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Item No. 7.1	Classification: OPEN	Date: 14 September 2022	Meeting Name: Planning Committee
Report title:	<p>Development Management planning application: Application 20/AP/3013 for: Full Planning Application</p> <p>Address: Colechurch House, London Bridge Walk, London Southwark</p> <p>Proposal: Redevelopment of the site to include demolition of Colechurch House, pedestrian footbridge and walkway and erection of an elevated 22-storey building (+ 4-storey basement) above a public park and providing office floorspace, retail floorspace, restaurant/café floorspace, leisure floorspace (all Use Class E), theatre and a bar (Sui Generis), delivered alongside a replacement pedestrian footbridge, public realm improvements, roof gardens, cycle parking, servicing, refuse, plant areas and other associated works incidental to the development.</p>		
Ward(s) or groups affected:	London Bridge and West Bermondsey		
From:	Director of Planning and Growth		
Application Start Date	PPA Expiry Date 31 December 2022		
Earliest Decision Date			

RECOMMENDATIONS

1. That planning permission is granted subject to conditions, referral to the Mayor of London and the applicant entering into an appropriate legal agreement; and
2. That environmental information be taken into account as required by Regulation 26(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended); and
3. That the planning committee in making their decision has due regard to the potential Equalities impacts that are outlined in this report; and
4. That following the issue of planning permission, the director of planning and growth write to the secretary of state notifying them of the decision, pursuant to Regulation 30(1)(a) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017; and
5. That following issue of planning permission, the director of planning and growth place a statement on the Statutory Register pursuant to Regulation 28(1) of the TCP (EIA) Regulations 2017, which contains the information required by Regulation 28 and, for the purposes of Regulation 28(1)(h) being the main

reasons and considerations on which the planning committee's decision was based shall be set out in the report; and

6. That, in the event that the requirements of (1) are not met by 31 December 2022 that the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in Paragraph 320 of this report.

EXECUTIVE SUMMARY

7. The proposal is for a large, commercial led redevelopment of the site known as Colechurch House, located at the confluence of Tooley Street and Duke Street Hill, adjacent to London Bridge and Borough High Street. The development would comprise mainly offices and ancillary restaurant at upper levels. At ground floor and basement levels there would be a new theatre, retail units, restaurant/café and a gym. The building would rise to a maximum height of 104.2m (AOD) and 22 commercial storeys and as such would be classed as a tall building.
8. The development has been conceived as a single, tall building, raised above ground level in order to create a generous new public realm which would occupy the ground floor footprint of the building and create new north-south pedestrian linkages and visual connections. The development would see the creation of landscaped public open space on a site that is currently hard landscaped. The elevated building would open up views of the Grade II listed St Olaf House and views to Tooley Street which runs along the northern boundary of the site. At street level the proposed building would be much more engaging with active frontages and visual interest along Tooley Street and the new landscaped public realm opening out onto Duke Street Hill.
9. The architecture and standard of design of the new building is considered to be exceptional and befitting of a building of this scale in such a central London location where the standard of new development architecture is one of excellence. The proposed office accommodation would be of a high standard and would meet the needs of modern office users.
10. The development would provide a new theatre with two venues of different capacities, 250 people for the main theatre and 150 for the second theatre where both are proposed to have flexible a configuration. It is intended that the theatre would become a new home for Southwark Playhouse and the theatre would be offered to them on affordable terms as part of the applicants affordable workspace offer and this would equate to a 75% discount on market rent levels. Additional office space and retail space would be provided as affordable workspace bringing the total on-site offer to 8% with the remaining 2% being provided as an in lieu payment to fund the fit out of the theatre space to a specification agreed with Southwark Playhouse.
11. The development would be highly energy efficient and sustainable with an on-site carbon reduction of 55% above the 2013 Building Regulations in addition to a carbon offset payment that would help the development achieve Carbon Zero targets. It is expected that the development would achieve BREEAM 'Outstanding' and this would be a conditioned requirement of any consent.

12. The site is located in the Central Activities Zone, the Bankside Borough and London Bridge Opportunity Area and the London Bridge District Town Centre, and is allocated in the Southwark Plan as NSP55. The proposals are consistent with the site allocation and the objectives of the development plan for this area.
13. The impact on the amenity of neighbours in terms of privacy, outlook and daylight/sunlight is set out in the report. It is noted that whilst there would be no significant adverse impacts on any residents, there would be some impacts on the windows of London Bridge Hospital, closest to the site. None of the windows or rooms that would be affected are homes and as such the standards of the BRE cannot be strictly applied. The use of these spaces is transient in nature and as such would not lead to any significant adverse impacts on users. These impacts need to be considered in the context of the character of the area in line with the flexibility expected by the BRE when looking at dense urban environments. These impacts also need to be balanced against the significant benefits of delivering this scheme
14. The development would be reliant on the Stopping Up (closure) of London Bridge Walk and whilst this has been concluded as being acceptable in planning terms, the applicant would need to make a separate application for permission to close Joan Street from the Highways Authority (LBS).
15. A total of 257 letters were sent to local residents as part of the council's neighbour consultation exercise and 14 letters of objection were received. A total of 154 letters of support have also been received. A detailed breakdown of the objections is included at paragraph 27.

Use Class	Existing sqm	Proposed sqm	Change +/-
Use Class E (a) to (f) retail/financial services	1,569	1,522	-47
Use Class E (g) i) Office	4,993	43,925	+38,932
Affordable workspace Use Class E	0	3,744 (8%)	+3,744
Sui Generis	0	2,0696	+2,0696
Jobs	165	Up to 3050	Up to + 2,885

16. CO2 Savings beyond part L Bldg. Regs.	55%
Trees lost	2 Class B and 7 Class C
Trees gained	38 (29 net gain)

	Existing	Proposed	Change +/-
Urban Greening Factor	0	0.28	+0.28
Public open space	-	2,277sqm	
Greenfield Run Off Rate	Unknown	1.34l/s	-1.34l/s
Green/Brown Roofs	0	547sqm	+547sqm

EVCPS (on site)	0	1	+ 1
Cycle parking spaces	0	815	+815

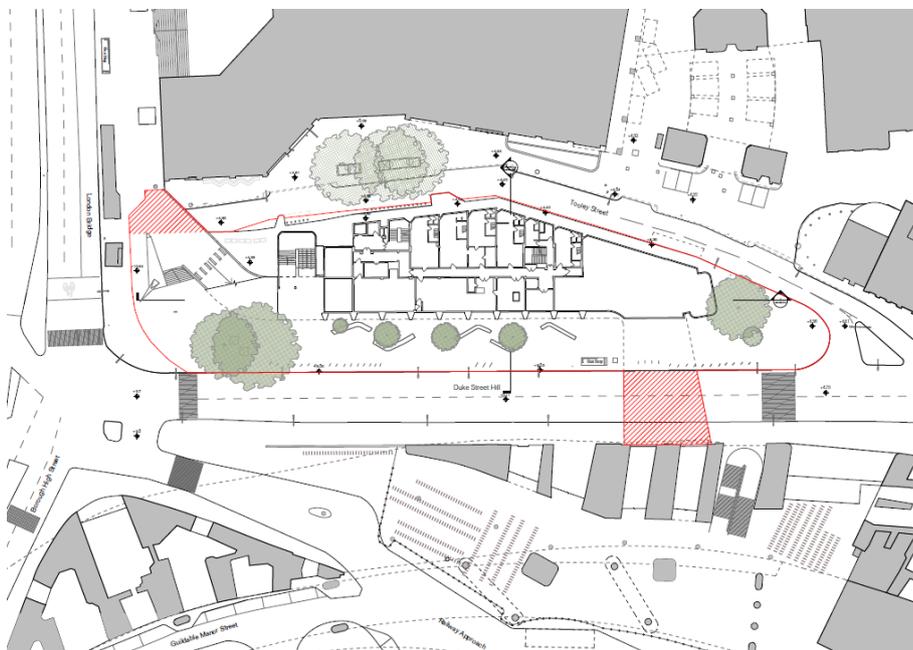
18.	CIL (estimated)	£3,580,062.40
	MCIL (estimated)	£7,670,315.99
	S106	£2,996,503 (equivalent)

BACKGROUND INFORMATION

Site location and description

19. The application site measures approximately 0.28 hectares and is bounded to the north and east by Tooley Street, to the south by Duke Street Hill and to the west by London Bridge. The site is currently occupied by Colechurch House, a 1960's concrete commercial building providing offices and retail floorspace. The retail spaces are located at lower ground, ground and first floor level with all office accommodation located on the remaining upper levels. There is a car park with capacity for 15 cars located at lower ground floor level and accessed from Tooley Street. The application site also encompasses the majority of the existing footway on the north side of Duke Street Hill. An elevated walkway with a footbridge linking to London Bridge Station is provided above Duke Street Hill from the south of the site. The River Thames is located approximately 55 metres to the north of the site.

Image – Site location plan



20. The existing building is of low architectural quality and is hampered by large expanses of inactive frontages on Tooley Street and Duke Street Hill which further diminishes the appearance of the building and fails to contribute positively to the area. The elevated walkway (known as London Bridge Walk) and footbridge are busy routes during the morning and evening rush hour however

they are only lightly used outside of these times. The footbridge is a dominant feature within the local streetscape.

Image – Colechurch House



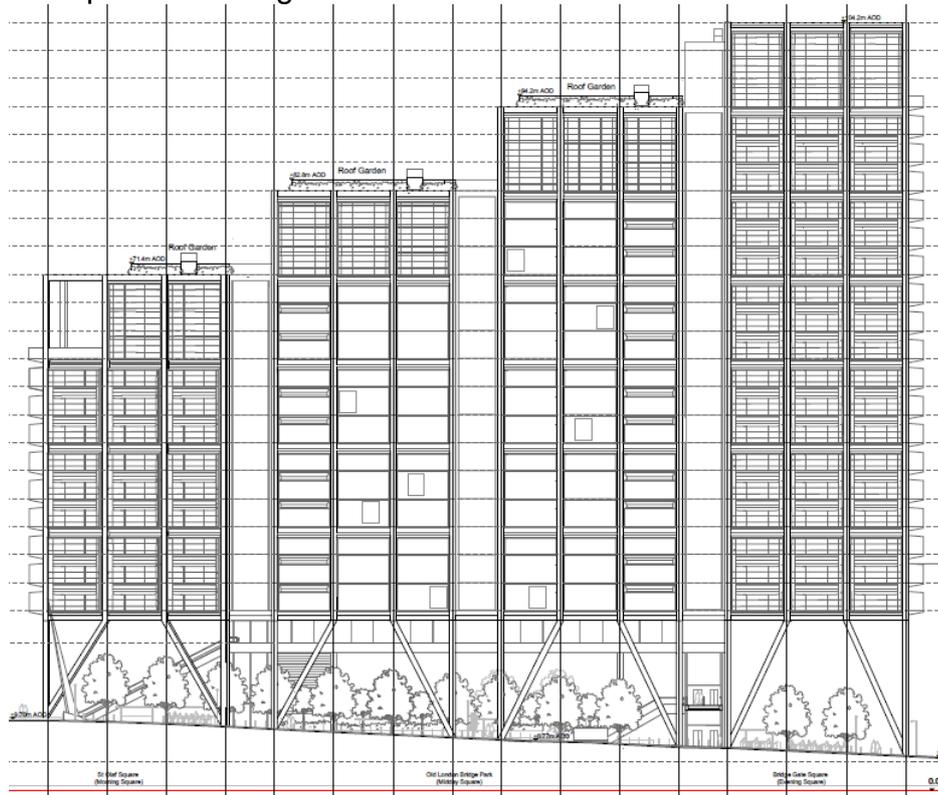
21. The building is set within a hard landscaped public realm characterised by footways and street furniture as well as some street trees. None of the trees are protected by way of a formal Tree Preservation Order although the trees along the eastern boundary are within the Tooley Street conservation area and as such benefit from provisional protection. The western end of the site is marked by The Southwark Gateway Needle sculpture designed by Eric Parry, and the Borough High Street conservation area flanks the western boundary. The site is a central and prominent location within the London Bridge district town centre.
22. The surrounding area is characterised largely by London Bridge Station and the significant commercial development surrounding the station. The immediate area is predominantly commercial with some retail. There are also significant healthcare facilities in the area with London Bridge Hospital immediately to the north and east of the site and Guy's Hospital campus to the south of the site on the opposite side of London Bridge Station.
23. The surrounding townscape is varied and there is a range of building heights, including tall buildings such as The Shard (306m), Guy's Hospital Tower (142m) and the News International Building (78m); to the lower rise buildings eastwards along Tooley Street and further south within the Borough High Street conservation area. There are various tall buildings on the north side of the River Thames within the City of London.

Details of proposal

24. Planning consent is sought for the demolition of the existing Colechurch House and redevelopment of the site to provide a new elevated 22 storey building with four levels of basement. The redevelopment would provide new offices, retail

space, a gym, food and beverage outlets and a new theatre incorporating an ancillary bar.

Image – Proposed building as viewed from Duke Street Hill



25. The relevant land use floor areas are set out in the table below:

Use	Use Class	Proposed GIA (sqm)	Proposed GEA (sqm)
Office	Class E	43,925	46,821
Theatre	Sui Generis	2,696	3,195
Retail	Class E	465	522
Restaurant/Café	Class E	691	717
Gym	Class E	366	525
Bar (ancillary to theatre)	Sui Generis	20	20
Total	-	48,163	51,800

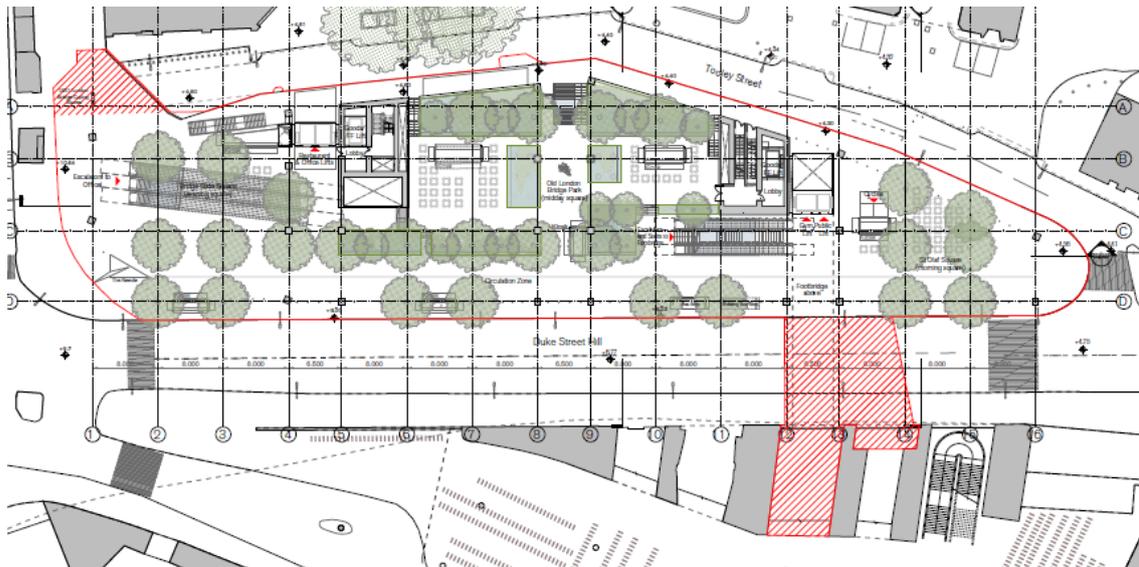
26. The proposed building would rise to 22 storeys and would be elevated above pavement level by between 11.3 metres and 18.5 metres, allowing for the creation of a new landscaped public realm beneath the elevated building on Duke Street Hill. This new public realm would provide a new landscaped open space as well as pedestrian and visual connections from Duke Street Hill through to Tooley Street to the north of the site. The footbridge to London Bridge Station would be demolished and replaced by a new footbridge, incorporated into the new development. This footbridge would be located to the eastern end of the site and would be accessed by escalators and lifts.



27. The building would rise to a maximum height of 104.2 metres (AOD) and would step down westwards to create four distinct elements. The above ground part of the building would accommodate the office space as well as a restaurant at level 11. The office space would be accessed from escalators and lifts at the western end of the side where it bounds London Bridge. The theatre, retail units, gym and all back of house functions/plant would be located at lower ground and basement levels, all of which would be accessed at grade from Tooley Street to the north of the site, taking advantage of the difference in levels between Tooley Street and Duke Street Hill. This would allow a new public realm and landscaping to be created below the elevated building as well as creating both visual and pedestrian links through the site. This is shown in detail on the image below which shows the retail and theatre entrances on Tooley Street with the new public realm on Duke Street Hill located above:



28. The development would provide a total of 815 cycle parking spaces as well as changing and showering facilities. The proposed cycle parking provision will comprise 593 long stay spaces at basement level, 160 short stay spaces and 44 long stay spaces within an automated cycle store accessed from the ground floor public realm. A further 18 short stay cycle spaces would be provided within the public realm. The scheme would be car free with the exception of a single accessible parking space that would be located within the basement and accessed from Tooley Street.



29. All servicing activity would be undertaken on-site in a dedicated service yard accessed via Tooley Street. The facility would provide three loading bays to accommodate the peak servicing demands of the proposed development. The applicant is also proposing to adopt a delivery consolidation solution to significantly reduce the number and size of vehicles travelling to the site each day.

Consultation responses from members of the public and local groups

30. Letters were sent to local residents when the application was first received in November 2020, at this time the application was advertised as EIA development in the local press and site notices were posted. Following the submission of revised/additional information in September 2021, a re-consultation was undertaken for the application. Taking both consultations together, 154 letters of support and 14 letters of objection have been received. The comments for both objection and support are set out in the table below:

Objection	Officer response
The proposed building is too large and is out of proportion with its immediate surroundings.	It is acknowledged that the proposed building is significantly taller than the existing Colechurch House however, officers consider the scale and massing to be an appropriate response to the sites specific location within the CAZ, town centre and opportunity area. The site has been given an allocation within The Southwark Plan which states that the site is suitable for a taller building. There are also numerous examples of much taller buildings within the immediate vicinity and as such it is not considered that the building would be too tall for or disproportionate within its

	<p>surroundings. The site sits outside of the Tooley Street and Borough High Street conservation areas, and the impact on nearby heritage assets has been considered and found, on balance and with regard to the benefits of the development, to be acceptable.</p>
<p>The trees would be difficult to maintain and would be unlikely to receive enough light.</p>	<p>The applicant has provided details of tree pits, soil depth and light penetration. Officers are satisfied that the trees would have sufficient soil depth, irrigation and natural light to grow and thrive.</p>
<p>No consideration seems to have been given to scale and leaving open space which is actually open and not covered.</p>	<p>The site is long and narrow with roads and pavements on both sides. Elevating the building is considered to be an innovative and high quality solution to providing a generous space at ground floor. The design of the building is such that it maximises the amount of space given to landscaping and public realm at ground floor level.</p>
<p>The demolition of the pedestrian bridge to the upper part of the main line station would result in increased numbers crossing the road at this busy, dangerous junction, to be made more complex by the imminent introduction of cycle lanes. This would be particularly apparent during rush hours when large numbers of pedestrians flood across London Bridge to or from the stations and when traffic is busiest.</p>	<p>The applicant amended the scheme to re-provide the pedestrian footbridge. As such, pedestrian access to London Bridge Station via a footbridge would be preserved as part of the application. Mitigation for the period of construction when the footbridge would not be available, has been agreed and would be secured in the s106 agreement.</p>
<p>The proposed public realm is unlikely to be successful and could be yet another area with noisy food and (licensed) beverage contributing to anti-social behaviour.</p>	<p>The proposed public realm would be a well landscaped space that would provide new routes and visual connections. Whilst there would be some seating this is not considered to be a threat to amenity or a risk for anti-social behaviour. The site is open in nature with lots of natural surveillance and as such would enhance the street level experience in this part of London Bridge.</p>
<p>The proposed materials are</p>	<p>The proposed materials are considered</p>

<p>inadequate for this location.</p>	<p>to be high quality and appropriate to the architectural style of the building providing a robust response to the detailed elevational design. Conditions regarding materials would be imposed in order to secure the highest standards.</p>
<p>The building is too large in the context of the surrounding listed buildings.</p>	<p>The significance of all the nearby listed buildings and the contribution of their urban settings to that significance has been considered. Where it is considered that there is harm arising to the setting of a number of heritage assets due to the scale and massing of the proposal and its incursion into views of heritage assets it has been recognised and considered. The harm overall is considered to be at the low end of 'less than substantial' harm as defined by the NPPF and where it can be considered in the balance against both the public benefits and the benefits inherent in the design of the building which would open up new views of the listed buildings as a result of the building being elevated above the streets. It is considered that, individually and overall, the acknowledged harm would be outweighed by the benefits of the scheme.</p>
<p>The proposed building is likely to cause adverse impacts due to high winds.</p>	<p>Wind and microclimate has been fully considered as part of the application and there would be no significant impacts as a result of the proposed development.</p>
<p>The development will result in very few benefits for local people and it will have significant negative impacts on local residents in terms of anti-social behaviour and pollution.</p>	<p>The provision of a substantial, high quality public realm, new pedestrian routes, job creation, retail opportunities and the inclusion of a new theatre are considered to be substantial public benefits.</p>
<p>The restaurants and bars, including that which would be ancillary to the theatre, are inappropriate in this area and would impact on local residents.</p>	<p>The site is located in the CAZ and within both a town centre and opportunity area. The proposed range of uses are considered entirely appropriate for the location and conditions would be used in order to manage and mitigate any potential impacts.</p>

<p>Servicing, taxis idling and bars/restaurant entrances cannot be allowed on the northern part of the site. It will significantly affect the amenity of local residents and the patients at London Bridge Hospital.</p>	<p>Trip generation is considered in full in the transport section of this report. It is not considered that the development would generate vehicle trips that would have any adverse impact on the local road network or any adjacent or nearby occupiers. Entrances to the theatres and retail units being positioned on Tooley Street is considered appropriate and will animate what is currently a very inactive part of the Thames Path.</p>
<p>The plans will significantly affect the daylight and sunlight of local residents, the office buildings to the north and also the patients at London Bridge Hospital.</p>	<p>The application site has been identified in policy, including in the Southwark Plan, as being suitable for a taller building and it is anticipated that there would be a degree of impact as a result of redevelopment. Developing sites in highly urbanised environments often results in some unavoidable impacts to daylight and sunlight. Recognising the challenges associated with developing inner city sites, the numerical targets given in the BRE are expected to be treated with a degree of flexibility, having due regard for the existing and emerging context within which these sites are located. The application site is within a Central London Opportunity Area and accordingly the standards should be applied with some degree of flexibility.</p> <p>Given the small number of windows overall that would experience significant effects and the site specific circumstances including the nature of the affected rooms and windows, it is considered that the overall impact would be acceptable given the benefits of the proposed development, the provision of a significant new public realm, offices, theatre, retail and significant employment opportunities. On balance, officers consider that, when reading the BRE guidance with the required flexibility, and in view of the positive benefits of the development proposal, the degree of harm to amenity would not justify withholding planning permission in this case.</p>

Comments from The London Bridge Experience	
Concern that The London Bridge Experience hasn't been properly acknowledged in any of the application documents and reports and The London Bridge Experience wish to fully respected and included in all relevant applications.	The London Bridge Experience has been fully considered as part of the officer assessment of the application through review of the application documents, consideration of the impacts on the London Bridge Experience and through officer site visit.
There are concerns that the development would result in noise and vibration impacts on The London Bridge Experience and that this would disrupt operations and visitor experience.	Whilst it is acknowledged that there may be some short term impacts during the construction period, officers consider that these can be adequately mitigated by way of condition.
There are concerns that the development would affect the stability of the site and result in structural issues and movement.	There is no evidence to suggest that the development of the site would result in any structural issues or movement.
Concerns have been raised with regard to dust and debris during demolition and construction and the air quality impacts this could have on visitors.	Dust and debris would be managed through a Construction Environmental Management Plan and this would be secured either as a condition or as part of the S106 Agreement.
There are concerns that pedestrian and vehicular access could be affected during demolition and construction and that this would have adverse impacts on the operation of the business	Access on Duke Street Hill and Tooley Street would be maintained.
The removal of London Bridge Walk and the Duke Street Hill walkway could have an impact on the operation of the business both in terms pedestrian movement and bin storage	Whilst originally proposed for removal, The pedestrian footbridge would now be re-provided as part of the development. Pedestrian movement would be improved as part of the development.
The development would result in the loss of The London Bridge Experience box office on Duke Street	This is a commercial matter between tenant and landlord.

