

Contents

Contents	1
EXECUTIVE SUMMARY	3
BACKGROUND INFORMATION	3
Site location and description.....	3
Details of proposal	4
Planning history of the site, and adjoining or nearby sites.....	4
KEY ISSUES FOR CONSIDERATION	4
Summary of main issues.....	4
Legal context.....	5
Planning policy.....	5
ASSESSMENT	6
Principle of the proposed development in terms of land use	6
Environmental impact assessment.....	6
Design.....	7
Impact of proposed development on amenity of adjoining occupiers and surrounding area.....	8
Noise and vibration	8
Energy and sustainability	10
Planning obligations (S.106 agreement).....	11
Mayoral and borough community infrastructure levy (CIL)	12
Other matters	12
Community involvement and engagement	12
Consultation responses from members of the public and local groups	12
Community impact and equalities assessment.....	12
Human rights implications.....	13
Positive and proactive statement.....	13
Positive and proactive engagement: summary table	14
CONCLUSION.....	14
BACKGROUND INFORMATION	14
BACKGROUND DOCUMENTS	14
APPENDICES.....	14

Item No. 6.2	Classification: OPEN	Date: 17 March 2021	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 20/AP/3101 for: Full Planning Application Address: SAINSBURY OUTPATIENT PHARMACY SOLOMON CENTRE GUYS HOSPITAL ST THOMAS STREET SE1 9RT Proposal: Construction of a new 8 storey hospital building (C2) 41 metres AOD, alterations to existing access arrangements and public realm works.		
Ward(s) or groups affected:	LONDON BRIDGE AND WEST BERMONDSEY		
From:	DIRECTOR OF PLANNING		
Application Start Date	14.10.2020	PPA Expiry Date	6 January 2021
Earliest Decision Date	13.10.2021		

RECOMMENDATION

1. That planning permission be granted subject to conditions, the applicant entering into an appropriate legal agreement, and referral to the Mayor of London.
2. In the event that the requirements of paragraph 1 above are not met by 30 July 2021, the director of planning be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 181.

EXECUTIVE SUMMARY

3. The site is currently a hard standing plot, previously occupied by a single storey building comprising a small Sainsbury's store and a pharmacy. These uses were ancillary to the main use of the land as a hospital, (Class C2).
 4. The application is for a new 8 storey building, positioned between the Southwark Wing and Tower Wing. The new hospital building will provide orthopaedic services comprising 24 medi-rooms, 8 theatres as well as an education training facility, support accommodation and discharge area.
 5. It is envisaged that the building will provide the facilities to offer an Orthopaedic Centre of Excellence, providing a full range of elective orthopaedic procedures for patients involving all orthopaedic surgeons within the region. The aim is to provide a hub of excellence for education and
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training to enable an innovative approach to the development of a of a comprehensive research portfolio to hopefully lead to improved outcomes for patients as well as the ability to attract substantial research funding.

6. The proposed building will directly link to The Tower at ground and first floor levels. This link will allow patients, staff and services to enter the building from the main entrance with good accessibility without the need to go outside.
7. The proposal is required to support existing demand as well as responding to the future needs of patients, whilst maintaining full health care services.

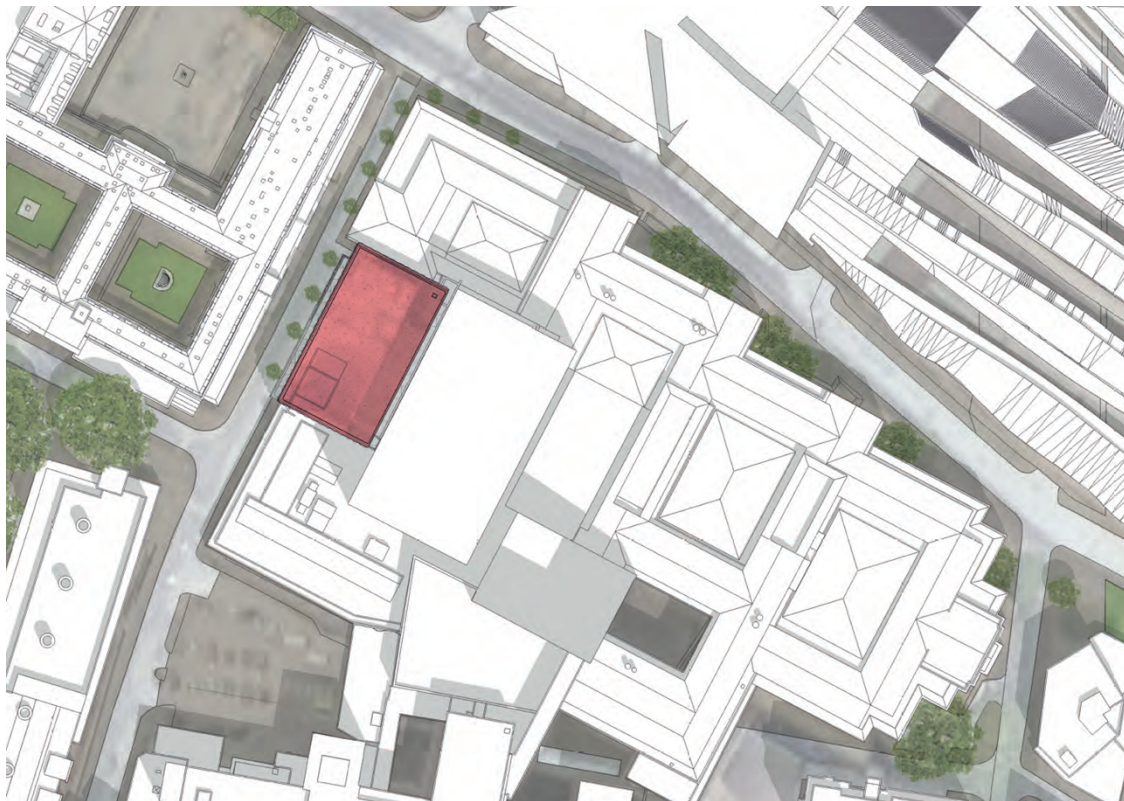
BACKGROUND INFORMATION

Site location and description

8. The site is located within Guy's hospital campus, off of Great Maze Pond. The site previously comprised a single storey outpatient pharmacy facility and Sainsbury's. The site is bound to the north by the Southwark wing to the east by Southwark Wing and Tower Wing, to the south by the Tower Wing and the Boiler House and to the west by Great Maze Pond.
 9. The site lies within the following designations;
 - Borough, Bermondsey and Rivers Archaeological Priority Zone
 - London Bridge District Town Centre
 - Bankside, Borough and London Bridge Strategic Cultural Area
 - Bankside, Borough and London Bridge Opportunity Area
 - Central Activity Zone
 - Air Quality Management Area
 10. The site is also included within a proposals designation in New Southwark Plan, NSP49 London Bridge Health Cluster.
 11. The site is located within Flood Zone 3, but benefits from flood defences.
 12. The site is not within a Conservation Area however Borough High Street Conservation lies to the west of the site. There are no listed buildings on site. However there are several listed buildings located within close proximity to the north west of the site these include;
 - Guy's Hospital War Memorial – Grade II
 - Guy's Hospital Main Building, (including Wings and Chapel) – Grade II*
 - Alcove from Old London Bridge in Inner Quadrangle of Guy's Hospital – Grade II
 - Statue of Thomas Guy in Courtyard of Guy's Hospital – Grade II
 - Gates, Gate Piers and Street Railings to Guy's Hospital – Grade II
 13. A designated Site of Importance for Nature Conservation (SINC) is located within 240 metres north of the site.
 14. The area is characterised by the medical and healthcare buildings within the campus. The site adjoins Southwark Wing to the north, which comprises a 5
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storey brick building. To the east and south of the site is the 34 storey Guy's Tower (Tower Wing) and 29 storey Guy's House.

15. The site is located within an area of excellent public transport accessibility, with a PTAL pf 6b. The site is easily accessible by London Bridge Railway and Underground Stations as well as by the numerous buses passing through London Bridge.
16. There is limited on street parking available within the surrounding area which lies within a controlled parking zone. A 24 hour NCP car park operates on Snowfields and blue badge holder car parking spaces are locate in the Tower Wing Car Park.



