposal is a CIL chargeable development because it comprises over 100sqm of new build. The site is located within Southwark CIL Zone 1 and MCIL2 Central London Zone. Based on the floor areas provided by the applicant's Form1 dated 21-Feb-25 and Outline Area Measure (Rev.P19, 18-Feb-25), **the gross amount of CIL is approximately £15,145,378 in total**, consisting of £10.2 million of Mayoral CIL and £4.9million of Borough CIL. It should be noted that this is an estimate, and the floor areas on approved drawings will be checked and the "in-use building" criteria will be further investigated, after planning approval has been obtained.

Community involvement and engagement

132. This application was accompanied by a statement of community involvement (which provides full details of the public consultation). In summary, the document confirms that the following public consultation events were undertaken from August 2024 to February 2025 by the applicant prior to submission of the application:

- Held nine consultation events, with over 267 attendees in total. The first six of these events were held at Arch 23 in Flatiron Square, nearby the site, with an engaging 3D installation created by award-winning creative agency Music providing a unique and exciting approach to displaying information related to the scheme. Refreshments were also provided at events.
- As part of the above the Applicant team organised a community fair on site showcasing local businesses, charities and groups in order to demonstrate potential activation of the space, build interest in the site and invite the public to a currently inaccessible space.
- Hosted a Commonplace website with over 1,735 unique individual visitors across the lifetime of the project (September 2024 to January 2025). Visitors were able to hear about the scheme, view the proposals and submit online feedback.
- Held five Design Champion Workshops, with 12 members of the local community able to learn about the design and development process and give direct and extensive feedback to the project team on various aspects of the proposals – all while being paid for their time.
- Received over 29 individual responses to the proposals, alongside informal feedback collated by project team members in person.
- Held meetings with local stakeholders, including meetings with neighbours, councillors, and local interest groups – with some meetings being frequent and ongoing.
- Distributed leaflets to over 2,828 addresses as part of our outreach to local residents and neighbours.
- Received over 185,000 impressions via Instagram targeted advertising for nearby residents and workers to participate in the consultation programme.

133. The applicant provided an engagement summary for the development consultation charter. It details the extent of pre-application consultation and demonstrates that the applicant has made acceptable efforts to engage with those affected by the proposals. As part of its statutory requirements, the council, sent letters to surrounding residents, displayed site notices in the vicinity, and issued a press notice publicising the planning application. Adequate efforts have, therefore, been made to ensure the community has been given the opportunity to participate in the planning process.

134. Details of consultation undertaken by the local planning authority in respect of this application are set out in the appendices. The responses received are summarised later in this report.

Consultation responses from members of the public and local groups

135. Public consultation was undertaken on 15.04.2025. 1056 neighbours were consulted, 8 comments were received, 2 in support, and 6 in objection.

136. Summarised below are the planning matters raised by members of the public with an officer response. Further detail on these matters is set out within the relevant sections in the report.

Support

137. The support comments state that the development would be a welcome addition to the area, and would bring much needed shops, while also involving the community. Officers agree that the development brings many public benefits to the area.

Objection

Excessive height

138. Officer comment: The Site is located within the Central Activities Zone and London Bridge Opportunity Area. It falls within an area where Southwark 'expect tall buildings' outlined in the adopted Policies Map and Figure 4 of Southwark Plan (2022).

139. The Site is also identified as Site Allocation NSP02 (Site Bordering Great Suffolk Street and Ewer Street). The Site Allocation also confirms that 'comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.'

140. The zone of theoretical visibility (ZTV) demonstrates the visual impact of the proposed development is heavily contained. Where visible, verified views demonstrate that the proposed scale of development would be commensurate to the location of the application site, and its architectural quality would be attractive, improving visual amenity. In particular, the stepped form limits the impression of the overall bulk and mass when seen from Great Suffolk Street with the maximum height set away from the street frontage. The visual impact is limited primarily to these very local views. There is limited intervisibility identified from wider viewpoint locations which includes the Union Street, Thrale Street, Kings Bench and Liberty of the Mint Conservation Areas.

Lack of connection to Ewer Street (via arches)

141. Officer comment: The arches between the site and Ewer Street are not owned by the applicant. A through-route was explored by the applicant and officers, but it was not possible to secure. One arch was available for cycle storage purposes; it was not suitable for a connection to Ewer Street in this instance. Creating a connection to Ewer Street via the arches remains a future goal.

Overlooking (from terraces)

142. Officer comment: The proposed terraces would not be in close proximity to conventional housing on Ewer Street (approx. 35m distance). Potential overlooking into nearby student housing will be appropriately managed by way of

condition (privacy screens/planting). Use of terraces will also be restricted to 08:00 – 22:00.

External lighting

143. Officer comment: External lighting will be appropriately managed by way of condition. Any external lighting system installed at the development shall comply with the Institute of Lighting Professionals (ILE) Guidance Note 1 for the reduction of obtrusive light (2021). Details of any external lighting (including: design; power and position of luminaries; light intensity contours) of all affected external areas (including areas beyond the boundary of the development) shall be submitted to and approved by the Local Planning Authority in writing before any such lighting is installed.

Servicing and delivery (via Ewer Street)

144. Officer comment: The servicing strategy for the Site utilises the existing southern access road at podium level (not Ewer Street). Servicing vehicles will enter the site from Dolben Street via the existing access to the site that is currently in use by Network Rail. Servicing vehicles will travel up the ramp to the podium level where a servicing area equipped with loading bays enables the servicing of both buildings and the arches. The proposals would result in an overall reduction in net trips on the podium (compared to the Network Rail use of the site).

Insufficient notification

145. Officer comment: Notification letters were sent were sent to 1056 nearby properties (all properties within 100m of the site). Multiple site notices and a press notice were also displayed. This meets the consultation requirements set out in Southwark Council's statement of community involvement (SCI).

Consultation responses from external and statutory consultees

146. Summarised below are the planning matters raised by external and statutory consultees. Matters are addressed within the relevant sections in the Assessment section of this report.

147. Greater London Authority (inc TfL):
- Land use principles: The office-led redevelopment of the site is supported in strategic land use terms.
- Urban Design: Broadly supported; and given the site's location within an area identified for tall buildings in the local plan, the proposed tall buildings are acceptable subject to addressing Policy D9 (Part C).
- Transport: Further work is required with respect to the ATZ assessment, cycle parking and the loss of the essential operation parking spaces for TfL; and various conditions and planning obligations appropriately secured.
- Heritage: A low level of less than substantial harm has been identified; however, in accordance with the NPPF, this harm could be outweighed by

the public benefits of the scheme and once these benefits are appropriately secured, GLA officers will consider the heritage harm in the balance at Stage II.
- Other issues on Sustainability and the Environment also require resolution prior to the Mayor's decision making stage.

Officer response: Heritage point is noted, Council officers do not identify harm in this instance. Further information has been submitted by the applicant, which is considered to adequately address the points made regarding transport, environment and sustainability. Any information considered outstanding will be provided prior to stage 2 and/or secured by way of condition/obligation.

148. Environment Agency: No objection subject to conditions.
Officer response: Conditions attached accordingly.

149. Metropolitan Police (Design out crime): No objection subject to conditions.
Officer response: Conditions attached accordingly.

150. TfL Railway Infrastructure: No objection subject to conditions.
Officer response: Conditions attached accordingly.

151. Thames Water: No objection subject to conditions.
Officer response: Conditions attached accordingly.

152. UKPN: No objection, advice regarding substation proximity given.
Officer response: Advice has been taken into consideration accordingly.

153. These matters are addressed comprehensively in the relevant preceding parts of this report.

Community impact and equalities assessment

154. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights

155. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.

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

    1. The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act

    2. The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:

- Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
- Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low

3. The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.

157. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

158. There are a range of potential impacts on the local community during construction and operation. Potential impacts in terms of infrastructure, environmental factors, amenity, accessibility, housing, employment creation and health have been discussed in detail in the relevant sections of this committee report and any necessary mitigation to limit adverse impacts has been secured through s106 obligations and planning conditions (for example construction impacts will be minimised through the use of a CEMP).

159. This application would deliver a significant amount of office and commercial floorspace, including affordable cultural space or a PIL to build affordable workspace elsewhere in the borough, thus presenting opportunities to increase access to cultural offerings or employment for all residents of the borough including those with protected characteristics. There will also be positive health and amenity benefits through enhanced public realm. The positive impacts arising from the development would benefit those groups with protected characteristics as well as the wider community.

160. The detailed proposals have been designed to ensure inclusive access for all. All public realm areas have appropriate gradients and slopes instead of steps wherever possible. The landscaped areas will incorporate appropriately designed furniture for a range of users. There is level access into the buildings and internally the design incorporates an appropriate provision of wheelchair accessible toilets, lifts, wide corridors, doors and circulation areas. Furthermore, both buildings provide DDA cycle parking facilities.

161. Officers are satisfied that equality implications have been carefully considered throughout the planning process and that Members have sufficient information available to them to have due regard to the equality impacts of the proposal as required by Section 149 of the Equality Act 2010 in determining whether planning permission should be granted.

Human rights implications

162. This planning application engages certain human rights under the Human Rights Act 1998 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.

163. This application has the legitimate aim of redeveloping this site for a mixed-use building comprising housing, community, retail and commercial floorspace together with accessible public realm. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

Positive and proactive statement

164. The council has published its development plan and Core Strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

165. The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.

Positive and proactive engagement: summary table

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

CONCLUSION

166. The proposed development provides substantial public benefits, stemming from the comprehensive redevelopment of an existing under-utilised brownfield site, which in turn makes a significant contribution to delivering the vision and

objectives of the development plan.

167. Public benefits include:

- Deliver the sustainable development of an underutilised brownfield site within Central London;
- Deliver a high-quality design which promotes sustainability measures throughout its design, construction and lifetime of the building. This includes the design achieving a BREEAM rating of “Excellent”;
- Contribute to the sustainable travel objectives of national, regional and local planning policy, by providing a car free development which would promote other means of travel such as cycling (through provision of new cycle spaces) and walking through the creation of new routes through the Site;
- Deliver new greening and landscaping throughout the Site, meeting BNG and UGF requirements;
- Reuse and enhance the railway viaduct, to create a unique and exceptional cultural and commercial destination;
- Provide active uses at ground floor level that would be open to members of the public;
- Provide opportunities for space for local businesses, and use of local supply chain where possible;
- Offer free access to public realm at ground floor and podium level, that would benefit the community;
- Assuming a 3-year construction programme, 10 years of estate management and 10 years of occupation, the Social Value created by the Proposed Development could be as high as circa £390million, as set out in the Social Value Statement.
- Provides a new office development which is expected to generate a 550 FTE of new jobs during construction and circa 2,484 new jobs in the end development;
- Up to £73.6 million of locally delivered Social Value is estimated to be generation through local spend in the supply chain during construction;
- Improvements to local infrastructure through CIL and s106 planning gain payments, of more than £10 million.

168. The proposed development would deliver a high-quality office-led development incorporating a significant amount of flexible commercial space and affordable cultural space (or PIL to fund off-site affordable workspace) and would provide a high-quality public realm offering. It is compliant with both the London and Southwark Plans and is therefore supported.

169. For the reasons set out in the Assessment section of this report, it is recommended that planning permission be granted, subject to conditions, referral to the Mayor of London, and the timely completion of a S106 Agreement.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Environmental, Neighbourhoods and Growth Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 0254 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Recommendation (draft decision notice)
Appendix 2	Relevant planning policy
Appendix 3	Planning history of the site and nearby sites
Appendix 4	Consultation undertaken
Appendix 5	Consultation responses received

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth		
Report Author	Nathaniel Young, Team Leader		
Version	Final		
Dated	15 July 2025		
Key Decision	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title		**Comments Sought**	**Comments included**
Strategic Director, Resources		No	No
Strategic Director, Environment, Sustainability and Leisure		No	No
Strategic Director, Housing		No	No
Date final report sent to Constitutional Team			11 July 2025

APPENDIX 1

Recommendation (draft decision notice)

Applicant LS Timber Square Developer Limited

planning permission is GRANTED for the following development:

Partial demolition of the viaduct structure, remodelling and refurbishment and change of use of existing arches within the viaduct structure to flexible office, retail, gymnasium and restaurant uses (Class E) and flexible cultural, drinking establishment, live music venue, nightclub, cinema, and theatre uses (Sui Generis); construction of two buildings (ground plus-12 storey plus plant and ground plus 15-storey plus plant) for flexible office and indoor sport and recreation facilities (Class E); associated landscaping, new public realm, creation of new entrances and frontages, cycle parking, highways works, plant and equipment and all other associated works.

At

Timber Square (Phase 2) 63 Ewer Street London SE1 0NR

In accordance with the valid application received on 26 February 2025 and supporting documents submitted which can be viewed on our Planning Register.

For the reasons outlined in the case officer's report, which is also available on the Planning Register.

The Planning Register can be viewed at: https://planning.southwark.gov.uk/online-applications/

Conditions

Permission is subject to the following Approved Plans Condition:

The development shall be carried out in accordance with the following approved plans:

Reference no./Plan or document name/Rev.	Received on

Reason:
For the avoidance of doubt and in the interests of proper planning.

Permission is subject to the following Time Limit:

1. The development hereby permitted shall be begun before the end of three years from the date of this permission.

   Reason: As required by Section 91 of the Town and Country Planning Act (1990) as amended.

