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**Date:** 01/09/2016

Dear R Joyce

**TOWN & COUNTRY PLANNING ACT 1990 (as amended)**  
**PRE-APPLICATION ENQUIRY**

**At:** 67-71 TANNER STREET, LONDON, SE1 3PL  
**Proposal:** Redevelopment of the site with a lower ground, ground plus eight storey building to accommodate office use with a retail unit at ground floor level.

I write in connection with your pre-application enquiry received on 01/07/2016 regarding a scheme to redevelop the site above. This letter summarises the council's written advice on your proposal and whether, based on the details submitted, it meets local planning requirements

This pre-application enquiry relates to land at 67-71 Tanner Street. The site is broadly triangular in shape and is approximately 0.046 hectares in size. It is bounded to the north by the railway viaduct serving London Bridge Station (including several currently vacant arches at grade), to the south by Tanner Street and to the west by a 7 storey mixed-use building ("the Leatherworks"). The site is currently vacant, though it is acknowledged that planning permission was granted in 2015 for a part 7/part 8 storey development comprising a ground floor retail unit and 9 residential apartments above.

**Planning Policy**

The statutory development plan for the borough comprises The London Plan consolidated with further alterations (March 2015); The Core Strategy (2011) and saved policies from the Southwark Plan (2007).

The site is located within the:

- Urban Zone
- Air Quality Management Area
- Bermondsey, Borough and Rivers Archaeological Priority Zone

Though the site is not located in a conservation area, it is located in close proximity to the Bermondsey Street Conservation Area and a number of buildings in the vicinity are acknowledged as contributing positively to the character and setting of the conservation area.

**Other key material considerations**

The National Planning Policy Framework

**Land Use**

The proposal is for a predominantly office-led development (use class B1a) with a ground floor retail unit (use class A1). The site is located just beyond the Bankside, Borough and London Bridge Opportunity Area, in which the expansion of a range of commercial uses are encouraged. It is considered that the proposed land-uses are appropriate in this location and will compliment the mixed-use character of the locale.

**Access and site layout**

The building would be aligned to the curve of Tanner Street, reflecting the form of the newly developed Arc building (former Century House), opposite. The proposed building footprint occupies the majority of the site. Whilst this approach is acceptable in principle, the extent of the built footprint should be tempered to allow for the creation of sufficient amenity space to serve the host building and its occupiers, as well as functional requirements linked to servicing. Further consideration is given to the design merits of this approach below.

It is noted that the proposal would safeguard access to the arches beneath the viaduct, though the future use of these spaces fall beyond the scope of the current proposal.

Pedestrian access to the site would take place directly from Tanner Street- ensuring an active frontage- and indicative layouts demonstrate a logical and efficient floorplate. The sole vehicular access from the site would be from Tanner Street. Prevailing policy in the Core Strategy establishes that all servicing should be undertaken off-street and so provision should be made for servicing and refuse collection to be undertaken within the demise of the site. This is particularly important for this development site given the reduced visibility presented by the viaduct. Details of the anticipated servicing requirements of a commercial scheme of this magnitude should be explored and detailed as part of any subsequent planning application. On-street servicing and deliveries will only be considered as a potential solution if it can be demonstrated that an on-site solution would not be feasible.

### **Scale, height and massing**

The proposal is for a commercial building rising to nine storeys. This is arranged as a principal 6 storey element that occupies the majority of the available site footprint, with three additional subservient storeys that each diminish in size. Though no detail on absolute height has been provided, it is anticipated that a 9 storey building with typical commercial floor to ceiling heights would exceed 30m and so would constitute a tall building.

Saved Southwark Plan Policy 3.20 states that any building over 30 metres in height should ensure that it makes a positive contribution to the landscape, is located at a point of landmark significance, is of the highest architectural standard, relates well to its surroundings, particularly at street level, and contributes positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.

Officers advise that whilst some additional height (relative to the consented scheme) could potentially be achieved, subject to detailed design, breaching the 30m threshold would be problematic given the large floorplate proposed and the relatively meagre contribution to the landscape that this would allow for. Officers consider that the uppermost storey should be omitted.

In terms of the development programme, it is also advised that any building exceeding 30m in height would be referable to the Mayor of London as part of the process of determination.

### **Detailed design**

Core Strategy policy 12 sets out that all new development should achieve the highest standards of design and saved Southwark Plan policies 3.12 and 3.13 provide detailed criteria for considering the quality of development proposals and their relationship with the immediate surroundings, respectively.