Hill and this would have an impact on the business.	
The existing staircase from Duke Street Hill to Tooley Street would be removed as part of the redevelopment and it isn't clear what other routes would be retained both during and post construction.	Whilst the staircase would be removed, new pedestrian north south routes would be provided thereby improving north south connectivity. Access along Tooley Street and Duke Street Hill would be maintained during construction.
The development would have an impact on drainage and water movement in the area and could result in water ingress to The London Bridge Experience.	The Environment Agency have reviewed the submitted Flood Risk Assessment and have raised no objections subject to conditions.
It is unclear what developer agreements are in place to improve the London Bridge tunnel.	Improvements to London Bridge Tunnel are not considered to be necessary as a result of the proposed development which will be improving the street environment on Tooley Street and Duke Street Hill.
Party wall issues.	These are not a planning matter.
Comments from Shard Quarter	
The proposed height, scale and massing is not proportionate to the site or its locational context and it would not make a positive contribution to the London skyline and landscape.	Officers consider that the height scale and stepped massing of the design is an appropriate and proportionate response to the site and its location, meeting the requirements of both Southwark Plan and London Plan policies. The high quality architecture is considered to make a positive contribution to the London skyline.
The development would have a harmful impact on strategic and local views and would fail to respond positively to the local character and townscape of London Bridge and the primacy of The Shard.	The effect of the proposed design has been considered both in the local and Strategic views through accurate visual representations (AVRs) as defined by the LVMF. Whilst it is acknowledged that there would be some visibility in the Strategic and local views, the effect has been assessed qualitatively and where there may be any harm identified it is considered to be of the lowest order of less than substantial and comfortably outweighed by the benefits of

	redeveloping the site. This is discussed in more detail in the main report. The height of the proposed building is significantly lower than the Shard and, coupled with its stepped profile it is not considered that the primacy of The Shard is challenged by the proposal.
The development would have a harmful impact on the Conservation Area and the setting of the adjacent listed buildings due to its height, form and massing.	In the main, the proposal is located outside the Tooley Street Conservation Area, (although at the junction of Tooley Street and Duke Street Hill it is within the Conservation Area). Due to being elevated above ground level, it would open up views of a number of listed buildings and the buildings in the conservation area especially from the south. This is considered to be a positive aspect of the design. The effect of the proposal on the setting of this urban conservation area has been considered in detail and the impact on heritage assets is discussed in more detail in the main report.
The removal of the walkway and pedestrian footbridge would have a detrimental impact on the public highway, both in terms of safety and capacity	The pedestrian footbridge has now been reintroduced.
Objection on the basis of highway capacity, which has not been fully considered.	Officers consider that the Transport Assessment and ES suitably review the issues of highway capacity/impacts.
Objection to the proposed Stopping Up.	In planning terms the proposed Stopping Up Order is considered acceptable however the applicant will have to make a formal application to Southwark Highways in order to secure a Stopping Up Order and this would be separate to any planning consent.
Comments from Oblix	
There is no policy support for a tall building in this location	The site benefits from an allocation in the Southwark Plan 2022 (NSP55) which states that the site is suitable for a taller building.
The proposals will fail to contribute to the London skyline and will not complement the London Bridge Tall	Proposed building is of a proportionate height and scale for its location and the standard of architecture is exemplary

<p>Building Cluster as the proposed development will be located away from the cluster on the River front, therefore jarring against the backdrop of The Shard and harming the River front views by providing a building that is out of scale with neighbouring properties. The building is too tall and would harm the primacy of The Shard.</p>	<p>and would make a positive contribution to the local townscape and the London skyline. The height of the proposed building is significantly lower than the Shard and the proposed building would very much be in the foothills of the cluster at London Bridge. As such, the primacy of The Shard is not threatened by the proposal.</p>
<p>The building fails to relate to its surroundings at street level and does not make a positive contribution to the townscape.</p>	<p>As set out above and in the main body of the report, the proposed building is considered to be suitable in terms of scale and massing, it responds positively to its surroundings at street level through the new public realm and the standard of architecture would make a positive contribution to the townscape.</p>
<p>The height of the building is not proportionate to the significance of the location and the size of the site nor does the development respond positively to the local character and townscape.</p>	<p>Officers consider that the height scale and massing is proportionate to the site and its location, meeting the requirements of both Southwark Plan and London Plan policies. The high quality architecture is considered to make a positive contribution to the townscape.</p>
<p>The HTVIA is not a robust document and Southwark should place little weight on it when assessing the impacts of the Proposed Development.</p>	<p>Officers consider the HTVIA to be a robust document, this was also reviewed independently on the Councils behalf by Land Use Consultants. Officers therefore consider it to be an appropriate detailed and robust document.</p>
<p>The proposed development will harm the significance of a number of designated heritage assets including St Paul's Cathedral, Tower of London and Southwark Cathedral.</p>	<p>Whilst it is acknowledged that there would be some harm to strategic and local views, the harm is considered to be less than substantial and comfortably outweighed by the benefits of redeveloping the site. This is discussed in more detail in the main report.</p>
<p>The proposed development would harm views from Oblix restaurant within the Shard and will affect the vitality and viability of the restaurant.</p>	<p>There is no entitlement to a view over a third party's land.</p>
<p>The proposed development would significantly impact the useable area of Oblix restaurant where tables can be located, damaging the restaurant's unique selling point and directly affecting revenue.</p>	<p>It is a commercial choice for the operators of Oblix restaurant how they choose to locate tables and organise their space however the issue of views out from the restaurant is not a planning matter as there is no entitlement to a view over a third party's land and the</p>

	development site is located a sufficient distance away to ensure that Oblix is not enclosed.
The proposals provide very little in the way of active frontages. The ground floor commercial units deliver only small kiosk uses which provide for very little active street level uses particularly along the Duke Street Hill. There is a risk of anti-social behaviour.	The proposal would result in active frontages along a stretch of Tooley Street that currently has very little in the way of animation. The new public realm would open out onto Duke Street Hill and would greatly improve the street level experience of this part of London Bridge.
Comments in support	
<ul style="list-style-type: none"> • The inclusion of a theatre will serve the community very well for years to come. • The Southwark Playhouse does great work, not only supporting the arts and culture industry, but also working with the local community, creating employment opportunities, and attracting new people to the area. • The Southwark Playhouse is an important cultural and community hub. It would be a valuable addition to the area. • The plans are hugely exciting and will open new opportunities for this area of London Bridge, which is currently quite a depressing space particularly at night time. • The development is modern and sustainable and it introduces green space to the area. • The building also has the benefit of making the street level open for public access. • The facilities look amazing and it will bring cultural life to the area. • The restaurant offering is very welcome as the area, although busy, is poorly served apart from takeaways. • Whilst the station itself has undergone a welcome transformation the surrounding area is poor and quite threatening at night. This new development is uplifting and offers hope for this extremely busy spot. • The plans will create a fantastic new building at the gateway to London Bridge. • There is a lot to support in the plans, and in particular the new park, affordable venue for Southwark Playhouse theatre and the net-zero carbon design of the building. The idea of putting the building up in the air and giving back the street level to the public is great. • The redevelopment and replacement of Colechurch House is long overdue. The proposed development will enhance the area. • The different parks underneath the building are a godsend to local office workers • The opening up of a view of art deco St Olaf's House from Duke Street Hill/Tooley Street is a great benefit. • London Bridge has changed greatly since 2000 and this is a continuation in the right direction. • Fosters & Partners are world class architects and this is a dramatic leap forward for the area. • The garden will be welcomed as will the new office space. 	

- This has similarities to the Bloomberg building in the city and is very welcome.
- It is rare to see such a beautifully crafted facade developed so intelligently and scientifically for each aspect.

Planning history of the site, and adjoining or nearby sites.

31. Any decisions which are significant to the consideration of the current application are referred to within the relevant sections of the report. A fuller history of decisions relating to this site, and other nearby sites, is provided in Appendix 3.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

32. The main issues to be considered in respect of this application are:
- Principle of the proposed development in terms of land use and compliance with the site allocation NSP55;
 - Affordable workspace
 - Environmental impact assessment
 - Design, including layout, building heights, landscaping and ecology;
 - Heritage considerations
 - Archaeology
 - Impact of proposed development on amenity of adjoining occupiers and surrounding area, including privacy, daylight and sunlight
 - Transport and highways, including servicing, car parking and cycle parking
 - Environmental matters, including construction management, flooding and air quality
 - Energy and sustainability, including carbon emission reduction
 - Ecology and biodiversity
 - 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
 - All other relevant material planning considerations
33. These matters are discussed in detail in the 'Assessment' section of this report.

Legal context

34. 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 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.

35. 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

36. The statutory development plans for the Borough comprise the London Plan (2021) and The Southwark Plan (2022). The National Planning Policy Framework (2021) is a material consideration but is not part of the statutory development plan. A list of policies which are relevant to this application is provided at Appendix 3. Any policies which are particularly relevant to the consideration of this application are highlighted in the report.

Policy designations

37. The site is subject to the following policy designations:
- Air Quality Management Area
 - Bankside, Borough and London Bridge Opportunity Area
 - Central Activities Zone
 - London Bridge District Town Centre
 - Protected Shopping Frontage SF12
 - Strategic Cultural Area
 - Thames Policy Area

Site allocation NSP55

38. The application site benefits from an allocation within the Southwark Plan 2022. Allocation NSP55 refers specifically to the application site and requires redevelopment to:
- 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
 - Contribute to a vibrant pedestrian area with retail, community or leisure uses (as defined in the glossary) which create an active street frontage; and
 - Provide a high quality pedestrian environment which links to London Bridge and the Thames Path; and
 - Provide ground floor active frontages on Duke Street Hill, including retail, community or leisure uses (as defined in the glossary).

NSP 55 sets out that the site is suitable for a taller building, subject to a range of considerations, including its location within the Thames Policy Area.

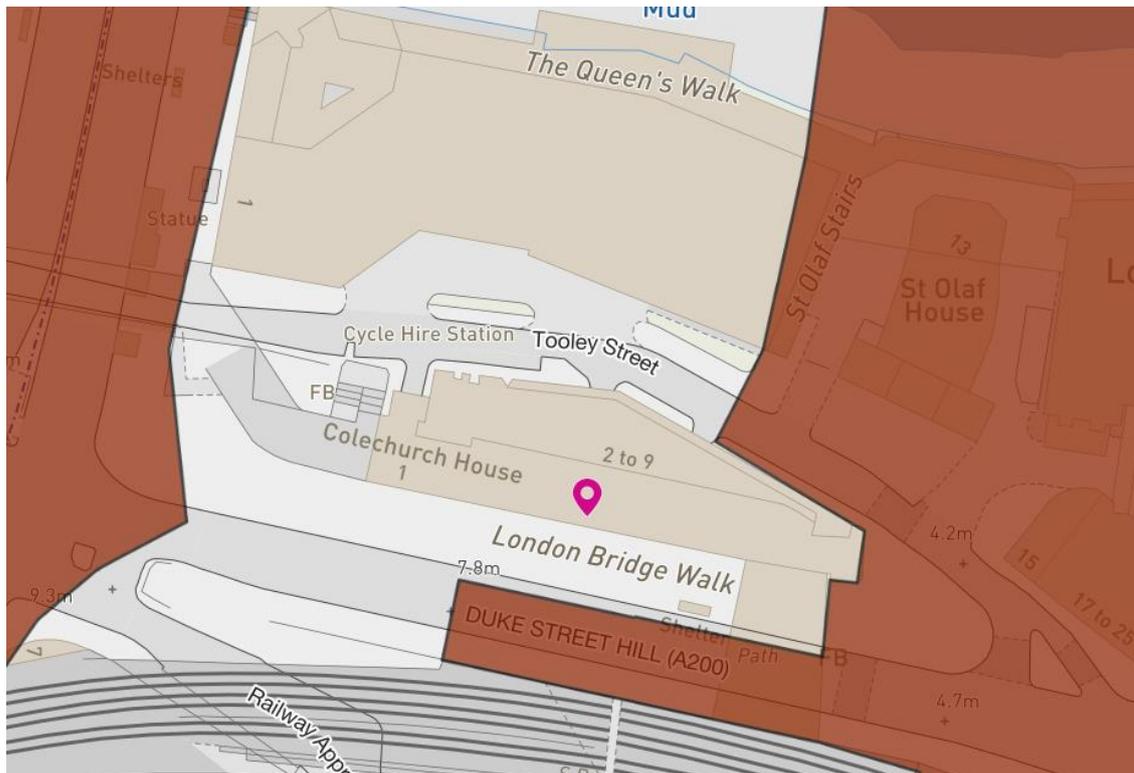
39. The site is located within Flood Zone 3 as identified by the Environment Agency flood map, which indicates a high probability of flooding however it benefits from

protection by the Thames Barrier.

Conservation areas

40. A small section of the eastern end of the application site at the apex of Duke Street Hill and Tooley Street is located within the Tooley Street Conservation Area. The Borough High Street Conservation Area flanks the western boundary of the site.

Image – Conservation areas (brown)



Listed Buildings

41. The existing Colechurch House is not listed however the following listed buildings are in close proximity to the site:
- Southwark Cathedral (Grade I);
 - St Olaf House (Grade II*);
 - London Bridge Hospital Riverside Block and 17-25 Tooley Street (Grade II);
 - Denmark House, 15 Tooley Street (Grade II);
 - 29, 31, 33 Tooley Street (Grade II);
 - Bridge over London Bridge Station (Grade II);
 - Archway of old London Bridge on Tooley Street (Grade II);
 - Hibernia Chambers (Grade II); and
 - 4, 6, 8 and 10 Borough High Street (Grade II).

London View Management Framework protected views

42. • View 2A.1 – Parliament Hill to St Paul's Cathedral

- View 3A.1 - Kenwood Gazebo to St Paul's Cathedral
- Tower of London World Heritage Site

ASSESSMENT

Principle of the proposed development in terms of land use

Relevant policy designations

43. The redevelopment of the site would be office led and would generate a significant uplift in employment floorspace as well as a significant cultural offering in the form of the proposed theatre. The development also proposes retail use, a gym, food and beverage outlets and an extensive new public realm. The new public realm would significantly improve the street level experience of this area and would improve animation, activity and interest at street level in addition to improving pedestrian connectivity and legibility.

CAZ, District Town Centre and Opportunity Area

44. The National Planning Policy Framework (NPPF) was updated in 2021. At the heart of the NPPF is a presumption in favour of sustainable development. The framework sets out a number of key principles, including a focus on driving and supporting sustainable economic development. Relevant paragraphs of the NPPF are considered in detail throughout this report. The NPPF also states that permission should be granted for proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.
45. London Bridge is part of the London Central Activities Zone, the Bankside, Borough and London Bridge Opportunity Area and the London Bridge District Town Centre. London Bridge has the potential to grow its strategic office provision, shops, leisure, culture, science and medical facilities. The site allocations in London Bridge will deliver around 57,000sqm (gross) offices and employment workspaces, 2,100sqm (gross) retail, community and leisure floorspace and up to 10,000 new jobs.

London Bridge Area Vision

46. The site is located within AV.11 – London Bridge Area Vision. Development in London Bridge Should:
- Attract global commerce with headquarter and local offices and build on its reputation for arts and crafts, food and trade while serving local needs through its town centre role;
 - Support the creation of a distinctive and inspiring world class environment through a mix of inspiring new architecture, restored and reactivated warehouses and other heritage revealed with 'placemarks', public art and quality public realm that provides openness, connectivity and a 'green grid'. Greenery and innovations in environmental resilience should be incorporated into buildings;

- Build on the fabric of local alleyways and yards to create quiet, green routes with clean air;
- Strengthen the cultural offer of the area and diversify activities and shops;
- Make sure the new standard of London Bridge Station is upheld and the Shard remains significantly taller and more visible than surrounding buildings as the station's landmark;
- Improve local accessibility and interchange at the station with enhanced walking, cycling, tube, bus and boat routes;
- Contribute towards the development of the Low Line, a new public realm corridor adjacent to historic railway arches, with lively accessible spaces for creativity, new jobs and retail;
- Harness the expertise and infrastructure from Kings College London, Guy's Hospital and other medical and science facilities to develop a strong, dynamic and specialised local economy that will attract new specialised services and research and promote health and wellbeing in the local environment.
- Enhance the sense of place and visitor and cultural activities along the Thames riverfront, and encourage use of riverboat services, waterborne freight and the Thames Path in a safe and sustainable way;
- Support the development of vibrant new high streets on St Thomas Street, Crucifix Lane and Tooley Street, complementing the distinct character of nearby Bermondsey Street.

Southwark Plan Site Allocation NSP55

47. The site benefits from a site allocation within The Southwark Plan. NSP55 which covers the site, states that development 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
 - Contribute to a vibrant pedestrian area with retail, community or leisure uses (as defined in the glossary) which create an active street frontage; and
 - Provide a high quality pedestrian environment which links to London Bridge and the Thames Path; and
 - Provide ground floor active frontages on Duke Street Hill, including retail, community or leisure uses (as defined in the glossary).

Conclusions on policy designations

48. The principle of a development containing a mix of uses including Class E office space, Class E retail, Class E restaurant/café, Class E gym and Sui Generis theatre with ancillary bar would support the role and functioning of the Central Activities Zone, the London Bridge District Town Centre as well as being consistent with the policies for the Opportunity Area and the site allocation. The acceptability of each use will be considered below.

Offices

49. Promoting the economy and creating employment opportunities is a key priority

for the planning system. The site lies within a London Plan Opportunity Area (Policy SD1) and within a District Town Centre (Policy SD6). London Plan Policy GG5 requires local planning authorities to plan for sufficient employment and industrial spaces to support economic growth whilst Policies E1 and E2 deal specifically with the provision of B Use Class (now called Class E(g) since the change to the Use Classes Order in 2021). London Plan Policy E11 requires development proposals to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases.

50. Southwark Plan Policy SP4 seeks to ensure that Southwark can develop a strong, green and inclusive economy. To achieve this the development plan aims to deliver at least 460,000sqm of new office space between 2019 and 2036 (equating to around 35,500 jobs). The policy states that around 80% of new offices will be delivered in the Central Activities Zone and sets a strategic target of 10,000 new jobs for the Borough, Bankside and London Bridge Opportunity Area. Policy SP4 further requires 10% of all new employment floorspace to be affordable workspace for start-ups and existing and new small and independent businesses in Southwark. Finally, the policy identifies the CAZ and district town centres as appropriate for delivering approximately 19,670sqm of retail floorspace.
51. The aforementioned London Plan and Southwark Plan policies support the provision of a commercial led development on this site. The existing Colechurch House provides approximately 4,993sqm of office employment floorspace and supports approximately 165 jobs. However, the building is in poor condition and in its current state is unlikely to attract new tenants. The proposed development would provide 43,925sqm (GIA) of Class E(g) office floorspace that would have the potential to support up to 3,050 jobs. This represents an uplift in office employment floorspace of approximately 38,932sqm and an increase in the number of jobs by approximately 2,885 full time positions. This uplift in employment floorspace and job provision would satisfy the aims of the London Plan and the Southwark Plan in creating new jobs and high quality office space within the Central Activities Zone, the Bankside, Borough and London Bridge Opportunity Area and the London Bridge Town Centre and is a welcome benefit of the development.

Retail, food & drink and gym

52. London Plan Policy SD6 and Southwark Plan policies identify this site as being within a town centre. The existing building provides 1,569sqm of retail floorspace however this is largely poor quality and located within the elevated walkway which has little beneficial impact on the vitality of the surrounding retail area and protected shopping frontage.
53. The proposed development would provide 465sqm of retail space, 691sqm of restaurant/café space and 366sqm of leisure floorspace, all of which fall within Class E. This equates to an overall provision of 1,522sqm of floorspace. Whilst this would represent a minor 47sqm reduction in retail floorspace provision, it should be noted that the proposed Class E accommodation would be high quality and would contribute more positively to the vitality and viability of the surrounding retail environment than the current Colechurch House.

54. In line with Southwark Plan Policy P37 – Protected Shopping Frontages, the development would provide active ground floor uses that provide a service to the general public and would enhance the shopping frontage. Due to the elevated nature of the building, the retail frontages would be on Tooley Street as opposed to Duke Street Hill however this is considered to be acceptable as the frontages would activate a busy portion of Tooley Street that forms part of the Thames Path but currently has very little animation or activation whilst providing a high quality public realm and landscaped area onto Duke Street Hill. The retail provision would be appropriate for this location in accordance with the aforementioned policies. Given the town centre location, the range of appropriate uses set out in the site allocation and national Government's clear intention to allow flexibility for commercial uses this is considered to be appropriate.

Theatre

55. The development would provide a new theatre (2696sqm) with ancillary bar (20sqm). The theatre would have two venues of different capacities, 250 people for the main theatre and 150 for the second theatre where both are proposed to have flexible a configuration. It is intended that it would be operated by Southwark Playhouse. London Plan policy HC5 supports the development of new cultural venues in town centres and places with good public transport connectivity. This policy seek to ensure that Opportunity Areas and large-scale mixed-use developments include new cultural venues. Southwark Plan policy P46 states that development will be permitted where:
- New leisure, arts and cultural uses are provided; and
 - It delivers or supports the delivery of public art projects, independent museums and theatres; and
 - New arts and cultural venues of strategic significance are proposed within the South Bank Cultural Quarter, Elephant and Castle Cultural Quarter, Old Kent Road and Canada Water Opportunity Area Cores and Peckham and Camberwell Creative Enterprise Zone.
56. The application site is located within the Strategic Cultural Area and more specifically within the South Bank Cultural Quarter. The provision of a theatre in this location would bolster Southwark's thriving leisure, arts and cultural sector. Promotion of new cultural facilities and specifically a theatre would allow Southwark to build on its strengths and further enhance the vibrant arts, leisure and cultural scene. This would bring further employment, engage local people and visitors, and create opportunities for training and learning. The delivery of a theatre is fully supported by both London Plan and Southwark Plan policies and is considered to be a positive element of the scheme that would enhance the cultural offering in this vibrant part of London.

Conclusion on land use

57. The proposal involves the provision of high quality office floorspace alongside retail, leisure and theatre space which are acceptable town centre uses. The provision of new offices is fully supported and the provision of modern, high quality offices is considered to be a benefit of the scheme and would facilitate

the growth of employment within the Central Activities Zone and the Opportunity Area. The proposed development would include a mix of uses that are appropriate for the site's location within the CAZ, Opportunity Area, town centre and cultural quarter.

Affordable workspace

- 58. London Plan Policy E2 requires the provision of a range of low-cost Class B1 business space to be supported to meet the needs of micro, small and medium sized enterprises and to support firms wishing to start up and expand. The policy states “development proposals for new B1 business floor space greater than 2,500sqm, or a locally determined lower threshold in a local development plan document, should consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises.
- 59. Policy E3 of the London Plan deals specifically with affordable workspace. The policy states “In defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purposes”. The policy identifies the circumstances in which it would be appropriate to secure affordable space.
- 60. Southwark Plan Policy P31 deals with affordable workspace. Criterion 2 of the policy requires Major ‘B Use Class’ development proposals to deliver at least 10% of the floorspace as affordable workspace on site at a discounted market rent for a period of at least 30 years. The policy recognises that there are many different forms that such space could take depending on the site location, characteristics and existing/proposed uses on site. The space should be offered to existing business on site first and then small and independent local businesses. Only where on-site provision would be impracticable are developers permitted to make a payment in lieu of the on-site provision.
- 61. In exceptional circumstances affordable retail, affordable cultural uses, or public health services which provide a range of affordable access options for local residents, may be provided as an alternative to affordable workspace (employment uses). This will only be acceptable if there is a demonstrated need for the affordable use proposed and with a named occupier. If the alternative affordable use is no longer required in the future, the space should be made available for affordable workspace (employment uses).
- 62. The proposed development would provide a total of 46,831sqm of employment floorspace and as such a total of 4,683sqm of affordable workspace should be provided in order to comply with planning policy.
- 63. The applicant proposed to satisfy the affordable workspace offer through the provision of an affordable retail unit, an affordable Class E (g) office space and through providing the theatre as an alternative to affordable workspace. This would be broken down as follows:

64.