Permission is subject to the following Pre-Commencements Condition(s)

2. No development shall take place, including any works of demolition, until a written CEMP has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall oblige the applicant, developer and contractors to commit to current best practice with regard to construction site management and to use all best endeavours to minimise off-site impacts, and will include the following information:

   • A detailed specification of demolition and construction works at each phase of development including consideration of all environmental impacts and the identified remedial measures;

   • Site perimeter continuous automated noise, dust and vibration monitoring;

   • Engineering measures to eliminate or mitigate identified environmental impacts e.g. hoarding height and density, acoustic screening, sound insulation, dust control measures, emission reduction measures, location of specific activities on site, etc.;

   • Arrangements for a direct and responsive site management contact for nearby occupiers during demolition and/or construction (signage on hoardings, newsletters, residents liaison meetings, etc.);

   • A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme; Site traffic - Routing of in-bound and outbound site traffic, one-way site traffic arrangements on site, location of lay off areas, etc.;

   • Site waste Management - Accurate waste stream identification, separation, storage, registered waste carriers for transportation and disposal at appropriate destinations; and

   • A commitment that all NRMM equipment (37 kW and 560 kW) shall be registered on the NRMM register and meets the standard as stipulated by

the Mayor of London.

To follow current best construction practice, including the following:

• Southwark Council's Technical Guide for Demolition & Construction at https://www.southwark.gov.uk/construction;

• Section 61 of Control of Pollution Act 1974;

• The London Mayors Supplementary Planning Guidance 'The Control of Dust and Emissions During Construction and Demolition';

• The Institute of Air Quality Management's 'Guidance on the Assessment of Dust from Demolition and Construction' and 'Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites';

• BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Noise';

• BS 5228-2:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Vibration';

• BS 7385-2:1993 Evaluation and measurement for vibration in buildings. Guide to damage levels from ground-borne vibration;

• BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings - vibration sources other than blasting; and

• Relevant Stage emission standards to comply with Non-Road Mobile Machinery (Emission of Gaseous and Particulate Pollutants) Regulations 1999 as amended & NRMM London emission standards (https://nrmm.london).

All demolition and construction work shall be undertaken in strict accordance with the approved CEMP and other relevant codes of practice, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with the National Planning Policy Framework (2024); Policy P50 (Highway impacts), Policy P56 (Protection of amenity), Policy P62 (Reducing waste), Policy P64 (Contaminated land and hazardous substances), Policy P65 (Improving air quality) and Policy P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan (2022).

3. No demolition or construction works shall begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site has been submitted to and approved by the Local Planning Authority. The Construction Logistics Plan shall identify all efficiency and sustainability measures that will be taken during

construction of this development. The development shall not be carried out otherwise than in accordance Construction Logistics Plan or any amendments thereto.

Reason: To ensure that construction works do not have an adverse impact on the transport network and to minimise the impact of construction activities on local air quality, in accordance with the National Planning Policy Framework (2024); T1 (Strategic approach to transport), Policy T4 (Assessing and mitigating transport impacts), Policy T7 (Deliveries, servicing and construction), Policy SI 1 (Improving air quality) of the London Plan (2021); Policy P56 (Protection of amenity) of the Southwark Plan (2022).

Further information and guidance is available at:
https://www.clocs.org.uk/resources/clp_guidance_clocs_final.pdf

4. a) Prior to the commencement of any development, a phase 1 desktop study of the historic and current uses of the site and adjacent premises shall be carried out together with an associated preliminary risk assessment including a site walkover survey, identification of contaminants of the land and controlled waters and develop a conceptual model of the site with conclusion and recommendations whether a Phase 2 intrusive investigation is required. This report shall be submitted to the Local Planning Authority for approval before the commencement of any intrusive investigations.

b) If the phase 1 site investigation reveals possible presence of contamination on or beneath the site or controlled waters, then, prior to the commencement of development works, an intrusive site investigation and associated risk assessment shall be completed to fully characterise the nature and extent of any contamination of soils and ground water on the site.

c) In the event that contamination is found that presents a risk to future users or controlled waters or other receptors, a detailed remediation and/or mitigation strategy shall be prepared and submitted to the Local Planning Authority for approval in writing. The strategy shall detail all proposed actions to be taken to bring the site to a condition suitable for the intended use together with any monitoring or maintenance requirements. The scheme shall also ensure that as a minimum, the site should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. The approved remediation scheme (if one is required) shall be carried out and implemented as part of the development.

d) Following the completion of the works and measures identified in the approved remediation strategy, a verification report providing evidence that all works required by the remediation strategy have been completed, together with any future monitoring or maintenance requirements shall be submitted to and approved in writing by the Local Planning Authority.

e) In the event that potential contamination is found at any time when carrying out the approved development that was not previously identified, it shall be reported in writing immediately to the Local Planning Authority, and a scheme of investigation and risk assessment, a remediation strategy and verification report (if required)

shall be submitted to the Local Planning Authority for approval in writing, in accordance with a-d above.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P64 (Contaminated land and hazardous substances), and the National Planning Policy Framework 2024.

5. Before any work hereby authorised begins, [excluding archaeological evaluation, demolition to slab level, and site investigation works] the applicant shall secure the implementation of a programme of archaeological mitigation works in accordance with a written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In order that the details of the programme of works for the archaeological mitigation are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2024.

6. No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

7. Before any work hereby authorised begins, [excluding demolition to slab level and site investigation works] the applicant shall secure the implementation of a programme of archaeological evaluation works in accordance with a written scheme of investigation which shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In order that the applicants supply the necessary archaeological information to ensure suitable mitigation measures and/or foundation design proposals be presented in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2024.

8. Before any work hereby authorised begins, [excluding archaeological evaluation, demolition to slab level, and site investigation works] the applicant shall secure the implementation of a programme of archaeological mitigation works in accordance with a written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In order that the details of the programme of works for the archaeological mitigation are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2024.

9. Before any works, hereby authorised begins [excluding demolition to slab level, archaeological evaluation and site investigation works], the applicant shall submit a detailed scheme showing the complete scope and arrangement of the basement and foundation design, and all associated subterranean groundworks, including the construction methods. The submitted documents should show how archaeological remains will be protected by a suitable mitigation strategy. The detailed scheme will need to be approved in writing by the Local Planning Authority and the development shall only be carried out in accordance with the approval given.

Reason: In order that all below ground impacts of the proposed development are known and an appropriate protection and mitigation strategy is achieved to preserve archaeological remains by record and/or in situ in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2024.

10. Within one year of the completion of the archaeological work on site, an assessment report detailing the proposals for the off-site analyses and post-excavation works, including publication of the site and preparation for deposition of the archive, shall be submitted to and approved in writing by the Local Planning Authority, and the works detailed in the assessment report shall not be carried out otherwise than in accordance with any such approval given. The assessment report shall provide evidence of the applicant's commitment to finance and resource these works to their completion.

Reason: In order that the archaeological interest of the site is secured with regard to the details of the post-excavation works, publication and archiving to ensure the preservation of archaeological remains by record in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2024.

11. The development hereby permitted shall not commence until the following documents, in consultation with London Underground, have been submitted to and approved in writing by the local planning authority which:

1. Identify the location of the existing LU assets and/or the areas where LU have an operational interest;
2. Provide design details and Risk Assessment Method Statement (RAMS) on all works, which should include but not limit to, demolition, excavation and piling works;
3. The development must be shown to take no support from LUL land or property or to detrimentally change the loading on them;
4. A Tunnel Impact Assessment caused by the development should be submitted to TfL's review and approval;
5. Details of any proposed boreholes or bored piles shall be submitted to LUL and their written approval shall be obtained. Driven piles will not be permitted in the vicinity of LUL's tunnels or other subsurface structure;
6. Demonstrate to TfL's satisfaction that the methods and timing of the works are not contrary to the contents of LU's document "Special Conditions for Outside Parties working on or near the railway";
7. An assessment of railway noise and vibration shall be carried out and appropriate protective measures shall be taken to protect the users of the property and of other properties potentially affected as a result of the current development against noise and vibration.

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with the London Plan 2021 Policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.

12. No works (excluding demolition and site clearance) shall commence until full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS) have been submitted to and approved in writing by the Local Planning Authority, including detailed design, size and location of attenuation units and details of flow control measures. Rainwater harvesting should be incorporated into the design unless a justifiable reason is provided. The strategy should achieve a reduction in surface water runoff rates during the 1% Annual Exceedance Probability (AEP) event plus climate change allowance, as detailed in the Sustainable Drainage Report prepared by Pell Frischmann (May 2025). The calculations should incorporate the full site area, the latest rainfall data, and the porosity of the tank. The 1 in 30 year and 1 in 100-year calculations should also be provided. The applicant must demonstrate that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows. The site drainage must be constructed to the approved details.

Reason: To minimise the potential for the site to contribute to surface water flooding in accordance with Southwark's Strategic Flood Risk Assessment (2017) and Policy SI 13 of the London Plan (2021).

Permission is subject to the following Grade Condition(s)

13. Prior to the commencement of any above grade works (excluding demolition and archaeological investigation), the following details shall be submitted to the Local Planning Authority for its approval in writing:

-Detailed condition survey of the existing viaduct and Grand Vitesse faï¿½ade including building recording scale plans, sections and elevations to minimum 1:50 scale;
-1:50 scale Demolitions plan of the existing viaduct and Grand Vitesse faï¿½ade;
-A construction method statement for the installation of primary structures for the new buildings above and adjacent to it.

The development shall not be carried out otherwise than in accordance with any such approval given.

Reason: In order that the Local Planning Authority may be satisfied as to the quality of architectural design and details in accordance with the National Planning Policy Framework (2024); Policy D4 (Delivering good design) of the London Plan (2021); Policy P13 (Design of places) and Policy P14 (Design quality) of the Southwark Plan (2022).

14. Prior to the commencement of any above grade works (excluding demolition and archaeological investigation), the following details shall be submitted to the Local Planning Authority for its approval in writing:

For each of the buildings hereby approved 1:5/10 section detail-drawings through:
-Heads, cills, and jambs of typical openings
-Parapets
-Terraces
-Shop fronts
-External connections with existing buildings
-The occulus and associated structures

The development shall not be carried out otherwise than in accordance with any such approval given.

Reason: In order that the Local Planning Authority may be satisfied as to the quality of architectural design and details in accordance with the National Planning Policy Framework (2024); Policy D4 (Delivering good design) of the London Plan (2021); Policy P13 (Design of places) and Policy P14 (Design quality) of the Southwark Plan (2022).

15. Prior to the commencement of any above grade works (excluding demolition and site clearance), samples of all external facing materials and full-scale (1:1) mock-ups of a typical bay of each building to be used in the carrying out of this

permission shall remain on site for inspection for the duration of the building's construction and be presented on site to the Local Planning Authority and approved in writing. The development shall not be carried out otherwise than in accordance with any such approval given. The faï¿½ades to be mocked up should be agreed with the Local Planning Authority.

Reason: In order that the Local Planning Authority may be satisfied that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing, are suitable in context and consistent with the consented scheme in accordance with the National Planning Policy Framework (2024); Policy D4 (Delivering good design) of the London Plan (2021); Policy P13 (Design of places) and Policy P14 (Design quality) of the Southwark Plan (2022).

16. The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific security needs of the development in accordance with the principles and objectives of Secured by Design. Details of these measures shall be submitted to and approved in writing by the local planning authority prior to commencement of above grade works and shall be implemented in accordance with the approved details prior to occupation.

Reason: In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention, in accordance with the National Planning Policy Framework (2024); Policy D11 (Safety, security and resilience to emergency) of the London Plan (2021) and Policy P16 (Designing out crime) of the Southwark Plan (2022).

17. Before any above grade work hereby authorised begins, detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings shall be submitted to and approved in writing by the Local Planning Authority. The site shall be landscaped strictly in accordance with the approved details in the first planting season after completion of the development. Details shall include:

1) a scaled plan showing all existing vegetation and landscape features to be retained with proposed trees, hedging, perennial and other plants;

2) proposed parking, access, or pathway layouts, materials and edge details;

3) location, type and materials to be used for hard landscaping including specifications, where applicable for:
   a) permeable paving
   b) tree pit design
   c) underground modular systems
   d) sustainable urban drainage integration
   e) use within tree Root Protection Areas (RPAs);

4) typical cross sections;

5) a schedule detailing sizes and numbers/densities of all proposed trees/plants;

6) specifications for operations associated with plant establishment and maintenance that are compliant with best practise; and

7) types and dimensions of all boundary treatments.

There shall be no excavation or raising or lowering of levels within the prescribed root protection area of retained trees unless agreed in writing by the Local Planning Authority.

The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use. Any trees, shrubs, grass or other planting that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the equivalent stem girth and species in the first suitable planting season.

Unless required by a separate landscape management condition, all soft landscaping shall have a written five-year maintenance programme following planting.

Works shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction; BS3998: (2010) Tree work - recommendations, BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 03:2022 (EN) - Tree Planting Standard.

Reason: So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2024; Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P56 (Protection of Amenity), Policy P57 (Open Space), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan (2022).

18. Details of bat tubes, bricks or boxes shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site.

No less than 2 bat tubes, bricks or boxes shall be provided and the details shall include the exact location, specification and design of the habitats. The bat tubes, bricks or boxes shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained.

The bat tubes, bricks or boxes shall be installed strictly in accordance with the

details so approved, shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the roost features and mapped locations and the Local Planning Authority agreeing the submitted plans, and once the roost features are installed in full in accordance to the agreed plans.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with the National Planning Policy Framework (2024); Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity and access to nature) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

19. Details of the biodiversity (green/brown) roof(s) shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site. The biodiversity (green/brown) roof(s) shall be:

a) Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm,

b) Or, extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) - meets the requirements of GRO Code 2014,

c) Laid out in accordance with roof plans; hereby approved; and

d) Planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (focused on minimum 75% wildflower planting, and no more than a maximum of 25% sedum coverage).

The biodiversity (green/brown) roof shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency.