Location of the proposed building

Details of proposal

17. The proposal is currently a vacant hardstanding plot of land. The application seeks to construct a new 8 storey building which will have a gross internal floor area, (GIFA) of 6616.4 sq. metres. The total gross external floor area, (GEFA) would be 7068.3 sq. metres. Due to the 2 storey plant and floor heights the building would measure 41 metres (AOD), classifying it as a tall building as determined by the current and proposed Southwark Plan Policies.
 18. The new building would be located between the Southwark Wing and the Tower Wing and will provide additional orthopaedic services accommodation 24 medi-rooms, 8 theatres and an education and training facility, as well as support accommodation and discharge area.
 19. The proposal aims to provide an Orthopaedic Centre of Excellence within
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South East London, which will provide a full range of elective orthopaedic procedures for patients, involving all orthopaedic surgeons within the region. It is proposed to provide a hub of excellence for education and training and would enable the development of comprehensive research.

20. The new building will directly link to The Tower at ground and first floor levels. These links mean that patients, staff and services can enter the building from the main entrance.
21. The ground floor of the building would act as both the reception and pre and post operative waiting area. Above the ground floor would be 4 clinical floors each with two theatre suites and six medi-rooms. The top floor of accommodation is intended to be both a support floor for clinical staff and for staff training, with a series of meeting rooms which can be opened to create a single flexible space, all of the spaces would be linked back to the theatres below to enable staff training using the latest technologies in real time.

Consultation responses from members of the public and local groups

22. Comment stating it would be good to see a biodiverse green roof.
 23. Comments from Team London Bridge
 24. We believe the proposals are best developed in the context of a wider masterplan for the London Bridge Health Cluster site which establishes the strategic ambition and objectives, informs the development of specific sites and avoids the problems of piecemeal development. We believe such a Masterplan should be agreed prior to consideration of individual development proposals. For example, it is crucial to know how access and permeability is planned into the campus linked to neighbouring areas and planned developments such as those on St Thomas Street and Melior Street.
 25. The proposals are based on a clearly articulated evolution of the design in response to feedback from Southwark Council and others. We recognise them as making a distinctive new contribution to the assemblage of buildings that make up the Guy's Hospital campus.
 26. Given the health and wellbeing role of Guy's and its status as a global innovation hub we would expect the development to support appropriately high sustainability standards. This would also meet the expectations of the London Bridge Area Vision in the New Southwark Local Plan. The standards should include:
 - Ambition to be BREEAM Outstanding alongside commitment to BREEAM Excellent
 - WELL Platinum
 - Air quality positive
 - EPC rating A
 - Wiredscore (platinum)
 - Reduced ground level wind speeds and urban heat island effect
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- water run off at greenfield rates
27. The proposals are silent on many of these targets or lack their ambition, for example committing to BREEAM Excellent without any ambition to attain BREEAM Outstanding. As the BREEAM assessment shows, this could be achieved through greater ambition on, for example, reducing energy and water use and improved construction practices.
 28. The proposals acknowledge that they only achieve a 28% improvement in carbon emissions over Building Regulations and this is recognised as falling well short of the requirements of both the New Southwark Plan and London Plan. While the “specialist clinical nature” of the building creates particular challenges, and the shortfall can be financially offset, the disparity is significant. We ask that it is further interrogated with a view to significantly improving performance.
 29. The plans could also more visibly address their role as one of the first major developments to be brought forward on a hospital site with the experience of managing the Covid-19 pandemic. They could anticipate future public expectations and requirements; including use of filtration systems, higher standards for fresh air provision in the building, wider doors, lifts and routes, touchless systems, and use of anti-viral coatings on surfaces.
 30. We are disappointed that the opportunity to make a strong contribution to the Green Grid vision that “London Bridge will become one of the greenest, most beautiful, environmentally sensitive and civic-minded business districts in the world” has not been taken. This should including a positive impact on the Urban Greening Factor achieved through greening the building inside and out and supporting biodiversity net gain. There is relevant experience nearby with the Orchard Isle Living Wall, supported and owned by Guy’s and St Thomas’ Charity, and its positive impact on health, wellbeing, wildlife and air quality.
 31. The provision of cycle parking for ten additional bikes is welcome but we believe it should be more generous and anticipate and incentivise a growth in cycle use, particularly since we know cycling by the Trust has increased dramatically in 2020. The plans identify the best route to connect with National Cycleway 4 is via Great Maze Pond which is already an area with significant congestion and conflicts between users on foot and on bike. The plans should be accompanied by measures to support alternative routes.
 32. We welcome the efforts to minimise the impacts of servicing through use of the existing Guy’s consolidation centre.

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

33. 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 xx
 - 34.
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KEY ISSUES FOR CONSIDERATION

Summary of main issues

35. The main issues to be considered in respect of this application are:
- Principle of the proposed development in terms of land use;
 - Environmental impact assessment
 - Design, 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
36. These matters are discussed in detail in the 'Assessment' section of this report

Legal context

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

39. The statutory development plans for the Borough comprise the London Plan 2016, Southwark Core Strategy 2011, and saved policies from The Southwark Plan (2007 - July). The National Planning Policy Framework (2019) and emerging policies constitute material considerations but are not part of the statutory development plan. A list of policies which are relevant to this application is provided at Appendix xx. Any policies which are particularly relevant to the consideration of this application are highlighted in the report.
40. The site lies within the following designations;
- Borough, Bermondsey and Rivers Archaeological Priority Zone
 - London Bridge District Town Centre
 - Bankside, Borough and London Bridge Strategic Cultural Area
 - Bankside, Borough and London Bridge Opportunity Area
 - Central Activity Zone
 - Air Quality Management Area
41. The site is located within Flood Zone 3 as identified by the Environment Agency flood map, which indicates a high probability of flooding however it benefits from protection by the Thames Barrier.

ASSESSMENT

Principle of the proposed development in terms of land use

Relevant policy designations

National Planning Policy Framework (2019)

42. The revised NPPF was updated on 19th February 2019 and sets out Government planning policies for England and how they should be applied. The NPPF must be taken into account when local development plans are produced and is a material consideration in planning application decisions by Local Planning Authority. The revised NPPF is the presumption in favour of sustainable development. This commitment to sustainable development should be achieved through three overarching objectives: an economic objective, a social objective and an environmental objective
43. Paragraph 212 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications;
- Chapter 2 Achieving sustainable development
 - Chapter 8 Promoting healthy and safe communities
 - Chapter 9 Promoting sustainable transport
 - Chapter 11 Making effective use of land
 - Chapter 12 Achieving well-designed places
 - Chapter 14 Meeting the challenge of climate change, flooding and coastal change
 - Chapter 15 Conserving and enhancing the natural environment
 - Chapter 16 Conserving and enhancing the historic environment
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London Plan 2016

44. The London Plan is the regional planning framework and was adopted in 2016. The relevant policies of the London Plan 2016 are:

Policy 3.1 Ensuring equal life chances for all
Policy 3.2 Improving health and addressing health inequalities
Policy 3.16 Protection and enhancement of social infrastructure
Policy 5.12 Flood risk management
Policy 5.13 Sustainable drainage
Policy 6.9 Cycling
Policy 7.4 Local character
Policy 7.5 Public realm
Policy 7.6 Architecture
Policy 7.8 Heritage assets and archaeology

Core Strategy 2011

45. The Core Strategy was adopted in 2011 providing the spatial planning strategy for the borough. The strategic policies in the Core Strategy are relevant alongside the saved Southwark Plan (2007) policies. The relevant policies of the Core Strategy 2011 are:

Strategic Policy 1 Sustainable development
Strategic Policy 2 Sustainable transport
Strategic Policy 4 Places for learning, enjoyment and healthy lifestyles
Strategic Policy 11 Open spaces and wildlife
Strategic Policy 12 Design and conservation
Strategic Policy 13 High environmental standards

Southwark Plan 2007 (saved policies)

46. In 2013, the council resolved to 'save' all of the policies in the Southwark Plan 2007 unless they had been updated by the Core Strategy with the exception of Policy 1.8 (location of retail outside town centres). Paragraph 213 of the NPPF states that existing policies should not be considered out of date simply because they were adopted or made prior to publication of the Framework. Due weight should be given to them, according to their degree of consistency with the Framework. The relevant policies of the Southwark Plan 2007 are:

Policy 3.2 Protection of amenity
Policy 3.11 Efficient use of land
Policy 3.12 Quality in design
Policy 3.13 Urban design
Policy 3.15 Conservation of the historic environment
Policy 5.1 Locating developments
Policy 5.2 Transport impacts
Policy 5.3 Walking and cycling

Draft New London Plan

47. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2nd March 2018. Following an Examination in Public, the Mayor then issued the Intend to Publish London Plan. The Secretary of State responded to the Mayor in March 2020 where he expressed concerns about the Plan and has used his powers to direct changes to the London Plan. The London Plan cannot be adopted until these changes have been made. Until the London Plan reaches formal adoption it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.