Use	Floorspace (sqm)
Theatre (inc ground floor kiosk)	2,703
Class E(g) office space	791

Retail/Restaurant unit	162
Total (inc 2% of communal areas)	3,744

65. In floorspace terms the proposed offer equates to 8%. Policy P31 does allow for a commuted sum in exceptional circumstances. The 2% affordable workspace shortfall would equate to approximately 939sqm. This would need to be provided within the main office building and would take up a small portion of one of the typical officer floors. It would be difficult to find an affordable workspace provider who would be able to manage such a space given the increased service charges that would likely be applied and the fact that it would be separated from the rest of the affordable Class E(g) floorspace. In this instance, given the configuration of the building, the principle of a commuted sum is considered acceptable.
66. The required commuted sum would work out at £2,220,350. However, the applicant is proposing to offer the theatre to Southwark Playhouse at £160,000 per year which would result in a 78% discount on market rent. Additionally, the developer is proposing to fit out the theatre to a specification agreed with Southwark Playhouse. This would result in an additional cost to the developer of approximately £2,660,000 and as such the developer is proposing that no commuted sum be payable in this case due to the fit out costs of the theatre and the significant discount on market rent of the theatre space. Officers consider the provision of a community based theatre in this location to be a significant benefit of the scheme and would assist in the relocation of a well-regarded local theatre group back to London Bridge. The fit out of the theatre space in lieu of a commuted sum is also considered acceptable in this instance and the costs of the fit out would far exceed the commuted sum and would minimise costs to Southwark Playhouse.
67. In terms of the remainder of the affordable workspace offer, the Class E(g) office space and affordable retail unit would be offered at a 75% discount on market rent with relevant stair casing from a peppercorn rent to the 75% level over the course of a 24 month period as set out below:
- 0-6 months at 100% discount (rent free period);
 - 7-13 months at 60% discount on the Local Open Market Rent;
 - 14-22 months at 40% discount on the Local Open Market Rent; and
 - From month 23 onwards at 75% of the Local Open Market Rent.
68. In addition, the Section 106 Agreement would include an Affordable Workspace Strategy. This would ensure, among other things, that:
- the workspace is provided for a 30-year period at the discounts set out above;
 - no more than 50% of the market rate floorspace can be occupied until the affordable workspace has been fitted-out ready for occupation;
 - updated costs and schedules for the fit out of the theatre including final costs and the requirement for any balancing payments should the fit out costs not exceed the commuted sum;
 - an updated affordable workspace strategy setting out contingency plans for the conversion of the theatre space to general Class E(g) affordable

workspace should Southwark Playhouse ultimately decide not to take on the space;

- detailed plans showing final location of affordable workspace;
- a management plan is in place to secure the appointment of a Workspace Provider and a methodology for that Provider to support the occupiers;
- appropriate marketing of the affordable workspace will be conducted; and
- the rates and service charges payable by the tenant will be capped.

Environmental impact assessment

69. Environmental Impact Assessment is a statutory procedure that provides for a process assesses and reports upon the beneficial and adverse (positive and negative) environmental effects of development projects. The proposed development falls within Schedule 2, Category 10(b) 'Urban Development Project' of the EIA Regulations 2017 and constitutes EIA development having regard to its potential for likely significant environmental effects
70. Regulation 3 of the EIA Regulations precludes the granting of planning permission unless the council has undertaken an environmental impact assessment, taking account of the environmental information, which includes the ES, any further information, any representations made by consultation bodies, and any other person, about the environmental effects of the development.
71. In accordance with the EIA regulations, an environmental statement (ES) comprising a non-technical summary, environmental statement and technical appendices accompanies the application. That information has been taken into account. Officers are satisfied that the ES is up to date and that the effects described in the ES properly identify the likely significant effects of the proposed development on the environment.

Alternatives

72. The EIA Regulations require the ES to provide information on the alternative options considered by the applicant and this includes a 'Do Nothing' scenario. It is stated by the applicant's consultants and accepted by officers that the 'Do Nothing' alternative would leave the application site in its current state. It should be noted that it has also been established in the Southwark Plan that the site represents an opportunity to redevelop a currently underutilised parcel of land in the heart of London to provide a sustainable and high quality office space, food/retail, cultural provision and public realm.
73. The 'Do Nothing' scenario is considered to have no environmental benefits compared with the proposed redevelopment of the site as the 'Do Nothing' scenario would leave an allocated sustainable, brownfield site in central London under used and would not bring forward the various benefits associated with development such as improved public realm and employment opportunities.
74. No alternative sites or locations have been considered for the proposed development as the site benefits from a site allocation and policy support to deliver a strategic development in this location.
75. The ES also describes the design evolution of the scheme which has been

influenced by environmental factors, particularly site connectivity; townscape and heritage; LVMF Views; wind; daylight, sunlight and overshadowing; ecology and biodiversity. As such, the final version of the scheme has been designed having full regard to the constraints and opportunities presented by the site as well as issues raised during the process.

Cumulative impacts

76. The ES considers cumulative effects arising from the proposed development in combination with other surrounding consented and planned developments and where relevant these effects are discussed further in the topic specific chapters later in the report.
77. A detailed assessment of the likely potential and residual impacts of the scheme is provided in the relevant sections of this report, taking into account the ES and the material planning policy considerations. In summary, officers are satisfied that the ES is adequate to enable a fully informed assessment of the environmental effects of the proposal.

Design

78. The NPPF stresses that good design is a key aspect of sustainable development and is indivisible from good planning (paragraph 124). Chapter 3 of the London Plan seeks to ensure that new developments optimise site capacity whilst delivering the highest standard of design in the interest of good place making. New developments must enhance the existing context and character of the area, providing high quality public realm that is inclusive for all with high quality architecture and landscaping. The importance of good design is further reinforced in the Southwark Plan Policies P13 and P14 which require all new buildings to be of appropriate height, scale and mass, respond to and enhance local distinctiveness and architectural character; and to conserve and enhance the significance of the local historic environment. Any new development must take account of and improve existing patterns of development and movement, permeability and street widths; and ensure that buildings, public spaces and routes are positioned according to their function, importance and use. There is a strong emphasis upon improving opportunities for sustainable modes of travel by enhancing connections, routes and green infrastructure. Furthermore all new development must be attractive, safe and fully accessible and inclusive for all

Site context

79. London Plan Policy D3 requires developments to make the most efficient use of land to optimise density, using an assessment of site context and a design-led approach and this is reflected in Southwark Plan Policy P18.
80. The proposal involves the comprehensive redevelopment of the site at the eastern end of Tooley Street/Duke Street Hill. The site currently includes a seven storey concrete commercial building (constructed in the 1970s). A small strip of the eastern edge of the site is in the Tooley Street conservation area and the Borough High Street conservation area lies adjacent to the western site boundary. There are several listed buildings in the immediate vicinity of the site including the Grade II listed St Olaf's House and London Bridge Hospital which

are both located on Tooley Street to the north. The Grade I listed Southwark Cathedral is located further away to the west on the other side of London Bridge and Borough High Street. The report assesses the impact of these proposals on all affected heritage assets below. The immediate context of the site is varied, characterised by principal pedestrian and vehicular routes as well as major rail infrastructure at London Bridge Station.

81. The site falls within the Central Activities Zone (CAZ) and the Bankside, Borough and London Bridge (BBLB) Opportunity Area that are characterised in this location by a rich mix of historic and modern buildings, streets and places; the vibrancy and diversity of its uses; and by landmark buildings and infrastructure, including most noticeably the Shard, which dominates the skyline with its monumental scale and outstanding architecture. The Shard forms the central and tallest element of a group of tall buildings clustered around the station with further tall buildings such as Fielden House and News International consolidating the cluster.

Site layout

82. London Plan Policy D8 requires new developments to create well designed, accessible, safe, inclusive attractive and well-connected public realm where appropriate. The policy sets out a range of criteria which new public realm should address. In respect of site layout and public realm Southwark Plan Policy P13 requires developments to ensure that the urban grain and site layout take account of and improve existing patterns of development and movement, permeability and street widths; to ensure that buildings, public spaces, open spaces and routes are positioned according to their function, importance and use and to ensure that a high quality public realm that encourages walking and cycling and is safe, legible, and attractive is secured. Landscaping must be appropriate to the context, including the provision and retention of street trees and use of green infrastructure. The detailed design of all areas of public realm must be accessible and inclusive for all ages and people with disabilities as well as providing opportunities for formal and informal play and adequate outdoor seating for residents and visitors.
83. The proposed site layout and building footprint is rational and legible. This is reinforced not only in the built form but in the new central and site wide public realm, providing a high quality public open space with high levels of access and informal surveillance.
84. The building is positioned in an east west alignment, following the line of both Tooley Street and Duke Street Hill to the north and south respectively which serves to reinforce the street pattern and urban form. The building is tallest at its eastern edge and progressively steps down eastwards in response to heritage views and the London Bridge cluster and would comprise a foothill building on the periphery of the cluster meeting the requirement set out in the NSP London Bridge Vision AV.11 that development should “Make sure that the new standard of London Bridge Station is upheld and the Shard remains significantly taller and more visible than surrounding buildings as the stations landmark;”. The building would be raised above ground in order to provide a site wide public realm and pedestrian routes through the site. This would address the requirement of Policy P17, 2. 6. Tall Buildings to provide a functional open space that is appropriate to

the height and size of the building and to policy P17, 2.5 which requires tall buildings to respond positively to local character and townscape as it would open up views of the listed buildings to the north on Tooley Street.

Height scale, massing and tall buildings

85. London Plan Policy D9 deals with tall buildings. The policy sets out a list of criteria against which to assess the impact of a proposed tall building (location/visual/functional/environment /cumulative). London Plan Policy D4 requires that all proposals exceeding 30 metres in height must have undergone at least one design review or demonstrate that they have undergone a local borough process of design scrutiny.
86. Southwark Plan Policy P17 deals with tall buildings. The policy sets out a list of requirements for tall buildings. The policy states that tall buildings 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

Point of landmark significance

87. A point of landmark significance is where a number of important routes converge, where there is a concentration of activity and which is or will be the focus of views from several directions. In this case the site, located at the confluence of Duke Street Hill / Tooley Street and the southern bridgehead of London Bridge is at a historic point of landmark significance not just for the borough, but also for London being at the primary crossing to the City of London from the south. It also provides one of the primary access points to London Bridge station, a strategically important transport hub.

Height proportionate to significance of the location and size of the site

88. Its location one block back from the foreshore and within the London Bridge Opportunity Area as defined by the GLA means that introduces height in a layered way behind the established development at the River edge. The proposed design also responds to its landmark location by stepping down from east to west to better reflect the historic scale and open character at the crossing when viewed from the River. In this way the proposal has responded appropriately to this landmark location with the design sculpted to reflect its sensitive historic context.

89. Set at 104m in height it is around a third of the height of the Shard nearby and is considered a 'foothill' building to its 300m plus prominent neighbour. In this respect, the proposal reflects its location within the London Bridge cluster, contributing to but not challenging the primacy of the Shard. It achieves this by remaining low at its western end – closest to the axis of London Bridge and the Grade I Listed Southwark Cathedral – and rising to its peak at the eastern end – closest to the Shard – where it is no taller than around a third the height of the Shard and with an articulated massing that is noticeably lesser than the combined Fielden House and News International buildings also visible in most approaches, reinforcing its role and position as a 'foothills' building. It is important to note that this is not just a function of the numerical absolute height of the building in relation to the height of the Shard. Critical to the buildings design is its careful consideration of its form and modelling in long, medium and short views within the wider city townscape, including axial views along London Bridge, Borough High Street and Tooley Street. Officers have worked with the developer to achieve revisions to the scheme that have ensured the relationship with the London Bridge cluster and the Shard meet the requirements of both AV.11 London Bridge Vision and P17 Tall Buildings. Consequently the height of the building is carefully moderated and sculpted around its sensitive location largely outside, partly inside and adjacent to conservation areas. As a consequence the proposed design is considered to be set at a height that is proportionate to the significance of the proposed location and the size of the site.

Positive contribution to the London skyline

90. The area immediately around London Bridge Station has been transformed since the construction of the Shard and a number of developments immediately around it. The site, which is an NSP allocation site NSP55 is considered "suitable for taller buildings" providing those taller buildings do not detract from the primacy of the Shard and subject to "considerations of impacts on existing character, heritage and townscape. The design is mannered and defined by three key characteristics: its elevation (with tree-like stilts) from the street; its division into four slender and stepped blocks each crowned by a light-weight frame; and its deeply recessed glazed gaps between each stepped block and prow-like ends. In this way the proposal has form and silhouette that gives it a strong architectural identity - recognisable from various approaches and intended to make a positive contribution to the London skyline and landscape.
91. Due to the long slender plan of the building the initial concern from officers was that the building would appear slab-like, potentially dominating views especially from the north or south. In effect, with its highly articulated form which steps down from 23 storeys, to 20, 17 and 14 storeys (east to west) the form is highly sculpted and articulated. At its western end the light-weight frame becomes an open terrace and the building appears to steps down further to 11-storeys to align more closely with the 1 London Bridge.
92. In this way the building profile reflects how the design has adapted to respond to its context. It takes a form that echoes the profile of the London Bridge cluster, with the tallest buildings located immediately around the Shard and more modest heights around the foothills of the cluster and particularly beyond the immediate cluster where heights respond to the conservation areas. In this way the design

is considered appropriate, taking into account the cumulative effect of existing tall buildings nearby.

Not cause a harmful impact on strategic, LVMF or borough views

93. The application is accompanied by a TVIA which provides detailed and zoomed views of viewpoints within the LVMF, Important Borough Views and wider townscape views. In these instances views are considered both in their own right to chart the townscape impact of the proposed design, and separately to recognise any harm caused. The impact on all views will be considered further in the heritage section below. In conclusion, whilst there would be some harm to views as a result of the tall building, the harm is considered to be less than substantial.
94. Five key areas have been assessed as part of the TVIA:
1. Tower of London World Heritage Site;
 2. LVMF Views 2A.1 from Parliament Hill and 3A.1 from Kenwood House
 3. Views of Southwark Cathedral;
 4. River view from London Bridge; and
 5. Views from Borough High Street.
95. These views are considered in the context of the policy and how they contribute to the significance of heritage asset and the impact of the development on all of these views will be considered further in the heritage section below. The NPPF sets out in paras 193-196 the need to give great weight to the conservation of the heritage asset (and the more important the asset, the greater the weight); evaluate the extent of harm or loss of its significance; generally refuse consent where harm is substantial; and, where necessary, weigh this harm against the public benefits of the scheme. Para 203 goes on to advise taking into account the effect of a scheme on the significance of a non-designated heritage asset. With regard to the tested views, whilst there would be some harm resulting from the development, the harm is considered to be less than substantial and outweighed by the public benefits. This is set out in more detail in the heritage section below.

Respond positively to local character and townscape

96. The majority of the site is not within a conservation area, but as noted earlier that part at the junction of Tooley Street with Duke Street Hill is within a conservation area and, there are conservation areas bounding the site and a number of listed buildings in close proximity. The surrounding townscape is varied both in terms of architectural style and scale, with heights range from the tall buildings at The Shard, News International, Fielden House and Guys Hospital Tower forming a clear cluster, and to the lower rise buildings along Tooley Street and Borough High Street Reflecting their location within conservation areas. Large scale modern commercial buildings are also found at More London. The proposed development sits within the wider area of the cluster focussed around London Bridge station but has been designed to carefully reflect its position on the periphery of the cluster, maintaining the Shard as the significantly taller and more visible central, point of this cluster. The architectural design and materials proposed would successfully integrate with both the modern commercial

developments and the richness of the heritage buildings that are located close to the site. In addition by lifting the building up it would better reveal adjacent listed buildings on the north of Tooley Street (can you state which ones please, I believe London Bridge Hospital and St Olafs House) as referenced in para 76. In this respect the development would respond positively to the local character.

Provide a functional public space

97. A key design feature and one of the public benefits of the scheme is the ground floor public space and garden. To achieve this the entire building has been raised on V-shaped stilts and the result is a landscape that will extend from Duke Street Hill to Tooley Street. The area involves a significant change of levels as Duke Street Hill rises to meet the Bridge and Tooley Street extends beneath and the landscape is designed around this to provide accessible routes across with steps, ramps and access platforms integrated seamlessly into the landscape.
98. The information submitted with the application demonstrates that, due to the low established scale and wide proportions of the station approach to the south, coupled with the substantial height of this space, the degree of solar penetration, even in winter, will ensure that the landscape will benefit from good exposure to sunlight. The devotion of much of the ground floor to landscape offers the prospect of a development that is both well lit and landscape led.
99. Further, the landscape will not only provide mature planting, trees and lush greenery and a place to sit, but it will also accommodate the commuting public moving to and from London Bridge Station. The station bridge will be re-provided as an elegant slender feature with escalators from Duke Street Hill. The removal of the existing utilitarian bridge will enhance views along Duke Street Hill towards the Grade 1 listed Southwark Cathedral, and will enhance the setting of the Duke Street Hill and Borough High Street conservation areas as well as the townscape of Duke Street Hill. This will provide a further public benefit to the scheme. The success of the development will rely to a large degree on the success and sustainability of this landscape. A condition and obligation is recommended to ensure that its detailed design and mature character of the landscape is delivered and maintained in the longer term. Accordingly it is considered that this landscape could provide the required functional public space appropriate to the height and size of the proposed building.

Provide a new publicly accessible space at or near to the top of the building

100. The proposal includes a restaurant at Level 11 which is accessible to the public. This is prominently located at the bridgehead with an open terrace in the framed feature at the top of the first tier. This will not only offer unique views of the River Thames but good views of Southwark Cathedral and even St Paul's to the west.

Architectural design and materials

101. Southwark Plan Policy P14 sets out the criteria for securing high quality design. In respect of architectural design and materials the policy requires all developments to demonstrate high standards of design including building fabric, function and composition; presenting design solutions that are specific to the site's historic context, topography and constraints; responding positively to the

context using durable, quality materials which are constructed and designed sustainably to adapt to the impacts of climate change.

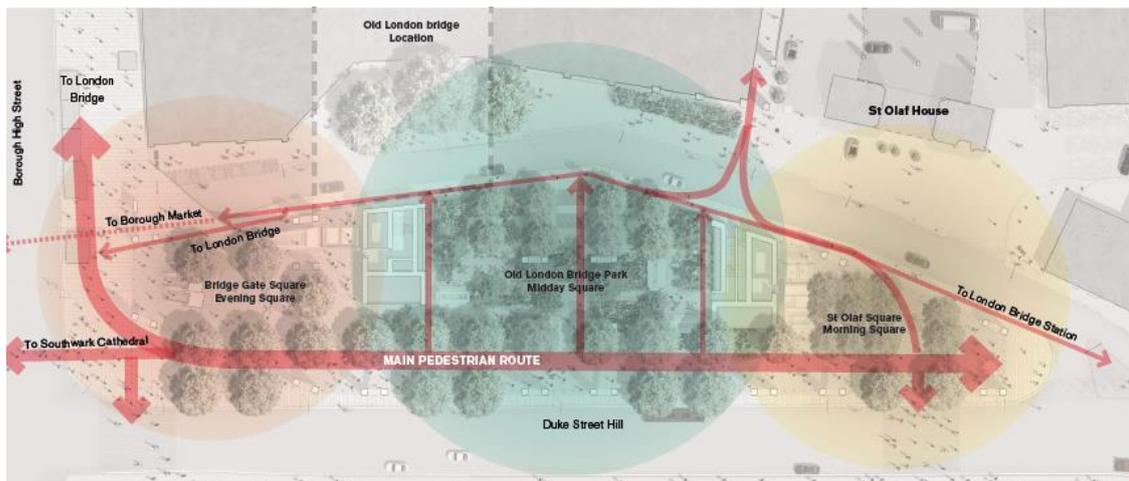
102. The proposed building would comprise four distinct stepped elements that would step down westwards. The facades exhibit a clear order, rhythm, texture and depth. The detailed elevational architecture of the building complements its massing strategy which successfully breaks up the mass and slenderises the proportions of the building particular in east and west views.
103. The architects have taken elements of the surrounding townscape to inform the architectural design and choice of materials for this development. The material palette has been informed by the recurring colours and textures found in the local context. The indicative material for the solid parts of the façade is brushed anodised aluminium in light bronze for the frame and the external louvres. Precast white polished concrete is proposed for the exposed columns and tapered floor slabs. The canopies to the south have integrated photovoltaic panels at optimal angles for energy generation and are located in a way so as to not be visible either from street level or the interior of the building. The windows are deeply recessed within the expressed triple stack frame attribute to the façade an inherently three dimensional appearance and allows the play of shadows to add modelling and articulation to the façade. The windows are clear double and triple glazing panels.
104. The proposed material for the exposed columns and beams at ground plane is white polished concrete. The choice of material for the extensive ceiling below the building is based on the intention to maximise the perceived brightness of the space. In order to maximise light levels, the finishing for the extensive ceiling is profiled white back-painted glass. This type of finish will reflect and bounce the light towards the ground. The material itself appears bright, reducing the contrast between the sky and the ceiling.
105. Overall, the elevational architecture is considered to be of the highest standards and would be successful in expressing the building's component parts well and giving the building a clear and coherent identity. The materials proposed are considered to be appropriate and high quality and would be secured by condition.

Landscaping, trees and urban greening

106. London Plan Policy G7 and Southwark Plan Policy P61 recognise the importance of retaining and planting new trees wherever possible within new developments, Policy G5 requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. The policy identifies a scoring system for measuring urban greening on a particular site (Urban Greening Factor) and suggests a target score of 0.3 for predominately commercial development.
107. With regards to trees, London Plan Policy G7 states that development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees, there

should be adequate replacement based on the existing value of the benefits of the trees removed. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

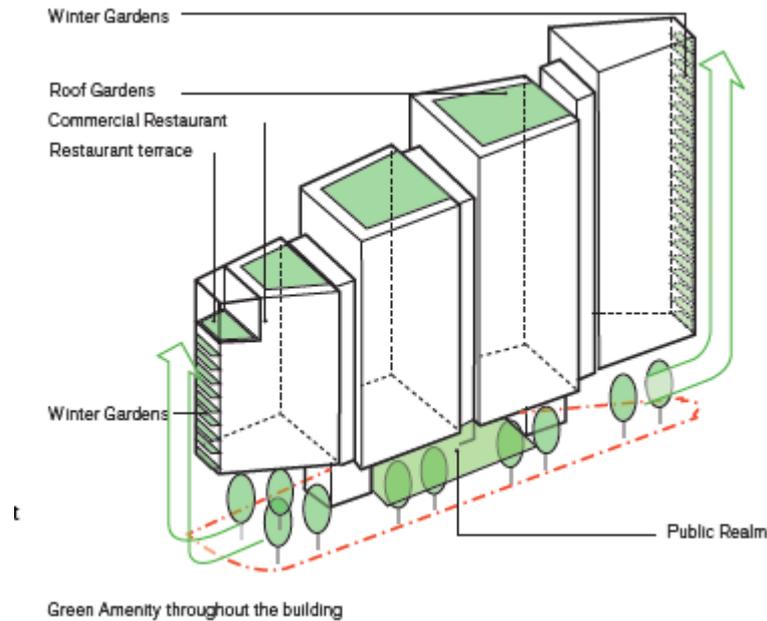
108. At the present time the site comprises mainly buildings, walkways and hard landscaping with a limited number of street trees on Duke Street Hill. Therefore the opportunity exists for significant improvements to be made in terms of soft landscaping proposals and contribution towards urban greening. At present there are a total of nine trees on site seven are Category C and two are Category B. These trees are located on street within the site boundary and it is proposed that all nine trees be removed in order to enable development to take place and to undertake a long term planting strategy for the site that would see trees appropriately located in order to maximise their impact on public amenity.
109. As part of the re-development plans, a total of 38 new trees would be planted on site and these would be a mixture of single and multi-stem species. This would be a significant improvement on the current situation and would result in higher value trees with greater canopy cover than at present. The 38 new trees would also contribute to the 981.98% biodiversity net gain that would be achieved in the site and is supported by the council's ecologist.
110. Landscaping and public realm are central to the development's design and are considered to be one of the most significant public benefits of the scheme, with the potential to transform the street level experience of this part of London Bridge. The proposed building would be elevated by up to 18.5 metres in order to accommodate a fully accessible public realm beneath the building, which would improve pedestrian connectivity, visual linkages and create a series of generous and accessible new public spaces. The public realm would comprise three character areas, each designed in response to their orientation and how they would be used.