The biodiversity roof(s) shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the green/brown roof(s) and the Local Planning Authority agreeing the submitted plans, and once the green/brown roof(s) are completed in full in accordance to the agreed plans.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity as well as contributing to the Urban Greening Factor requirements of the London Plan (2021) with the aim of attaining a minimum score or 0.4 for residential developments and 0.3 for commercial developments in accordance with the National Planning Policy Framework (2024); Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity and access to nature); Policy P59 (Green infrastructure)

and Policy P60 (Biodiversity) of the Southwark Plan (2022).

20. (i) Details of Bee bricks and/or invertebrate hotels shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site.

No less than Bee bricks and/or invertebrate hotels shall be provided and the details shall include the exact location, specification and design of the habitats.

(ii) Full details of the features and mapped locations to meet the requirements of (i) shall be submitted to and approved in writing by the Local Planning Authority

(iii) Evidence shall be submitted in writing to the Local Planning Authority to show that the features have been installed in full in accordance with part (ii)

(iiii) The Bee bricks and/or invertebrate hotels shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained and maintained in perpetuity

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with the National Planning Policy Framework (2024); Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity and access to nature) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

21. Prior to the commencement of above grade works a Landscape and Ecological Management Plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas (except privately owned domestic gardens), shall be submitted to and approved in writing by the Local Planning Authority. The Landscape Management Plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the Local Planning Authority.

The scheme shall include the following elements:
-Greens roofs
-Planting beds
-Climbers on trellices
-Tree planting

Reason: To ensure the protection of wildlife and supporting habitat and secure opportunities for the enhancement of the nature conservation value of the site and to ensure the management of the public realm, in accordance with the National Planning Policy Framework (2024); Policy G1 (Green infrastructure), Policy G5 (Urban greening), Policy G6 (Biodiversity and access to nature), Policy D8 (Public realm) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

22. Notwithstanding the detail shown on the approved drawings, before any above grade work hereby authorised begins, details of the appearance, height and materials of the screening panels (or alternatively planting measures) to be installed on the office terraces (where in close proximity of residential uses, including student housing).

Shall be submitted and approved in writing by the Local Planning Authority. The terrace screening shall all be installed in accordance with the approved details prior to occupation and shall be maintained as such for the life of the development.

Reason: In the interest of protecting neighbour privacy and the amenity of future occupiers in accordance with the National Planning Policy Framework (2024), and Policy P56 (Protection of amenity) of the Southwark Plan (2022).

Permission is subject to the following Pre-Occupation Condition(s)

23. Prior to the occupation of the development, a post-construction monitoring report should be completed in line with the GLA's Circular Economy Statement Guidance. The report should be submitted to and approved by the LPA in writing.

Reason: In order to maximise the re-use of materials and in the interests of sustainable waste management.

24. Prior to the occupation of the development, the post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template should be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance. Together with any supporting information, it should be submitted to, and approved by the LPA in writing.

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings

25. No development shall be occupied until confirmation has been provided that either:-
1. Surface water capacity exists off site to serve the development or
2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Or
3. All Surface water network upgrades required to accommodate the additional flows from the development have been completed.

Reason: Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the

Thames Water website at thameswater.co.uk/preplanning.

26. No development shall be occupied until confirmation has been provided that either:-
1. Foul water Capacity exists off site to serve the development, or
2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or
3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed.

Reason: Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning.

27. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.

Reason: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning.

28. Prior to occupation, a lighting design strategy for biodiversity shall be submitted to and approved in writing by the local planning authority. The strategy shall:
a) identify those areas/features that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places. All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority. Prior to the new development being first brought into use/occupied a bat friendly Lighting

Plan shall be submitted to and approved by the Local Planning Authority.

Reason: To ensure compliance with the Habitats Regulations and the Wildlife & Countryside Act (1981), (as amended), and because bats are known to be active in vicinity of the development site.

29. Prior to the occupation of the development or any phase of the development, whichever is the sooner, a landscape management plan, including long term design objectives to meet BNG requirements, management responsibilities and maintenance schedules for all landscape areas, other than small, privately owned, domestic gardens, shall be submitted to and approved by the Local Planning Authority.

Details of an irrigation schedule shall be provided for all trees to ensure successful establishment.

For stem girths of up to 20cm the schedule shall be a minimum of three years, and five years for stem girths greater than 20cm. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

If within a period of five years from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, or becomes, in the opinion of the local planning authority, seriously damaged or defective, another tree of the same species and size as that originally planted shall be planted at the same place in the first suitable planting season., unless the local planning authority gives its written consent to any variation.

Works shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 8545 (2014) Trees: from nursery to independence in the landscape; BS3998: (2010) Tree work - recommendations; BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 01:2021 (EN) -Tree Pruning Standard; EAS 03:2022 (EN) - Tree Planting Standard.

Reason: So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2024; Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P56 (Protection of Amenity), Policy P57 (Open Space), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan (2022).

30. a) Before the first occupation of the building hereby permitted commences, the applicant shall submit in writing and obtain the written approval of the Local Planning Authority to a Travel Plan written in accordance with TfL best guidance at the time of submission, setting out the proposed measures to be taken to encourage the use of modes of transport other than the car by all users of the building, including staff and visitors.

b) At the start of the second year of operation of the approved Travel Plan, a detailed survey showing the methods of transport used by all those users of the building to and from the site and how this compares with the proposed measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise in accordance with any such approval given.

c) At the start of the fifth year of operation of the approved Travel Plan a detailed survey showing the methods of transport used by all those users of the building to and from the site and how this compares with the proposed measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise in accordance with any such approval given.

Reason: In order that the use of non-car based travel is encouraged in accordance with the National Planning Policy Framework (2024); Policy T6 (Car parking) of the London Plan (2021); Policy P54 (Car parking) of the Southwark Plan (2022).

31. Prior to first occupation of the development hereby permitted a Delivery and Service Management Plan detailing how all elements of the site are to be serviced shall be submitted to and approved by the Local Planning Authority. The servicing of the development shall be carried out in accordance with the approval given and the Service Management Plan shall remain extant for as long as the development is occupied.

Reason: To ensure compliance with the National Planning Policy Framework (2024); Policy P49 (Public transport); Policy P50 (Highways impacts); Policy P51 (Walking) of the Southwark Plan (2022).

32. No dwelling shall be occupied until a drainage verification report prepared by a suitably qualified engineer has been submitted to and approved in writing by the Local Planning Authority. The report shall provide evidence that the drainage system (incorporating SuDS) has been constructed according to the approved details and specifications (or detail any minor variations where relevant) as detailed in the Sustainable Drainage Report prepared by Pell Frischman (ref: 0869_A01-PEF-ZZZ-ZZZZ-RP-C-000002, dated: May 2025) and shall include plans, photographs and national grid references of key components of the drainage network such as surface water attenuation structures, flow control devices and outfalls. The report shall also include details of the responsible management company.

Reason: To ensure the surface water drainage complies with Southwark's Strategic Flood Risk Assessment and Policy SI 13 of the London Plan (2021).

33. A scheme of sound insulation shall be installed to ensure that the LFmax sound

from amplified and non-amplified music and speech shall not exceed the lowest L90 5min at 1m from the facade of nearby residential premises at all third octave bands between 63Hz and 8kHz. Prior to the commencement of use of the commercial premises the proposed scheme of sound insulation shall be submitted to the local planning authority for approval. The scheme of sound insulation shall be constructed and installed in accordance with the approval given and shall be permanently maintained thereafter. Following completion of the development and prior to the commencement of use of the commercial premises, a validation test shall be carried out. The results shall be submitted to the LPA for approval in writing.

Reason: To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities associated with non-residential premises in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2024.

34. The Rated sound level from any plant, together with any associated ducting, shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. Furthermore, the Specific plant sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific Sound levels shall be calculated fully in accordance with the methodology of BS4142:2014+A1:2019.

Suitable acoustic treatments shall be used to ensure compliance with the above standard. A validation test shall be carried out and the results submitted to the Local Planning Authority for approval in writing to demonstrate compliance with the above standard. Once approved the plant and any acoustic treatments shall be permanently maintained thereafter.

Reason: To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2024.

35. Prior to the commencement of any future use involving the cooking of food, full particulars and details of a scheme for the extraction and ventilation of the commercial kitchen shall be submitted to and approved by the Local Planning Authority. The scheme shall include:

- Details of extraction rate and efflux velocity of extracted air
- Full details of grease, particle and odour abatement plant
- The location and orientation of the extraction ductwork and discharge terminal
- A management servicing plan for maintenance of the extraction system

To ensure that fumes and odours from the kitchen to do affect public health or residential amenity. Once approved the scheme shall be implemented in full and

permanently maintained thereafter.

Reason: In order to ensure that that any installed ventilation, ducting and ancillary equipment in the interests of amenity will not cause amenity impacts such as odour, fume or noise nuisance and will not detract from the appearance of the building in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P65 (Improving air quality), and the National Planning Policy Framework 2024.

36. Any external lighting system installed at the development shall comply with the Institute of Lighting Professionals (ILE) Guidance Note 1 for the reduction of obtrusive light (2021). Details of any external lighting (including: design; power and position of luminaries; light intensity contours) of all affected external areas (including areas beyond the boundary of the development) shall be submitted to and approved by the Local Planning Authority in writing before any such lighting is installed. The development shall not be carried out otherwise than in accordance with any such approval given. Prior to the external lighting being used, a validation report shall be shall be submitted to the LPA for approval in writing.

Reason: In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with the Southwark Plan 2022 Policy P16 (Designing out crime); Policy P56 (Protection of amenity), and the National Planning Policy Framework 2024.

37. (a) Non-residential uses within the development hereby approved shall achieve a BREEAM rating of 'Excellent' or higher, and shall achieve not less than the total credits for each of the Energy, Materials and Waste categories in the BREEAM Pre-Assessment hereby approved.

(b) Before the first occupation of each relevant Phase hereby permitted, a certified Post Construction Review (or other verification process agreed with the local planning authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed excellent standard at as outlined within the submitted BREEAM pre-assessment have been met.

Reason: To ensure the proposal complies with The National Planning Policy Framework (2023); Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London Plan (2021) and Policy P70 (Energy) of the Southwark Plan (2022).

38. Prior to occupation a satisfactory Secured by Design inspection must take place. The resulting Secured by Design certificate shall be submitted to and approved by the local planning authority.

Reason: In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in

exercising its planning functions and to improve community safety and crime prevention, in accordance with the National Planning Policy Framework (2024); Policy D11 (Safety, security and resilience to emergency) of the London Plan (2021) and Policy P16 (Designing out crime) of the Southwark Plan (2022).

Permission is subject to the following Compliance Condition(s)

39. The use hereby permitted for Class E gymnasium shall not be permitted outside of the hours of:
06:00 - 23:30 on Monday to Saturday
06:00 - 23:00 on Sundays and Bank Holidays

Reason: To safeguard the amenity of neighbouring residential properties in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2024.

40. The use hereby permitted for Class E & Sui Generis uses (excluding Gymnasiums) shall not be permitted outside of the hours of:
08:00 - 23:30 on Monday to Saturday
08:00 - 23:00 on Sundays and Bank Holidays

Reason: To safeguard the amenity of neighbouring residential properties in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2024.

41. The use of the external terraces hereby permitted shall only be permitted between the hours of 08:00 - 22:00.

Reason: To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2024.

42. Any deliveries or collections to the commercial units shall only be between the following hours: 08:00 - 20:00 to on Monday to Saturdays and 10:00 - 16:00 on Sundays and Bank Holidays.

Reason: To safeguard the amenity of neighbouring residential properties in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2024.

43. The development hereby approved shall be carried out in accordance with the recommendations of the submitted Fire Statement (prepared by Hoare Lea REVISION 03 dated 19 FEBRUARY 2025); unless a revised Fire Statement is submitted to and approved in writing by the Local Planning Authority prior to the relevant works being carried out.

Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with Policies D5 (Inclusive Design) and D12 (Fire safety) of the London Plan (2021).

44. Before the first occupation of any part of the development hereby approved, the refuse storage arrangements shown on the approved drawings; shall be provided and made available for use by the occupiers.

The refuse storage facilities shall thereafter be retained and the space used for no other purpose.

Reason: To ensure that the refuse will be appropriately stored within the site thereby protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance in accordance with the National Planning Policy Framework (2024) and Policy P56 (Protection of amenity) and P62 (Reducing waste) of the Southwark Plan (2022).

Signed: *Stephen Platts* Director of Planning and Growth

Informative Notes to Applicant Relating to the Proposed Development

1. Paragraph 3.12.9 of Policy D12 explains that Fire Statements should be produced by someone who is:
"third-party independent and suitably-qualified" The Council considers this to be a qualified engineer with relevant experience in fire safety, such as a chartered engineer registered with the Engineering Council by the Institution of Fire Engineers, or a suitably qualified and competent professional with the demonstrable experience to address the complexity of the design being proposed. This should be evidenced in the fire statement. The Council accepts Fire Statements in good faith on that basis. The duty to identify fire risks and hazards in premises and to take appropriate action lies solely with the developer.

   The fire risk assessment/statement covers matters required by planning policy. This is in no way a professional technical assessment of the fire risks presented by the development. The legal responsibility and liability lies with the 'responsible person'. The responsible person being the person who prepares the fire risk assessment/statement not planning officers who make planning decisions.