48. GG2 – Making the best use of land
GG3 – Creating a healthy city
SD4 – The Central Activities Zone
S1 – Developing London’s social infrastructure
S2 – Health and social facilities
HC1 – Heritage conservation and growth
D1 - London’s form and characteristics
D8 - Tall buildings

New Southwark Plan

49. For the last 5 years the council has been preparing the New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy. The council concluded consultation on the Proposed Submission version (Regulation 19) on 27 February 2018. The New Southwark Plan Proposed Submission Version: Amended Policies January 2019 consultation closed in May 2019.

50. The New Southwark Plan Submission Version – Proposed Modifications for Examination was submitted to the Secretary of State in January 2020 for Local Plan Examination. It is anticipated that the plan will be adopted in late 2020 following an Examination in Public (EIP). As the NSP is not yet adopted policy, it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.

51. AV.11 London Bridge Area Vision
SP2 Regeneration that works for
SP4 Strong local economy
SP5 Healthy, active lives
SP6 Cleaner, Greener, Safer
P12 Design of places
P13 Design quality
P15 Designing out crime
P16 Tall buildings
P17 Efficient use of land

P18 Listed buildings and structures
P20 Conservation of the historic environment and natural heritage
P21 Borough views
P22 Archaeology
P26 Education places
P44 Healthy developments
P46 Community uses
P48 Public transport
P49 Highway impacts
P52 Cycling
P53 Car parking
P54 Parking standards for disabled people and the mobility impaired
P55 Protection of amenity
P64 Improving air quality
P65 Reducing noise pollution and enhancing soundscapes
P67 Reducing flood risk
P68 Sustainability standards
P69 Energy
IP3 Community infrastructure levy (CIL) and Section 106 planning obligations
IP7 Statement of community involvement

Proposal NSP49

Principle of the proposed development in terms of land use

52. London Plan Policies 3.2, 3.16 and 3.17 and Publication London Plan Policies S1 and S2 support the provision of new high-quality social infrastructure in light of local and strategic social infrastructure need and new models of care. Boroughs are required to work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses.
 53. London Plan Policies 2.12 and 2.13 and Publication London Plan Policies SD1, SD4 and SD5 support strategic functions such as centres of medical excellence and associated specialist facilities in the Central Activities Zone. The proposed 8-storey building which would accommodate orthopaedic centre of excellence seeks to meet existing and future an orthopaedic healthcare service demand in modern and high-quality accommodation.
 54. From a strategic planning perspective, the application site is within the London Bridge, Borough and Bankside Opportunity Area, which the Local Plan has identified as having considerable potential for intensification, particularly at London Bridge and its environs; complemented by improvements to public transport and interchange facilities, better pedestrian integration with the surrounding area and greater use of river passenger transport. More specifically, London Plan Policies 3.2, 3.16 and 3.17 and Publication London Plan Policy S2 affirm the Mayor's support for the provision of high-quality health and social care facilities particularly in places easily accessible by public transport, cycling and walking. Guy's and St Thomas' hospital is a major NHS health facility with the highest public transport accessibility level
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(6b) and has a reputation for excellence in clinical research and which provides a range of important health services to London as well as the local community. Therefore, the proposed development complies with core London Plan and Publication London Plan policies.

55. The site lies within the hospital campus and it is therefore entirely appropriate to use the land for hospital purposes. The provision of modern world class health and education facilities are noted as part of the vision within the current and emerging Southwark plans.
56. The orthopaedic centre is designed to meet an identified need and improve facilities for the community. The proposal makes effective use of land, will mitigate biodiversity impacts, minimise waste and pollution and seek to provide a BREEAM 'Excellent' sustainable building.
57. The proposed development is located in an area of highest public transport accessibility, is easy to reach on foot and existing cycle parking for staff and visitors.
58. The site is located within the Borough, Bermondsey and Rivers Archaeological Priority Zone. The site lies 10 metres west of Borough High Street Conservation Area as well as a number of listed buildings.
59. The proposal protects existing heritage assets on site and does not affect the setting of the conservation areas or listed buildings.

Environmental impact assessment

60. No EIA Screening Opinion request was submitted to ascertain whether the Proposed Developments would require an Environmental Impact Assessment to be submitted as part of the planning application. However the development would be below the threshold for which an EIA would be required.
61. The proposed development will be similar in nature to the surrounding land uses. Consequently, the extent of the impact of the Proposed Developments are localised due to the nature and characteristics of the end use, and mitigation will be proposed where necessary. There would be a number of positive impacts to be created from the proposed development, notably the provision of improved health care facilities.
62. Good construction practice and site operations would ensure minimal effects to the local environment, whilst its temporary nature would be offset by the benefits the Proposed Developments will deliver. Effects would therefore be mainly limited and local in nature. There may be some impact in terms of additional traffic generation, however it is envisaged that this increase in traffic can be accommodated in the existing highway network and a Traffic Management Plan and / or Construction Logistics Plan will be implemented.

Design

Site context

63. The original London Guy's Hospital consisted of a courtyard facing St Thomas Street opened in 1725. In 1738 the General Court of the hospital started the expansion of the new building; a new East Wing was erected in 1774-80. The building has been added to over the years and extensively repaired following severe bomb damage during the blitz. In 1974 the hospital added the 34 storey Guy's Tower. The hospital campus consists of 19 distinct buildings dating from the 18th century to the present.
64. Great Maze Pond is a narrow pedestrian road, which links directly to London Bridge Station and the Shard. Within close proximity of the site are The Shard and the Guy's Cancer Centre of Excellence, which opened in 2016.
65. The proposed site is constrained on three sides by existing hospital buildings. These include the 34 storey Guy's tower the rear, the 5 storey Southwark wing and the 2 storey Heatherwick Clad Boiler house. Across Great Maze pond which borders the fourth elevation is the recently restored Boland House which is used for the Science Gallery.

Height scale and massing

66. In terms of the locational requirements for tall buildings the site is situated within a highly accessible location, an Opportunity Area and a town centre. The principle of a tall building in this location is established to some extent with the existing series of tall buildings within the existing context. It is still necessary to test the current application against all the requirements of saved policy 3.20 of the Southwark Plan, which requires that all tall buildings should:
 - i. Make a positive contribution to the landscape; and
 - ii. Be located at a point of landmark significance; and
 - iii. Be of the highest architectural standards; and
 - iv. Relate well to its surroundings, particularly at street level
 - v. Contribute positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.
 67. The building, in terms of its location, its architectural design, and its response to the local streetscape, is considered to meet the requirements for a tall building set out in saved policy 3.20. Given its setting within a group of existing and planned very tall buildings, its height would have no impact on the London skyline.
 68. London Plan Policy 7.7 and Publication London Plan Policy D9 set out the criteria against which tall buildings should be assessed. Policy D9 further establishes that boroughs should determine where tall buildings are an appropriate form of development in development plans and criteria against which impact should be assessed including the requirement to take account of and avoid harm to the significance of London's heritage assets and their settings.
 69. The application site is located within a designated tall buildings area (London Bridge area) as identified by New Southwark Plan Policies P12 and Policy P16. In these policies tall buildings are identified as those which are more
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than 30 metres (or 25 metres in the Thames Policy Area) and/or significantly change the skyline.