111. Morning Square would be located to the eastern end of the site and would capture the morning sun. This area would accommodate the escalators and lift/stairs providing access to the replacement footbridge connecting to London Bridge Station. Whilst this area would be landscaped and feature tree planting, it would also accommodate public art and some seating areas reflecting a balance between hard and soft landscaping in response to its character as a

busy node at the junction of Tooley Street and Duke Street Hill.

112. Midday Square would be located centrally within the site and would be the most heavily landscaped and tree planted part of the public realm. Midday Square would also provide pedestrian linkages to Tooley Street and the entrances to the theatre and retail units. The character of Midday Square would be of a soft landscaped space with trees, green walls, seating and further opportunities for local/public art.



113. Evening Square makes up the third and final part of the public realm. Located to the west of the site and named due to its position in taking advantage of the evening sun, this part of the public realm has been designed as the front door to the development with the access points for the offices above being located centrally within this space. This is likely to be a high transit space and this is reflected in the fact that it would be a more hard landscaped space than Midday Square and Morning Square although there would still be ample room for tree planting.
114. The three ground level squares each serve a different purpose and have been designed accordingly. Whilst all three squares would feature tree planting, the central Midday Square would be the hub of the green planted spaces, drawing people in and providing access to the retail and theatre entrances on Tooley Street. Midday Square would contribute most significantly to the Urban Greening Factor for the site.
115. When originally submitted, the site was anticipated to achieve a score of 0.3 UGF and as such would have fully complied with London Plan Policy. However, due to TfL requirements for increased footpath widths to accommodate increased pedestrian flows (including landing areas for escalators, stairs and lifts serving the replacement footbridge), some of the landscaping at ground floor level had to be redesigned. This resulted in a reduction of the proposed number of trees from the original 40 to the now proposed 38. As such the Urban Greening Factor has been reduced to 0.28UGF.

116. The proposed development dramatically increases green cover across the site through green walling, street trees, and intensive planting and intensive green roofs. It is considered that this level of planting would not be possible without raising the building above ground and as such the score of 0.28UGF is considered acceptable in this instance taking into account the site specific circumstances and the requirements set out by TfL.

Design Review Panel

117. The proposal was reviewed by the Design Review Panel in September 2020 at pre-application stage. The panel criticised the loss of the pedestrian bridge and the visual impact of the proposal especially from the north and east and they questioned the quality of the landscape and the prominence of the Southwark Playhouse.
118. Overall the panel welcomed the involvement of a high profile architect on this proposal. They noted the ambition to create a highly sustainable building in this location and concluded that this is a key piece of urban infrastructure at this important river crossing.
119. In response to these issues the bridge would now be reinstated as part of this development. Further, the TVIA includes the views considered by the panel and especially the view from the east along Tooley Street where the building is at its tallest. In this respect the elevated building and prow-like design presents a narrow vertical profile from this side that will accentuate its verticality without causing harm to the established setting.

Designing out crime

120. Policy D3 of the London Plan 2021 states that measures to design out crime should be integral to development proposals and be considered early in the design process. Developments should ensure good natural surveillance, clear sight lines, appropriate lighting, logical and well-used routes and a lack of potential hiding places. Policy P16 of the Southwark Plan 2022 reinforces this and states that development must provide clear and uniform signage that helps people move around and effective street lighting to illuminate the public realm. These issues are important considerations and the development would be required to achieve Secure By Design Accreditation. This would be a conditioned requirement of any consent issued, as recommended by the Metropolitan Police.

Fire safety

121. A Fire Safety Strategy (updated in June 2021) has been submitted to demonstrate compliance with the requirements of London Plan Policy D12. This policy requires developments to achieve the highest standards of fire safety and ensure that they identify suitably positioned unobstructed outside space for appliances, incorporate features to reduce risk to life and injury in the event of a fire; designed and constructed in order to minimise the spread of a fire; and provide suitable and convenient means of escape for all building users.
122. The policy requires that the Fire Strategy statement should include information

in terms of the building's construction, means of escape for all users, fire suppression features and measures that would reduce risk to life and injury. The strategy should also include details of how access would be provided for fire service personnel and equipment as well as provision for appliances to gain access to the building.

123. The submitted Fire Statement has been prepared in accordance with Policy D12 of the London Plan. The Fire Strategy sets out that the building would be served by an automatic suppression system in the form of sprinklers with a fire detection and alarm system. The strategy also provides information on emergency power supplies, means of escape, basis of design, means of construction and the competency of the strategy authors. The development would include dedicated fire fighter stairs and lifts as well as well as combined passenger/evacuation lifts.

Heritage considerations

124. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to consider the impacts of a development on a listed building or its setting and to pay special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Further, 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.
125. Chapter 16 of the NPPF contains national policy on the conservation of the historic environment. It explains that great weight should be given to the conservation of heritage assets. The more important the asset, the greater the weight should be (paragraph 199). Any harm to, or loss of significance of a designated heritage asset should require clear and convincing justification (paragraph 200). Pursuant to paragraph 201, where a proposed development would lead to substantial harm or total loss of significance of a designated heritage asset, permission should be refused unless certain specified criteria are met. Paragraph 202 explains that where a development would give rise to less than substantial harm to a designated heritage asset, the harm should be weighed against the public benefits of the scheme. Paragraph 203 deals with non-designated heritage assets and explains that the effect of development on such assets should be taking into account, and a balanced judgment should be formed having regard to the scale of any harm or loss and the significance of the asset. Working through the relevant paragraphs of the NPPF will ensure that a decision-maker has complied with its statutory duty in relation to Conservation Areas and Listed Buildings.
126. Development plan policies (London Plan Policy HC1 and Southwark Plan Policies P19, P20 and P21) echo the requirements of the NPPF in respect of heritage assets and require all development to conserve or enhance the significance and the settings of all heritage assets and avoid causing harm.

The Tooley Street Conservation Area

127. The property is not listed but part of the site is included in the Tooley Street

conservation area. The eastern-most corner of the site is within the Conservation Area boundary which skirts the existing reinforced concrete building, and includes the historic buildings of the River frontage to the north and extends a short distance to the west along Duke Street Hill. Given that part of the site is within the conservation area it is necessary to assess impacts on the Tooley Street Conservation area as required by s72 (as well as its impact on neighbouring conservation areas).

128. The existing building is a mid-rise concrete-framed building in the brutalist style designed around an elevated walkway which connects London Bridge Station to the London Bridge crossing. The building is an interesting example of this typology but is not listable and is not of sufficient architectural interest or significance to warrant its preservation. The building itself is not in a conservation area. Its demolition can be justified and considered in the planning balance overall.
129. The adopted Conservation Area Appraisal (2003) defines the significance of the Hays Wharf Sub-Area (Sub-Area 1) primarily in the views “from north bank where it presents a solid block of development from London Bridge to the Crown Court at Battle Bridge Lane.” To the south and within the blocks the appraisal goes on to highlight a “*range of intimate spaces, from the bustle and café character of Hay’s Galleria, to the quite precious and private drive-through to the entrance of St Olaf House.*” This duality of character is noted in the appraisal and in the hierarchy of significance the river presence is rightly prescient.
130. The eastern-most edge of the site is currently a widened pavement. It does not include any historic built fabric and its inclusion in the conservation area outline is not due to a particular historic feature. In essence its inclusion appears to be that the open space in this location contributes to the appreciation of the significance of the Conservation Area, primarily because it offers unobstructed views of a number of listed buildings including the Grade II* listed St Olaf House and its drive-through entrance when viewed from Duke Street Hill and thus contributes positively to its setting.
131. The proposal responds to this intimate setting and the entire building is raised on stilts to a height of approximately 15m in this location. The effect of elevating the new building in this way will be that a new soffit is created on the site approximately at the parapet height of the historic townscape offering largely uninterrupted views, and in some cases framing, the local views of these buildings.
132. The building is at its tallest on the eastern edge of the site and as such is likely to have the greatest material impact on this small part of the conservation area on which it sits. However, the substantial elevation of the building especially in this location, its careful consideration of views of the historic townscape from Tooley Street and Duke Street Hill will not only conserve the open setting of these buildings but would also, when one considers the enhancements to the public realm, offer a considerable enhancement to the presence of the conservation area from the south.
133. The river view of the conservation area and the presence of Sub-Area 1 in particular is largely unaffected by the proposal. Views of St Olaf House and its

relationship to the area are unaffected – with the stepped profile of the tall building layered behind the primary river frontage and merging with other tall buildings around the base of the Shard which retains its primacy as the centre of the cluster.

134. In conclusion, it is considered the effect of the proposal on the conservation area, due to its substantial elevation above the ground plane and localised emphasis on the visibility of preserved historic townscape, the opening up of previously restricted views of buildings and especially of the southern façade and distinctive drive-through entrance of the grade 2* St Olaf House, the proposal is only likely to cause limited harm to the character and appearance of the conservation area. Whilst the presence of a tall building in this location cannot go unnoticed, its elevation on columns above the ground plane, its emphasis on the public realm and its sensitive response to features of significance to the historic townscape, ensures that the limited harm caused is at the lowest order of Less than Substantial as defined by paragraph 199 of the NPPF (2021).
135. The NPPF requires that harm should be avoided and, where identified clear and convincing justification for that harm should be required. In this case, part of the justification includes the minimal impact on the physical space within the conservation area, the fact that no built fabric of significance is affected and the way that the design deliberately sets out to minimise any impact on the setting of the conservation area, and in fact reveals and frames adjacent listed buildings leading to less than substantial harm being caused as set out in the above paragraphs. . The NPPF goes on in paragraph 201 to state that, where less than substantial harm is considered the only justification that can be considered in the balance are any substantial public benefits arising due to the development. In this case the devotion of most of the site to a publicly accessible landscape, the provision of a public footbridge to the station that enhances the setting of both the Borough High Street and Tooley Street conservation areas and the setting of the grade 1 listed Southwark Cathedral and the inclusion of a new theatre as part of the development, together with the conservation benefits of opening up views of the historic townscape are considered to outweigh the limited harm to the character and appearance of the conservation area and meets the test set out in guidance policy.

Listed buildings

136. The property sits between two conservation areas, the Tooley Street CA to the east and the Borough High Street CA to the west. As well as those closest to the site listed in paragraph 32, the wider area includes a number of other listed buildings, and a more comprehensive list is set out below:
137. The Grade I Listed:
- Southwark Cathedral; and
 - The George Inn;
- The Grade II* Listed:
- St Olaf House;
 - 9A St Thomas Street;
 - Nos 9, 11 and 13 St Thomas Street; and
 - Guys Hospital main buildings including Wings and Chapel;
- The Grade II Listed in the immediate area:
- Southern archway of London Bridge;

- Hibernia Chambers;
- Bridge House;
- 6, 8 and 10 Borough High Street;
- Joiner Street Bridge;
- London Bridge Hospital; and
- 29,31 and 33 Tooley Street

138. The proposal, due to its substantial scale, will alter the settings of the immediate Listed buildings. In an urban setting such as this where modern buildings are often located immediately adjacent to heritage assets it is not unusual to consider such change but in doing so it is necessary to consider the significance of each asset, the contribution of their setting to that significance and to understand where harm may arise to their significance as a consequence of the development. In this context, the devotion of the ground plane to a public space coupled with the elevation of the building by around 11 to 15m will help to establish a new setting for the affected heritage assets opening up views that are currently unavailable and the replacement of the existing utilitarian footbridge with a lighter structure better reveals parts of the heritage townscape. How this impacts individual heritage assets is set out in the following paragraphs.

139. The application is accompanied by a TVIA which provides detailed and zoomed views of LVMF defined views, Important Borough Views and wider townscape views. In these instances views are considered both in their own right to chart the townscape impact of the proposed design and separately to recognise any harm caused. In this respect five key areas have been the focus of attention:

The Tower of London

1. The Tower of London World Heritage Site.

140. The proposal is likely to appear as an incidental feature from the wider Tower environs, set behind the More London development and the River frontage buildings and within the Shard Cluster, similar in height to the recently completed Fielden House and London Bridge Place buildings.

141. The TVIA demonstrates that the building would not be visible from the views of highest significance identified in the Tower of London Setting Study, the Inner Ward views around the Tower itself and the views from Royal Mint Court. In this respect it is considered that the proposal does not give rise to harm to the Outstanding Universal Value of the Tower of London World Heritage Site.

St Paul's Cathedral

2. The LVMF Views 2A.1 from Parliament Hill and 3A.1 from Kenwood House.

142. In the LVMF view from Parliament Hill the proposal is located immediately to the left of the dome of St Paul's. The proposal will appear in the Wider Setting Consultation area, in the backdrop to the Strategic Landmark of St Paul's Cathedral. The LVMF notes that in the backdrop to St Paul's is the London Bridge cluster currently visible in in this view. It goes on to state that: "*the Shard with its distinctive shape and high quality materials provides a strong orientation point to allow the viewer to recognise St Paul within the wider panorama.*"



143. The building's stepped form responds deliberately to this specific view with the first step aligning with the top of the peristyle. Beyond that and from the second step the building is angled away from the dome. The zoomed-in view demonstrates that the stepped profile does not interact with the dome above the peristyle and it will remain below the distant horizon.
144. It is considered that there is some limited harm arising to this LVMF View (2A.1) due to the close interaction between the silhouette of the building and the dome and peristyle. Notwithstanding this, the harm is considered to be of the lowest order of less than substantial harm, only apparent in the highly zoomed in view and not detracting from the viewer's ability to recognise and appreciate St Paul's Cathedral. The GLA has not raised a concern about this impact of the proposal in this London Panorama and whilst Historic England have not raised a formal objection in this regard, they have expressed concerns that the development would cause some harm to this protected view. In conclusion the less than substantial harm arising could be considered in the balance against the public benefits arising from this proposal.
145. In the view from Kenwood House the proposal will appear a short distance to the left of the dome of St Paul's Cathedral. Here too the proposal will be at the edge of the backdrop Wider Setting Consultation area of St Paul's. The zoomed-in view once again demonstrates that the proposal is lowest closest to the dome and rising away from it and stays well below the distant horizon. The GLA have not raised any concerns about this view. It is not considered that the development gives rise to any harm to this protected view.



146. In conclusion, the proposal does not give rise to harm in this LVMF View (3A.1) and will not affect the viewer's ability to recognise and appreciate the Strategic Landmark of St Paul's Cathedral

Southwark Cathedral

3. Views of Southwark Cathedral

147. Whilst the wider London views are significant, the local views of and around Southwark Cathedral have been a key consideration. In this respect one of the main areas of concern has been the approach to the Cathedral along Winchester Walk from the west. The Cathedral itself is Grade I Listed and is the centre-piece of this part of the Borough High Street Conservation Area.
148. In early design iterations, the proposed building potentially clashed with the cathedral spire in views along Winchester Walk. During the course of the pre-application discussions the design was amended with a reduction in height from 128m to 104m in height. At this reduced height, the TVIA now demonstrates that the tower would be partially visible from the western-most end of Winchester Walk to around its mid-way point on the southern (Borough Market Car Park) side of the street. Whilst only visible from these limited viewpoints it has to be borne in mind that the street is usually very busy and so this is a view that will be experienced by relatively large numbers of people. Nonetheless the revisions to the development are considered to have significantly reduced the impact of the scheme on the listed cathedral building as set out below.
149. In assessing this view officers considered in particular that this is an experience from within the conservation area and one of the main approaches to the cathedral terminated by a clear view of the cathedral spire. This approach and view contributes positively to the significance of the cathedral and the conservation area and their settings. The TVIA demonstrates that visibility of the tower, which would appear behind the Cathedral, to the left hand side of the tower, and whilst it fills a space currently open to the sky it does not intrude into

the crown of the cathedral spire. The greatest visibility is at the western end of Winchester Walk and by around mid-point the proposed building disappears from view. As a consequence, bearing in mind the significance of the cathedral (being Grade I Listed) and the degree of visibility, it is considered that there is some harm arising and that this harm is of the lowest order of less than substantial.



150. In these cases decision-makers have to consider whether the limited harm arising to the setting of the cathedral and the conservation area due to the degree of visibility from Winchester Walk, can be justified convincingly. The harm is considered to be at the lowest order of less than substantial when we consider the extent of the impact i.e. that the scheme fills in a currently open sky space to the left of the tower when viewed from Winchester Walk and then the scheme disappears from view behind the cathedral as one gets closer to the cathedral and its environs.
151. Any harm to a designated heritage asset must be given considerable weight, and balanced against the public benefits arising in accordance with the NPPF and thus the statutory duties which are engaged. In carrying out that balancing exercise, it is relevant to note that the harm is partly driven by one of the substantial public benefits of the development which is the ground floor public landscape, which could only be delivered successfully by the raising the building on stilts above the ground plane. Raising the building in this way has resulted in some visibility of the scheme in conjunction with the cathedral from Winchester Walk.
152. Further, it is considered that the delivery of a high quality landscaped public space in the Colechurch House site will deliver wider benefits, not only to those accessing the site but also the substantial numbers of commuters using London Bridge Station every day.
153. In conclusion, it is considered that the lowest order of less than substantial harm

to the setting of Southwark Cathedral and the Borough High Street Conservation Area due to the visibility from Winchester Walk is outweighed convincingly by the substantial public benefits arising from the development including the ground floor public landscape, the affordable workspace (including the re-provided Southwark Playhouse) and the exemplary quality of the design.

The setting of listed buildings (in order of proximity)

154. *St Olaf House*

St Olaf House is Grade II* listed and as such is one of the borough's most significant listed buildings. Its primary façade is onto the River where it forms part of the block of development forming a continuous and highly significant frontage visible from the north bank. The development will have a limited effect on the views of St Olaf House from the north and will appear in the backdrop as a highly articulated mass and stepped glazed façade. Due to its articulated massing and stepped profile, rising from the lowest point at the west to the highest point in the east, the design compliments the group of buildings around the Shard, appears in the secondary layer of visibility to the rear of St Olaf House and does not detract from its river setting.

155. To the rear onto Tooley Street St Olaf House has a distinguished frontage, drive-through portico and a public underpass offering access to the River Walk. This allows the viewer to enjoy and appreciate its authentic Art Deco design and its features of significance close-up. By lifting the entire building up on stilts and turning most of the site into a publicly accessible landscape the development has opened up routes and views of the southern facade St Olaf House – previously largely hidden behind the current Colechurch House. The design has specifically responded to this challenge with the degree of elevation above the ground plane calibrated to optimise visibility of this listed building and open up new views and routes to and from the River. In this respect the harm arising as a consequence of the substantial building being located so close to this important Listed Building is counter balanced to a degree by the enhancement to the setting of the listed building created by the redevelopment and the residual harm is considered to be limited and of a lesser order of Less than Substantial harm.

156. In conclusion, it is considered that the lowest order of less than substantial harm to the setting of St Olaf House due to the scale and massing of the development is outweighed convincingly by the substantial public benefits arising from the development including the enhancement to the setting of St Olaf House, ground floor public landscape, the affordable workspace (including the re-provided Southwark Playhouse) and the exemplary quality of the design.

157. *London Bridge Hospital*

London Bridge Hospital comprises a group of buildings and includes Nos 15, 17-25 and 29-33 Tooley Street. The significance of the London Bridge Hospital is two-fold, firstly in respect of its River presence (where it forms part of that cohesive group of buildings together with St Olaf House and the Hays Galleria) and secondly in respect of its street frontage on Tooley Street.

158. The development will have a limited effect on the views of London Bridge Hospital from the north and will appear in the backdrop as a highly articulated mass and stepped glazed façade. Due to its articulated massing and stepped

profile it is considered that the design compliments the group of buildings around the Shard, will appear in the backdrop and to the side of London Bridge Hospital and does not detract from its river setting.

159. When viewed from Tooley Street the Grade II Listed London Bridge Hospital forms a rich and cohesive historic townscape. It is a group that defines this part of the conservation area and mainly appreciated from the south along Tooley Street. By lifting the entire building up the development has opened up views of the London Bridge Hospital and with the soffit of the new building elevated to the parapet height of the hospital buildings, it reinforces the cohesive historic character of this group of listed buildings. In this respect the harm arising as a consequence of the substantial building located so close to this important Listed Building is considered to be limited and of a lesser order of Less than Substantial harm.
160. In conclusion, it is considered that the lowest order of less than substantial harm to the setting of London Bridge Hospital, due to the scale and massing of the development elevated above the view-line is outweighed convincingly by the substantial public benefits arising from the development including the ground floor public landscape, the affordable workspace (including the re-provided Southwark Playhouse) and the exemplary quality of the design.
161. *Southern archway of London Bridge*
The significance of this listed structure is largely contained within the structure of the modern bridge with fragments visible on the east-west approach along Tooley Street/Montague Close. The development will have no impact on the setting of this heritage asset invisible in the easterly approach (where it would be located behind the viewer) and largely shielded from view by Bridge House in the approach along Montague Close.
162. *Joiner Street Bridge*
The significance of this listed structure is largely contained within the structure of the modern London Bridge Station and visible mainly and recessed in the pedestrian entrance/exit to the Station. The development will have no impact on the setting of this heritage asset invisible in the northerly approach from Tooley Street and shielded from view by the station superstructure as one exits.
163. *Hibernia Chambers, Bridge House and 6, 8 and 10 Borough High Street*
The significance of this group of buildings is in their relationship with London Bridge and the Cathedral to the rear. On the Bridge they are a cohesive group of historic buildings forming a largely unbroken historic frontage on the western edge of the bridge approach. They are a striking group of buildings for historic guilds and cooperatives currently repurposed as commercial offices with some retail. Their primary facades and highest significance are onto the Bridge but to the rear they form the built edge of Southwark Cathedral environs.
164. The development is to the east of these buildings and outside the conservation area and when considered in the context of the four lanes of highway of the Bridge and the largely modern townscape of the eastern edge of the Bridge the impact on the setting of these heritage assets is considered to be limited. Further, and by starting low at the bridgehead and rising away from these buildings to the east the development is considered to have a limited impact if

any on the setting of these heritage assets.

165. *The St Thomas Street group*

To the south of the Station is a number of Listed Buildings mainly located within Sub Area 4 of the Borough High Street. These include the Grade I Listed George Inn and the Grade II* Listed 9A St Thomas Street, Nos 9, 11 and 13 St Thomas Street; and Guys Hospital main buildings including Wings and Chapel.

166. The development is hidden from view by the recently completed News Building and as such will not impact on the settings of these highly significant Listed Buildings

167. In conclusion and when the significance of the listed buildings identified above are considered together with the contribution of their settings any harm arising due to the development is limited and where it is noted has been considered to be at the lower end of Less than Substantial. In this case, any harm to the listed buildings and their settings is comprehensively outweighed by the substantial public benefits arising due to the development including the improvement to the setting of some of the listed buildings, ground floor public landscape, the affordable workspace (including the re-provided Southwark Playhouse) and the exemplary quality of the design.

4. The river view from London Bridge

168. From this location, the development is seen in the context of the London Bridge cluster, the River frontage and Southwark Cathedral. As a primary approach from the north and one that encompasses heritage assets of the highest significance, this view encapsulates the contrasts of the modern city – the scale and design of the modern development sitting alongside the historic setting and fine grain of the historic city, but with the new interventions standing clearly separate from the key historic features.