2. All wild birds, nests, eggs and young are protected under the Wildlife & Countryside Act 1981 (as amended). The grant of planning permission does not override the above Act. All applicants and sub-contractors are reminded that persons undertaking site clearance, hedgerow removal, demolition works etc. between March and August may risk committing an offence under the above Act and may be liable to prosecution if birds are known or suspected to be nesting. The Council will pass complaints received about such work to the appropriate authorities for investigation. The Local Authority advises that such work should be scheduled for the period 1 September-28 February wherever possible. Otherwise, a qualified ecologist should make a careful check before work begins.

3. With respect to any proposals for piling through made ground, we would refer you to the EA guidance document "Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention" (NGWCL Centre Project NC/99/73).

4. A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.eï¿½luent@thameswater.co.uk .

Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

5. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

6. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-ourpipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

7. The contents of the application are contrary to existing leases or other restrictions in London Underground's favour on the property. The applicant is advised to contact LU Property Team prior to the commencement of the works.

8. The applicant must ensure that any construction and subsequent maintenance can be carried out to any proposed buildings or structures without adversely affecting the safety of/or encroaching upon Network Rail's adjacent land and air-space. Therefore, any buildings are required to be situated at least 2 metres (3m for overhead lines and third rail) from Network Rail's boundary.

   This requirement will allow for the construction and future maintenance of a building without the need to access the operational railway environment. Any less than 2m (3m for overhead lines and third rail) and there is a strong possibility that the applicant (and any future resident) will need to utilise Network Rail land and air-space to facilitate works as well as adversely impact upon Network Rail's maintenance teams' ability to maintain our boundary fencing and boundary treatments. Access to Network Rail's land may not always be granted and if granted may be subject to railway site safety requirements and special provisions with all associated railway costs charged to the applicant.

   As mentioned above, any works within Network Rail's land would need approval from the Network Rail Asset Protection Engineer. This request should be submitted at least 20 weeks before any works are due to commence on site and the applicant is liable for all associated costs (e.g., all possession, site safety, asset protection presence costs). However, Network Rail is not required to grant permission for any third-party access to its land.

9. All operations, including the use of cranes or other mechanical plant working

adjacent to Network Rail's property, must at all times be carried out in a "fail safe" manner such that in the event of mishandling, collapse or failure, no plant or materials are capable of falling within 3.0m of the boundary with Network Rail.

10. Storm/surface water must not be discharged onto Network Rail's property or into Network Rail's culverts or drains except by agreement with Network Rail. Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property. Proper provision must be made to accept and continue drainage discharging from Network Rail's property; full details to be submitted for approval to the Network Rail Asset Protection Engineer. Suitable foul drainage must be provided separate from Network Rail's existing drainage. Soakaways, as a means of storm/surface water disposal must not be constructed within 20 metres of Network Rail's boundary or at any point which could adversely affect the stability of Network Rail's property. After the completion and occupation of the development, any new or exacerbated problems attributable to the new development shall be investigated and remedied at the applicants' expense.

11. Any scaffold which is to be constructed within 10 metres of the railway boundary fence must be erected in such a manner that at no time will any poles over-sail the railway and protective netting around such scaffold must be installed. The applicant/applicant's contractor must consider if they can undertake the works and associated scaffold/access for working at height within the footprint of their property boundary.

12. Where vibro-compaction/displacement piling plant is to be used in development, details of the use of such machinery and a method statement should be submitted for the approval of the Network Rail's Asset Protection Engineer prior to the commencement of works and the works shall only be carried out in accordance with the approved method statement.

13. In view of the nature of the development, it is essential that the developer provide (at their own expense) and thereafter maintain a substantial, trespass proof fence along the development side of the existing boundary fence, to a minimum height of 1.8 metres. The 1.8m fencing should be adjacent to the railway boundary and the developer/applicant should make provision for its future maintenance and renewal without encroachment upon Network Rail land. Network Rail's existing fencing / wall must not be removed or damaged and at no point during or post construction should the foundations of the fencing or wall or any embankment therein, be damaged, undermined or compromised in any way. Any vegetation within Network Rail's land boundary must not be disturbed. Any fencing installed by the applicant must not prevent Network Rail from maintaining its own fencing/boundary treatment.

14. Any lighting associated with the development (including vehicle lights) must not

interfere with the sighting of signalling apparatus and/or train drivers' vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway. The developers should obtain Network Rail's Asset Protection Engineer's approval of their detailed proposals regarding lighting.

15. The potential for any noise/vibration impacts caused by the proximity between the proposed development and any existing railway should be made aware to the future occupiers of the site. It must also be assessed in the context of the National Planning Policy Framework which holds relevant national guidance information.

    The current level of usage may be subject to change at any time without notification including increased frequency of trains, night-time train running and heavy freight trains. The appropriate building materials should be used to reduce any potential noise disturbance from the railway.

16. Where a proposal calls for hard standing area/parking of vehicles area near the boundary with the operational railway, Network Rail would recommend the installation of a highways approved vehicle incursion barrier or high kerbs to prevent vehicles accidentally driving or rolling onto the railway or damaging lineside fencing.

17. Any trees/shrubs to be planted adjacent to the railway boundary these shrubs should be positioned at a minimum distance greater than their predicted mature height from the boundary. Certain broad leaf deciduous species should not be planted adjacent to the railway boundary as the species will contribute to leaf fall which will have a detrimental effect on the safety and operation of the railway. Network Rail wish to be involved in the approval of any landscaping scheme adjacent to the railway. Any hedge planted adjacent to Network Rail's boundary fencing for screening purposes should be so placed that when fully grown it does not damage the fencing or provide a means of scaling it. No hedge should prevent Network Rail from maintaining its boundary fencing. If required, Network Rail's Asset Protection team are able to provide more details on which trees/shrubs are permitted within close proximity to the railway.
    If you would like to discuss any of the above, please contact AssetProtectionSouthern@networkrail.co.uk.

Biodiversity Net Gain Informative

Biodiversity net gain is a way of creating and improving biodiversity by requiring development to have a positive impact ('net gain') on biodiversity.

In England, biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This statutory framework is referred to as 'biodiversity net gain' in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.

Under the statutory framework for biodiversity net gain, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met ("the Biodiversity Gain Condition").

This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.

The biodiversity gain condition is a pre-commencement condition: once planning permission has been granted, a Biodiversity Gain Plan must be submitted to and approved by Southwark Council (the local planning authority) before commencement of the development. There are exemptions, transitional arrangements and requirements relating to irreplaceable habitat which disapply the condition from certain planning permissions, as well as special modifications for planning permissions for phased development and the treatment of irreplaceable habitats. Based on the information available this permission is considered to be one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements are considered to apply.

Important Notes Relating to the Council's Decision

1. Conditions

- If permission has been granted you will see that it may be subject to a number of planning conditions. They are an integral part of our decision on your application and are important because they describe how we require you to carry out the approved work or operate the premises. It is YOUR responsibility to comply fully with them. Please pay particular attention to those conditions which have to be met before work commences, such as obtaining approval for the siting and levels of buildings and the protection of trees on the site. If you do not comply with all the conditions in full this may invalidate the permission.

- Further information about how to comply with planning conditions can be found at:

  https://www.planningportal.co.uk/info/200126/applications/60/consent_types/12

- Please note that there is a right of appeal against a planning condition. Further information can be found at: https://www.planningportal.co.uk/info/200207/appeals/108/types_of_appeal

2. Community Infrastructure Levy (CIL) Information

- If your development has been identified as being liable for CIL you need to email Form 1: CIL Additional Information, Form 2: Assumption of Liability and Form 6: Commencement Notice to cil.s106@southwark.gov.uk as soon as possible, so that you can be issued with a Liability Notice. This should be done at least a day before commencement of the approved development.

- **Payment of the CIL charge is mandatory and the CIL Regulations comprises a range of enforcement powers and penalties for failure to following correct procedures to pay, including stop notices, surcharges, late payment interests and prison terms.**

- To identify whether your development is CIL liable, and further details about CIL including eligibility and procedures for any CIL relief claims, please see the Government's CIL guidance:

  https://www.gov.uk/guidance/community-infrastructure-levy

- All CIL Forms are available to download from Planning Portal:

  https://www.planningportal.co.uk/info/200136/policy_and_legislation/70/community_infrastructure_levy/5

- Completed forms and any CIL enquiries should be submitted to cil.s106@southwark.gov.uk

3. National Planning Policy Framework

- In dealing with this application we have implemented the requirements in the National Planning Policy Framework to work with the applicant/agent in a positive, proactive and creative way by offering a pre-application advice service; as appropriate updating applicants/agents of any issues that may arise in the processing of their application and where possible and if applicable suggesting solutions to secure a successful outcome. We have considered the application in light of our statutory policies in our development plan as set out in the officer's report.

4. Appeals to the Secretary of State

- If you are aggrieved by the decision of your local planning authority to grant it subject to conditions, then you can appeal to the Secretary of State under section 78 of the Town and Country Planning Act 1990.

  Appeals can be made online at: https://www.gov.uk/planning-inspectorate.

  If an enforcement notice is or has been served relating to the same or substantially the same land and development as in your application and if you want to appeal against your local planning authority's decision on your application, then you must do so within: **28 days** of the date of service of the enforcement notice, OR within **6 months** (12 weeks in the case of a householder or minor commercial appeal) of the date of this notice, whichever period expires earlier.

- The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.

- The Secretary of State need not consider an appeal if it seems to the Secretary of State that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.

- If you intend to submit an appeal that you would like examined by inquiry then you must notify the Local Planning Authority and Planning Inspectorate (inquiryappeals@planninginspectorate.gov.uk) at least 10 days before submitting the appeal.

- Further details are on GOV.UK (https://www.gov.uk/government/collections/casework-dealt-with-by-inquiries).

5. Purchase Notice

- If either the local planning authority or the Secretary of State grants permission subject to conditions, the owner may claim that the land can neither be put to a reasonably beneficial use in its existing state nor made capable of reasonably beneficial use by the carrying out of any development

which has been or would be permitted. In these circumstances the owner may serve a purchase notice on the Council requiring the Council to purchase the owner's interest in the land in accordance with Part VI of the Town and Country Planning Act 1990

6. Provisions for the Benefit of the Disabled

- Applicants are reminded that account needs to be taken of the statutory requirements of the Disability Discrimination Act 1995 to provide access and facilities for disabled people where planning permission is granted for any development which provides:

  i. Buildings or premises to which the public are to be admitted whether on payment or otherwise. [Part III of the Act].

  ii. Premises in which people are employed to work as covered by the Health and Safety etc At Work Act 1974 and the Management of Health and Safety at Work Regulations as amended 1999. [Part II of the Act].

  iii. Premises to be used as a university, university college or college, school or hall of a university, or intended as an institution under the terms of the Further and Higher Education Act 1992. [Part IV of the Act].

- Attention is also drawn to British Standard 8300:2001 Disability Access, Access for disabled people to schools buildings – a management and design guide. Building Bulletin 91 (DfEE 99) and Approved Document M (Access to and use of buildings) of the Building Regulations 2000 or any such prescribed replacement.

7. Other Approvals Required Prior to the Implementation of this Permission.

- The granting of approval of a reserved matter or outstanding matter does not relieve developers of the necessity for complying with any Local Acts, regulations, building by-laws and general statutory provisions in force in the area, or allow them to modify or affect any personal or restrictive covenants, easements, etc., applying to or affecting either the land to which the permission relates or any other land or the rights of any persons or authorities (including the London Borough of Southwark) entitled to the benefits thereof or holding an interest in the property concerned in the development permitted or in any adjoining property. In this connection applicants are advised to consult the council's Highway Maintenance section [tel. 020-7525-2000] about any proposed works to, above or under any road, footway or forecourt.

8. Works Affecting the Public Highway

- You are advised to consult the council's Highway Maintenance section [tel. 020-7525-2000] about any proposed works to, above or under any road, footway or forecourt.

9. The Dulwich Estate Scheme of Management

- Development of sites within the area covered by the Scheme of Management may also require the permission of the Dulwich Estate. If your property is in the Dulwich area with a post code of SE19, 21, 22, 24 or 26 you are advised to consult the Estates Governors', The Old College, Gallery Road SE21 7AE [tel: 020-8299-1000].

10. Building Regulations.

- You are advised to consult Southwark Building Control at the earliest possible moment to ascertain whether your proposal will require consent under the Building Act 1984 [as amended], Building Regulations 2000 [as amended], the London Building Acts or other statutes. A Building Control officer will advise as to the submission of any necessary applications, [tel. call centre number 0845 600 1285].

11. The Party Wall Etc. Act 1996.

- You are advised that you must notify all affected neighbours of work to an existing wall or floor/ceiling shared with another property, a new building on a boundary with neighbouring property or excavation near a neighbouring building. An explanatory booklet aimed mainly at householders and small businesses can be obtained from the Department for Communities and Local Government [DCLG] Free Literature tel: 0870 1226 236 [quoting product code 02BR00862].

12. Important

- This is a PLANNING PERMISSION only and does not operate so as to grant any lease, tenancy or right of occupation of or entry to the land to which it refers.

Timber Square (Phase 2) 63 Ewer Street London (ref 25/AP/0524) ;

APPENDIX 2

Relevant planning policy

National Planning Policy Framework (NPPF)

The revised National Planning Policy Framework ('NPPF') was published in December 2024 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental.

Paragraph 02 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications. The particularly relevant chapters from the Framework are:

- Section 2 - Achieving sustainable development
- Section 6 - Building a strong, competitive economy
- Section 8 - Promoting healthy and safe communities
- Section 9 - Promoting sustainable transport
- Section 11 - Making effective use of land
- Section 12 - Achieving well–designed and beautiful places
- Section 14 - Meeting the challenge of climate change, flooding and coastal change
- Section 16 - Conserving and enhancing the historic environment

The London Plan 2021

On 2 March 2021, the Mayor of London published the London Plan 2021. The spatial development strategy sets a strategic framework for planning in Greater London and forms part of the statutory Development Plan for Greater London. The relevant policies are:

- The London Plan is the regional planning framework and was adopted on March 2nd 2021. The most relevant policies are those listed below.