70. In functional terms, the development has been well thought out. Wind and daylight/ sunlight impacts have been satisfactorily addressed and are therefore acceptable. The site is within the Thames Policy Area and the impact of the proposed building (8-storey) is negligible compared to its neighbouring much taller buildings such as the (34-storey) Tower Wing and the (95-storey) Shard.

Site layout

71. The site layout and massing are supported, and it is noted that there are a number of operational and fire related requirements that have dictated the layout and massing of the building. Pedestrian routes and permeability are clearly articulated and are safe and direct.

Architectural design and materials

72. The applicant has sought to create a positive street facing presence and the simple articulation of the main facade is welcomed and integrates successfully with neighbouring buildings. Given the site is adjacent to a conservation area and within close proximity to the Grade II* Listed Guy's Hospital Main Building, the building will be constructed using contextual materials that respond sensitively to its surrounding context. The proposal includes the use of high-quality cladding materials, key details such as window reveals and rooflines and suggests an exemplary build quality would be achieved. The proposed materials will be dealt with via appropriate conditions.
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London View Management Framework (LVMF)

73. London Plan Policies 7.11 and 7.12 and Publication London Plan Policy HC.4 provide for the designation, protection and management of 27 strategically important views of London. These policies are explained in detail in the LVMF which forms SPG to the London Plan. The proposed building has been tested in the three LVMF protected views the site falls within: 2A Parliament Hill, 3A Kenwood House, and 12B Southwark Bridge, and the applicant has demonstrated that the proposed building would be almost entirely obscured by the Shard in all the three protected views, and given its height, only a small section of part of its roof would be perceptible. The proposed building therefore does not raise any strategic planning concerns with regards to the relevant strategically protected views identified in the LVMF and London

Landscaping, trees and urban greening

74. Landscape and the public realm is an important part of any proposal for a tall building. It will not only create a setting for the building, allowing it to land appropriately, but also an opportunity for such a development to demonstrate the benefits that can flow from expanding vertically providing more space at grade in a congested part of the city.
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75. The existing site is cleared but was previously occupied by a single storey commercial building. This represented a very low density use which failed to optimise density in such a central and accessible location. At present the site is hoarded up and has a negative contribution to the landscape. The proposed building occupies most of its small site and the scope for the provision of substantial public realm benefits is therefore limited.
76. At ground level it is proposed the recently created pedestrian zone along Great Maze Pond by the Science Gallery will be extended in front of the proposed new building. It is proposed to use complementary hard and soft landscaping with concrete seating area and to treat the ground floor as a shop window for the OCE with to soffit glazing.
77. There are no existing landscape constraints. The proposed public realm shown within the red line includes a line of four street trees. Enhancing green amenity should be seen as an essential element in the design of new facilities within the hospital campus, particularly in relation to recuperation and overall health benefits. It is considered that a condition is imposed to ensure the landscape details are submitted.
78. The GLA have requested that a calculation of the scheme's Urban Greening Factor (UGF), as set out in Policy G5 of the Publication London Plan and achieve the specified target of 0.3. A drawing showing the surface cover types and accompanying UGF calculation should be submitted prior to any Stage 2 referral. Opportunities should be sought for additional planting in the public realm, which could take the form of rain gardens, in order to improve the urban greening of the scheme.



View from Great Maze Pond

Heritage considerations

79. The Planning (Listed Buildings and Conservation Areas) Act 1990 and S66 in particular, imposes the duty on local planning authorities to have special regard to the desirability of preserving or enhancing a listed building and its setting or any features of special architectural or historic interest which it possesses. Further, special attention should be paid to the desirability of preserving or enhancing the character or appearance of conservation areas. This is also reflected in the NPPF (2019), which requires all development to conserve or enhance heritage assets and their settings and avoid causing harm. Designated heritage assets include Statutory listed buildings and designated conservation areas. The NPPF asserts in paragraphs 190 and 192, that Planning Authorities should identify the significance of affected heritage assets and their settings and assess how these are affected by a development, and then in paras 193-196, if any harm is identified, how that harm can be considered in the balance.
80. The site is 60 metres east of the Grade II listed alcove from the old London Bridge station, 70 metres east of the Grade II* listed main building of Guy's Hospital, 70 metres south-east of the Grade II listed statue of Thomas Guy and 75 metres south-east of the Grade II listed gates of Guy's Hospital. The site is not within a Conservation Area, but Borough High Street Conservation Area lies 10 metres to the west of the site.
81. The proposal protects the above onsite and nearby listed buildings and does not undermine the appearance of the Borough High Street Conservation Area. There is no adverse impact and no heritage assets are lost as a result of this proposal. The public benefits the scheme would deliver include a high quality, highly sustainable hospital building, employment generation, and new and improved public realm. The applicant has demonstrated there would be no adverse impact on the nearest SINC, which is located 280 metres from the application site.

Archaeology

82. Policy 3.19 of the Southwark Plan requires an archaeological assessment and evaluation to be submitted for planning applications affecting sites within the Archaeological Priority Zones (APZ).
 83. The site is located within Borough, Bermondsey and Rivers Archaeological Priority Zone. A Historic Environment Assessment has been prepared to assess the impact of the scheme on buried heritage assets. The assessment concludes that there is high potential for Roman, later medieval and post-medieval structural and water management remains and moderate potential for human remains relating to the 18th century burial ground within the site.
 84. In consultation with Southwark Council's archaeologist it was agreed that a Watching Brief was the most appropriate form of mitigation. The targeted Watching Brief will consist of establishing where, if at all, archaeological deposits survive, recording any necessary material if present and ensuring
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that the proposed groundworks do not destroy any significant archaeological

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

85. Strategic policy 13 of the Core Strategy 'High environmental standards' seeks to ensure that development sets high standards for reducing air, land, noise and light pollution and avoiding amenity and environmental problems that affect how we enjoy the environment in which we live and work. Saved policy 3.2 of the Southwark Plan states that permission will not be granted for development where a loss of amenity, including disturbance from noise, would be caused. The adopted Residential Design Standards SPD expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.

Daylight and Sunlight

86. The BRE sets out three 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 (VSC) can be reduced by about 20% of the original value before the loss is noticeable.
 87. In considering the impact upon sunlight, the test is based upon a calculation of annual probable sunlight hours (APSH) for all window faces within 90 degree of due south. The BRE guidelines state that a window should receive a minimum of 25% of the annual probable sunlight hours, of which, 5% should be received in winter months. Where window sunlight levels fall below this recommendation, the window should not lose more than a 20% of its former value and the reduction in sunlight over the whole year should not be greater than 4% of the ASPH.
 88. The proposed development will cause some noticeable reductions to some of the windows and rooms belonging to the surrounding buildings, all of which are associated with the hospital and are non residential.
 89. Technically there is no strict requirement to assess non residential uses unless they are buildings of special uses. The majority of reductions occur to areas which would not normally require assessment such as circulation areas, stairwells and offices and although daylight is beneficial it is not critical and allowing leniency would be reasonable. Especially because these room types require artificial lighting to be used. The BRE guidance does allow for reductions to occur under Appendix F (iii) where the developer of the new building owns the existing nearby building, providing there is the potential to carry out a reconfiguration, the proposed development should be considered compliant.
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90. The windows assessed for impacts from the proposed development are Guy's Hospital Building A to the north of the site, Guy's Hospital Building B, (Guy's Tower) to the South East and adjoining the site to the rear, Guy's campus to the South West of the site, Guy's Galleria to the West of the site and The Counting House immediately opposite the site to the West.