169. In this view the stepped profile and articulated form of the design is apparent. The building introduces height closer to the River edge but does so in a measured way – set behind the warehouses forming the River edge. Beyond that, its stepped profile and vertical articulation appears to respond to the lower scale and finer grain of the Borough High Street Conservation Area and Cathedral to the right of the bridge whilst rising to the left to reflect the modern scale of the Shard, which continues to remain significantly taller than and the towers that surround it, including this proposal.
170. In this context the proposal is considered to complement the established townscape and form of the London Bridge cluster as it reduces in height towards Southwark Cathedral. There is no additional harm arising to any heritage assets as a consequence and the proposal is considered to comply with policy in this view.

5. The Borough High Street View

171. This view is located at the busy junction of Borough High Street and Southwark Street in the southern approach to London Bridge. Here the viewer is located within the Borough High Street Conservation Area and where a number of listed buildings are visible in the foreground. In the background and also visible in the view are the Shard and a number of the glass-clad towers clustered around it, with the Shard maintaining its primacy in the view.
172. The proposal appears to mediate between the glass-clad buildings in the backdrop, and the more distant form of 1 London Bridge in this view. The lower tier is most prominent with the second and part of the third tier also visible in the gap between London Bridge Place and 1 London Bridge. Its stepped form together with the open framed design of the lowest tier appear to respond to the urban setting and it does not appear discordant in this view. Further, its slender vertical blocks and its masonry materiality and adds a new and dynamic materiality to the cluster.



173. Accordingly, it is considered that there is no harm arising to the character and appearance of the conservation area and its setting in this view. The stepped form of the building appears to lead the eye of the viewer towards the location of London Bridge and its design contributes positively to the amenity of the area. In this way the building forms part of a highly articulate backdrop highlighting the bridgehead beyond and creating a focus to the view that is centred on the River crossing.
174. In conclusion, the development is an elegant and highly articulated design that is exemplary in many respects. The stated ambition to establish a highly sustainable development together with a ground plane devoted to publicly accessible landscape is unique and potentially ground-breaking. Added to that, the provision of a high quality and well established theatre as well as an important piece of commuter infrastructure – the bridge – will ensure that the development will deliver exemplary design in this location.
175. In assessing the proposal Officers have recognised some less than substantial harm (as defined by paragraph 199 of the NPPF) arising to heritage assets due to this proposal. Of the harms identified all have been at the lowest end of the spectrum. In particular the impact of the proposal on views of Southwark Cathedral and the Borough High Street Conservation Area from Winchester Walk as well as the LVMF View 2A.1 from Parliament Hill is highlighted in the assessment above
176. The NPPF goes on to state that any harm to heritage assets should be avoided and requires compelling justification before it can be considered in the balance. Paragraph 202 goes on to state that: *Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*

177. In this case the substantial public benefits arising including the ground-based public landscape, the re-provided Southwark Playhouse Theatre and affordable workspace, the re-provided and improved pedestrian bridge as well as the exemplary quality of design are considered substantial public benefits that provide compelling justification for the limited harm identified. These public benefits are in addition to the redevelopment of an under-utilised site, the delivery of high quality office building and a new rooftop restaurant.

Archaeology

178. Archaeology has been considered in full in Chapter 12 of the ES. Baseline data has been collated within a 250m study area, agreed by the Southwark Archaeology Officer. A suitable range of sources are stated to have been consulted. The ES has considered the potential effects resulting from the demolition and construction of the proposed development on the following potentially sensitive assets (receptors):
- Prehistoric remains;
 - Roman remains;
 - Later medieval building foundation remains and cut features;
 - Post-medieval building remains, including basements and cellars; and
 - Remains of John Rennie's 1831 London Bridge.
179. The site occupies a highly significant location within Southwark within a Tier 1 Archaeological Priority Area. The line of medieval and post medieval Borough High Street will run through the footprint of this building. It is most likely the Roman alignment of Borough High Street also runs through the footprint of Colechurch House. The boundary of Bermondsey St Olave's historic parish is also within the footprint of the building. This site has the potential to contain archaeological evidence from both sides of the historic alignment of Borough High Street from the roman, post roman, medieval and post-medieval periods. The site includes buildings likely to occupy the west side of this road.
180. Much of the footprint of Colechurch House has previously been excavated, and has received limited publication despite the significance of the remains excavated. The site also contains remains of the grade II listed John Rennie, 1831 London Bridge. These have been examined in archaeological work for the base of the Southwark Needle, now located within the pavement of London Bridge, at the junction with Duke Street Hill. The remains excavated appear to consist of granite corbel tables, indicating the façade of the bridge might continue to the south.
181. The remains of Rennie's 1832 London Bridge are known to survive within the site boundary. Archaeological monitoring by the PCA recovered two parts of a probably corbel table, that are now displayed on Duke Street Hill, in construction works for the Southwark Needle. The east wall of this grade II listed building is within the red line boundary of the site, and appears to be within the construction area. Archaeological evaluation should enable a clearer definition to be made of the character and significance of surviving remains.
182. The applicants note the agreed WSI for an archaeological evaluation in paragraph 12.46 of the ES chapter. The works for this WSI have been partially

carried out; one trench was excavated within the existing basement of Colechurch House, the second trench, to the south wall was not possible due to the needs of essential retail within the building to use the space.

183. The excavated trench revealed another historic basement that was not shown on Goad's insurance mapping. However, it was apparent from this trench that the sands and gravels below Colechurch House, within this historic property boundary survived to a level paralleled at Fennings Wharf, therefore there is the potential for prehistoric archaeology, in the form of burials and cut features to be present where sand and gravels from the eyot surface survive. Above these natural deposits was a depth of archaeological material.
184. Within the footprint of the proposed basement level there is therefore the potential for archaeology from the prehistoric, roman, medieval and post-medieval periods to be present. These remains have been impacted by previous development of the site, and earlier archaeological works. Due to the scale of foundations of modern Colechurch House, its predecessor buildings and previous archaeological excavations, survival of archaeological material is likely to be varied across the site.
185. Following the results of the evaluation, further archaeological mitigation works should be undertaken to ensure the suitable management of the archaeological resource on site. Early consideration should be made to ensure the provision of access to the evaluation and subsequent mitigation works and to timetable in the needs of access into the construction programme of the building.
186. The presence of fabric from grade II listed John Rennie's London Bridge and Colechurch House itself are both of archaeological interest. The management of built fabric from the listed bridge will be a key heritage concern.
187. Whilst there would be no adverse effects on archaeological heritage as a result of the completed and operational development, it is acknowledged that there would be unavoidable effects during the demolition and construction phase. Demolition and construction works including the breaking out of existing foundation/floor slab, the excavation of the basement, pile removal, insertion of new piles and lift pits, and landscaping works are likely to have an impact on potential buried archaeological assets.
188. A phased programme of archaeological mitigation comprising an initial archaeological trenched evaluation, which would help to establish the nature, extent and significance of any archaeological remains within the site is agreed as the most appropriate way to offset the significant adverse effects of the development. The proposed mitigation strategy, in addition to the scope of the assessment, has been discussed and agreed with the Council's Archaeologist.
189. The results of the evaluation would enable an informed decision in respect of an appropriate mitigation strategy for any significant archaeological assets which could comprise targeted excavation if areas of significant remains are identified. A watching brief could be carried out for remains of lesser significance. This would ensure that significant archaeological assets are not removed without record.

190. As such, the council's archaeologist has recommended conditions relating to archaeological evaluation, archaeological building recording, archaeological mitigation, archaeological foundation and basement design, archaeological reporting and a final condition setting out a public engagement programme.

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

191. The importance of protecting neighbouring amenity is set out Southwark Plan Policy P56 which states "Development should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users". The adopted 2015 Technical Update to the Residential Design Standards SPD 2011 expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.
192. A development of the size and scale proposed will clearly have potential significant impacts on the amenities and quality of life of occupiers of properties both adjoining and in the vicinity of the site. The proposal has required an EIA in order to ascertain the likely associated environmental impacts and how these impacts can be mitigated. The accompanying Environmental Statement (ES) and addendum deals with the substantive environmental issues. An assessment then needs to be made as to whether the residual impacts, following mitigation, would amount to such significant harm as to justify the refusal of planning permission.

Outlook and privacy

193. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear. The closest neighbours to Colechurch House are the buildings to the north on Tooley Street, none of which are in residential use. The proposed development would maintain or exceed the minimum distances as set out in the supplementary planning document and as such it is considered that there would be no significant adverse impact in terms of overlooking or loss of outlook.

Daylight

194. A daylight and sunlight report has been submitted as part of the Environmental Statement. The report assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
195. The BRE Guidance provides a technical reference for the assessment of amenity relating to daylight, sunlight and overshadowing. The guidance within it is not mandatory and the advice within the guide should not be seen as an instrument of planning policy. The guidance notes that within dense urban environments and areas of modern high rise buildings, a higher degree of obstruction may be unavoidable to match the height and proportion of existing buildings. This site benefits from an allocation in the Southwark Plan that indicates that redevelopment of the site could include taller buildings and there are existing tall buildings in the area such as The Shard, News International building and Guys Hospital Tower which are in close proximity to the site as well as consented

schemes along St Thomas Street to the south of London Bridge Station.

196. The BRE sets out the detailed daylight tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted. This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by about 20% of their original value before the loss is noticeable. In terms of the ES, the level of impact on loss of VSC is quantified as follows;

Reduction in VSC	Level of effect
0-19.9%	Negligible
20-29.9%	Minor
30-39.9%	Moderate
40% +	Major

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

198. The ES considers the effects on the following neighbouring buildings:

- 27-23 Tooley Street (London Bridge Hospital - Main Building);
- 29-33 Tooley Street (London Bridge Hospital – Urgent Care Centre);
- Shard Place (Residential)
- 15-25 Tooley Street (Emblem House/Denmark House – London Bridge Hospital);
- 13 Tooley Street (St Olaf’s House – London Bridge Hospital);
- Southwark Cathedral
- Southwark Cathedral Annex

199. 29-33 Tooley Street, Shard Place and Southwark Cathedral and annex would all remain fully compliant with the BRE in terms of both VSC and NSL and will not be considered further in the report. The tables below outline the general results in terms of the loss of VSC and NSL that would be experienced by the remaining buildings and a more localised assessment of the affected properties is detailed below.

Table – VSC Results

Property	No. of windows tested	No. retaining at least 80% of their baseline value	No. with minor adverse impact of up to 29.9% reduction in VSC	No. with moderate adverse impact of between 30%-39.9% reduction in VSC	No. with major adverse impact of over 40% reduction in VSC
27-33 Tooley Street	75	48	1	14	12
15-25 Tooley Street	217	123	39	39	16
13 Tooley Street	127	6	3	19	99

Table NSL Results

Property	No. of rooms tested	No. retaining at least 80% of their baseline value	No. with minor adverse impact of up to 29.9% reduction in VSC	No. with moderate adverse impact of between 30%-39.9% reduction in VSC	No. with major adverse impact of over 40% reduction in VSC
27-33 Tooley Street	57	48	2	6	1
15-25 Tooley Street	31	26	3	1	1
13 Tooley Street	71	24	22	3	22

27-33 Tooley Street

200. This building is in healthcare use and is the main building of London Bridge Hospital. The BRE is designed to assess daylight and sunlight impacts on residential properties and as such cannot be strictly applied to non-residential uses. However, in this instance it is considered useful in helping to gauge the level of impact on daylight and sunlight as a result of the proposed development. A total of 75 windows have been assessed for VSC and 57 rooms assessed for NSL. Whilst 48 windows would comply with the BRE in terms of VSC, 14 windows would see moderate losses of up to 39.9% and 12 windows would see losses in excess of 40% which is categorised as a major loss of VSC.
201. However, these 75 windows serve 57 rooms and all of the rooms have been assessed for NSL with 48 rooms complying with the BRE and only one room experiencing a major loss of NSL. Many of the windows that would see losses of VSC would experience these losses, in some part, due to existing obstructions such as proximity of adjacent buildings. Overall, given the high level of NSL compliance and the transient nature of the use of these rooms, the impact on this building is considered to be acceptable.

15-25 Tooley Street

202. This building is in healthcare use and provides outpatient facilities for London Bridge Hospital. A total of 217 windows have been assessed for VSC and 31 rooms assessed for NSL. Whilst 123 windows would comply with the BRE in terms of VSC, 39 windows would see moderate losses of up to 39.9% and 16 windows would see losses in excess of 40% which is categorised as a major loss of VSC.
203. The 217 windows assessed all serve rooms that provide outpatient facilities and as such are transitory in their use. It should also be added that of the 38 rooms assessed for NSL, only one window would see a moderate loss of NSL and one window would see a major loss. Overall the effect on this building is considered to be minor. Given the high level of NSL compliance and the transient nature of the use of these rooms, the impact on this building is considered to be acceptable.

13 Tooley Street

204. This building (St Olave's House) also provides outpatient facilities as part of London Bridge Hospital. Of the 127 windows assessed for VSC, only six would comply with the BRE. There would be 19 windows experiencing moderate losses of VSC and 99 windows experiencing major losses of VSC. In terms of NSL, 71 rooms were assessed and 24 would remain compliant. The remaining rooms would see minor losses (22 rooms), moderate losses (three rooms) and major losses (22 rooms). The overall effect to this building is considered to be moderate and although the effect on amenity of these rooms from reduced daylight levels is recognised, the impact is considered acceptable given the use of the building as outpatient facilities and commercial uses.

Sunlight

205. Only the building at 13 Tooley Street has been assessed for sunlight as this is the only building that meets the orientation criteria specified by the BRE in terms of the positioning and location of rooms/windows. Whilst there would be a loss of sunlight in terms of both annual sunlight hours and winter sun, the level of loss is considered acceptable taking into account the existing sunlight levels and the non-residential nature of the building which accommodates outpatient facilities and some commercial spaces.

Overshadowing of amenity spaces

206. The ES has also considered overshadowing of amenity spaces including the Thames Path, the River Thames and Southwark Cathedral. On the 21 March it was determined that there would be no effect on Southwark Cathedral or the annex. There would be some additional shadow cast throughout the day on the Thames Path however this effect would be negligible given the existence of substantial buildings already in existence closer to the Thames Path. Additionally, there would be some shadow cast throughout the day on the River Thames, however this effect would not be significant.
207. On the 21 June it was determined that there would be no effect on the Thames Path or River Thames. Whilst there would be some additional shadow cast

throughout the day on Southwark Cathedral and the annex the effect would be negligible.

208. On the 21 December it was determined that there would be no effect on the Thames Path or Southwark Cathedral and annex. Whilst there would be some additional shadow cast throughout the day on the River Thames, the effect would be not be significant.

Conclusion on daylight and sunlight

209. The daylight and sunlight assessment presented as part of the ES demonstrates that there would be several windows that would see noticeable losses of VSC and rooms that would see noticeable losses of NSL beyond the BRE guidelines. None of the windows or rooms that would be affected are homes and as such the standards of the BRE cannot be strictly applied. The affected windows and rooms serve patient and outpatient facilities at London Bridge Hospital. The use of these spaces is transient in nature and as such would not lead to any significant adverse impacts on users.
210. The application site has been identified in policy, including in The Southwark Plan, as being suitable for a taller building and it is anticipated that there would be a degree of impact as a result of redevelopment. Developing sites in highly urbanised environments often results in some unavoidable impacts to daylight and sunlight. Recognising the challenges associated with developing inner city sites, the numerical targets given in the BRE are expected to be treated with a degree of flexibility, having due regard for the existing and emerging context within which these sites are located. The application site is within a Central London Opportunity Area and accordingly the standards should be applied with some degree of flexibility.
211. Given the small number of windows overall that would experience significant effects and the site specific circumstances set out above including the nature of the affected rooms and windows, it is considered that the overall impact would be acceptable given the benefits of the proposed development in redeveloping a currently under-used site, the provision of a significant new public realm, offices, theatre, retail and significant employment opportunities. On balance, officers consider that, when reading the BRE guidance with the required flexibility, and in view of the positive benefits of the development proposal, the degree of harm to amenity would not justify withholding planning permission in this case.

Solar glare

212. Solar glare has been considered as part of the ES in Chapter 11. A total of 25 road and 24 rail locations have been tested. Sixteen of the 25 road locations are considered to either have no effect or negligible effects. At the remaining nine locations it is considered that minor adverse effects could occur and these are not considered to be significant. This is because solar reflections occur within 30° to 10° or between 10° to 5° of the driver's line of sight for a short period of time. A number of these locations include viewpoints which are not affected by solar reflections from the proposed development or with reflections which occur

above the 5° visor cut-off line, which the driver may deploy should this become necessary.

213. In terms of the rail viewpoints, the reflective elements of the scheme would be visible from within 30° of the driver's line of sight on approach to London Bridge Station on seven tracks. All 24 viewpoints considered would experience minor adverse effects which would not be considered significant. This is because the train would be travelling at a reduced speed as it approaches London Bridge Station and the majority of solar reflections occur above the 5° cut off line so the driver would be able to deploy the visor should this become necessary.

Transport and highways

214. Chapter 9 of the NPPF seeks to ensure that transport issues are properly addressed as part of development proposals. Proposals must assess the impact upon existing transport networks, promote and maximise opportunities for sustainable transport modes whilst mitigating any adverse transport related environmental effects and must make a significant contribution to improving accessible movement and permeability as a key priority for place making. Paragraph 111 states "development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe".
215. This approach is reflected in Chapter 10 of the London Plan and Southwark Plan Policies P49 – P55, which require development proposals to maximise sustainable modes of transport by minimising car journeys, to deliver enhanced walking and cycling opportunities and safe, accessible routes to public transport. Developments should be car free save for disabled parking provision and mitigation will be secured where necessary to address impacts upon the road and public transport networks to serve new developments
216. This application was accompanied by a Transport Assessment and transport has been fully considered as part of the ES under chapter 7 – Traffic and Transport. The documents have been reviewed by the Council's Transport Policy and Highways Teams, and Transport for London (TfL).

Site context

217. The site is bounded by Tooley Street to the north and east with Duke Street Hill forming the southern boundary and the western boundary being flanked by Borough High Street as it approaches London Bridge. Duke Street Hill (A200) and Borough High Street/London Bridge (A3) both form part of the TLRN whilst Tooley Street is a Southwark- controlled road.
218. London Bridge London Underground (LU) station is located opposite the application site and provides Jubilee and Northern line services. London Bridge National Rail Station is also located opposite the site and is served by Southern, Southeastern and Thameslink services. London Bridge Station has been substantially redeveloped and improved with significantly upgraded capacity and accessibility. There are a total of 15 bus routes available within a 150 metre radius of the application site including services from the adjacent London Bridge bus station which is operated by TfL. Consequently, the site has a Public

Transport Accessibility Level (PTAL) of 6b (the highest possible on a scale of 1-6b).

219. There is a cycle hire station located on Tooley Street adjacent to the site, with a capacity of 21 cycles. The local area is well covered by Legible London signage, including a large 'key' sign on the corner of Duke Street Hill where it meets Tooley Street. There are a range of cycle routes adjacent to or in close proximity to the site including:

- Route 4 of the National Cycle Network (NCN);
- Route 22 of the Local Cycle Network (LCN);
- Cycleway 4 (CW4) which links Bermondsey, Canada Water and Greenwich.

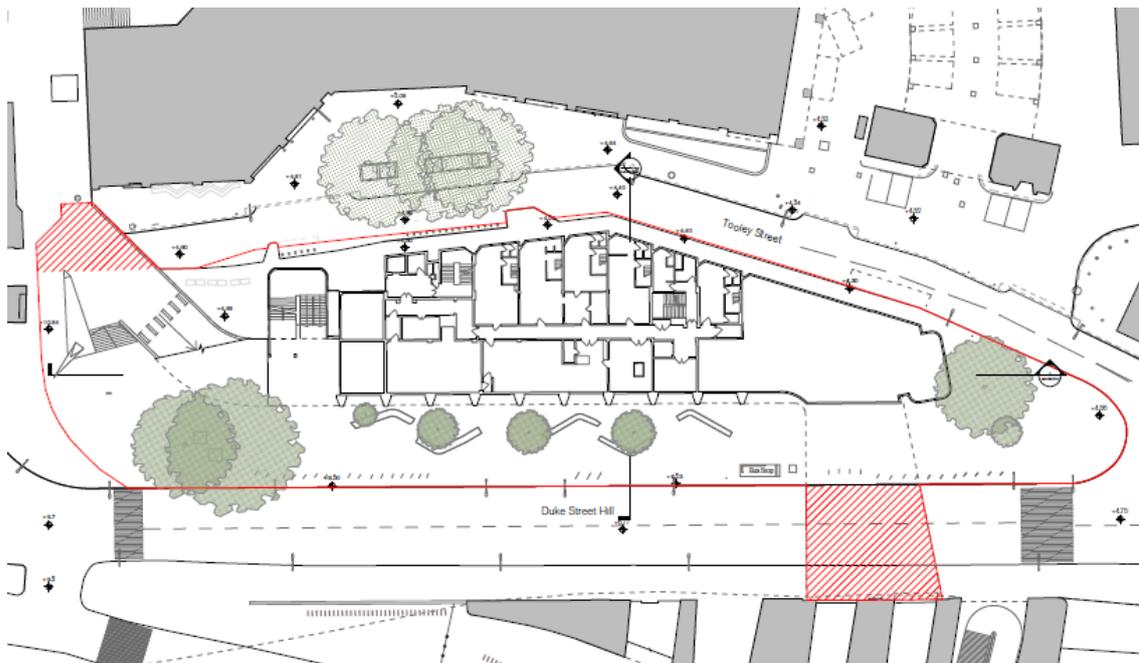
220. Riverboat services are provided from London City Pier which is located approximately 370 metres to the west and provides connections to Battersea, North Greenwich, Tower Bridge and Westminster.

Site layout

Existing

221. Vehicular access is currently gained from Tooley Street to the rear of the site. From London Bridge there begins an elevated walkway (London Bridge Walk) that rises along the Duke Street Hill frontage and subsequently becomes a footbridge that provides direct access to London Bridge Station. Access to Colechurch House and the majority of the retail units is taken from this elevated walkway.

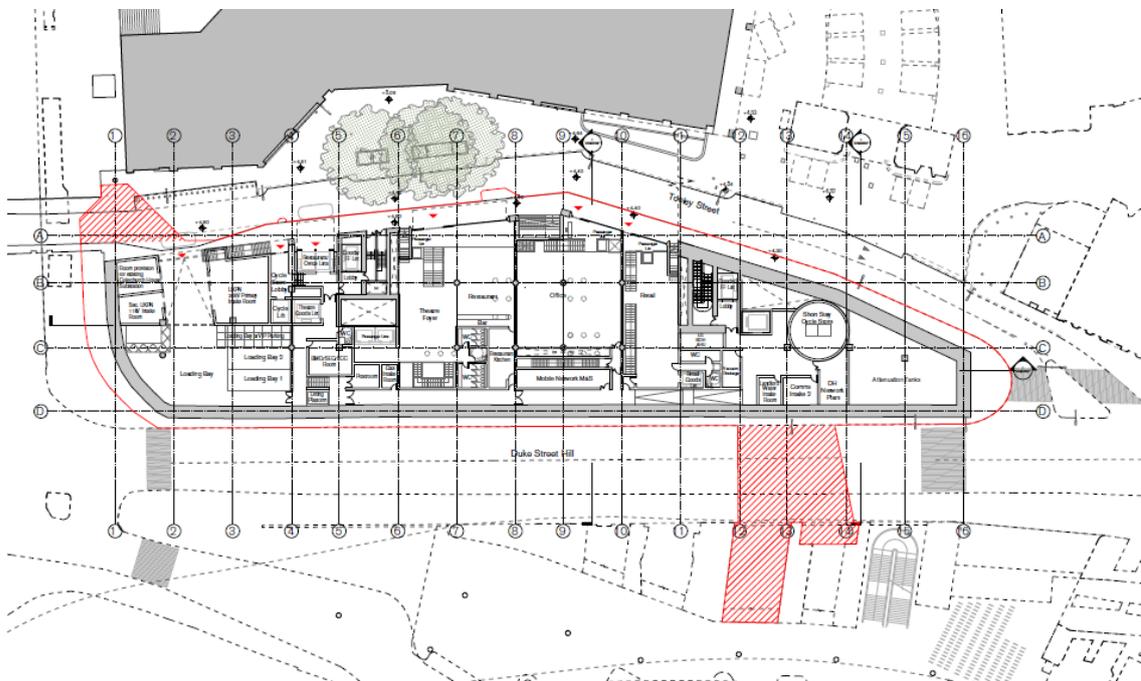
Image – Existing arrangement



Proposed

222. The existing Colechurch House and elevated walkway and footbridge would be demolished. The new building would be elevated well above street level, allowing a new public realm to be provided at grade with visual and pedestrian links through the site from Duke Street Hill to Tooley Street. A new replacement pedestrian footbridge linking to London Bridge Station would be provided at the eastern end of the site in the bridge's current location.
223. The development proposes to retain a single vehicular access point in the existing location on Tooley Street at the northern end of the site. This would be located at lower ground floor level, taking into account the difference in levels between Duke Street Hill and Tooley Street, and would provide access to a loading area with three servicing bays each with capacity to accommodate an 8m long box van. The loading area would also provide access to the accessible parking space.