- Good Growth 1 - Building strong and inclusive communities
- Good Growth 2 - Making the best use of land
- Good Growth 3 - Creating a healthy city
- Good Growth 4 - Delivering the homes Londoners need
- Good Growth 5 - Growing a good economy
- Good Growth 6 - Increasing efficiency and resilience

- Policy SD1 - Opportunity Areas
- Policy SD10 - Strategic and local regeneration
- Policy D1 - London's form, character and capacity for growth
- Policy D3 - Optimising site capacity through the design-led approach

- Policy D4 - Delivering good design
- Policy D5 - Inclusive design
- Policy D8 - Public realm
- Policy D9 - Tall buildings
- Policy D11 - Safety, security and resilience to emergency
- Policy D12 - Fire safety
- Policy D13 - Agent of Change
- Policy D14 - Noise
- Policy E1 - Offices
- Policy E2 - Providing suitable business space
- Policy E3 - Affordable workspace
- Policy E11 - Skills and opportunities for all
- Policy HC1 - Heritage conservation and growth
- Policy HC3 - Strategic and local views
- Policy G1 - Green infrastructure
- Policy G4 – Open space
- Policy G5 - Urban greening
- Policy G6 - Biodiversity and access to nature
- Policy SI 1 - Improving air quality
- Policy SI 2 - Minimising greenhouse gas emissions
- Policy SI 3 - Energy infrastructure
- Policy SI 4 - Managing heat risk
- Policy SI 5 - Water infrastructure
- Policy SI 6 - Digital connectivity infrastructure
- Policy SI 7 – Reducing waste and supporting the circular economy
- Policy SI 8 - Waste capacity and net waste self-sufficiency
- Policy SI 12 - Flood risk management
- Policy SI 13 - Sustainable drainage
- Policy T1 - Strategic approach to transport
- Policy T2 - Healthy Streets
- Policy T3 - Transport capacity, connectivity and safeguarding
- Policy T4 - Assessing and mitigating transport impacts
- Policy T5 - Cycling
- Policy T6 - Car parking
- Policy T6.5 - Non-residential disabled persons parking
- Policy T7 - Deliveries, servicing and construction
- Policy T9 - Funding transport infrastructure through planning

Southwark Plan 2022
The Southwark Plan 2022 was adopted on 23 February 2022. The plan provides strategic policies, development management policies, area visions and site allocations which set out the strategy for managing growth and development across the borough from 2019 to 2036. The relevant policies are:

- SP2 – Southwark together

- SP3 – A great start in life
- SP4 – Green and inclusive economy
- SP5 – Thriving neighbourhoods and tackling health inequalities
- SP6 – Climate emergency

- P13 – Design of places
- P14 – Design quality
- P16 – Designing out crime
- P17 – Tall buildings
- P18 – Efficient use of land
- P20 – Conservation areas
- P21 – Conservation of the historic environment and natural heritage
- P22 – Borough views
- P23 – Archaeology
- P26 – Local List
- P28 – Access to employment and training
- P30 – Office and business development
- P31 – Affordable workspace
- P33 – Business relocation
- P34 – Railway arches
- P35 – Town and local centres
- P44 – Broadband and digital infrastructure
- P45 – Healthy developments
- P46 – Leisure, arts and culture
- P49 – Public transport
- P50 – Highways impacts
- P51 – Walking
- P52 – Low line routes
- P53 – Cycling
- P54 – Car parking
- P56 – Protection of amenity
- P59 – Green infrastructure
- P60 – Biodiversity
- P61 – Trees
- P64 – Contaminated land and hazardous substances
- P65 – Improving air quality
- P66 – Reducing noise pollution and enhancing soundscapes
- P67 – Reducing water use
- P68 – Reducing flood risk
- P69 – Sustainability standards
- P70 – Energy

- IP1 – Infrastructure
- IP2 – Transport infrastructure
- IP3 – Community infrastructure levy (CIL) and Section 106 planning obligations

- IP6 – Monitoring development
- IP7 – Statement of Community Involvement

- AV.02 – Bankside and the Borough Area Vision
- NSP02 – Site Bordering Great Suffolk Street and Ewer Street

APPENDIX 3

Planning history of the site and nearby sites

An overview of the relevant planning history for the Site is provided below. The Site's planning history relates to the arches, and to buildings on top of the arches associated with Network Rail's use of the Site.

James Forbes House

- Planning permission granted for four-storey office building for 10-year period (02/AP/1153).
- Extension to time period to allow for use of office building for a further 6 years (12/AP/0445).
- Further extension to allow for office use until 31 March 2024 and re-clad of building (18/AP/1485).
- Further extension to allow for office use until 30 June 2025 (23/AP/1960).
- The building was removed in 2024.

Maintenance Delivery Unit ('MDU')

- Planning permission granted for three-storey modular building with parking, to provide railway MDU (10/AP/3231).
- This building is due to be demolished in advance of the Proposed Development, outside of the scope of this Application.

The Arches

- Planning permission granted for temporary change of use to provide welfare facilities for construction (23/AP/2646).
- Application to regularise the use of the land as either car park and/or event space (sui generis) (11/AP/0638) (Application withdrawn).
- Planning permission granted for change of use from light industrial to health and fitness facility (Class D2) and external alterations (10/AP/0861).

APPENDIX 4

Consultation undertaken

Site notice date: 19/03/2025
Press notice date: 13/03/2025
Case officer site visit date: n/a
Neighbour consultation letters sent: 15/04/2025

Internal services consulted

LBS Transport Policy Team
LBS Planning Policy [Formal Consultation] - General
LBS Transport Policy Team
LBS Highways Development & Management
LBS Building Control Division
LBS Archaeologist
LBS Design And Conservation Team [Formal Consultation]
LBS Local Economy
LBS Ecology Officer
Flood Risk Management & Urban Drainage Team
LBS Urban Forester
LBS Waste Management Team
LBS Network Developments Construction Management Plans
LBS Environmental Protection Team
LBS CCTV - Public Space Surveillance
LBS Community Infrastructure Team

Statutory and non-statutory organisations

Thames Water
UK Power Networks
South East London Integrated Care Board (ICB)
NHS London Healthy Urban Development Unit
Planning Casework Unit
Active Travel England
Better Bankside
Living Bankside
Bankside Open Spaces Trust
Southbank And Waterloo Neighbours
Greater London Authority
Environment Agency
Transport For London

TFL Railway Infrastructure Manager
London Underground
Network Rail
London Fire & Emergency Planning Authority
Natural England - London Region & South East Region
Metropolitan Police Service (Designing Out Crime)

Neighbour and local groups consulted:

Studio 30 51 Ewer Street London
Studio 26 51 Ewer Street London
Studio 17 51 Ewer Street London
Studio 16 51 Ewer Street London
Studio 13 51 Ewer Street London
Studio 6 51 Ewer Street London
Studio 5 51 Ewer Street London
Unit 2 First Floor 5 - 11 Lavington Street London
Apartment 30 Rosler Building 85 Ewer Street
Apartment 28 Rosler Building 85 Ewer Street
Apartment 20 Rosler Building 85 Ewer Street
Apartment 18 Rosler Building 85 Ewer Street
Flat 25 5B Bear Lane London
Flat 19 5B Bear Lane London
Unit 3 Lower Ground 5 - 11 Lavington Street London
Unit 1 Ground Floor 5 - 11 Lavington Street London
154 Union Street London Southwark
146 Union Street London Southwark
Third Floor Crane Building 22 Lavington Street
Apartment 26 Braque Building 86 Ewer Street
Apartment 13 Braque Building 86 Ewer Street
Apartment 6 Braque Building 86 Ewer Street
Apartment 34 Rosler Building 85 Ewer Street
Apartment 7 Ernst Building 142 Union Street
Flat 10 5B Bear Lane London
Unit 2 202 Union Street London
48A Great Suffolk Street London Southwark
Fourth Floor South Block Harling House 47 - 51 Great Suffolk Street
Unit 1 Grande Vitesse Industrial Centre 38 Great Suffolk Street
Flat 176 17 Great Suffolk Street London
Flat 165 17 Great Suffolk Street London
Flat 154 17 Great Suffolk Street London
Flat 152 17 Great Suffolk Street London
Flat 149 17 Great Suffolk Street London
Flat 138 17 Great Suffolk Street London
Flat 128 17 Great Suffolk Street London
Flat 127 17 Great Suffolk Street London
Flat 120 17 Great Suffolk Street London

Flat 114 17 Great Suffolk Street London
Flat 111 17 Great Suffolk Street London
Flat 98 17 Great Suffolk Street London
Flat 86 17 Great Suffolk Street London
Flat 85 17 Great Suffolk Street London
Flat 69 17 Great Suffolk Street London
Flat 60 17 Great Suffolk Street London
Flat 51 17 Great Suffolk Street London
Flat 47 17 Great Suffolk Street London
Flat 43 17 Great Suffolk Street London
Flat 38 17 Great Suffolk Street London
Flat 35 17 Great Suffolk Street London
Flat 2 28 Great Suffolk Street London
Flat 171 17 Great Suffolk Street London
Flat 168 17 Great Suffolk Street London
Flat 148 17 Great Suffolk Street London
Flat 126 17 Great Suffolk Street London
Flat 122 17 Great Suffolk Street London
Flat 110 17 Great Suffolk Street London
Flat 101 17 Great Suffolk Street London
Flat 100 17 Great Suffolk Street London
Flat 97 17 Great Suffolk Street London
Flat 95 17 Great Suffolk Street London
Flat 90 17 Great Suffolk Street London
Flat 82 17 Great Suffolk Street London
Flat 78 17 Great Suffolk Street London
Flat 75 17 Great Suffolk Street London
Flat 74 17 Great Suffolk Street London
Flat 73 17 Great Suffolk Street London
Flat 68 17 Great Suffolk Street London
Flat 44 17 Great Suffolk Street London
Flat 26 17 Great Suffolk Street London
Flat 24 17 Great Suffolk Street London
Flat 19 17 Great Suffolk Street London
Flat 12 17 Great Suffolk Street London
Flat 11 17 Great Suffolk Street London
Flat 5 17 Great Suffolk Street London
Flat 85 18 Great Suffolk Street London
Flat 71 18 Great Suffolk Street London
Flat 69 18 Great Suffolk Street London
Flat 63A 18 Great Suffolk Street London
Flat 63 18 Great Suffolk Street London
Flat 59 18 Great Suffolk Street London
Flat 46 18 Great Suffolk Street London
Flat 40 18 Great Suffolk Street London
Flat 29 18 Great Suffolk Street London
Flat 28 18 Great Suffolk Street London

Unit 527-529 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 324 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 320 Metal Box Factory Business Centre 30 Great Guildford Street
Unit G08 Metal Box Factory Business Centre 30 Great Guildford Street
Unit Gg006 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 109 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 107 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 434 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 440 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 430 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 423 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 414-416 Metal Box Factory Business Centre 30 Great Guildford Street
Part Third Floor North Harling House 47 - 51 Great Suffolk Street
29 Great Suffolk Street London Southwark
Flat 174 17 Great Suffolk Street London
Flat 173 17 Great Suffolk Street London
Flat 169 17 Great Suffolk Street London
Flat 164 17 Great Suffolk Street London
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Flat 145 17 Great Suffolk Street London
Flat 144 17 Great Suffolk Street London
Flat 140 17 Great Suffolk Street London
Flat 134 17 Great Suffolk Street London
Flat 119 17 Great Suffolk Street London
Flat 117 17 Great Suffolk Street London
Flat 109 17 Great Suffolk Street London
Flat 89 17 Great Suffolk Street London
Flat 81 17 Great Suffolk Street London
Flat 62 17 Great Suffolk Street London
Flat 54 17 Great Suffolk Street London
Flat 52 17 Great Suffolk Street London
Flat 48 17 Great Suffolk Street London
Flat 39 17 Great Suffolk Street London
Flat 34 17 Great Suffolk Street London
Flat 31 17 Great Suffolk Street London
Flat 14 17 Great Suffolk Street London
Flat 13 17 Great Suffolk Street London
Flat 87 18 Great Suffolk Street London
Flat 75 18 Great Suffolk Street London
Flat 64 18 Great Suffolk Street London
Flat 62 18 Great Suffolk Street London
Flat 51 18 Great Suffolk Street London
Flat 49 18 Great Suffolk Street London
Flat 43A 18 Great Suffolk Street London
Flat 30 18 Great Suffolk Street London

Flat 26 18 Great Suffolk Street London
Unit 314 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 302 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 301 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 415 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 219 Metal Box Factory Business Centre 30 Great Guildford Street
Unit G09 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 102 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 205-206 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 510 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 428 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 511 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 507 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 201 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 105-106 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 129-130 Metal Box Factory Business Centre 30 Great Guildford Street
Second Floor 81 Southwark Street London
First Floor Old Union Yard Arches 229 Union Street
Part Second Floor 169 Union Street London
Arches 45 To 51 Wardens Grove London
Second Floor And Third Floor Flat 13 Risborough Street London
Flat 7 Risborough Street London
Meeting Room The Print Rooms 164 - 180 Union Street
Press At The Print Rooms The Print Rooms 164 - 180 Union Street
Unit 309 The Print Rooms 164 - 180 Union Street
Unit 311 The Print Rooms 164 - 180 Union Street
Unit G7 The Print Rooms 164 - 180 Union Street
Unit G3 The Print Rooms 164 - 180 Union Street
Unit 202 The Print Rooms 164 - 180 Union Street
Unit Lg02 The Print Rooms 164 - 180 Union Street
Unit 203 Second Floor The Print Rooms 164 - 180 Union Street
Unit G8 The Print Rooms 164 - 180 Union Street
Unit 416 The Print Rooms 164 - 180 Union Street
Unit 408 The Print Rooms 164 - 180 Union Street
Unit 601 The Print Rooms 164 - 180 Union Street
Unit 401 The Print Rooms 164 - 180 Union Street
Flat 4 160 Union Street London
Flat 2 160 Union Street London
Flat 1 160 Union Street London
Unit Lg09 The Print Rooms 164 - 180 Union Street
Communal Workspace The Print Rooms 164 - 180 Union Street
Flat 8 69 Southwark Street London
Flat 1 69 Southwark Street London
Studio 142 51 Ewer Street London
Studio 141 51 Ewer Street London
Studio 136 51 Ewer Street London
Studio 133 51 Ewer Street London