Address	Nos. of windows (VSC)	Pass Rate (%)	Number of Rooms Assessed (Daylight Distribution Test)	Pass Rate (%)
Counting House	57	56	30	47
Guy's Galleria	10	100	1	100
Guy's Campus	14	100	2	100
Guy's Hospital Building A	52	71	21	19
Guy's Hospital Building B	79	58	45	16
Guy's Hospital Building C	82	98	40	100

Counting House

91. Counting House is used to provide temporary visitor accommodation for patients, visitors and staff to the campus.
92. The daylighting has been assessed to 57 windows using the Vertical Sky Component Test. The results demonstrate that 26 windows met the recommended BRE level, 12 windows achieve a value within 60% of their former values and 19 windows will experience noticeable reductions.
93. The internal daylight levels have been assess using the Daylight Distribution test, of the 30 rooms assessed 14 meet the recommended BRE levels. The results demonstrate that the reductions that occur will be noticeable by BRE standards. However this analysis applies to residential rooms. Typically, commercial properties are more dependent on artificial lighting.
94. Minor deviation within non – residential use is less critical in terms of enjoyment of daylight, especially in urban city areas where there are reduced existing daylighting levels. Trying to preserve these levels is more challenging and more flexibility should be applied.
95. Sunlight levels have been tested and found to be below the residential standards. Notwithstanding all windows will receive reasonable sunlight
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annually including during the winter months.

Guys Galleria

96. The daylighting has been assessed to 10 windows. All of the windows tested met the recommended levels detailed within the BRE. The internal daylight levels were tested to one room and this demonstrated that it would comply.
97. The sunlight test demonstrated that the building would achieve levels of sunlight in excess of the BRE requirements.

Guy's Campus

98. The daylighting levels were assessed to 14 windows, all of the windows demonstrated compliance with the BRE Guidelines. The internal daylight levels to two rooms were assessed; both rooms achieve the recommended levels in the BRE.
99. Sunlight levels were assessed to two rooms both rooms will retain good levels of sunlight following the proposed development.

Guy's Hospital Building A

100. Building A is a medical building with associated offices.
101. The daylighting has been assessed to 52 windows of which 11 windows met the BRE guidelines, 26 windows demonstrated a minor adverse loss (20-29%), one window achieved a moderate loss (30-39%) and 14 windows would be subject to noticeable losses. The internal daylighting test also demonstrates there will be some reductions.
102. The sunlight analysis shows that there will be a reduction of sunlight to this building, particularly on the lower floors.

Guy's Hospital Building B

Building B is a medical building with associated offices.

103. The VSC daylight test was carried out to 79 windows. One window met the BRE test. 45 windows demonstrated losses between 20 – 29%, one window was subject to a loss of 30- 39% and 32 windows were subject to losses above 40%. The daylight assessment of the individual rooms demonstrated
 104. The daylight distribution figures demonstrate that of the 45 rooms assessed. Seven are BRE compliant, 31 rooms are subject to a minor deviation and 14 rooms are subject to noticeable reductions. It should be noted that the majority of the rooms which are subject to these losses are circulation areas where there is no requirement for daylight.
 105. Sunlight has not been assessed for this block as there are no windows which are 90 degrees due south.
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Guy's Hospital Building C

Building C contains residential accommodation associated with the hospital.

106. The daylighting was assessed to 82 windows, of which 80 meet the BRE guide lines. One window was subject to a minor deviation and the other window will experience a noticeable loss. The windows that are subject to additional deviations are mitigated through multiple windows serving a room, demonstrated in the internal daylighting results. The internal daylighting has been assessed to 40 rooms of which all fall in line with the BRE guidance.
107. Sunlight has not been assessed for this block as there are no windows which are 90 degrees due south.

Overshadowing to the amenity

108. Access to daylight and sunlight is important aspect of a microclimate around buildings. The areas typically require access to good natural light are gardens, parks, playgrounds, sitting areas and focal points.
109. There are two areas identified for assessment, an amenity space within the centre of Counting House and a roof terrace on the fourth floor of Building A. The tests demonstrate that there would be no impact upon the amenity space within Counting House and that there would be a 0.8 percent loss to the amount of sun on the roof terrace of Block A.

Conclusion on daylight and sunlight

110. The proposal is of a size and within a location where reductions are unavoidable. Notwithstanding, the overall impact to the surrounding buildings is confined to buildings within the hospital campus, which are for the most part medical. The residential accommodation most affected is that of Counting House, however the accommodation provided here is of a temporary nature and therefore the BRE standards should be applied more flexibly.
111. The proposal would not impact negatively upon the amenity spaces closest to the site. The proposal is therefore considered acceptable in terms of daylight and sunlight.

Outlook and privacy

112. In order to maintain privacy the Council's Residential Design Standards SPD recommends a minimum separation distance of 12m between the fronts of buildings and any buildings which front a highway, and a minimum of 21m at the rear. The site of the development is such that the nearest neighbouring buildings are separated from the site by either roads or other substantial hospital buildings. Counting House is the nearest facing habitable accommodation, (albeit short stay hospitality) lies opposite Great Maze Pond at a distance of 15 metres. This would be an acceptable level of separation.
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113. The proposed building would lie immediately adjacent Guy's Tower, it therefore will be impacted in terms of outlook due to the proximity of the buildings, notwithstanding these are non habitable windows and within the same ownership. The requirement for outlook within a public building is not the same as for residential windows. Privacy is not going to be an issue as there are no windows on the elevation facing onto Guy's Tower.

Ecology and biodiversity

114. Saved Policy 3.28 of the Southwark Plan requires that biodiversity is taken into account in all planning applications and encourages the inclusion of features which enhance biodiversity.

115. London Plan Policies 5.10 and 5.11 require green roofs and other green infrastructure to be incorporated within major schemes, this is reiterated within the New London Plan.

116. The site is vacant and hoarded from active use. Collectively the habitats within the proposed development site are assessed as being of a low ecological value. Based on the habitat types present, it is considered that the site has no potential to support protected species.

Designing out crime

117. As a large organisation The Trust employ their own qualified security personnel who have been consulted and commented upon the proposal to ensure the security of both hospital staff and users of the proposed facility.

118. Key security aspects of the new development;

- No external entry point, all staff and visitors enter via currently monitored entrances to the hospital.
- All clinical and staff areas are secured via swipe card access related to a site wide database.
- There are no opening windows for unauthorised access.
- All glazing is both toughened and laminated in line with healthcare specifications.
- External fire escape doors are alarmed and constructed of steel.
- The building is raised 800mm above external levels, the front of the building behind the cladding is mass concrete to protect from potential ram raids.
- Rise /fall bollards are located at either end of Great Maze Pond to prevent vehicles using this as a cut through.
- Staff will each have their own lockers to house personal items located within a staff access only staff room.

Fire safety

119. Policy D12 of the Publication London Plan states that proposals must be accompanied by a fire statement, prepared by a suitably qualified third party

assessor, demonstrating how the development would achieve the highest standards of fire safety and ensure that they: are designed to incorporate appropriate features which reduce the risk to life in the event of a fire; are constructed in an appropriate way to minimise the risk of fire spread; provide suitable and convenient means of escape for all building users; adopt a robust strategy for evacuation and provide suitable access and equipment for firefighting which is appropriate for the size and use of the development. At this stage no fire strategy is submitted, however the applicant has confirmed that a fire strategy is being prepared for submission as a policy compliant fire safety strategy prior to any Stage 2 referral.

Noise and vibration

Transport and highways

120. The NPPF states that planning decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.
121. Core Strategy Strategic Policy 2 encourages walking, cycling and the use of public transport rather than travel by car. Saved Policy 5.1 of the Southwark Plan states that major developments generating a significant number of trips should be located near transport nodes. Saved Policy 5.2 advises that planning permission will be granted for development unless there is an adverse impact on transport networks; and/or adequate provision has not been made for servicing, circulation and access; and/or consideration has not been given to impacts of the development on the bus priority network and the Transport for London (TfL) road network.

Servicing and deliveries

122. The majority of delivery and servicing activity associated with the hospital is undertaken in a consolidated servicing yard accessed off Weston Street. Servicing bays and a compacter are provided here. A tunnel system is utilised to distribute goods delivery and waste from across the hospital campus. The new building will utilise this central logistics hub and distribute via basement tunnels/lifts at each level. No separate delivery facilities will be provided in respect of the proposed development.
123. The existing loading bay which fronts the site will be removed to enhance the public realm.