Image – Proposed arrangement



224. Pedestrian access to the site would be achieved from a number of locations depending on what facility/use is being accessed. The retail units, theatre and affordable workspace would be accessed from Tooley Street whilst the offices and restaurants would be accessed via escalators at grade on Duke Street Hill adjacent to London Bridge. Access to the new pedestrian footbridge linking to London Bridge Station would be gained from the escalators and lifts that are proposed from the eastern end of Duke Street Hill.

Trip generation

225. In terms of proposed vehicle movements associated with the proposed development, the Council's Transport Policy Team have reviewed the applicant's Transport Assessment as well as the travel surveys within the TRICS database. The office part of the development would be anticipated to generate 57 and 52 two way vehicle movements in the morning and evening peak periods respectively. The remaining uses (gym, restaurant, retail, theatre) would be

expected to generate 16 and 11 two way vehicle movements in the morning and evening peaks respectively. Overall, this development would be expected to produce 73 and 63 two-way vehicle movements in the morning and evening peak hours. Although these figures are higher than the vehicle movements predicted by the applicant's consultant, the Council's transport officer considers that this level of net supplementary vehicular traffic would not have any noticeable adverse impact on the prevailing vehicle movements on the adjoining roads.

226. As far as public transport is concerned, the development is anticipated to generate an additional 963 and 1047 two way public transport trips in the morning and evening peaks respectively across underground, train and bus services. Given the high public transport accessibility level of the site and the various options available for public transport, this level of trip generation is not expected to have any significant adverse impact on the public transport network.
227. Additional mitigation/travel plan measures proposed include the provision of cycling shower /change facilities, travel information and appointment of a travel plan co-ordinator who would promote sustainable travel including organising and publicising sustainable travel events in addition to monitoring the travel plan. A Construction Logistics Plan, Demolition and Environmental Management Plan and Travel Plan would be secured in the S106 Agreement alongside contributions towards improved bus services.

Servicing and deliveries

228. It is proposed that all servicing would take place from within a dedicated on-site servicing yard accessed from Tooley Street. This servicing yard would be sufficiently sized in order to accommodate the peak demands of the development without any servicing activities having to take place from the street. The servicing yard would have capacity to accommodate three eight metre long box vans and swept paths have been provided to demonstrate that all vehicles would be able to access and egress the site in a forward gear therefore minimising any highways safety impacts.
229. The development is expected to generate 116 servicing trips per day however this is expected to be reduced significantly through the use of delivery consolidation services. Off-site consolidation is proposed for the site. The primary role of delivery consolidation centres is to reorganise non-perishable goods in order to provide a more economic and environmentally friendly delivery strategy. The key functions of delivery consolidation are to:
- reduce the number of vehicles on the road network surrounding the site;
 - improve vehicle capacity utilisation;
 - undertake deliveries outside of peak hours; and,
 - mitigate against missed deliveries through scheduling.
230. The use of delivery consolidation, which would be secured in the legal agreement, is anticipated to reduce the number of servicing trips by at least 50%.

Refuse storage arrangements

231. Refuse will be stored within a central store in the basement which is sufficiently

sized and located to accommodate all waste generated by the proposed development. The bins would be transferred to the lower ground floor servicing area directly accessed from Tooley Street for collection. These details would be secured by condition.

Car parking

232. London Plan Policy T6 seeks to encourage car free and car limited development as much as possible and sets maximum car parking standards for different uses whilst recognising the need for an appropriate provision of disabled parking and adequate arrangements for servicing. Non-residential uses should provide a minimum of 1 disabled space. All car parking spaces must be fitted with electric vehicle charging points. Southwark Plan Policies P54 and P55 set out car parking standards for various land uses and echo the requirements of the London Plan in terms of setting maximum car parking standards and promoting car free development save for minimum disabled provision.
233. The development is proposed to be 'car free' with the exception of one accessible car parking space which must be equipped with electric vehicle charging facilities. This provision is in line with development plan policies and should be secured by conditions.

Cycle parking and cycling facilities

234. London Plan Policy T5 sets minimum cycle parking standards for different uses. Southwark Plan Policy P53 sets out a higher requirement than the London Plan standards.
235. The development proposes a total of 815 secure cycle parking spaces within a basement store (593 spaces) and an automated cycle store (204 spaces) as well as some cycle parking in the public realm (18 spaces). It is proposed that the existing 34 Sheffield stands located within the public realm, which provide cycle parking for 68 bicycles, be relocated to the automated cycle store.
236. The 815 cycle parking spaces being proposed includes 637 long stay spaces and 178 short stay spaces. All of the basement cycle parking would be long stay whilst the automated cycle store would comprise 16 short stay spaces and an additional 44 long stay spaces. The basement level cycle parking would be accessed by two lifts which are able to accommodate the peak demands of cyclists.
237. The automated cycle store would provide an innovative and efficient approach to cycle parking and has been employed in other major world cities. The store is formed of a large cylindrical drum located within the basement levels of the building and accessed from a 'hub' unit located above ground which cyclists use to access the store. The key information and benefits of the automated store, are as follows:
- The store is available to users 24/7, with no risk to parking overnight;
 - The average retrieval time is only 13 seconds, ranging from 8 to 17 seconds – comparable to the time taken to lock a bike at a conventional stand;

- Traditional parking can appear full even if there is surplus capacity which deters usage. Users are able to clearly and swiftly determine the number of spaces available;
- For large cycle stores it can be difficult to locate cycles or remember where yours is parked. This is not an issue with an automated solution;
- The store enables users to leave possessions (including helmets) attached to the bike and therefore removes the hassle of carrying cumbersome kit with users;
- Users don't have to negotiate doors, lifts or ramps with their bikes.
- Theft of bikes is a deterrent for cycling; and,
- Servicing and maintenance is undertaken on a preventative regime with an exceptionally low incident rate based on comparable usage in other cities

238. The development generates a cycle parking requirement of 804 cycle parking spaces and by providing 815 spaces, there would be an 11 space overprovision which is welcomed.

Pedestrian footbridge

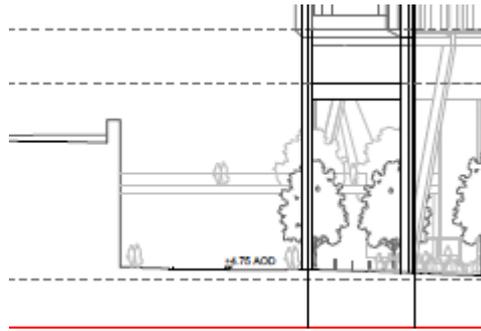
239. When originally submitted, the development proposed the complete removal of the pedestrian footbridge linking to London Bridge Station with no replacement bridge proposed. Following significant objection from TfL and Southwark officers, the developer amended the scheme and now proposes to provide a new replacement footbridge that would safely deliver pedestrians from Duke Street Hill to London Bridge Station.

240. A new bridge is preferred over a refurbished bridge as the existing bridge is not DDA compliant due to the steep access ramps and access to the bridge is not clear for people who may not be familiar with the local area. The existing bridge therefore has significant accessibility and legibility shortcomings. It is also considered that the bridge does not contribute to a safe environment outside of peak times due to the enclosed and covered nature of the bridge, with instances of antisocial behaviour and more serious crimes such as theft and drug use having been reported.

241. The proposed replacement footbridge has been sensitively designed to be incorporated into the proposed public realm in a manner which addresses the existing issues associated with the current bridge. The key attributes of the proposed footbridge are:

- A clear height of 5.03m is maintained above the Duke Street Hill carriageway beneath the bridge – a height which is no less than the existing structure.
- The bridge will measure 5m in width;
- The bridge will be open and transparent, contributing to a safer environment for users;
- The bridge will be designed to be DDA compliant and complemented by a public lift to take people between Duke Street Hill and the bridge; and,
- The bridge will be principally accessed from Duke Street Hill via two escalators and a central stair.

Image – Replacement footbridge



242. In order to preserve access to London Bridge Station at all times and to minimise impacts on the junctions and pedestrian crossings of Duke Street Hill and Tooley Street, the applicant is proposing to provide a temporary footbridge that would be operational prior to the existing bridge being removed and would continue to be operational until such time as the new bridge is completed and available for use by the public. This would be secured in the legal agreement and would assist in minimising disruption to pedestrian movement during the demolition and construction phase.

Pedestrian comfort

243. TfL's Pedestrian Comfort Level (PCL) Assessment Guidance provides an empirical way of determining the acceptability of suitable widths of pedestrian spaces. Whilst it is designed for footways, consideration has been given to the guidance to ensure the suitability of the width of the bridge. The PCL guidance states that a Score of 'C+' is the minimum score that TfL accept for sites at 'transport interchanges' and at locations defined as 'office and retail' which both accurately describe the location of the proposed development. The proposed bridge would meet the C+ requirement during the morning peak and an improved score of B during the evening peak and as such meets the TfL criteria. In terms of pedestrian comfort at ground level, six areas were assessed (as shown below)
244. All areas assessed met the C+ minimum requirement with two areas scoring B- and two areas scoring A-. As such it is considered that the ground level plan would comfortably be able to accommodate the predicted pedestrian flows as designed.

Healthy streets

245. London Plan Policy T2 requires development proposals to demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance. The development provides the opportunity to greatly improve the pedestrian environment, improving the street level experience, improving pedestrian connectivity and legibility, promoting sustainable forms of transport and the use of public transport modes and the re-provision of the footbridge linking to London Bridge Station.
246. This development would be car free save for a single accessible car parking space thus promoting walking, cycling and use of public transport. Contributions have been secured for sustainable transport modes to accommodate the

demand created by future occupiers of the site. The scheme has been designed to enhance public realm on Duke Street Hill as well as improved connections to Tooley Street and the network of streets towards the riverside. The development seeks to significantly enhance biodiversity through the new landscaped public realm on Duke Street Hill and seeks to improve air quality. The scheme has been designed to minimise air and noise pollution as much as possible

Environmental impacts

247. Environmental impacts from traffic and transport have been considered in the ES under Chapter 7. The assessment in the ES focuses on analysing the effects relating to severance (being or the feeling of being isolated or separated from something); pedestrian amenity, fear and intimidation; delay for drivers, cyclists and pedestrians; accidents and safety and public transport. The assessment firstly reviews the demolition and construction period and then looks at impacts once the development is completed and operational.
248. There would be an increase in the number of vehicles on surrounding roads during the demolition and construction phase of the development. Most of the heavy goods vehicles traffic movements associated with the construction will occur outside of the typical highway network peak periods and would be spread evenly throughout the day. The increase in the number of total construction traffic across the assessment area would be no greater than 9% and whilst there would be a greater increase in heavy duty vehicles (HDV's) on Tooley Street, it should be noted that the increase is from a very low baseline figure, particularly in the context of the wider traffic numbers on the remainder of the assessment area and the low absolute increase in vehicle numbers overall. It should also be noted that this increase in vehicle numbers would be short terms and temporary, being associated with the construction phase of the development.
249. There would be no significant adverse effects on pedestrians (in terms of severance, delay, amenity, fear & intimidation), cyclists (in terms of delay, amenity, fear & intimidation) or car drivers (in terms of delay) during demolition and construction of the proposed development. As the effects of demolition and construction traffic would not be significant, no specific mitigation measures are required. However, a Construction Logistics Plan will be prepared and implemented during demolition and construction of the proposed development, in agreement with the London Borough of Southwark, which would include measures in order to minimise the effects from demolition and construction traffic. This would be subject to consultation with London Bridge Hospital in order to minimise disruption to the operation of the facility.
250. Once completed and operational, the assessment has focused on transport considerations such as increased trips on the local highway network. The proposed development is not anticipated to generate delivery and servicing vehicle trips during morning and afternoon peak periods on the transport network owing to the proposed restrictions set out in the delivery and servicing management plan that would restrict deliveries to outside the hours of 8-9am and 5-6pm.
251. There would be no significant adverse effects on pedestrians (in terms of severance, accidents and safety), cyclists (in terms of severance, accidents and

safety) and car drivers (in terms of delay, accidents and safety) once the proposed development is completed and operational. There would be an increase in the number of trips associated with the development on public transport when compared with the baseline conditions, with an increase in the number of people travelling locally by public transport. However, these effects are not considered to be significant or detrimental. As there would be no significant adverse impacts, no specific mitigation is proposed.

252. Consideration has also been given to the potential for cumulative effects that could occur during the construction phase and as part of the completed development. In both instances the effects are considered negligible and as such not significant.
253. Climate change has been considered as part of the traffic and transport ES assessment and it is concluded that it will not have a direct effect on severance; delay; or amenity, fear and intimidation. Changing to more sustainable and active travel modes, lower emission vehicles and improved technology (which would also increase telecommuting and flexible working) could result in a reduction in peak hour traffic and the consequent reduced emissions and traffic volumes could have a benefit for cyclists and pedestrians.

Environmental matters

Flood risk

254. The application site is located within Flood Risk Zone 3A and as such a Flood Risk Assessment, Basement Impact Assessment and Drainage Strategy have been submitted as part of the application. The main source of flood risk in Southwark is as a result of tidal activity within the River Thames which lies approximately 55 metres to the north of the site. It should be noted that the site would benefit from protection by the Thames Barrier up to the 1 in 1000 year event.
255. The proposed development does not include any residential accommodation and all of the proposed uses are classified as "less vulnerable" and as such are acceptable within Flood Zone 3a. The site itself has been assessed as being at low risk of flooding from rivers or tidal sources; from surging sewers; groundwater sources; artificial sources; and surface water flooding. The Environment Agency have been consulted on the proposed development and have raised no objection subject to the imposition of conditions regarding piling; SUDS; and contamination, remediation and verification. These conditions would be attached to any consent issued.

Sustainable urban drainage (SUDS)

256. SUDS has been considered as part of the submitted Flood Risk Assessment. The SUDS assessment reviewed various SUDS strategies for their suitability to be employed within the development. Given the site specific circumstances and limited external space associated with the development, the opportunity to incorporate significant SUDS technologies is difficult, particularly with regards to rain gardens, ponds or permeable surfaces. Instead, the development would incorporate an attenuation tank of a minimum 220 cubic metres to allow the

reduction of the peak discharge rate to 1.34 litres/sec. The proposed location of the attenuation tank is at the lower ground level, to the east of the building.

Noise and vibration

257. The ES considers the potential for noise and vibration impacts during demolition, construction and operation of the development. This is reported within Chapter 9 of the ES. Once complete and operational, the noise and vibration assessment considered noise and vibration effects associated with operational road traffic noise on surrounding roads, operational noise from building services systems and operational noise from the proposed uses.
258. A demolition and construction environmental management plan would be required as part of any consent issued and this would include appropriate noise and vibration management and monitoring measures. The assessment identified that further mitigation measures would be required during the demolition and construction phase in order to reduce the significant effects that were still anticipated to occur. These mitigation measures include noise monitoring at sensitive locations and carrying out works in accordance with best practicable means.
259. Whilst the implementation of mitigation measures would reduce demolition and construction noise levels at sensitive receptors, it is anticipated that some significant adverse effects are likely to remain when works are undertaken nearest to the sensitive receptors. There is expected to be a temporary significant adverse effect in relation to noise at London Bridge Hospital (Olaf House and Emblem House) and overall this has been categorised as moderate adverse.
260. Whilst the remaining receptors nearby would experience some adverse effects during demolition/piling and construction, including One London Bridge (commercial), Minerva House, The Mudlark (residential), and Southwark Cathedral (place of worship), these are not anticipated to be significant. Negligible effects would be experienced at residential receptors Shard Place and the Shard which are not significant.
261. The assessment also identified the potential for significant adverse vibration effects at The Mudlark, Minerva House, Southwark Cathedral, Shard Place, The Shard, London Bridge Hospital (Olaf House and Emblem House) and One London Bridge, given their proximity to the site boundary. The assessment identifies appropriate mitigation measures such as attended monitoring of vibration at the closest receptors to assist in controlling levels at sensitive receptors and the implementation of continuous flight augered piling. With these mitigation measures in place, the effects on these receptors are likely to be temporary and adverse but are not deemed to be not significant.
262. In terms of the completed and operational development, no significant effects are anticipated from road traffic associated with the development. Conditions will be imposed on any consent issued to ensure that all plant noise would be in line with the council's limits and standards. Conditions would also be imposed to limit the hours of use of balconies and terraces. There is the potential for noise breakout from the theatre to the street however this could be controlled by employing suitable sound insulation at construction stage as well as the provision

of sound absorption within entrance corridors and through appropriate attenuation of ventilation pathways. This would minimise any potential effects and impacts and it is considered that there would be no likely significant noise or vibration effects as a result of the completed and operational development.

Ground conditions (land contamination)

263. Ground conditions have been considered and reported in Chapter 13 of the ES and considers the effects of the demolition and construction and operational development on workers, site users, ground gas, soil and water. During the demolition and construction phase, the potentially significant adverse effects on ground conditions were considered to be:
- Potential remobilisation and creation of contaminant pathways as a result of construction activities such as piling;
 - Potential for demolition and construction workers to be exposed to landfill/ground gas;
 - Potential for building materials and construction/demolition workers to be exposed to Unexploded Ordnance (also known as 'UXO') and potential leaching/pollution from existing UXO; and
 - Potential for demolition and construction workers coming into direct contact with contaminated soils and/or contaminated groundwater and/or surface water.
264. The ES assumes that standard mitigation measures would be put in place, such as the implementation of a Demolition and Construction Environmental Management Plan; control of asbestos in line with the 2012 Asbestos Regulations; and surface water run-off from the development being discharged into the combined sewer under Tooley Street. These standard mitigation measures alongside additional mitigation measures will ensure that there would be no significant adverse effects during the demolition and construction phase. The additional mitigation measures that will be secured include the submission of a Piling Method Statement; Ground Gas Mitigation Strategy; and Foundation Works Risk Assessment. Standard conditions would ensure appropriate remediation for all expected and unexpected contamination.
265. Once the development is completed and operational, no significant adverse effects are anticipated, as a result of the implementation of the previously mentioned mitigation measures. It should be noted that the water quality of the surface water run-off will result in a minor beneficial effect on hydrology.

Air quality

266. The application site is located within an Air Quality Management Area and the impact of the development on air quality has been assessed as part of the ES. The results of this assessment are reported in Chapter 8 of the ES. In terms of potential air quality effects, the assessment has considered:
- the impacts of the demolition and construction phase of the proposed development on dust soiling and concentrations of PM10 at existing sensitive receptors during the demolition and construction period;

- the impacts of changes to highway movements;
- the impacts of existing emission sources of NO₂, PM₁₀ and PM_{2.5} on future residents and users of the development;
- whether or not the proposed development is 'air quality neutral'; and
- the cumulative impacts on air quality of the proposed development in combination with cumulative schemes identified in the local area.

267. The demolition and construction phase of a development is temporary and short term. It is acknowledged that there would be an increase in the number of heavy goods vehicles (HGV) on the roads as a result of the demolition and construction phase of the development. All demolition and construction works have the potential to generate significant adverse effects on air quality without appropriate mitigation measures in place. In line with standard air quality guidance, mitigation measures will be put in place to ensure that there are no significant effects. Mitigation measures will include use of dust suppression equipment (such as fine water sprays); prohibition of HGV's from idling; use of a delivery schedule to minimise local disruption; recycling of on-site concrete; pre-demolition soft strip of the building followed by a floor by floor demolition; and provision of wheel washing facilities. With these mitigation measures in place there would be no significant air quality effects during the demolition and construction period, which by their nature would be short term and temporary.

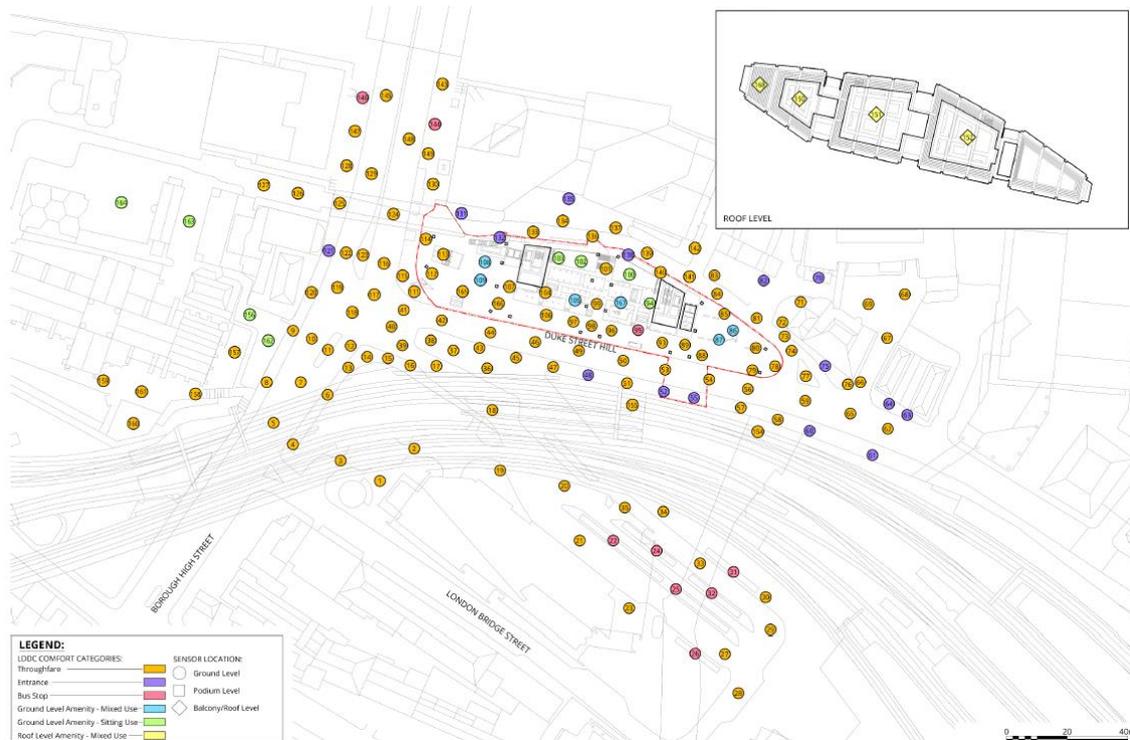
268. In terms of the completed development, road traffic emissions associated with the development were assessed for nitrogen dioxide as having beneficial effects at St Olaf House and Denmark House on Tooley Street and at London Bridge Hospital (Urgent Care Centre). A slight adverse impact was identified at two receptor locations at Denmark House however these are not considered to be significant and Denmark House does not provide patient accommodation. Negligible effects were recorded at all other receptors and no significant effects were identified overall. For PM_{2.5} and PM₁₀ all effects were negligible, and therefore not significant. On this basis there is no requirement for additional mitigation for the operational stage of the development and the scheme would meet or exceed Air Quality Neutral.