Studio 129 51 Ewer Street London
Studio 123 51 Ewer Street London
Studio 118 51 Ewer Street London
Studio 115 51 Ewer Street London
Studio 103 51 Ewer Street London
Studio 87 51 Ewer Street London
Studio 74 51 Ewer Street London
Studio 72 51 Ewer Street London
Studio 69 51 Ewer Street London
Studio 68 51 Ewer Street London
Studio 67 51 Ewer Street London
Studio 54 51 Ewer Street London
Studio 36 51 Ewer Street London
Studio 32 51 Ewer Street London
Studio 18 51 Ewer Street London
Studio 3 51 Ewer Street London
Apartment 39 Rosler Building 85 Ewer Street
Ground Floor West 182 - 194 Union Street London
Part Ground Floor And First Floor Skyline House 200 Union Street
G32 Jerwood Space 171 Union Street
Unit 6 Rear East First Floor Europoint House 5 Lavington Street
Apartment 20 Braque Building 86 Ewer Street
Apartment 2 Braque Building 86 Ewer Street
Apartment 38 Rosler Building 85 Ewer Street
Apartment 35 Rosler Building 85 Ewer Street
Unit 4 Lower Ground 5 - 11 Lavington Street London
9 - 11 Bear Lane London Southwark
46B Copperfield Street London Southwark
46A Copperfield Street London Southwark
Arch 17 Dolben Street London
Apartment 23 Braque Building 86 Ewer Street
Apartment 18 Braque Building 86 Ewer Street
Apartment 17 Rosler Building 85 Ewer Street
Apartment 12 Rosler Building 85 Ewer Street
113 Jerwood Space 171 Union Street London
Railway Arches 45 To 51 Union Street London
52A Great Suffolk Street London Southwark
50 Great Suffolk Street London Southwark
Front Harling House 47 - 51 Great Suffolk Street
Third Floor North Block Harling House 47 - 51 Great Suffolk Street
Second Floor South Block Harling House 47 - 51 Great Suffolk Street
Flat 6 28 Great Suffolk Street London
Flat 175 17 Great Suffolk Street London
Flat 172 17 Great Suffolk Street London
Flat 161 17 Great Suffolk Street London
Flat 157 17 Great Suffolk Street London
Flat 155 17 Great Suffolk Street London

Flat 153 17 Great Suffolk Street London
Flat 142 17 Great Suffolk Street London
Flat 130 17 Great Suffolk Street London
Flat 123 17 Great Suffolk Street London
Flat 113 17 Great Suffolk Street London
Flat 106 17 Great Suffolk Street London
Flat 105 17 Great Suffolk Street London
Flat 99 17 Great Suffolk Street London
Flat 84 17 Great Suffolk Street London
Flat 71 17 Great Suffolk Street London
Flat 67 17 Great Suffolk Street London
Flat 65 17 Great Suffolk Street London
Flat 59 17 Great Suffolk Street London
Flat 56 17 Great Suffolk Street London
Flat 45 17 Great Suffolk Street London
Flat 41 17 Great Suffolk Street London
Flat 37 17 Great Suffolk Street London
Flat 36 17 Great Suffolk Street London
Flat 30 17 Great Suffolk Street London
Flat 27 17 Great Suffolk Street London
Flat 25 17 Great Suffolk Street London
Flat 23 17 Great Suffolk Street London
Flat 3 17 Great Suffolk Street London
Flat 86 18 Great Suffolk Street London
Flat 79 18 Great Suffolk Street London
Flat 60 18 Great Suffolk Street London
Flat 55 18 Great Suffolk Street London
Flat 53 18 Great Suffolk Street London
Flat 50 18 Great Suffolk Street London
Flat 43 18 Great Suffolk Street London
Flat 27 18 Great Suffolk Street London
2 - 8 Great Suffolk Street London Southwark
Professional Project Catering Lavington House 25 Lavington Street
Unit 402 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 132-134 Metal Box Factory Business Centre 30 Great Guildford Street
Stationery Cupboard Meeting Room Metal Box Factory Business Centre 30 Great Guildford Street
Unit Gg007 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 502 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 518 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 504 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 519 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 520 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 418 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 531-533 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 515 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 508 Metal Box Factory Business Centre 30 Great Guildford Street

Unit 505 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 409 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 405 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 401 Metal Box Factory Business Centre 30 Great Guildford Street
Language Services Direct 81 Southwark Street London
Third Floor 100 Union Street London
Majority Basement 169 Union Street London
Ground Floor 11 Risborough Street London
Flat 1 1 Risborough Street London
Unit 302 The Print Rooms 164 - 180 Union Street
Unit G1 The Print Rooms 164 - 180 Union Street
Unit 201 The Print Rooms 164 - 180 Union Street
Unit 210 Second Floor The Print Rooms 164 - 180 Union Street
Unit 107 The Print Rooms 164 - 180 Union Street
Unit G4 The Print Rooms 164 - 180 Union Street
Unit 213 The Print Rooms 164 - 180 Union Street
Unit 513 The Print Rooms 164 - 180 Union Street
Unit 402 The Print Rooms 164 - 180 Union Street
160 Union Street London Southwark
Flat 9 69 Southwark Street London
Flat 4 69 Southwark Street London
Apartment 6 50 Ewer Street London
Studio 144 51 Ewer Street London
Studio 140 51 Ewer Street London
Studio 139 51 Ewer Street London
Studio 132 51 Ewer Street London
Studio 131 51 Ewer Street London
Studio 110 51 Ewer Street London
Studio 108 51 Ewer Street London
Studio 100 51 Ewer Street London
Studio 89 51 Ewer Street London
Studio 70 51 Ewer Street London
Studio 65 51 Ewer Street London
Studio 62 51 Ewer Street London
Studio 56 51 Ewer Street London
Studio 45 51 Ewer Street London
Studio 42 51 Ewer Street London
Studio 23 51 Ewer Street London
Studio 10 51 Ewer Street London
27A Great Suffolk Street London Southwark
Apartment 10 Rosler Building 85 Ewer Street
Apartment 12 Braque Building 86 Ewer Street
Apartment 44 Rosler Building 85 Ewer Street
Apartment 24 Rosler Building 85 Ewer Street
Apartment 8 Ernst Building 142 Union Street
Flat 24 5B Bear Lane London
5C - 5D Bear Lane London Southwark

Flat 2 31 Dolben Street London
50A Great Suffolk Street London Southwark
Southbank Petrol Service Station Harling House 47 - 51 Great Suffolk Street
Units 2 To 6 And Arch 30 Grande Vitesse Industrial Centre 38 Great Suffolk Street
Flat 166 17 Great Suffolk Street London
Flat 156 17 Great Suffolk Street London
Flat 143 17 Great Suffolk Street London
Flat 137 17 Great Suffolk Street London
Flat 132 17 Great Suffolk Street London
Flat 131 17 Great Suffolk Street London
Flat 129 17 Great Suffolk Street London
Flat 116 17 Great Suffolk Street London
Flat 103 17 Great Suffolk Street London
Flat 87 17 Great Suffolk Street London
Flat 66 17 Great Suffolk Street London
Flat 64 17 Great Suffolk Street London
Flat 61 17 Great Suffolk Street London
Flat 33 17 Great Suffolk Street London
Flat 32 17 Great Suffolk Street London
Flat 20 17 Great Suffolk Street London
Flat 18 17 Great Suffolk Street London
Flat 17 17 Great Suffolk Street London
Flat 9 17 Great Suffolk Street London
Flat 89 18 Great Suffolk Street London
Flat 81 18 Great Suffolk Street London
Flat 67 18 Great Suffolk Street London
Flat 61 18 Great Suffolk Street London
Flat 57 18 Great Suffolk Street London
Flat 56 18 Great Suffolk Street London
Flat 52 18 Great Suffolk Street London
Flat 38 18 Great Suffolk Street London
Flat 31 18 Great Suffolk Street London
18B Great Suffolk Street London Southwark
22 Great Suffolk Street London Southwark
Flat 37 18 Great Suffolk Street London
Unit 524 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 323 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 317 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 311-312 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 207-208 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 122-124 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 218 Metal Box Factory Business Centres 30 Great Guildford Street
Unit 441 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 110 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 521 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 413 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 425 Metal Box Factory Business Centre 30 Great Guildford Street

Unit 235 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 126 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 436 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 431 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 417 Metal Box Factory Business Centre 30 Great Guildford Street
Unit G01 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 522 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 509 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 227-228 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 213-216 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 203-204 Metal Box Factory Business Centre 30 Great Guildford Street
Ggvt Metal Box Factory Business Centre 30 Great Guildford Street
Fourth Floor 81 Southwark Street London
Basement 81 Southwark Street London
Unit 1 50 Ewer Street London
Ground Floor Old Union Yard Arches 229 Union Street
Majority First Floor 169 Union Street London
83 Southwark Street London Southwark
Fifth Floor 81 Southwark Street London
4 Risborough Street London Southwark
Unit 1 3 Risborough Street London
Railway Arch 64 Ewer Street London
Unit 310 The Print Rooms 164 - 180 Union Street
Unit 301 The Print Rooms 164 - 180 Union Street
Unit G5 The Print Rooms 164 - 180 Union Street
Unit 212 Second Floor The Print Rooms 164 - 180 Union Street
Unit 312 The Print Rooms 164 - 180 Union Street
Unit 419 The Print Rooms 164 - 180 Union Street
Unit 409 The Print Rooms 164 - 180 Union Street
Unit 515 The Print Rooms 164 - 180 Union Street
Unit 514 The Print Rooms 164 - 180 Union Street
Unit 504 The Print Rooms 164 - 180 Union Street
Studio 412 The Print Rooms 164 - 180 Union Street
Unit 508 The Print Rooms 164 - 180 Union Street
Unit 108 The Print Rooms 164 - 180 Union Street
Basement Embassy Tea House 195 - 205 Union Street
Unit 503 The Print Rooms 164 - 180 Union Street
42 Copperfield Street London Southwark
Apartment 10 50 Ewer Street London
Studio 150 51 Ewer Street London
Studio 145 51 Ewer Street London
Studio 122 51 Ewer Street London
Studio 111 51 Ewer Street London
Studio 102 51 Ewer Street London
Studio 94 51 Ewer Street London
Studio 82 51 Ewer Street London
Studio 76 51 Ewer Street London

Studio 61 51 Ewer Street London
Studio 60 51 Ewer Street London
Studio 51 51 Ewer Street London
Studio 48 51 Ewer Street London
Studio 46 51 Ewer Street London
Studio 35 51 Ewer Street London
Studio 33 51 Ewer Street London
Studio 14 51 Ewer Street London
Studio 8 51 Ewer Street London
Apartment 1 Rosler Building 85 Ewer Street
156B Union Street London Southwark
144B Union Street London Southwark
Unit 3 To 4 Ground Floor Europoint House 5 Lavington Street
5 - 7 Bear Lane London Southwark
Unit 4 38 Copperfield Street London
Ground Floor Embassy Tea House 195 - 205 Union Street
Unit 3 First Floor 5 - 11 Lavington Street London
Railway Arches 6 To 13 And Arch 66 Braque Building 86 Ewer Street
Apartment 33 Rosler Building 85 Ewer Street
Apartment 3 Rosler Building 85 Ewer Street
Apartment 17 Braque Building 86 Ewer Street
Unit 6 First Floor Front 5 - 11 Lavington Street London
Units 7 To 10 Ground Floor 5 - 11 Lavington Street London
Flat 22 5B Bear Lane London
Units 1 To 2 Lower Ground 5 - 11 Lavington Street London
152 Union Street London Southwark
148 Union Street London Southwark
Citizen M Hotel Lavington Street London
171 Union Street London Southwark
Fifth Floor Crane Building 22 Lavington Street
Railway Arch 9 Ewer Street London
Apartment 19 Braque Building 86 Ewer Street
Apartment 47 Rosler Building 85 Ewer Street
Apartment 31 Rosler Building 85 Ewer Street
Apartment 27 Rosler Building 85 Ewer Street
Apartment 6 Rosler Building 85 Ewer Street
Apartment 3 Ernst Building 142 Union Street
Flat 23 5B Bear Lane London
G38 171 Union Street London
Unit 3 202 Union Street London
Unit 11 And 12 First Floor 5 - 11 Lavington Street London
London Travelwatch 5 - 11 Lavington Street London
Flat 28 17 Great Suffolk Street London
Flat 16 17 Great Suffolk Street London
Flat 10 17 Great Suffolk Street London
Flat 8 17 Great Suffolk Street London
Flat 1 17 Great Suffolk Street London