Site layout

124. The hospital campus is bound by St Thomas Street to the north, Weston Street to the east, Snowfields and Newcomen Street to the south. The proposed development is located on Great Maze Pond, a private road located in between the Southwark Wing and Tower Wing along the western edge of the main hospital building which forms the core of the hospital.
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125. St Thomas Street is a two-way single carriageway road, subject to a 20mph speed limit. It follows a northwest / southeast alignment between the A3 and Bermondsey Street. St Thomas Street forms part of the TfL Road Network (TLRN), as a red route, which imposes restrictions on loading, waiting and parking along the route.
126. A taxi rank is located on the southern side of the carriageway, directly to the east of the junction with Great Maze Pond opposite the Shangri La Hotel providing capacity for two vehicles. A signalised pedestrian crossing is located directly to the east of Great Maze Pond.
127. Great Maze Pond separates the hospital campus providing a pedestrianised entry point from St Thomas Street to the north, forming a two way vehicular route for the southern section. Vehicle access is controlled by bollards from St Thomas Street. Directly outside the proposed site, Great Maze Pond is formed of a narrow two way carriageway, forming a dead end prior to St Thomas Street for vehicles.
128. The hospital has two public entrances, the main entrance off Great Maze Pond at the centre of the campus and the smaller pedestrian access directly off St Thomas Street opposite the new London Bridge Station entrance.
129. Vehicular access and patient drop off/ pick up is on Great Maze Pond from Snowsfields with parking within Vehicular Drop Off and Patient Parking zone.

Car parking

130. No car parking was provided specifically for the former Sainsbury's and Pharmacy located on the OCE site. The hospital car park, located in front of the main entrance provides five ambulance bays, six drop off bays and 15 disabled bays and two electric bays. A further NCP car park is located on Kipling Street. It is not intended to provide additional car parking as part of this application.

Cycle parking and cycling facilities

131. Guy's Hospital Campus provides a total of 75 secure long stay cycle parking spaces and a further 41 short stay cycle spaces. Staff cycle parking is located in front of the Borough Wing and visitor cycle parking in the form of Sheffield stands are located on the western side of Great Maze Pond. The proposal would reformat the secure long stay cycle storage to accommodate the additional 10 hoops.
132. There is also a Santander Cycle Hire Docking Station located on Snowsfields, which provides space for 30 bicycles.

Public Transport Accessibility

Buses

133. The closest bus stop is located on the A3 approximately 350 m walking from
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the site. Additional bus stops are located on Southwark Street and London Bridge.

134. There are currently 3 bus services that enter, drop off and pick up from the site, which will continue. It is not envisaged that these services will increase, however 3 covered bus shelters will be provided following the development with 1 on Hunters Way in a similar location to the existing stop and the remaining two located close to the entrance. In addition standing for two further buses will be provided onsite.
135. The site is within a PTaL of 6b, the highest level of accessibility, using TfL's software to calculate journey times to the site it is demonstrated that the majority of inner London can access the site within a 30 to 45 minute public transport time.
136. In addition to the services provided by TfL, London Bridge station is 100m north of the site and provides services from Southeastern and Southern rail to destinations across south London, Kent, Surrey and East Sussex. Thameslink services also run through London Bridge to Brighton, Luton, Cambridge and Bedford.

Trip Generation

137. In terms of staff it is anticipated that up to 40 new members of staff will be employed at the site following completion of the Orthopaedic Centre. A travel survey conducted in March 2011 of 1,528 staff responses found the following travel practices;
 - 2% Drive
 - 0% DLR
 - 1% Motorcycle
 - 3% Other
 - 7% Walked
 - 8% Cycled
 - 11% Bus
 - 20% London underground
 - 48% Train
 138. The survey demonstrates that circa 80% of staff travel by public transport and 15 % by active modes. Since the survey, the consultant car park has been closed, therefore it is anticipated that the car use would have dropped further.
 139. In respect of the travel modes for the new staff assuming the building is open to patients between 08:00 to 20:00, similar to the adjacent facilities. It is anticipated that 20 staff are expected to travel by train, 8 by London Underground and 4 by bus. Three members of staff are expected to travel by foot or cycle respectively.
 140. In respect of patients and visitors, no overnight accommodation will be located in the facility; therefore, no visitors are anticipated. The new building is expected to generate 20 additional patients a day. Based on previous surveys
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of patients and visitors to the hospital it was found that the highest proportion travelled by rail (25%), followed by underground, (24%) and 20% by bus. 10% said they travelled by car and 6% came on foot, 14% by motorcycle and scooter and 1% cycled.

Conclusion on transport issues

141. The development proposals will provide a new Orthopaedic of Excellence at Guys Hospital measuring around 5,550m², comprising an 8 storey building, which would provide clinical theatres and education /training space.
142. No overnight accommodation will be located in the new facility; however 8 clinical theatres will be relocated from the existing hospital and 24 pre / post operation medical rooms will be provided.
143. It is anticipated that up to 40 new members of staff will be employed, with on average to generate 20 patients a day.
144. No additional car parking is proposed and 10 new cycle parking spaces will be provided within existing cycle stores. The site has an excellent level of pedestrian, cycling and public transport infrastructure, making it highly accessible by sustainable modes of transport.
145. A Healthy Streets Assessment has been undertaken on routes to key destinations. The assessment demonstrated that whilst some routes have high vehicular activity, the quality of routes is of a good quality. The development proposals will improve the pedestrian environment for existing and future users.
146. The number of private vehicular trips generated by the development is expected to have a negligible impact upon the surrounding road network. The net increase in public transport users is not expected to result in a material effect due to the frequency of services available. The proposed development will not result in a material impact on the local transport network and is supported by a high level of public transport provision.

Environmental matters

Construction management

147. Construction is likely to be challenging given the very constrained site and proximity of the very high pedestrian flows on Great Maze Pond. The submitted draft construction management plan proposes to close a section of Great Maze Pond for a period of around 2 years, which will have implications for pedestrian flows and pedestrian crossing on St Thomas Street, part of the Transport for London Road Network (TLRN). This will require discussion with TfL as the highway authority and may require temporary crossing facilities/kerb build outs to manage the changes in flow.
 148. The Construction Management Plan submitted with the planning application sets out an approximate time frame of 26 months for the proposed building works. It is proposed to divert pedestrian flow from Great Maze Pond to
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facilitate a partial closure of this route to allow works to be carried out. It is suggested that a condition be included to ensure the construction works are undertaken in conjunction with discussion with TfL.

149. Flood risk

150. Strategic Policy 13 of the Core Strategy allows development to occur in the protected Thames flood zone as long as it is designed to be safe and resilient to flooding. The policy further requires major development to reduce surface water run-off by at least 50%.
151. The online Environment Agency flood zone 3 but benefits from the Thames River Defences. Since the site is defended the risk of flooding is considered low. However, in line with the NPPF, the site can be categorised as 'More Vulnerable' and this type of development is only permitted if application of Sequential and Exception Tests are demonstrated.
152. The sequential test demonstrates that the majority of sites in London suffer from similar flood risk and do not offer an advantage over the proposed site. Both Guy's and St Thomas's Hospital sites are fully in Flood Zone 3.
153. There is a low risk of flooding from tidal, rivers, surface water and private drainage for the proposed development which can be mitigated.
154. The proposed development does not increase flood risk elsewhere as the flows up to the 1 in 100 year plus 40% climate change storm events are managed at the source through SuDS. The runoff rate will be restricted will be restricted to 2 l/s from the roof area through the use of Blue roof. Remaining areas will drain unrestricted to the sewer located in Great Maze Pond. The Exception Test is demonstrated with New Southwark Plan ambitions on the health cluster located around the proposed development and the safe operation plans for the building.
155. The finished floor level for the vulnerable uses should be kept above the maximum likely flood, level 4.68m AOD. There are no proposed vulnerable uses on the ground floor other than patient wait and access areas.
156. The Environment Agency have stated that whilst the proposal is not in complete compliance they raise no objections.

Sustainable urban drainage

157. The proposed development will include SuDS features to manage the surface water without causing any risk to the neighbouring area. The surface water drainage network will be designed to accommodate all storm events up to the 1 in the 100 year storm event (plus 40% climate change). Due to the site boundary constraints and presence of contamination, infiltration techniques will not be adopted for this site. It is proposed to attenuate the flow through the installation of a blue roof.