A simple brick palette is proposed for the majority of the building with deep recessed windows that are angled into the building to provide greater depth. The pattern of fenestration is such that the glazed elements are off-set on each floor to avoid a simple, orthogonal grid. Initial visualisations demonstrate attempts to distinguish the base, middle and top of the building. The uppermost floor would be treated with a contrasting aesthetic such that it appears as a distinct top to the building, whilst the brick frame would be expressed as double height to differentiate the base of the building.

Officers are supportive of this approach in principle, however, it is considered that the top of the building can be effectively articulated with the recessive curves that are shown on the 7th and 8th storeys. These curved set-backs could be embellished to make them more readily apparent from street level and, perhaps, start to address the tricky relationship with neighbours. It is not considered that an additional storey in a different architectural language is necessary here. The double height brick frame that is mooted at the base of the building is supported and officers consider that there is an opportunity for this to be a partial double height space, particularly for the commercial lobby/reception space.

The proposed building would follow the alignment of existing properties on Tanner Street and form a curve that sweeps towards the viaduct, mirroring the form of the Arc development, opposite. Officers believe that this form is representative of the urban grain in this area and has a successful relationship both with Tanner Street and the neighbouring Leatherworks building, with the exception of the upper storeys.

The simplicity of the materials palette is supported by officers, though the successful realisation of this approach will be contingent on the quality of the chosen brick. Officers consider that the depth of reveals, angled glazing

and brick soffits could in combination be successful in articulating the facade.

Though the images presented show a scheme at an early stage of the design process, officers are satisfied that this approach makes an appropriate response to the local context and should be pursued.

### **Density**

The site is located within the urban zone, in which Core Strategy Policy 6 establishes that density should be within the range of 200 - 700 habitable rooms per hectare. Notwithstanding that this is a commercial scheme as opposed to residential, the density of the development provides a useful insight as to whether a proposal will sit comfortably in its local context and harmoniously alongside neighbours.

The proposal would comprise 3,334sqm commercial floorspace (GIA) (therefore, adopting the methodology set out in the Southwark Plan, 126 habitable rooms), which would equate to a density in excess of 2,600 habitable rooms per hectare. This is likely to indicate an over-development of the site. Ultimately, this will be determined having regard to the relationship between the proposed building and its neighbours, including issues linked to residential amenity, to prevailing building heights/forms and to the architectural quality of the proposal.

### **Amenity impacts**

The information presented at this point focuses on the height, bulk and massing of the proposed development and only offers limited information on the relationship between the proposed building and its immediate neighbours. Evidently, a number of issues will require careful consideration.

The upper storeys are likely to have a harmful impact on residential occupiers immediately to the south and south-west. It appears that the uppermost residential units at 59-63 Tanner Street ("the Leatherworks") have an outlook directly over the site in question and further iterations of the proposal will need to properly consider the nature of any impacts on these units, clearly demonstrating a deliberate design response and/or mitigation, as appropriate.

Similarly, it is anticipated that the proposal by virtue of its height, massing and proximity to neighbours could have a harmful impact on daylight and sunlight levels received at nearby properties. In particular the proposal could impact on the aforementioned units immediately to the south-west, as well as units at the Arc development to the south (former Century House). A detailed daylight, sunlight and overshadowing assessment should be provided in accordance with the BRE's guidance for measuring such impacts and regard should be given to all residential neighbours and commercial occupiers that might have a particular requirement for natural light. Careful consideration also needs to be given to the potential for direct overlooking across Tanner Street, which might necessitate a particular approach to the detailed design in order to safeguard the privacy of occupiers.

### **Green infrastructure**

The submission fails at this stage to include any detail on landscaping, the potential for tree planting or the incorporation of other green infrastructure, as required by London Plan policy 5.10. Further iterations of the development should clearly set out how the requirements of this policy can be achieved.

### **Transport and servicing issues**

#### **Car parking**

It is assumed that the development would be car free. This is supported.

#### **Cycle parking**

No cycle parking is currently shown on layout plans. The applicant should refer to the long stay/short stay cycle parking standards for B1 office use that are set out in Table 6.3 (Policy 6.9) of the London Plan 2015. This policy sets out that a minimum of 1 long stay cycle storage space per 90sqm commercial floorspace is required and an additional 1 space per 500sqm for short stay (i.e. visitor) cycle parking.

Southwark Plan policy 5.3 sets out that all cycle parking should be secure, convenient and weatherproof. The council's preference is for the use of Sheffield stands (or similar) since they are most easily used by cyclists of all abilities and are compatible for bikes of different sizes.