Flat 84 18 Great Suffolk Street London
Flat 83 18 Great Suffolk Street London
Flat 78 18 Great Suffolk Street London
Flat 77 18 Great Suffolk Street London
Flat 74 18 Great Suffolk Street London
Flat 70 18 Great Suffolk Street London
Flat 44 18 Great Suffolk Street London
20 Great Suffolk Street London Southwark
Atm 18A Great Suffolk Street London
Unit 325 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 321 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 319 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 315 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 304 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 225 Metal Box Factory Business Centre 30 Great Guildford Street
Unit G04 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 517 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 528 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 532 Metal Box Factory Business Centre 30 Great Guildford Street
Unit G014 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 421 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 424 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 419 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 534 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 523 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 503 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 410 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 101 Metal Box Factory Business Centre 30 Great Guildford Street
Lgnd Unit 11B 5 - 11 Lavington Street London
Majority Second Floor 169 Union Street London
Ground Floor 169 Union Street London
Second Floor 181 Union Street London
Flat 3 3 Risborough Street London
Flat 2 1 Risborough Street London
Flat 4 1 Risborough Street London
Unit 306 The Print Rooms 164 - 180 Union Street
Unit 204 Second Floor The Print Rooms 164 - 180 Union Street
Unit 418 The Print Rooms 164 - 180 Union Street
Unit 417 The Print Rooms 164 - 180 Union Street
Unit 413 The Print Rooms 164 - 180 Union Street
First Floor 46 Copperfield Street London
Unit 5 Ground Floor 5 - 11 Lavington Street London
Part Second Floor North Europoint House 5 Lavington Street
Part Second Floor Third Floor And Fourth 5 - 11 Lavington Street London
52 Great Suffolk Street London Southwark
Railway Arches 56 To 57 Ewer Street London
144 Union Street London Southwark

Part Second Floor South Europoint House 5 Lavington Street
First Floor Skyline House 200 Union Street
Apartment 2 Ernst Building 142 Union Street
Unit 7 38 Copperfield Street London
71 - 79 Southwark Street London Southwark
Unit 5 38 Copperfield Street London
Arch 26 Old Union Yard Arches 229 Union Street
Third Floor North Wigglesworth House 69 Southwark Bridge Road
34 - 40A Bear Lane London Southwark
Railway Arch 77 Gambia Street London
201 Embassy Tea House 195 - 205 Union Street London
204 Union Street London Southwark
36 Bear Lane London Southwark
Sixth Floor Crane Building 22 Lavington Street
Workman Llp 182 - 194 Union Street London
Railway Arches 15 And 16 Dolben Street London
Flat 1 5B Bear Lane London
Flat 20 5B Bear Lane London
156 Union Street London Southwark
Apartment 5 Braque Building 86 Ewer Street
30A Dolben Street London Southwark
Second Floor 182 - 194 Union Street London
Second Floor Crane Building 22 Lavington Street
Fourth Floor Crane Building 22 Lavington Street
Railway Arch 67 Ewer Street London
Railway Arch 55 Ewer Street London
Ground Floor 46 Copperfield Street London
Arch 31 Old Union Yard Arches 229 Union Street
Unit 602 The Print Rooms 164 - 180 Union Street
Unit 411 The Print Rooms 164 - 180 Union Street
Unit 405 The Print Rooms 164 - 180 Union Street
Unit 403 The Print Rooms 164 - 180 Union Street
Unit 509 The Print Rooms 164 - 180 Union Street
Unit 506 The Print Rooms 164 - 180 Union Street
Unit 505 The Print Rooms 164 - 180 Union Street
Unit 502 The Print Rooms 164 - 180 Union Street
Unit 501 The Print Rooms 164 - 180 Union Street
Unit 313 The Print Rooms 164 - 180 Union Street
Flat 3 69 Southwark Street London
67 Southwark Street London Southwark
Apartment 9 50 Ewer Street London
Apartment 8 50 Ewer Street London
Studio 149 51 Ewer Street London
Studio 143 51 Ewer Street London
Studio 127 51 Ewer Street London
Studio 120 51 Ewer Street London
Studio 114 51 Ewer Street London

Studio 113 51 Ewer Street London
Studio 107 51 Ewer Street London
Studio 105 51 Ewer Street London
Studio 99 51 Ewer Street London
Studio 95 51 Ewer Street London
Studio 77 51 Ewer Street London
Studio 75 51 Ewer Street London
Studio 71 51 Ewer Street London
Arch 28 Old Union Yard Arches 229 Union Street
Basement Unit 7 5 - 11 Lavington Street London
Ground Floor Crane Building 22 Lavington Street
First Floor Crane Building 22 Lavington Street
Arch 29 Old Union Yard Arches 229 Union Street
Arch 30 Old Union Yard Arches 229 Union Street
Union Jack 225 Union Street London
Apartment 15 Rosler Building 85 Ewer Street
Railway Arches 52 To 53 Ewer Street London
Mar I Terra Public House 14 Gambia Street London
Second Floor 5 - 11 Lavington Street London
Flat 2 5B Bear Lane London
Flat 17 5B Bear Lane London
152A Union Street London Southwark
Railway Arch 61 Ewer Street London
144A Union Street London Southwark
150 Union Street London Southwark
Apartment 25 Braque Building 86 Ewer Street
Apartment 22 Braque Building 86 Ewer Street
Railway Arches 69 And 70 Ewer Street London
Apartment 6 Ernst Building 142 Union Street
Apartment 1 Ernst Building 142 Union Street
Apartment 4 Ernst Building 142 Union Street
Flat 6 5B Bear Lane London
Flat 12 5B Bear Lane London
Flat 3 5B Bear Lane London
Flat 9 5B Bear Lane London
Unit 8 And Unit 9 First Floor 5 - 11 Lavington Street London
Flat C 162 Union Street London
Arch 24 Old Union Yard Arches 229 Union Street
First Floor 182 - 194 Union Street London
Ground Floor Front 181 Union Street London
Third Floor 182 - 194 Union Street London
Unit 6 First Floor Rear 5 - 11 Lavington Street London
Unit 7 First Floor 5 - 11 Lavington Street London
Fourth Floor North Harling House 47 - 51 Great Suffolk Street
Part Right Side Of First Floor 182 - 194 Union Street London
Office Mansard House 29 Dolben Street
Railway Arch 78 Gambia Street London

Unit G6 The Print Rooms 164 - 180 Union Street
Unit 113 The Print Rooms 164 - 180 Union Street
Unit 3 38 Copperfield Street London
Unit 4 Ground Floor 5 - 11 Lavington Street London
First Floor 181 Union Street London
Apartment 8 Braque Building 86 Ewer Street
Apartment 5 Ernst Building 142 Union Street
Apartment 14 Rosler Building 85 Ewer Street
Basement West 182 - 194 Union Street London
Apartment 36 Rosler Building 85 Ewer Street
Studio 59 51 Ewer Street London
Studio 50 51 Ewer Street London
Studio 28 51 Ewer Street London
Studio 4 51 Ewer Street London
Apartment 21 Rosler Building 85 Ewer Street
Apartment 13 Rosler Building 85 Ewer Street
Part Ground Floor East Skyline House 200 Union Street
Apartment 25 Rosler Building 85 Ewer Street
Apartment 23 Rosler Building 85 Ewer Street
120 Union Street London Southwark
Apartment 15 Braque Building 86 Ewer Street
Apartment 9 Braque Building 86 Ewer Street
Unit 16 Ground Floor 5 - 11 Lavington Street London
Units 13 And 14 Ground Floor 5 - 11 Lavington Street London
Unit 5 First Floor 5 - 11 Lavington Street London
13 Bear Lane London Southwark
Apartment 24 Braque Building 86 Ewer Street
Apartment 14 Braque Building 86 Ewer Street
Apartment 10 Braque Building 86 Ewer Street
Apartment 4 Braque Building 86 Ewer Street
Apartment 49 Rosler Building 85 Ewer Street
Apartment 16 Rosler Building 85 Ewer Street
Apartment 2 Rosler Building 85 Ewer Street
Flat 18 5B Bear Lane London
Flat 15 5B Bear Lane London
Flat 4 5B Bear Lane London
Flat 5 31 Dolben Street London
Units 8 And 9 Lower Ground 5 - 11 Lavington Street London
Part Ground Floor Front Harling House 47 - 51 Great Suffolk Street
Part First Floor North Block And Part First Floor South Block Harling House 47 - 51 Great Suffolk Street
Third Floor South Block Harling House 47 - 51 Great Suffolk Street
Flat 167 17 Great Suffolk Street London
Flat 151 17 Great Suffolk Street London
Flat 141 17 Great Suffolk Street London
Flat 136 17 Great Suffolk Street London
Flat 133 17 Great Suffolk Street London

Flat 118 17 Great Suffolk Street London
Flat 112 17 Great Suffolk Street London
Flat 104 17 Great Suffolk Street London
Flat 96 17 Great Suffolk Street London
Flat 80 17 Great Suffolk Street London
Flat 77 17 Great Suffolk Street London
Flat 76 17 Great Suffolk Street London
Flat 72 17 Great Suffolk Street London
Flat 63 17 Great Suffolk Street London
Flat 57 17 Great Suffolk Street London
Flat 55 17 Great Suffolk Street London
Flat 46 17 Great Suffolk Street London
Flat 15 17 Great Suffolk Street London
Unit 217 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 232-234 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 209-211 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 229 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 224 Metal Box Factory Business Centre 30 Great Guildford Street
Third Floor 81 Southwark Street London
Ground Floor 81 Southwark Street London
Second Floor 9 Risborough Street London
Third Floor 9 Risborough Street London
Flat 2 5 Risborough Street London
Flat 1 5 Risborough Street London
Unit 110 The Print Rooms 164 - 180 Union Street
Units 307 To 308 The Print Rooms 164 - 180 Union Street
Unit 414 The Print Rooms 164 - 180 Union Street
Unit 517 The Print Rooms 164 - 180 Union Street
Unit 512 The Print Rooms 164 - 180 Union Street
Unit 209 The Print Rooms 164 - 180 Union Street
Unit 206 The Print Rooms 164 - 180 Union Street
Flat 5 160 Union Street London
Apartment 4 50 Ewer Street London
Studio 135 51 Ewer Street London
Studio 134 51 Ewer Street London
Studio 125 51 Ewer Street London
Studio 119 51 Ewer Street London
Studio 117 51 Ewer Street London
Studio 112 51 Ewer Street London
Studio 93 51 Ewer Street London
Studio 81 51 Ewer Street London
Studio 73 51 Ewer Street London
Studio 57 51 Ewer Street London
Studio 44 51 Ewer Street London
Studio 43 51 Ewer Street London
Studio 27 51 Ewer Street London
Studio 24 51 Ewer Street London

Studio 20 51 Ewer Street London
Studio 19 51 Ewer Street London
Studio 15 51 Ewer Street London
Studio 7 51 Ewer Street London
Studio 2 51 Ewer Street London
Studio 1 51 Ewer Street London
Apartment 21 Braque Building 86 Ewer Street
44 Copperfield Street London
Crane Building 22 Lavington Street London
Apartment 7 Braque Building 86 Ewer Street
Apartment 51 Rosler Building 85 Ewer Street
Apartment 45 Rosler Building 85 Ewer Street
Apartment 43 Rosler Building 85 Ewer Street
Flat 16 5B Bear Lane London
Crane House Lavington Street London
158 Union Street London Southwark
Unit 10 First Floor 5 - 11 Lavington Street London
Unit 15 Ground Floor 5 - 11 Lavington Street London
Unit 4 First Floor 5 - 11 Lavington Street London
Unit 6 Ground Floor 5 - 11 Lavington Street London
Unit 11 Lower Ground 5 - 11 Lavington Street London
Unit 10 Lower Ground 5 - 11 Lavington Street London
Flat 1 31 Dolben Street London
Flat 4 31 Dolben Street London
Third Floor East And Third Floor Rear Skyline House 200 Union Street
Part Ground Floor Skyline House 200 Union Street
Basement And First To Fifth Floors Embassy Tea House 195 - 205 Union Street
111 Jerwood Space 171 Union Street London
Block B Part Ground Floor 182 - 194 Union Street London
Railway Arches 58 And 59 Ewer Street London
Basement East 182 - 194 Union Street London
Arches 33 To 34 Dolben Street London
18 Dolben Street London Southwark
Railway Arch 60 Ewer Street London
Railway Arch 68 Ewer Street London
Railway Arch 62 Ewer Street London
Railway Arch 65 Ewer Street London
202 Union Street London Southwark
Mansard House 29 Dolben Street London
156A Union Street London Southwark
148B Union Street London Southwark
152B Union Street London Southwark
148A Union Street London Southwark
Unit 2 38 Copperfield Street London
Railway Arch 35B Union Street London
Railway Arch 35A Union Street London
Living Accommodation 225 Union Street London

207 Union Street London Southwark
1m03 Jerwood Space 171 Union Street
Third Floor Front Skyline House 200 Union Street
Arch 27 Old Union Yard Arches 229 Union Street
Second Floor North Block Harling House 47 - 51 Great Suffolk Street
Flat 4 28 Great Suffolk Street London
Flat 3 28 Great Suffolk Street London
Flat 1 28 Great Suffolk Street London
24 - 26 Great Suffolk Street London Southwark
Flat 170 17 Great Suffolk Street London
Flat 158 17 Great Suffolk Street London
Flat 147 17 Great Suffolk Street London
Flat 146 17 Great Suffolk Street London
Flat 124 17 Great Suffolk Street London
Flat 115 17 Great Suffolk Street London
Flat 108 17 Great Suffolk Street London
Flat 107 17 Great Suffolk Street London
Flat 102 17 Great Suffolk Street London
Flat 94 17 Great Suffolk Street London
Flat 2 17 Great Suffolk Street London
15A Great Suffolk Street London Southwark
Flat 88 18 Great Suffolk Street London
Flat 82 18 Great Suffolk Street London
Flat 80A 18 Great Suffolk Street London
Flat 68 18 Great Suffolk Street London
Flat 66 18 Great Suffolk Street London
Flat 65 18 Great Suffolk Street London
Flat 42 18 Great Suffolk Street London
Flat 33 18 Great Suffolk Street London
Flat 32 18 Great Suffolk Street London
Unit 318 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 316 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 303 Metal Box Factory Business Centre 30 Great Guildford Street
Metal Box Cafe Metal Box Factory Business Centre 30 Great Guildford Street
Unit 221 Metal Box Factory Business Centre 30 Great Guildford Street
Fry Meeting Room Metal Box Factory Business Centre 30 Great Guildford Street
Restaurant At Metal Box Factory Business Centre 30 Great Guildford Street
Unit 103 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 403 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 429 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 411 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 412 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 512 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 127 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 120 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 439 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 438 Metal Box Factory Business Centre 30 Great Guildford Street