Land contamination

158. The submitted land contamination assessment demonstrated that no elevated concentrations of ground contaminants were reported that would represent a significant risk to controlled waters. It is suggested that a condition be added to deal with any potential contamination found during the course of construction.

Air quality

159. The majority of the borough, including the application site, is within an Air Quality Management Zone due the significant presence of traffic generated pollutants. As a result, developments are required to take account of any impacts upon air pollution as a result of, and during construction of, a proposed development.

160. There are potential adverse impacts upon local air quality during the construction phase, particularly from dust generation and additional construction traffic vehicle movements. An air and noise quality neutral assessment of the development's transport emissions has not been undertaken and therefore prior to the Stage 2 submission to the GLA it is requested that this be undertaken.

161. An air quality assessment has been undertaken investigating the construction and operational air quality impacts for the proposed development. The report makes various recommendations and these will be included within a condition.

Energy and sustainability

162. The London Plan Policy 5.2 sets out that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy: Be lean (use less energy); Be clean (supply energy efficiently); Be green (use renewable energy). This policy requires major commercial development to achieve a carbon dioxide improvement of 35% beyond Building Regulations Part L 2013, as specified in Mayor's Sustainable Design and Construction SPG.

163. Policy 5.3 states that developments should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process. London Plan Policy 5.7 states that major development should incorporate on-site renewable energy generation, wherever feasible.

164. Strategic Policy 13 of Core Strategy states that development will help us live and work in a way that respects the limits of the planet's natural resources, reduces pollution and damage to the environment and helps us adapt to climate change.

165. An energy statement has been submitted which provides an initial assessment of the energy demand and carbon dioxide (CO₂) emissions from a baseline building and estimates the expected energy and CO₂ emissions savings associated with the proposed development. This sets out that the proposed development will reduce carbon emissions by 28%, this is 7% below the current

35% target. The contribution to off set this shortfall is currently set at £60 per tonne over a period of 30 years, which would equate to a contribution of £37,800. It should be noted that the contribution is due to increase to £90 per tonne. The amount to be paid would also be dependent on the timing for the adoption of the New London Plan, as the contribution could require a 100% reduction.

Carbon emission reduction

166. The Intend to Publish London Plan, Policy SI requires a minimum on –site reduction of at least 35 % beyond Building Regulations. A zero carbon target, and on site reduction of at least 35% has been in place for major residential developments since October. On final publication of the London Plan this will apply to all non residential developments.

Be Lean (use less energy)

167. The proposed building is being designed specifically to reduce its demand for energy throughout its use and operation. In order to be lean the following measures have been adopted.

168. Improved fabric performance has been selected using better U-values than the current Building Regulations and an enhanced air permeability rate.

169. All glazing has been modelled to achieve high levels of light transmittance whilst limiting solar gains. The light transmittance of the glazing has been set to a high level 70% and solar heat gains have been limited by solar performing glass. Additionally, internal shading has been included to give extra protection against solar gains and reduce cooling energy demand.

170. Due to the nature of the proposed building the requirements for heating, ventilation and cooling are high. The heating and cooling are provided from the existing estate infrastructure. Enhanced ventilation plant efficiencies in excess of the Building Regulation minimum efficiencies have been targeted.

171. Luminaire efficiency will be above the minimum Building Regulation standards. In addition, presence detection controls is to be provided on the lighting system to allow for optimum system.

172. The new building systems will have central time control, optimum start/stop control, local temperature and time adjustment which will result in reduced energy requirements for space heating useage.

Be Clean (supply energy efficiently)

173. The hospital has an existing Combined heat and power facility that serves the site and this will be used to server the proposed new building.

174. Policy 5.9 of the London Plan outlines a hierarchy of measures which should be followed in order to reduce the demand for cooling within the development. These have been included within the proposal by;

- Minimising internal heat gains.
- Reducing solar gains
- Passive ventilation
- Mechanical ventilation

Be Green (Use low or carbon zero energy)

175. In accordance with Policy 5.7 of the London Plan the technical feasibility and economic viability of installing green technology has been assessed with only Solar Photovoltaic panels found to be the most appropriate.

Circular economy

176. The Publication London Plan has introduced circular economy policies including a requirement to submit Circular Economy Statements for developments. The GLA has released draft guidance for developers on how to prepare Circular Economy Statements and a 'Design for a circular economy' Primer that helps to explain the principles and benefits of circular economy projects.

177. Publication London Plan Policy SI.7 requires referable applications to include a Circular Economy Statement, whilst Policy D3 of the Publication London Plan requires development proposals to integrate circular economy principles as part of the design process. Therefore, the applicant is required to submit a circular economy statement in accordance with the GLA guidance, as part of the submission of the Stage 2 report.

Planning obligations (S.106 agreement)

178. Saved Policy 2.5 of the Southwark Plan and Policy 8.2 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. Saved Policy 2.5 of the Southwark Plan is reinforced by the recently adopted Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. Strategic Policy 14 'Implementation and delivery' of the Core Strategy states that planning obligations will be sought to reduce or mitigate the impact of developments. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:

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

179. Following the adoption of Southwark's Community Infrastructure Levy (SCIL) on 1 April 2015, much of the historical toolkit obligations such as Education and Strategic Transport have been replaced by SCIL. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight.

Planning Obligation	Mitigation	Applicant Position
Carbon off-set	£37,800	
Employment and Training	Intend to Publish London Plan 100% at £90 per tonne £653,400 £62,350	
Construction industry apprenticeships	£4,500	
Archaeology	£11,171	

180. In the event that an agreement has not been completed by 31 August 2021 , the committee is asked to authorise the director of planning to refuse permission, if appropriate, for the following reason:

181. In the absence of a signed S106 legal agreement there is no mechanism in place to mitigation against the adverse impacts of the development through contributions and it would therefore be contrary to Saved Policy 2.5 Planning Obligations of the Southwark Plan 2007, Strategic Policy 14 Delivery and Implementation of the Core Strategy (2011) Policy 8.2 Planning Obligations of the London Plan (2016) and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015).

Mayoral and borough community infrastructure levy (CIL)

182. 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, as this application is for healthcare and is part of the existing hospital there are no requirements for any Mayoral CIL or Southwark CIL payment.

Community involvement and engagement

183. The engagement and consultation was delivered to capture the following parties:

- Relevant local councillors at London Borough of Southwark including:
 - Leader of Southwark Council (at the time and new leader)
 - Cabinet member for growth, development and planning
 - Cabinet member for public health and community safety
 - London bridge and west Bermondsey ward councillors
 - Member of Parliament for Bermondsey and Old Southwark
 - London Assembly Member
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- Relevant local community groups who are active in the area such as:
- Team London Bridge
- Old Bermondsey Forum
- Shad Thames Area Management Partnership
- Bermondsey Street Tenants and Residents Association
- Bermondsey Village Hall Trust
- Kipling Street Tenants and Residents Association
- SE1 Forum
- Southwark Living Street
- Bermondsey Street
- Patients, Staff and industry experts with an interest in the project
- Patient Reference Group
- Member of the public within an agreed consultation area
- Local businesses within the agreed consultation area
- Other interested parties and site users

Date	Activity	Audience
September 2018 October 2018 March 2019 April 2019 September 2019	Meetings and design workshops on internal layout and user experience	Patients Staff Patient and Reference Group Industry experts
August 2020	Letter outlining details of the project with an offer of one to one virtual briefing	Relevant politicians including: <ul style="list-style-type: none"> • Leader of the council • Cabinet members for Growth, Development and Planning • Cabinet member for Public Health and Community Safety • London Bridge and West Bermondsey ward Councillors • Member of Parliament for Bermondsey and Old Southwark • London Assembly Member Identified community groups including: <ul style="list-style-type: none"> • Team London Bridge • Old Bermondsey Forum • Shad Thames Area Management Partnership • Bermondsey Street Tenants and Residents Association • Bermondsey Village Action Group • Bermondsey Village Hall