#### **Servicing**

Detailed information for the servicing/refuse collection demands for a commercial development of this nature should be provided and an appropriate servicing solution presented as a result. It is not clear from the information submitted whether the intention is that servicing takes place from within the site and, indeed, whether servicing vehicles could adequate access, turn and exit the site. As noted above, appropriate provision should be made within the confines of the site in the first instance and the solution should be supported by details that demonstrate sufficient visibility splays and tracking diagrams to demonstrate safe manoeuvring for

the largest anticipated servicing vehicle.

## **Sustainable development implications**

### **Energy**

Core Strategy policy 13 stipulates that new buildings will be required to demonstrate the highest possible environmental standards. Major office developments will be expected to achieve BREEAM Excellent accreditation. This should be understood at the design stage since a number of potential BREEAM credits can quickly be lost at an early stage. It is recommended that a BREEAM Pre-Assessment accompanies any future planning application.

Further, London Plan Policy 5.2 requires a reduction in carbon emissions equivalent to 35% below the target established in Part L of the Building Regulations 2013. A detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction outlined are to be met within the framework of the energy hierarchy should be provided.

### **Air Quality**

The site is in an Air Quality Management Area and both the construction programme and/or the installation of CHP could give rise to air quality impacts that might affect nearby sensitive receptors. Details of appropriate mitigation should be provided with any formal application to demonstrate that the effects on air quality would not be significant and would be in accordance with the Mayors guidance.

### **Flood risk**

Although office use is categorised as a 'less vulnerable' use in the National Planning Policy Guidance relating to flood risk, the site is situated in Flood Risk Zone 3 and so a site-specific Flood Risk Assessment (FRA) will be required as part of any formal planning application.

### **Ground contamination**

Based on the site's historic uses there is a risk of exposure to potential contaminants during construction and in the completed development to construction workers, future occupiers, ground water and surface water. For these reasons a desk-based contamination assessment would be required with any future planning application, with further site investigations and potential mitigation required as part of the development process.

### **Archaeology**

The site is in an archaeological priority zone and may have important archaeological remains which should be appropriately managed.

## **s106 Planning Obligations and Community Infrastructure Levy (CIL)**

The council's Section 106 and CIL SPD sets out the range of issues that might be captured in section 106 agreements. For a commercial development of this magnitude, the following issues referenced in the SPD are most relevant:

- Archaeology;
- Employment and enterprise;
- Transport - site specific

The applicant should be aware that Mayoral CIL in Southwark is charged at a rate of £35 per sqm (subject to indexation). For the purposes of Southwark's own CIL, the site is within zone 2, within which retail floorspace is chargeable at a rate of £125 per sqm. There is no Southwark CIL charge for office floorspace in this location.

It is necessary to complete a 'Planning Application Additional Information Requirement Form' to determine the amount of chargeable floorspace on the site and submit this with any formal planning application on the site. The amount to be paid is calculated when planning permission is granted and it is paid when development starts. Further details about the CIL can be found using the links below.

<http://www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil>

<http://www.communities.gov.uk/publications/planningandbuilding/communityinfrastructurelevymay11>

### **Other matters**

It is advised that prior to the submission of an application discussions should be had with the Council's Highway Development Control Team regarding any works on or adjacent to the Highway. Regard should be had to the material palette set out in the Council's SSDM (Southwark Street Design Manual). All development will be required to incorporate the principles of inclusive design, with suitable access provided for people with disabilities or those who are mobility impaired.

### **Conclusion**

The proposed redevelopment of the site is welcomed and an office-led scheme supported in principle. The

emerging design concept is promising and would relate well to the local context. Officers consider that this approach should be pursued, however, the uppermost storey should be removed and the proposal restricted to eight storeys, with the curved set-backs expressed at the 7th and 8th floors developed to better articulate the top of the building. Further detail is required to demonstrate that the functional/servicing requirements of the site can be accommodated 'in-plot' with such an extensive amount of the site covered with built development and further detail is also required to demonstrate that the proposal will not be detrimental to the amenity of neighbours, particularly the Leatherworks building to the west and Arc building to the south.

This advice is given to assist you but is not a decision of the Council. Further issues may arise following a formal planning application, where a site visit and public consultation and consultation with statutory consultees would be undertaken.

Please accept this letter as the closure of your current enquiry.

Yours sincerely

*Simon Bevan*  
Director of Planning