Unit 437 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 530 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 513 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 202 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 404 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 128 Metal Box Factory Business Centre 30 Great Guildford Street
Office 2 Old Union Yard Arches 229 Union Street
Office 1 Old Union Yard Arches 229 Union Street
Arch 22 Old Union Yard Arches 229 Union Street
Part Basement 181 Union Street London
Fifth Floor 182 - 194 Union Street London
First Floor 7 Risborough Street London
Flat 2 3 Risborough Street London
Flat 3 1 Risborough Street London
Unit G9 The Print Rooms 164 - 180 Union Street
Unit G2 The Print Rooms 164 - 180 Union Street
183 - 185 Union Street London Southwark
Apartment 11 Braque Building 86 Ewer Street
Apartment 3 Braque Building 86 Ewer Street
Apartment 29 Rosler Building 85 Ewer Street
Flat 21 5B Bear Lane London
Flat 7 5B Bear Lane London
Flat 5 5B Bear Lane London
Living Accommodation Mar I Terra Public House 14 Gambia Street
Flat B 162 Union Street London
28A Great Suffolk Street London Southwark
Flat 163 17 Great Suffolk Street London
Flat 162 17 Great Suffolk Street London
Flat 139 17 Great Suffolk Street London
Flat 135 17 Great Suffolk Street London
Flat 125 17 Great Suffolk Street London
Flat 121 17 Great Suffolk Street London
Flat 92 17 Great Suffolk Street London
Flat 58 17 Great Suffolk Street London
Flat 53 17 Great Suffolk Street London
Flat 50 17 Great Suffolk Street London
Flat 49 17 Great Suffolk Street London
Flat 42 17 Great Suffolk Street London
Flat 29 17 Great Suffolk Street London
James Forbes House 27 Great Suffolk Street London
5 - 13 Great Suffolk Street London Southwark
Flat 73 18 Great Suffolk Street London
Flat 72 18 Great Suffolk Street London
Flat 41 18 Great Suffolk Street London
Unit 309-310 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 305-308 Metal Box Factory Business Centre 30 Great Guildford Street
Cigar Box Meeting Room Metal Box Factory Business Centre 30 Great Guildford

Street
Unit 407 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 433 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 432 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 427 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 422 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 420 Metal Box Factory Business Centre 30 Great Guildford Street
Unit G015 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 526 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 212 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 222 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 17 5 - 11 Lavington Street London
Third To Fourth Floor 5 - 11 Lavington Street London
Second Floor 100 Union Street London
Railway Arch 63 Ewer Street London
Unit 101 The Print Rooms 164 - 180 Union Street
Unit G10 The Print Rooms 164 - 180 Union Street
Flat 93 17 Great Suffolk Street London
Flat 91 17 Great Suffolk Street London
Flat 88 17 Great Suffolk Street London
Flat 83 17 Great Suffolk Street London
Flat 79 17 Great Suffolk Street London
Flat 70 17 Great Suffolk Street London
Flat 40 17 Great Suffolk Street London
Flat 22 17 Great Suffolk Street London
Flat 21 17 Great Suffolk Street London
Flat 7 17 Great Suffolk Street London
Flat 6 17 Great Suffolk Street London
Flat 4 17 Great Suffolk Street London
Flat 80 18 Great Suffolk Street London
Flat 76 18 Great Suffolk Street London
Flat 58 18 Great Suffolk Street London
Flat 54 18 Great Suffolk Street London
Flat 48 18 Great Suffolk Street London
Flat 47 18 Great Suffolk Street London
Flat 45 18 Great Suffolk Street London
Flat 39 18 Great Suffolk Street London
Flat 36 18 Great Suffolk Street London
Flat 35 18 Great Suffolk Street London
Flat 34 18 Great Suffolk Street London
Living Accommodation 22 Great Suffolk Street London
18A Great Suffolk Street London Southwark
Lavington House 25 Lavington Street London
Unit 334 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 322 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 313 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 223 Metal Box Factory Business Centre 30 Great Guildford Street

Letter Press Meeting Room Metal Box Factory Business Centre 30 Great Guildford Street
Unit Gg005 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 108 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 104 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 514 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 506 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 525 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 426 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 501 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 516 Metal Box Factory Business Centre 30 Great Guildford Street
Unit G02 Metal Box Factory Business Centre 30 Great Guildford Street
Unit G03 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 125 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 435 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 231 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 226 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 207 Second Floor The Print Rooms 164 - 180 Union Street
Unit 205 The Print Rooms 164 - 180 Union Street
Unit 407 The Print Rooms 164 - 180 Union Street
Unit 406 The Print Rooms 164 - 180 Union Street
Unit 516 The Print Rooms 164 - 180 Union Street
Unit 511 The Print Rooms 164 - 180 Union Street
Unit 507 The Print Rooms 164 - 180 Union Street
Flat 3 160 Union Street London
Apartment 5 50 Ewer Street London
Studio 147 51 Ewer Street London
Studio 146 51 Ewer Street London
Studio 138 51 Ewer Street London
Studio 126 51 Ewer Street London
Studio 106 51 Ewer Street London
Studio 92 51 Ewer Street London
Studio 91 51 Ewer Street London
Studio 85 51 Ewer Street London
Studio 84 51 Ewer Street London
Studio 83 51 Ewer Street London
Studio 66 51 Ewer Street London
Studio 58 51 Ewer Street London
Studio 49 51 Ewer Street London
Studio 40 51 Ewer Street London
Studio 38 51 Ewer Street London
Studio 37 51 Ewer Street London
Studio 34 51 Ewer Street London
Studio 29 51 Ewer Street London
Studio 12 51 Ewer Street London
Unit 1 38 Copperfield Street London
Apartment 40 Rosler Building 85 Ewer Street

Unit 3 Ground Floor 5 - 11 Lavington Street London
Unit 2 Ground Floor 5 - 11 Lavington Street London
30 Dolben Street London Southwark
Apartment 16 Braque Building 86 Ewer Street
Apartment 37 Rosler Building 85 Ewer Street
Apartment 22 Rosler Building 85 Ewer Street
Apartment 19 Rosler Building 85 Ewer Street
Apartment 11 Rosler Building 85 Ewer Street
Apartment 9 Rosler Building 85 Ewer Street
Apartment 7 Rosler Building 85 Ewer Street
Flat 11 5B Bear Lane London
5A Bear Lane London Southwark
Flat A 162 Union Street London
Fourth Floor Rear Crane Building 22 Lavington Street
Fourth Floor Middle Crane Building 22 Lavington Street
Fourth Floor Front Crane Building 22 Lavington Street
Part First Floor Harling House 47 - 51 Great Suffolk Street
Basement And Ground Floor Harling House 47 - 51 Great Suffolk Street
30 Great Suffolk Street London Southwark
Flat 5 28 Great Suffolk Street London
Unit 415 The Print Rooms 164 - 180 Union Street
Unit 410 The Print Rooms 164 - 180 Union Street
Unit Lg07 The Print Rooms 164 - 180 Union Street
Flat 7 69 Southwark Street London
Flat 6 69 Southwark Street London
Flat 5 69 Southwark Street London
Railway Arch 66 Ewer Street London
Studio 148 51 Ewer Street London
Studio 137 51 Ewer Street London
Studio 128 51 Ewer Street London
Studio 116 51 Ewer Street London
Studio 104 51 Ewer Street London
Studio 101 51 Ewer Street London
Studio 90 51 Ewer Street London
Studio 80 51 Ewer Street London
Studio 64 51 Ewer Street London
Studio 63 51 Ewer Street London
Studio 55 51 Ewer Street London
Studio 53 51 Ewer Street London
Studio 47 51 Ewer Street London
Studio 25 51 Ewer Street London
Studio 22 51 Ewer Street London
Studio 21 51 Ewer Street London
Studio 11 51 Ewer Street London
Studio 9 51 Ewer Street London
120 - 128 Union Street London Southwark
Second Floor Skyline House 200 Union Street

Unit 1 First Floor 5 - 11 Lavington Street London
Apartment 8 Rosler Building 85 Ewer Street
Apartment 5 Rosler Building 85 Ewer Street
Unit 6 Lower Ground 5 - 11 Lavington Street London
Unit 5 Lower Ground 5 - 11 Lavington Street London
12 Gambia Street London Southwark
Apartment 1 Braque Building 86 Ewer Street
Apartment 46 Rosler Building 85 Ewer Street
Apartment 42 Rosler Building 85 Ewer Street
Apartment 41 Rosler Building 85 Ewer Street
Apartment 32 Rosler Building 85 Ewer Street
83 Ewer Street London Southwark
Flat 14 5B Bear Lane London
Flat 13 5B Bear Lane London
Flat 8 5B Bear Lane London
5E Bear Lane London Southwark
39 Bear Lane London Southwark
Flat 3 31 Dolben Street London
Railway Arches 16 South End And 19 To 22 Ewer Street London
Topdesk Crane Building 22 Lavington Street
Arch 25 Old Union Yard Arches 229 Union Street
52 Great Suffolk Street London Southwark
48 Great Suffolk Street London Southwark
Fifth Floor Flat Harling House 47 - 51 Great Suffolk Street
Unit 220 Metal Box Factory Business Centre 30 Great Guildford Street
Unit 230 Metal Box Factory Business Centre 30 Great Guildford Street
First Floor 81 Southwark Street London
Part Second Floor 5 - 11 Lavington Street London
Lgnd Unit 11A 5 - 11 Lavington Street London
Ground Floor 100 Union Street London
Unit 1 202 Union Street London
Ground Floor Rear 181 Union Street London
Part Basement 169 Union Street London
Part First Floor 169 Union Street London
Fourth Floor 182 - 194 Union Street London
13 Risborough Street London Southwark
First And Second Floor Including First Floor 9 11 Risborough Street London
Flat 11 Risborough Street London
Second Floor 7 Risborough Street London
6 Risborough Street London Southwark
Unit 104 The Print Rooms 164 - 180 Union Street
Unit 303 The Print Rooms 164 - 180 Union Street
Unit 304 To 305 The Print Rooms 164 - 180 Union Street
Unit 211 Second Floor The Print Rooms 164 - 180 Union Street
Unit 208 Second Floor The Print Rooms 164 - 180 Union Street
Unit 112 The Print Rooms 164 - 180 Union Street
Unit 111 The Print Rooms 164 - 180 Union Street

Unit 109 The Print Rooms 164 - 180 Union Street
Unit 412 The Print Rooms 164 - 180 Union Street
Unit 404 The Print Rooms 164 - 180 Union Street
Unit 518 The Print Rooms 164 - 180 Union Street
Unit 510 The Print Rooms 164 - 180 Union Street
Unit Lg01 The Print Rooms 164 - 180 Union Street
Unit 105 The Print Rooms 164 - 180 Union Street
33 Bear Lane London Southwark
Flat 2 69 Southwark Street London
Apartment 7 50 Ewer Street London
Apartment 3 50 Ewer Street London
Apartment 2 50 Ewer Street London
Studio 130 51 Ewer Street London
Studio 124 51 Ewer Street London
Studio 121 51 Ewer Street London
Studio 109 51 Ewer Street London
Studio 98 51 Ewer Street London
Studio 97 51 Ewer Street London
Studio 96 51 Ewer Street London
Studio 88 51 Ewer Street London
Studio 86 51 Ewer Street London
Studio 79 51 Ewer Street London
Studio 78 51 Ewer Street London
Studio 52 51 Ewer Street London
Studio 41 51 Ewer Street London
Studio 39 51 Ewer Street London
Studio 31 51 Ewer Street London

APPENDIX 5

Consultation responses received

Internal services

LBS Transport Policy
LBS Planning Policy
LBS Transport Policy
LBS Highways Development & Management
LBS Archaeology
LBS Design & Conservation Team [Formal]
LBS Ecology
LBS Urban Forester
LBS Environmental Protection
LBS Community Infrastructure Levy Team

Statutory and non-statutory organisations

Thames Water
Transport for London
Metropolitan Police Service

Neighbour and local groups consulted:

85 Southwark Street London Southwark
16 Penderry Rise London SE6 1HA
Flat 48 Rosler Building, 85 Ewer Street, SE1 0FT
Apartment 50 Rosler Building 85 Ewer Street London
Apartment 26 Rosler Building 85 Ewer Street London
Apartment 4 Rosler Building 85 Ewer Street London
20 court way twickenham london
Apartment 48 Rosler Building 85 Ewer Street London

OPEN **MUNICIPAL YEAR 2025-26**

COMMITTEE: **PLANNING COMMITTEE (MAJOR APPLICATIONS) A**

NOTE: Original held in Constitutional Team; all amendments/queries to Gerald Gohler, Constitutional Team, Tel: 020 7525 7420

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Councillor Cleo Soanes (reserve)			
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