Wind

269. Wind microclimate has been considered as part of the ES and the results are set out in Chapter 10 of the ES. The assessment seeks to understand whether any undesirable wind conditions would be created on site or within the surrounding area as a result of the proposed development. It considers if the resultant wind speed changes would be suitable for the intended use of specific locations around and within the site in terms of comfort and safety.

270. The assessment of the wind conditions requires a standard against which the measurements can be compared. This assessment of the wind tunnel results adopts the Lawson Comfort Criteria which are the well established guidelines that have been in use for over 30 years. The Lawson Criteria establishes four pedestrian activities (comfort categories) taking into account that less active pursuits require more benign wind conditions. The four categories include: sitting, standing, strolling and walking.

271. The assessment considered areas within the site, at ground level (such as thoroughfares and building entrances), roadways, pedestrian crossings, bus stops, amenity areas (at ground floor and podium level including seating areas), and roof terraces. In addition, areas around other buildings surrounding the site (such as building entrances), roads, nearby bus stops, car parks and thoroughfares have been tested. The image below details the probe locations that have been used as well as their current use:



272. The ES has tested a number of scenarios, including Configuration 1- baseline (the existing situation); Configuration 2 – The proposed development with existing surrounding buildings; Configuration 3 - The Proposed Development with Cumulative Surrounding Buildings; Configuration 4 - Proposed Development with Proposed Landscaping and the Existing Surrounding Buildings; Configuration 5 - Proposed Development with Proposed Landscaping and the Cumulative Surrounding Buildings; Configuration 6 - Proposed Development with Proposed Landscaping, Wind Mitigation and the Existing Surrounding Buildings; and Configuration 7 - Proposed Development with Proposed Landscaping, Wind Mitigation and the Cumulative Surrounding Buildings.

273. For the purposes of the assessment, the most relevant configurations that will be addressed in more detail are Configuration 1; Configuration 6 and Configuration 7. Configuration 1 relates to the existing building and surroundings (baseline). The ES notes that during the windiest season, the current conditions range from suitable for sitting to uncomfortable for all pedestrian use. There are several instances of conditions being one category higher than their intended use such as the bus stop (probe location 26) within London Bridge Bus Station whereby conditions are suitable for strolling as opposed to standing.

274. Wind conditions during the summer season are typically the same or one category calmer ranging from suitable for sitting to walking use within and

surrounding the site. There is one existing location with strong winds with the potential to be a safety concern for cyclists and more vulnerable pedestrians in the existing context. This is probe location 1 which sits at the west end of the News International Building where are winds exceeding 15m/s for approximately 23 hours per year.

275. Configuration 6 assess the wind conditions with the proposed development in place alongside the proposed landscaping, wind mitigation and the existing surrounding buildings. In terms of pedestrian comfort, the ES notes that during the windiest season, wind conditions would range from suitable for sitting to strolling use on-site and sitting to walking use off-site. During the summer season, wind conditions on and off-site would typically be one category calmer with on-site conditions ranging from sitting to standing use.
276. On-site thoroughfares around development would have wind conditions ranging from suitable for standing to strolling use during the windiest season and would represent negligible to minor/moderate beneficial effects. Off-site thoroughfares around the proposed development would have wind conditions similar to those in the baseline, ranging from suitable for sitting to uncomfortable for all pedestrian use during the windiest season. This would be consistent with the baseline scenario and would represent a negligible (not significant) effect. Furthermore, there would be no significant adverse effects at any entrances, bus stops, roads or car parks.
277. Ground floor amenity areas both on and off-site have also been considered. On-site ground floor amenity areas, such as the new public spaces would have wind conditions ranging from suitable for sitting to standing use during the summer season with effects from the development ranging from negligible to minor beneficial. Off-site ground floor amenity areas around the proposed development would have wind conditions similar to those in the baseline, ranging from suitable for sitting to standing use during the summer season and would represent a negligible effect.
278. With regards to strong winds, the only location where strong winds would be anticipated would be at probe location 1 and this is the same as the conditions under the baseline scenario and as such is not an impact of the development.
279. Configuration 7 is largely the same as Configuration 6 with the exception that Configuration 7 includes cumulative surrounding development within the assessment as opposed to the existing townscape. With the inclusion of the proposed landscaping and wind mitigation in the context of cumulative surrounding development, wind conditions off-site would be as presented in Configuration 6 throughout the year and there would be no significant adverse effects.
280. The ES demonstrates that wind conditions across the site and surrounding area would range from sitting to walking use throughout the year with generally calmer conditions in the summer months. Proposed mitigation would help reduce unsuitable conditions and it is noted that there would be no major effects as a result of the development. With the appropriate mitigation in place there would be no instances of strong winds or significant effects that would compromise safety, as a result of the proposed development. In order to ensure the outcomes

of the ES are realised with regards to wind microclimate and to ensure a suitable process to mitigate any further wind impacts that may be identified during and post construction, a Post Construction Wind Mitigation Review will be required as part of the S106 agreement.

Ecology

281. The applicant has submitted a Biodiversity Net Gain Assessment. The application site presently has very low ecological value. The submitted assessment concludes that there is an opportunity to increase biodiversity net gain by approximately 981.98% through design measures such as bird boxes, bat boxes, green roofs, green walls, street trees, intensive podium planting and insect boxes. The Council's Ecologist has reviewed the application and raises no objection subject to conditions. The relevant conditions would be imposed on any consent issued whilst an Ecological Management Plan would be secured as part of the S106 Agreement

Light pollution

282. The ES has considered light pollution as part of the daylight and sunlight assessment (Chapter 11) and notes that mitigation measures would be put in place such as occupancy sensors; dimmable lights; and exterior lights shut off at 23:00 (with the exception of the lights within the lower parts of the building and those required at street level to illuminate the public realm).
283. Pre curfew, the assessment showed that there would be no effect at Denmark House, Shard Place or Southwark Cathedral and Annex. A negligible effect was identified at London Bridge Hospital Main Building and St Olaf House for light intrusion pre-curfew (before 11pm).
284. Post curfew the assessment continued to show that there would be no effect at Shard Place or Southwark Cathedral and Annex. A negligible effect was identified at Denmark House and London Bridge Main Building for light intrusion post-curfew. The remaining building, 13 Tooley Street (St Olaf's House, London Bridge Hospital) would experience a significant effect (major adverse) for light intrusion post curfew.
285. The light intrusion to St Olaf House would be above the 5 lux threshold established by the ES and would affect rooms on two elevations. However, on one of the internal elevations of St Olaf House, the impacts only marginally exceed the 5 lux threshold, experiencing approximately 7.5 lux. On the closest elevation, approximately 15-17.5 lux would occur however, it is important to note that the building is of predominantly commercial use as opposed to patient accommodation and as such is not sensitive to light intrusion. It should also be noted that the assessment shows a worst-case scenario whereby the office would be fully lit at night. Taking this into account alongside the nature of the use of St Olaf House, the level of impact is considered to be acceptable.

Socio-economics

286. Socio-economics is assessed in Chapter 6 of the ES. The assessment notes that the site currently provides up to 165 full time jobs and that the loss of the existing

employment on site, during demolition and construction, would be an adverse effect, albeit temporary and not significant. The demolition and construction phase of the development would be expected to generate up to 420 full time positions and whilst this effect would be beneficial, it would not be significant.

287. Once completed, the development would have the potential to generate up to 3,050 full time jobs which would be a net increase of up to 2,885 full time jobs on this site. This effect would be beneficial at local and borough level. In terms of local spending associated with the completed development, the proposal would have the potential to generate between £5.5 million and £7.1 million. Given the site is close to amenities, shops and transport links, it could be expected for much of this to be spent in the local economy. The new employees accommodated by the development would have a beneficial effect on the local economy through this additional spending. No mitigation measures are required in this instance.

Energy and sustainability

288. Chapter 9 of the London Plan deals with all aspects of sustainable infrastructure and identifies the reduction of carbon emissions as a key priority. Policy SI2 requires all developments to be net zero carbon with a minimum onsite reduction of 35% for both commercial and residential. Non-residential development should achieve 15 per cent reduction through energy efficiency measures. Where developments are unable to meet net zero carbon targets any shortfall between the minimum 35% and zero carbon must be mitigated by way of a payment towards the carbon offset fund. The energy strategy for new developments must follow the London Plan Hierarchy (be lean/ be clean/ be green/be seen) and this must be demonstrated through the submission of an Energy Strategy with applications and post construction monitoring for a period of 5 years.
289. Southwark Plan Policies P69 and P70 reflect the approach of the London Plan by seeking to ensure that non-residential developments achieve a BREEAM rating of 'Excellent' and include measures to reduce the effects of overheating using the cooling hierarchy. The policies reflect the London Plan approach of 'lean, green and clean' principles and requires non-residential buildings to be zero carbon with an onsite reduction of at least 40%. Any shortfall can be addressed by way a contribution towards the carbon offset green fund.

Whole life cycle and carbon capture

290. Policy SI 2 – Minimising Greenhouse Gas Emissions of the London Plan requires developments to calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken that would serve to reduce life-cycle carbon emissions.
291. Whole Life Cycle carbon emissions are those associated with the construction, use and eventual deconstruction of a development over its whole life cycle, considering impacts of construction materials, along with their repair, maintenance and replacements, as well as regulated and unregulated operational carbon emissions. A Whole Life Carbon Assessment and GLA Template was submitted.
292. The applicants submission states that they are aiming to maximise the

opportunity of reuse of materials in various applications, where feasible and that they continue to engage with the supply chain to look at alternative and innovative materials with lower embodied carbon in order that where new materials need to be used, they can have the lowest possible embodied carbon.

293. A pre-demolition audit has also been completed in order to assess what materials can be reused and recycled. The audit confirms that 100% of the bricks, concrete, insulation materials, timber, electrical equipment/materials, tiles/ceramics, metals, plasterboard, plastic, and soils used in the current building will either be reused, recycled or recovered. Of the remaining materials only asphalt (50%), hazardous waste (2%), floor coverings (5%), glass (5%) and vegetation (50%) would be sent to landfill. Overall, 51.1% of material currently used on the site would be reused, 48.5% would be recycled, 0.2% would be recovered and only 0.01% would be landfill.

Carbon emission reduction

294. As previously stated, the London Plan requires a minimum 35% carbon reduction whilst the Southwark Plan requires a minimum 40% carbon reduction on site. Both policies accept that the difference between these targets and 100% can be balanced through a financial contribution to the carbon offset fund. The combination of the optimised passive design measures, energy-efficient plant selection and the innovative ambient loop heat pump design, result in an overall annual carbon reduction of 55% relative to the current 2013 Part L2A target emission rate (TER) for the building, using SAP10 carbon numbers. This would be accompanied by a carbon offset payment of £619,528 which would bring the development to carbon zero and achieve the aims of the policies of both the London Plan and the Southwark Plan. More detail on the strategy to achieve the 55% carbon reduction is set out below:

Be Lean (use less energy)

295. The development would incorporate a range of passive and active design measures that would reduce carbon emissions through energy efficient design and construction. Passive measures would include:

- Optimising the building façade to achieve improved u values and taking advantage of the buildings orientation in designing the facades in order to maximise daylight penetration and minimise solar gain. For instance, the lift and stair cores are placed on the south façade where they shield the office space from excess solar glare; and
- The use of natural ventilation to assist in managing heating and cooling;

296. Active measures would include:

- The use of Ground Sourced Heat Pumps (GSHP) and water sourced heat pumps;
- Digital Building Management System and metering to monitor and control building services and enable optimum operation;
- EC/DC motors for fan coil units;
- Ventilation heat recovery;

- Low energy lighting;
- Use of low energy white goods; and
- High efficiency lifts/elevators.

Be Clean (supply energy efficiently)

297. Currently there are no nearby district heating networks within 1km of the site that the development could connect to and no on-site CHP system is proposed given the negative carbon value that can be attached to CHP. As such, no carbon savings are reported from the 'Be Clean' stage of the energy hierarchy. The development would be futureproofed in order to ensure the potential to connect to a future district heating network should one become available.

Be Green (Use low or carbon zero energy)

298. The proposed development will employ the use of photovoltaic panels and a close loop ground sourced heat pump. The photovoltaic panels will be façade mounted and will be secured as part of an energy strategy in the legal agreement.
299. The close loop ground sourced heat pump would provide heating and cooling to the proposed building. Full details of this technology and how it will ultimately be applied would also be secured as part of an updated site wide energy strategy to be secured as part of the legal agreement.

Be Seen (Monitor and review)

300. The London Plan asks developers to monitor energy use during occupation and to incorporate monitoring equipment to enable occupants to monitor and reduce their energy use. In accordance with London Plan policies it is appropriate to secure post completion monitoring within the s106 agreement. The applicant has confirmed that the development would be metered and that a building management system would be utilised. As built, the applicant commits to updating the contextual and energy performance data onto the Be Seen portal and would confirm that the metering installation is installed and correctly calibrated. When operational, the applicant commits to submitting energy performance data annually for at least five years and where performance differs from estimated performance then they would identify the cause and take action where necessary. These commitments would be secured in the legal agreement.

Circular economy

301. Policy SI 7 Reducing Waste and Supporting the Circular Economy of the London Plan requires referable applications to promote circular economy outcomes and aim to be net zero-waste. These applications are required to submit a Circular Economy Statement to demonstrate:
1. How all materials arising from demolition and remediation works will be re-used and/or recycled.
 2. How the proposal's design and construction will reduce material demands and enable building materials, components and products to be

- disassembled and re-used at the end of their useful life.
3. Opportunities for managing as much waste as possible on site.
 4. Adequate and easily accessible storage space and collection systems to support recycling and re-use.
 5. How much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy.
 6. How performance will be monitored and reported.
302. The applicant seeks to develop the site in a manner that clearly demonstrates tangible sustainability measures to include health and wellbeing for the occupants, energy solutions and water saving features. This includes the creation of a significant street level open space. The building has been designed to be low carbon both in terms of its operation and embodied carbon for construction.
303. The proposed building would exceed the carbon emissions saving targets and would reduce water consumption and the use of unsustainable materials. A pre-demolition audit has been completed that maximises the use of reused, upcycled or recycled materials and works towards closing the loop of waste generation during construction with a 90% diversion from landfill. Procurement will follow sustainable lines and the supply chain would be required to source and deliver lower carbon materials to the site.
304. The development has been designed for ease of disassembly and the grid structure has been rationalised in order to promote pre-fabrication and modularization. The applicant has committed to optimise material use and use the whole life-cycle carbon analysis for assisting the decision making process. Finally, when operational, the development would employ a waste management and waste collection strategy that would maximise recycling. This would be secured by way of a condition.

Overheating

305. London Plan Policy SI4 Managing heat risk and Southwark Plan policy P69: Sustainability standards set out the cooling hierarchy that should be followed when developing a cooling strategy for new buildings. The hierarchy is as follows:
- Minimise internal heat generation through energy efficient design; then
 - Reduce the amount of heat entering the building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
 - Manage the heat within the building through exposed internal thermal mass and high ceilings; then
 - Use passive ventilation; then
 - Use mechanical ventilation; then
 - Use active cooling systems (ensuring they are the lowest carbon options).
306. The steps set out in the hierarchy have been applied to the proposed development in sequence and systematically as part of the design process and is set out below in sequential order:

Minimise internal heat generation through energy efficient design

307. Glazing ratio optimised throughout the building to provide enough daylight and solar control glass applied to minimise solar gains. LED lighting is proposed to reduce internal heat gains.

Reduce the amount of heat entering the building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls

308. The glazing ratio has been derived by data-driven design in limiting solar gains and managing daylight levels and respond to the solar exposure and façade orientation. The glazing area is maximised to the north for daylighting and optimised to the most exposed elevations to manage solar gains. Also, external shading elements have been dimensioned to assist in providing shading without significantly increasing embodied carbon. Roof terraces and green roofs are proposed to various office levels and the plant roof. The plant screen would be covered by a green wall and these urban greening strategies will contribute to creating a microclimate to reduce the urban heat island impact locally.

Manage the heat within the building through exposed internal thermal mass and high ceilings

309. A minimum of 2.9m of floor to ceiling height is proposed to the office areas. Moreover, concrete plank slabs will be exposed and provide thermal mass storage internally.

Use passive ventilation

310. Natural ventilation is possible through openings and vents in the façade for natural ventilation and for night-time cooling.

Use mechanical ventilation

311. Highly efficient mechanical ventilation with heat recovery is proposed for fresh air supply all year round.

Use active cooling systems (ensuring they are the lowest carbon options)

312. All previous measures contributed to reducing the peak cooling demand and decreasing the size of fan coil units for thermal comfort as well as using efficient heat pumps with waste heat recovery opportunity.

BREEAM

313. Southwark Plan Policies P69 requires the development to achieve BREEAM 'excellent'. A BREEAM Pre-assessment report has been undertaken based on the illustrative scheme which demonstrates that an "excellent" standard can be achieved which meets the policy requirement and is therefore acceptable however the applicant has confirmed that they would be able to achieve BREEAM 'Outstanding' and as such an appropriate condition should be imposed on any consent issued in order to secure this standard.

Planning obligations (S.106 agreement)

314. 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

315. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight.

Planning Obligation	Mitigation	Applicant Position
Archaeology	£11,171	Agreed.
Carbon offset	£619,528	Agreed.
Employment during construction	Provide 103 jobs, 103 short courses and 25 construction industry apprentices for Southwark residents or make a payment of £442,900	Agreed.
Employment in the development	Provide 302 sustained jobs for unemployed Southwark residents or make a payment of £1,298,600	Agreed.
Transport for London	Cycle hire - £220,000 Wayfinding - £33,000 Healthy Streets - A contribution is sought towards the Healthy Streets scheme.	Agreed. Agreed. Still under discussion with the applicant and would be finalised as part of any Stage II referral to the Mayor.
Transport (site specific)	Buses - £270,000 Roads - £8,000 Footways - £28,832 Raised tables - £40,000 DSP Bond - £24,472	Agreed.
Trees	Not specifically required unless unforeseen issues prevent trees from being planted or they die within five	Agreed.

	years of completion of the development in which case a contribution will be sought - £10,000 per tree.	
Admin fee	2% of the total of all financial contributions.	

316. The legal agreement would also secure the following S.278 works:

- Repave the footway including new kerbing fronting the development on Tooley Street (LB Southwark), London Bridge/Borough High Street and Duke Street Hill (TfL) in accordance with the SSDM requirements;
- Construct proposed vehicle crossover / loading bay entrance on Tooley Street using materials in accordance with SSDM requirements;
- Promote a TMO to amend any parking arrangements, modification of waiting restrictions along Tooley Street. Works to include road markings and signage;
- Reconstruct any redundant vehicle crossovers as footway along Tooley in accordance with the SSDM standards;
- Improve and or provide new pedestrian crossings to provide connectivity between the development and the River Walk;
- Provision of two raised tables and removal of street clutter on Tooley Street;
- Upgrade street lighting to current LBS standards. Include the possibility to provide lamp columns mounted to the new building in order to improve effective footway widths;
- Change all utility covers on footway areas to recessed type covers;
- Remove or relocate any street furniture fronting the development if required. Include the possibility to install any sign plates on the walls of the new building in order to improve effective footway widths; and,
- Rectify any damaged footways, kerbs, inspection covers and street furniture due to the construction of the development. footways should be paved with yorkstone natural stone slab paving and with 300mm wide granite kerbs.

317. The applicant would be required to enter into a separate S.278 Agreement with Transport for London for works taking place on the TLRN. Transport for London would require the following S.278 works:

- Providing/upgrading eastbound Duke Street Hill bus stop/cycle parking/lighting;
- Improving the pedestrian crossing on Duke Street Hill;
- Improving the layout of junctions of Duke Street Hill/London Bridge and Duke Street Hill/Tooley Street;
- Street tree planting/replacement of failures and a commuted sum for maintenance (to be agreed with TfL);
- Altering kerb lines on Duke Street Hill (temporary);
- Providing segregated cycle lane eastbound (temporary);
- Temporary stairs landing on TLRN (temporary); and

- Widening crossings on Duke St Hill and altered signal times (temporary).
318. The legal agreement must also include an obligation requiring the applicant to enter into a S.247 Agreement for the stopping up of the highway on this site. This refers specifically to the required Stopping Up of London Bridge Walk and the footbridge linking to London Bridge Station.
319. The legal agreement should secure the following strategy documents:
- Affordable Workspace Strategy - including a marketing and management strategy;
 - Construction Logistics Plan – including details of diversions for buses during construction, funding for any bus diversions and how the temporary pedestrian bridge will provide continued bridge access during the course of demolition and construction;
 - Delivery and Servicing Plan – including full details of the delivery consolidation service;
 - Demolition and Construction Environmental Management Plan – setting out appropriate dust monitoring and noise assessment/monitoring;
 - Ecological Management Plan;
 - Employment Skills and Business Support Plan;
 - Estate Management Plan – setting out how the public realm would be managed and maintained in addition to full details of public access and security;
 - Landscaping Strategy;
 - Site Wide Energy Strategy – including full details of Be Seen monitoring, details of PV panels and commitment to future proofing the site for onward connection to any future district heating network;
 - Theatre Design Strategy;
 - Travel Plan; and
 - Wind Mitigation Post Construction Review.
320. In the event that an agreement has not been completed by 31 December 2022, the committee is asked to authorise the director of planning to refuse permission, if appropriate, for the following reason:
321. In the absence of a signed S106 legal agreement there is no mechanism in place to mitigate against the adverse impacts of the development through contributions and it would therefore be contrary to London Plan (2021) Policies DF1 (Delivery of the Plan and Planning Obligations) T9 (Funding transport infrastructure through planning) and E3 (Affordable workspace), Southwark Plan (2022) Policies P28 (Access to employment and training), P31 (Affordable Workspace), P70 (Energy), IP3 (Community infrastructure levy (CIL) and Section 106 planning obligations), the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015), Paragraph 57 of the NPPF.

Mayoral and borough community infrastructure levy (CIL)

322. 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. In this instance, based on information provided by the applicant, an estimated Mayoral CIL payment of £7,670,315.99 and a Southwark CIL payment of £3,580,062.40 would be due. This figure is an estimate only, and would be calculated in more detail when CIL Additional Information and Assumption of Liability forms are submitted prior to implementation.

Community involvement and engagement

323. The developer has submitted a statement of community involvement that summarises the consultation that has taken place on the application. This includes an extensive programme of pre-application meetings in addition to consultation and engagement with key stakeholders and the wider community. The consultation area contained approximately 4,300 addresses surrounding the site, with a mix of residential and commercial uses. In addition to consulting with residents, the consultation programme identified the following political, community and business stakeholders:

Political	Community	Business
<ul style="list-style-type: none"> • Borough & Bankside Ward councillors • Florence Eshalomi AM MP • LB Southwark Cabinet Members • London Bridge & West Bermondsey Ward Councillors • Neil Coyle MP 	<ul style="list-style-type: none"> • Bankside Open Spaces Trust • Fair Community Housing • Historic England • Historic Royal Palaces • Leathermarket JMB • Living Bankside • Southwark Cathedral • Southwark Cyclists 	<ul style="list-style-type: none"> • Better Bankside • Borough Market • Colechurch House building tenants • Guy's & St Thomas' NHS Trust • HCA • King's College London • London Bridge Experience • Network Rail • News International • REM • Sellar • Shangri La Hotel • St Martins Property Group • Team London Bridge BID • TfL • The Arch Company

324. The applicant has set out the following stakeholder meetings that took place as part of the consultation programme:

Meeting	Date	Attendees	Summary of Discussions
London Bridge & West Bermondsey ward councillors	17 June 2020	<ul style="list-style-type: none"> • Cllr Humaira Ali 	<ul style="list-style-type: none"> • Proposed park and public realm

		<ul style="list-style-type: none"> • Cllr William Hougbo • Cllr Damian O'Brien 	<ul style="list-style-type: none"> • Public access to roof terrace • Security of park.
LB Southwark Cabinet	24 June 2020	<ul style="list-style-type: none"> • Cllr Johnson Situ • Cllr Stephanie Cryan 	<ul style="list-style-type: none"> • Height • Possible occupiers inc. Southwark Playhouse • Sustainability.
Team London Bridge BID	16 June 2020	<ul style="list-style-type: none"> • Nadia Broccardo • Jack Skillen 	<ul style="list-style-type: none"> • Public realm, • connectivity, area masterplan, bridge removal.
Leathermarket JMB	19 June 2020	<ul style="list-style-type: none"> • Andy Bates • Michele King 	<ul style="list-style-type: none"> • Local employment opportunities.
The Arch Co	22 June 2020	<ul style="list-style-type: none"> • Clare Fowler • Lorna Blake 	<ul style="list-style-type: none"> • Area masterplan, station works.
Southwark Cathedral	24 June 2020	<ul style="list-style-type: none"> • Andrew Nunn • Matthew Knight 	<ul style="list-style-type: none"> • Impact on views, wind and shadowing on the Cathedral.
Landscape workshop 1 with BOST	22 July 2020	<ul style="list-style-type: none"> • Jessica Beatty • Tim Wood 	<ul style="list-style-type: none"> • Design workshop focused on the proposed park and landscape.
Landscape workshop 2 with BOST	29 July 2020	<ul style="list-style-type: none"> • Tim Wood • Deborah Nagan 	<ul style="list-style-type: none"> • Follow-up to first workshop.
London Bridge Experience	19 August 2020	<ul style="list-style-type: none"> • James Kislingbury • Danny Scriven 	<ul style="list-style-type: none"> • Neighbourly issues relating to proposed development and construction.
Southwark Cathedral Fabric Advisory Committee (FAC)	8 September 2020	<ul style="list-style-type: none"> • Members of the FAC 	<ul style="list-style-type: none"> • Environment impacts on the Cathedral.

Pedestrian Bridge Working Group	17 September 2020	<ul style="list-style-type: none"> • Network Rail • TfL • City of London • Town Legal • Cllr Dan Taylor 	<ul style="list-style-type: none"> • Improving the pedestrian access between London Bridge and London Bridge station at ground level.
STAMP (Shad Thames Area Management Partnership)	1 October 2020	<ul style="list-style-type: none"> • Janet Morris 	<ul style="list-style-type: none"> • Discussion of the park proposals and other public realm improvement.
Team London Bridge BID	5 October 2020	<ul style="list-style-type: none"> • Nadia Broccardo • Jack Skillen 	<ul style="list-style-type: none"> • Activation of Tooley St. • In support of removing footbridge.

325. In terms of public consultation, Covid 19 required that consultation events were undertaken online. The applicant held a Zoom webinar on Saturday 20 June between 10am and 11am and then a second webinar on Tuesday 23 June between 4.30pm and 5.30pm. The webinar was an opportunity for the Applicant's team to present the initial proposals to neighbours and stakeholders, giving neighbours the opportunity to ask questions and get clarifications on the scheme.
326. Neighbouring residents and businesses were formally notified about the exhibition by a flyer distributed to approximately 4,300 addresses in the local area. A copy of the flyer is included in Appendix 3 of the Statement of Community involvement.
327. The SCI confirms that around 30 people attended the webinar and the key issues raised were:
- Clarification was sought on the access route to the river walk.
 - The main issues with the current building, including anti-social behaviour, graffiti and petty crime
 - Support towards the public park and public realm improvements
 - Impact on traffic flow as a result of removing the footbridge
 - Anticipated timescales for the planning application and construction
328. A further public consultation event was undertaken on Thursday 1 October between 12pm and 8pm and again on Saturday 3 October between 10am and 2pm. This was a more traditional face to face exhibition consultation event and was held at Unit 2, London Bridge Walk. As well as repeating the previous steps of sending letters to residents, neighbours and occupiers, the applicant advertised the event in The Southwark News, a copy of which is included in the

SCI.

329. In order to cater to those who were unable to attend an in-person exhibition, the applicant held two further Zoom webinars on Tuesday 6 October and Wednesday 7 October from 5pm to 6pm.
330. As part of its statutory requirements the Local Planning Authority sent letters to surrounding residents, displayed site notices in the vicinity, and issued a press notice publicising the planning application. Adequate efforts have, therefore, been made to ensure the community has been given the opportunity to participate in the planning process. Details of consultation and any re-consultation undertaken by the Local Planning Authority in respect of this application are set out in the appendices.

Consultation responses from local groups

331. Better Bankside – Concerns are raised regarding the potential use of Montague Close and Borough Market for servicing and consider that a consolidated servicing strategy should be employed on this site. Whilst the automated cycle store is supported there is a concern that employees using non-office spaces would not benefit from changing/shower facilities. There is a concern that the development does not meet London Plan cycle standards. Generally, Better Bankside welcome the improved permeability through and around the site and consider the public park to be well considered but query how micro-climate and user comfort of these spaces have been tested, given how exposed the principal park areas fronting on to Duke Street Hill and Borough High Street are likely to be. Better Bankside suggest that further attention needs to be given to the urban realm along the Tooley Street frontage and how it connects under London Bridge and suggest that this whole stretch should be treated as a shared space environment and is not a secondary frontage to the development.
332. **Response** – The development would implement a delivery consolidation strategy and this would be secured as part of the S106 agreement. The intention is that Tooley Street be the main access and egress point for vehicular traffic and this could be secured as part of the obligation. The primary use of the site is as an office and office staff who use either of the cycle stores (basement or automated), would have access to the changing and shower facilities. The microclimate of the park has been fully considered and it would be well lit with wind conditions appropriate for its use. The development would result in significant improvements on Tooley Street which lacks animation and activity along this stretch however the Council's Transport department would not be supportive of a shared surface environment due to road safety implications.

Consultation responses from external and statutory consultees

333. Arqiva – No objections
Response – Noted.
334. Borough Market - The Trustees of Borough Market Southwark (TBMS) are generally welcoming of investment in the area but have raised some concerns about the impact of the proposals on the operation of the market. These concerns relate primarily to delivery and servicing, the potential impacts of using Montague

Close and Bedale Street as a servicing route and the impacts the increased traffic levels would have on the market as well as pedestrian conflict. TBMS seek assurances that all construction traffic be restricted from using Montague Close/Bedale Street and that they be consulted on future Construction and Environmental Management Plans. With regard to the retail units being proposed, TBMS would welcome the introduction of artisan/independent traders and small scale cafes and would urge the Council to impose conditions/obligations to prevent large food uses and supermarkets from the site. TBMS also request that the site provide public toilets and that a wayfinding strategy be secured which TBMS should be involved in the development of.

335. **Response** – Whilst the servicing strategy does indicate that the site could be accessed from Tooley Street and Montague Close, it is the intention that Tooley Street be the main route for vehicular access and egress to the site and this can be secured as part of the Delivery and Service management Plan obligation. Construction traffic would access the site from Tooley Street or Duke Street Hill and this would be secured under the Construction Environmental Management Plan on which the Council agree to consult TBMS. Given the location of the proposed development opposite London Bridge Station as opposed to within Borough Market, it is not considered appropriate to restrict the type of end user that could occupy the retail units however it should be noted that the size, design and location of the retail units are such that they would likely not meet the requirements of a supermarket or large scale food use. Wayfinding has been secured as part of the legal agreement through TfL's established Legible London scheme.
336. City of London – The City of London support the proposed re-development and have commented that the proposal is well designed and sustainable with important amenities for occupiers. The inclusion of a new theatre for Southwark Playhouse, bringing this cultural use back to London Bridge and making its creative output and community outreach more accessible is supported. The scheme's inclusion of a new public park for London will be an amenity for workers, residents, and visitors as well as the contribution it will make to health and wellbeing in the area. The replacement of the existing footbridge on London Bridge Walk, with a new safe and accessible pedestrian bridge of lightweight and minimalist design will enable a more pleasant route for local and commuting pedestrians to and from London Bridge. It also opens up historic views to Southwark Cathedral that have been long obscured.
Response – Noted.
337. Environment Agency – No objection subject to conditions.
Response – Noted and agreed.
338. Greater London Authority – The GLA have commented that they are strongly supportive of the proposed development in principle. The principle of the proposed office-led mixed use redevelopment within the CAZ and Opportunity Area is strongly supported. The proposal would provide a significant quantitative increase and qualitative enhancement to the existing office, retail, leisure and cultural offer. The Council should robustly secure the proposed affordable workspace and the new theatre.

339. Overall, the scheme is of a high design and architectural quality. Whilst the height and massing could be supported, further information is required on the functional and environmental impacts of the tall building. Further clarification on inclusive access is required. The fire statement should be revised to provide further information prior to Stage 2 referral. The proposal would marginally diminish the viewer's ability to perceive and appreciate St Paul's Cathedral from LVMF view 2A.1 and would have less than substantial harm to the setting of the Grade I listed St Paul's Cathedral from this strategic view.
340. The proposal would result in less than substantial harm to the setting of the Tower of London World Heritage Site (and designated heritage assets within it); the Grade I listed St Paul's Cathedral and Southwark Cathedral, and other designated heritage assets. At this stage, it is considered that the public benefits in terms of public realm improvements, provision of affordable workspace and employment creation could outweigh the identified harm.
341. The proposed cycle and car parking is broadly acceptable. Further clarification on cycle parking access and queues management; a replacement cycle hire docking station; and further consideration of off-site cycle parking is required to improve the overall quantum. The removal of the pedestrian footbridge and management of pedestrian flows at Duke Street Hill, including road safety requires further consideration. Given the development's impact on TLRN, footways and cycling routes it will be important to consider and enhance where appropriate the local cycling and walking network and facilities. In this respect, a section 278 agreement is required to secure proposed public realm works and financial contributions are sought towards public realm improvements, improved signage and cycle hire re-provision and other infrastructure works. The proposed servicing strategy and construction management requires further clarification. Travel plans, delivery and servicing plans and construction logistics plans should also be secured.
342. Further information and amendments to energy strategy, urban greening, flood risk assessment, drainage strategy, air quality assessment, and circular economy strategy is required.
343. Response – The applicant has suitably revised the Fire Strategy to take into account the comments made by the GLA at Stage I. Further information has also been provided on energy, flood risk, drainage, air quality and circular economy. Officers have reviewed this information alongside the detailed comments made by the GLA and consider that the information suitably addresses all concerns. This would be confirmed with the GLA as part of the Stage II referral process.
344. It is acknowledged that the UGF of 0.28 does not meet the London Plan policy requirement of 0.3 and as such a landscaping strategy attached to the legal agreement will ensure that the applicant maximises the landscaping potential of the site and that all efforts to increase this score would be made.
345. The overall quantum of cycle parking has now been improved in light of the GLA comments and there would now be an overprovision when assessed against the London Plan standards. Further provisions such as a cycle hire docking station, S.278 works and financial contributions have been secured in the proposed Heads of Terms for the legal agreement. Additionally, the applicant is re-

providing the pedestrian footbridge and as such this reduces the potential for road safety impacts on Duke Street Hill. The theatre and other affordable workspace would be secured as part of the legal agreement.

346. Historic England - Historic England has no issues with the proposed redevelopment of Colechurch House in principle, and recognises the significant opportunities that the scheme presents in improving the urban environment and public realm within and around the site. Concerns have been expressed about the impact of the proposed development on St Paul's Cathedral and the Tower of London. The development site is located within the Wider Setting Consultation Area for two views protected by the Mayor of London, these are Parliament Hill summit to St Paul's Cathedral (LVMF 2A.1) and Kenwood viewing gazebo to St Paul's Cathedral (LVMF 3A.1).
347. The protected views of St Paul's Cathedral have been affected by existing and consented tall building development around London Bridge Station, the largest of which is The Shard, which was completed in 2012. In View 2A.1 these appear almost as a wall of development that partially blocks the silhouette. However, the dome remains clear of any development from its lantern eastwards in this view, preserving the suburban backdrop and ensuring the cathedral's dominance within a wider-London context. The tall buildings around London Bridge have also affected other important heritage views including those from the Inner Ward of the Tower of London World Heritage Site which is located across the Thames to the north east of the development site.
348. The impact of these proposals on St Paul's Cathedral in the Protected Vista from Parliament Hill (LVMF 2A.1) is the most sensitive. By appearing directly behind the peristyle of the dome - a key architectural element of Wren's design, the proposed development would fail to "preserve or enhance the clarity with which the silhouette of the Cathedral can be distinguished from its background" thus conflicting with the guidance contained within the LVMF SPG. Historic England consider that the impact of the development in this view would cause a medium, yet serious level of less-than-substantial harm to the significance of St Paul's Cathedral. Historic England also consider that the development would cause some harm to the Grade I and scheduled buildings that frame Tower Green at the west end of the Inner Ward of the Tower of London.
349. **Response** - These issues have been set out in full in the design and heritage section of the main report. In the LVMF view from Parliament Hill the proposal is located immediately to the left of the dome of St Paul's. The buildings stepped form responds deliberately to this specific view with the first step aligning with the top of the peristyle. Beyond that and from the second step the building is angled away from the dome. The zoomed-in view demonstrates that the stepped profile does not interact with the dome above the peristyle and it will remain below the distant horizon. Officers accept that there is some limited harm arising to this LVMF View (2A.1) due to the close interaction between the silhouette of the building and the dome and peristyle. Notwithstanding this, officers consider the harm to be of the lowest order of less than substantial harm, only apparent in the highly zoomed in view and not detracting from the viewer's ability to recognise and appreciate St Paul's Cathedral.
350. In the view from Kenwood House the proposal will appear a short distance to the

left of the dome of St Paul's Cathedral. Here too the proposal will be at the edge of the backdrop Wider Setting Consultation area of St Paul's. The zoomed-in view once again demonstrates that the proposal is lowest closest to the dome and rising away from it and stays well below the distant horizon. Officers consider that the proposal does not give rise to harm in this LVMF View (3A.1) and will not affect the viewer's ability to recognise and appreciate the Strategic Landmark of St Paul's Cathedral.

351. In terms of the Tower of London views, the proposal would be visible from the wider Tower environs, set behind the More London development and the river frontage buildings and within the Shard Cluster, similar in height to the recently completed Fielden House and London Bridge Place buildings. The TVIA demonstrates that the building would not be visible from the views of highest significance identified in the Tower of London Setting Study – the Inner Ward views around the Tower itself and the views from Royal Mint Court. In this respect it is considered that the proposal does not give rise to harm to the Outstanding Universal Value of the Tower of London World Heritage Site.
352. London Borough of Camden – No objection.
Response – Noted.
353. London Borough of Lambeth – No objections.
Response – Noted.
354. London Fire Brigade – LFB have commented that they note the provisions of the Fire Safety Strategy.
Response – Noted.
355. Metropolitan Police – The Metropolitan Police consider that this development is suitable to achieve Secured By Design accreditation, and in order to assist the development with achieving Secured By Design standards, relevant conditions regarding secured by design measures and accreditation should be imposed.
Response - Noted and agreed, the relevant conditions would be imposed on any consent issued.
356. NATS – No objection.
Response – Noted.
357. Natural England – No objection.
Response – Noted.
358. Network Rail – Support the principle of the proposals and request informatives regarding asset protection.
Response – Noted. The relevant informatives would be added to any consent issued.
359. Royal Borough of Greenwich – No objections.
Response – Noted.
360. Southwark Cathedral – Fully supportive of the removal of the footbridge which destroys an ancient view of the cathedral and are not supportive of a replacement footbridge.

Response – The existing footbridge is large, bulky and covered and is a prominent feature in the street and views along Duke Street Hill. The proposed replacement footbridge would be lightweight, open to the sky and with transparent balustrades so as to reduce and minimise any impacts on views along Duke Street Hill.

361. Team London Bridge – Team London Bridge support the re-provision of a footbridge and consider that the new footbridge would allow for improved views of heritage assets in the local area. Concerns have been raised that the UGF score has reduced from 0.3 to 0.28 and TLB consider that this could be improved by providing green walls, more mature trees and increased planting at the west end of Duke Street Hill. Whilst TLB welcome the opportunity to provide a new public realm under the building, the finishes and detailed design will need to be carefully considered. TLB would welcome additional detail on bike lifts, cycle hire docking stations, servicing arrangements and sustainability targets.
362. **Response** – The final, refined design of the footbridge would be secured by condition as will all material finishes and final design/planting of the public realm. Further opportunity to maximise planting is secured as part of the Landscaping Strategy in the legal agreement. The legal agreement would also secure a Delivery and Servicing Management Plan, and Energy Strategy. A contribution towards cycle hire has been secured and TfL will be involved in finalising a location. In terms of the cycle lift, this would be accessed from Tooley Street and would provide direct access to the cycle store area.
363. Thames Water – No objections subject to relevant conditions and informatives.
Response – Noted and agreed, the relevant conditions and informatives would be attached to any consent issued.
364. Theatres Trust – The Theatres Trust welcome the inclusion of this theatre space within the proposed development and wish to see that it is delivered. The Theatres Trust offer detailed advice and comments with regards to signage/promotion/wayfinding in order to ensure the visibility of the theatre as well as advice regarding the bar and restaurant which will be an important part of revenue generation for the occupying theatre. Detailed comments and advice have been given with regards to the fit out of the theatre space including structural/acoustic/drainage/technical details as well as comments with regard to evacuation, capacity, accessibility and movement space. The Theatres Trust recommend that the applicant appoint a specialised theatre consultant to provide advice both on the design and co-ordination with the base build. Their expertise would also be beneficial in determining the scoping of and specification of works for the fit out for example best materials, fixtures and fittings for the theatre.
365. **Response** – A detailed theatre design strategy would be secured as part of the S106 Agreement. This would secure details of the final design and finish of the theatre and the Council agree that The Theatres Trust should be a consultee on this document. This would ensure that the detailed technical comments provided by The Theatres Trust can be considered during the next stage of the design process. The applicant has been working with Southwark Playhouse to date and it is considered that the input of The theatres Trust would be beneficial.
366. Transport for London – When initially consulted on the proposed development,

TfL objected to the removal of the pedestrian footbridge. It was considered that the removal of the pedestrian footbridge would result in adverse network impacts due to the displaced pedestrians trying to access/egress London Bridge Station, an associated reduction in pedestrian comfort levels, impacts on road safety and the bus station due to increased pedestrian flow and impacts on future network management. As such, the applicant was encouraged to revise the scheme to reinstate the pedestrian footbridge and this was fully supported by TfL and the access to the new footbridge being via lifts and escalators is considered to make the bridge more attractive for use than the current footbridge. TfL consider that a contribution should be made to fund any public transport diversions that may be required during construction as well as contributions towards cycle hire, healthy streets and legible London signage. TfL have requested that the legal agreement secure a Travel Plan, Construction Logistics Plan and Delivery/Service Management Plan.

367. **Response** – Noted and agreed. The revised scheme would provide a replacement footbridge and this addresses the majority of TfL's concerns. The relevant contributions sought by TfL have been agreed with the applicant and the legal agreement would secure the requested strategies and plans and these would be fully consulted upon with TfL.
368. Twentieth Century Society – Object to the demolition of Colechurch House which they consider to be a non-designated heritage asset. The Society also considers that the demolition of this building contravenes the spirit of paragraph 148 of the NPPF. Buildings like this also contain a large quantity of embodied carbon and substantial environmental harm results from their demolition.
369. **Response** – Whilst there are many fine examples of brutalist architecture in the Borough and central London, the existing Colechurch House is considered to be of limited architectural or heritage merit. Whilst it would be possible to refurbish the building, it would not be possible to address some of the more significant shortcomings of the building, such as the harsh frontages on Duke Street Hill and Tooley Street nor would it be possible to realise the significant benefits that come forward from the proposed scheme such as employment creation, affordable workspace, a new theatre and a significantly improved public realm.

Community impact and equalities assessment

370. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights.
371. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
372. 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.

373. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership. The proposal would result in the provision of a more accessible footbridge across Tooley Street which would benefit those with mobility impairments. Similarly the provision of a new purpose built theatre would enable that to also be fully accessible, both for staff and for audiences. The training/apprentice programme during construction would positively benefit local communities, which have a high proportion of people from BAME backgrounds. The existing business uses on the site including a number of shops would close, but these would not impact individuals with protected characteristics.

Human rights implications

374. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.
375. This application has the legitimate aim of providing a mixed use commercial development incorporating offices, retail, theatre, gym and a new 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

376. 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.

377. 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

378. The redevelopment of Colechurch House to provide a large scale commercial scheme is supported by current development plan policies as is the principle of a taller building. The development would result in a substantial increase in jobs and employment opportunities due to the provision of high quality office accommodation and a substantial increase in commercial floorspace on a central, sustainable, highly connected brownfield site. The development has the potential to provide up to 3,050 jobs on a site that benefits from the highest levels of public transport availability. Sustainable transport is promoted through the provision of extensive and high quality cycling facilities including parking, showering facilities, changing rooms and an automated cycle store.
379. The detailed design of the building, elevating the ground floor well above ground level, allows the development to bring forward significant public realm benefits through the creation of a site wide landscaped public space at the base of the building. This space would provide a much needed green space in a central location that would be a benefit enjoyed by workers, visitors and residents. The new public realm would improve pedestrian connectivity due to the new legible north south route through the site and would open up views to the Grade II listed London bridge Hospital and St Olaf House. The public realm would achieve an UGF of 0.28 which is considered acceptable given the improvement in landscaped space over the consented scheme and that that design of the development has maximised the landscaping potential. The new public realm is a key design feature of the new development and is considered to be a significant benefit of the scheme, greatly improving the street level experience of this part of London Bridge.
380. The development would incorporate a new theatre space, providing a new home for Southwark Playhouse. The theatre would be offered to Southwark Playhouse on affordable terms with a discount equivalent to 75% of market rent. The

provision of a theatre in this location would bolster Southwark's thriving leisure, arts and cultural sector. Promotion of new cultural facilities and specifically a theatre would allow Southwark to build on its strengths and further enhance the vibrant arts, leisure and cultural scene. This would bring further employment, engage local people and visitors, and create opportunities for training and learning. The delivery of a theatre is fully supported by both London Plan and Southwark Plan policies and is considered to be a positive element of the scheme that would enhance the cultural offering in this vibrant part of London.

381. The proposal would not give rise to significant harm to neighbouring amenity by way of overlooking, loss of privacy, noise or disturbance. It is recognised that there will be some adverse impact by way of daylight/sunlight impacts to London Bridge Hospital. Given the small number of windows overall that would experience significant effects and the site specific circumstances, including the nature of the affected rooms and windows, it is considered that the overall impact would be acceptable given the benefits of the proposed. On balance, officers consider that, when reading the BRE guidance with the required flexibility, and in view of the positive benefits of the development proposal, the degree of harm to amenity would not justify withholding planning permission in this case.
382. Whilst there would be some harm to the views of some nearby heritage assets, including St Pauls Cathedral, Southwark Cathedral and the Tower of London, this is considered to be less than substantial harm which would be outweighed by the wider benefits of the proposal such as significant employment benefits, the provision of a new theatre on affordable terms to Southwark Playhouse, additional affordable workspace, greatly enhanced public realm, improved pedestrian and visual connectivity and the provision of a high quality building that would make a valuable contribution to the townscape.
383. The development would achieve Carbon Zero status through a combination of an in lieu payment and a 55% carbon reduction on site. The on-site carbon reduction of 55% alongside the scheme being expected to achieve BREEAM Outstanding will result in one of the most energy efficient and sustainable buildings in London.
384. Developments of this size and nature have the potential for significant environmental impacts and therefore an Environmental Statement has been submitted. The impacts identified in the Environmental Statement have been assessed and taken into account and should be considered in determining the application. No impacts of a significant scale have been identified which are not capable of being mitigated through detailed design, through conditions, or through provisions in the S106 agreement.
385. The application is considered to be in compliance with the development plan, and emerging documents, when read as a whole, and It is therefore recommended that planning permission be granted, subject to conditions, the timely completion of a S106 Agreement and referral to the Mayor of London.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 0254 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	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	Terence McLellan, Team Leader	
Version	Final	
Dated	31 August 2022	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Date final report sent to Constitutional Team		31 August 2022