		Trust <ul style="list-style-type: none"> • Kipling Street Tenants and Residents Association • SE1 Forum • Southwark Living Street • Bermondsey Street
August 2020	Invitation issued to virtual exhibition, community newsletter summarising the project and feedback form	Members of the public and business community Relevant politicians Identified community groups including: <ul style="list-style-type: none"> • Team London Bridge • Old Bermondsey Forum • Shad Thames Area Management Partnership • Bermondsey Street Tenants and Residents Association • Bermondsey Village Action Group • Bermondsey Village Hall Trust • Kipling Street Tenants and Residents Association • SE1 Forum • Southwark Living Street • Bermondsey Street
August 2020	Staff weekly bulletin included details of the consultation with a link to the virtual exhibition	Staff at hospital
August 2020	Guy's and St Thomas' NHS Foundation Trust's website and social media account promoted details of the consultation including a link to the virtual exhibition and a short summary of the project	Staff Patients Industry experts Interested parties
August 2020 On going	Virtual exhibition detailing the proposals	Members of the public and business community Interested patients Relevant politicians including: <ul style="list-style-type: none"> • Leader of the council • Cabinet members for Growth, Development and Planning

		<ul style="list-style-type: none"> • Cabinet member for Public Health and Community Safety • London Bridge and West Bermondsey ward councillors • Member of Parliament for Bermondsey and Old Southwark • London Assembly Member Identified community groups
1 September 2020	Briefing on the proposals	Local Ward Members
September 2020	Email correspondences with interested local community stakeholders	Old Bermondsey Street Neighbourhood Forum Snowfields Management Ltd Team London Bridge

Consultation responses from members of the public and local groups

184. The following comments were received from Team London Bridge.

Topic	Summary of comment	Applicant's Response	
Sustainability	The group suggested that it is important to them that the proposed building promotes high sustainability standards including aiming to achieve BREEAM outstanding level, WELL platinum level, promote positive air quality, EPC rating A, wirescore (platinum), reduce ground level wind speeds and urban heat island effect and ensure water run off at greenfield rates.	We are proposing to deliver a highly sustainable development. The proposed development will achieve BREEAM rating Excellent. Design The group suggested that they are keen to	
Design	The group suggested that they are keen to ensure that the proposed building is of exemplary design, which fits into the historic location and is supported by the council's Design Review Panel	The proposed building has been designed to respect and enhance its local setting. The proposals have been presented to Southwark Council's Urban Design Officer, which resulted in significant amendment to the design	

Green Grid Vision	The group suggest that the proposals should seek to make a strong contribution to the 'Green Grid Vision' for the local area.	The proposals have been designed to be sustainable and will seek to promote sustainability measures through its design and construction and in how the building is used/operation where appropriate/necessary	
Cycling to the site	The group suggest that the proposals should promote active travel methods and make suggestions including providing generous cycle storage and encouraging use of different routes to alleviate pressure on Great Maze Pond	The proposals will seek to encourage site users and visitors to use green modes of travel including cycling and public transport	
Carbon footprint during construction	The group suggest that the scheme should seek to minimize its carbon footprint through choice of materials, construction methods, incorporating energy efficiency into the scheme and use of renewable sources.	Sustainable design and construction have been key drivers in the brief for the proposal. Hospitals inherently have higher energy demands than other developments due to the nature of treatment patients and life threatening illnesses. However, the proposed development has been designed to follow the energy hierarchy to ensure the proposals make the fullest contribution to minimizing carbon dioxide. The proposal is to connect to the campus CHP network, which will become more sustainably over time, and provide solar panels on appropriate areas of building.	
Servicing	The group suggested that the proposals should have a minimal impact from servicing arrangements	The proposals will use the existing servicing arrangements to service the new building and therefore no additional servicing arrangements are required.	

Consultation responses from external and statutory consultees

185. GLA

London Plan and Publication London Plan policies on principle of development, urban design, inclusive access, transport, sustainable development, circular economy, noise and air quality are relevant to this application. The application does not comply with the London Plan and the Publication London Plan, for the reasons set out below; however, the possible remedies stated could address these deficiencies:

- **Principle of development:** The proposed new health facility (Use Class – C2) within the hospital’s campus, located in CAZ and an opportunity area is strongly supported, subject to satisfactory resolution of the strategic matters set out in this report.

- **Heritage, urban design and inclusive access:** The scheme is of high-quality design. There are no heritage and design concerns and no adverse impact on protected views or river prospects. However, the proposed design and inclusive access measures, and key materials must be secured through appropriate conditions. The applicant must submit a policy compliant fire strategy prior to any Stage 2 referral.

- **Transport:** Given that the proposal is car free, with anticipated relatively small number of new jobs and patients, the residual impacts on the local transport networks will be limited. However, further details and clarifications are required as set out in the transport section of the report.

- **Sustainable development:** Further details and clarification are required, including the scheme’s Urban Greening Factor.

- **Circular economy:** The applicant is required to submit a circular economy statement in accordance with the GLA guidance.

- **Noise and air quality:** Further information is required. As it stands, the proposal does not comply with noise and air quality Policies 7.14 and 7.15 of the London Plan and Policies SI.1 and D14 of the Publication London Plan.

186. Environment Agency

We consider that planning permission should only be granted to the proposed development as submitted subject to planning conditions.

187. Transport for London

Although it is anticipated that the number of new jobs and patients would be low, the applicant is required to clarify this, as the application material is not consistent across the submitted documents. This information should be clarified, so additional cycle hire demand and cycle parking levels in particular can be properly assessed, which is already very well used in the London Bridge area, for example the Hop Exchange cycle hire docking station in Southwark Street is one on the busiest in London.

188. The proposal to improve the section of Great Maze Pond adjacent to the site is

strongly supported as this area has not functioned well in the past, being service vehicle dominated in an area where pedestrian footfall is extremely high. The applicant and the Council should consider this opportunity to seek improvements to the area in front of the entrance to the Tower Wing as this area similarly does not function well and is imbalanced between the dominant pedestrian flows and car and other vehicle parking.

189. Construction is likely to be challenging given the very constrained site and proximity of the very high pedestrian flows on Great Maze Pond. The submitted draft construction management plan proposes to close a section of Great Maze Pond for a period of around 2 years, which will have implications for pedestrian flows and pedestrian crossing on St Thomas Street, part of the Transport for London Road Network (TLRN). This will require discussion with TfL as the highway authority and may require temporary crossing facilities/kerb build outs to manage the changes in flow.
190. Management of construction vehicle in the open section of Great Maze Pond, and egress into St Thomas Street, will be important to reduce road safety impacts in these high pedestrian and cycle movement areas. The construction logistics plan should be secured by way of condition or S106 obligation, for approval by the Council in consultation with TfL. Any temporary changes to the TLRN will need to be agreed with, and implemented at no cost to TfL.
191. The travel plan should be embedded in and complement the overall Guy's Hospital travel plan.
192. Historic England
Application should be determined by the Local Planning Authority.

Consultation responses from internal consultees

193. Ecology – No further surveys required.
 194. Highways - Great Maze Pond is a private road and not public highway. Therefore, we don't have any highway comments on this planning application apart from that the applicant should rectify any damaged footways, kerbs, inspection covers and street furniture due to the construction of the development. In addition to this, the applicant should liaise with our Network Management Team with regards to the Construction Management Plan.
 195. Urban Forester - There are no existing landscape constraints. The proposed public realm shown within the red line includes a line of four street trees. Enhancing green amenity should be seen as an essential element in the design of new facilities within the hospital campus, particularly in relation to recuperation and overall health benefits.
 196. Archaeologist - The applicant's archaeologists have worked very hard to ensure this application meets the requirements of the council. With this application is a Written Scheme of Investigation that adequately provides for the archaeological interests of the site. The provision of this WSI should be secured by condition as should the submission of a timely archaeological report. To secure these
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elements of the work the following conditions are recommended, should you be minded to grant consent for this application. Archaeological watching brief compliance condition and reporting condition.

Community impact and equalities assessment

197. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights.
198. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
199. 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.
200. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

Human rights implications

201. 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.
202. This application has the legitimate aim of providing the hospital facilities. The
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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

203. 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.
204. 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

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|---|-----|
| 205. Was the pre-application service used for this application? | YES |
| 206. If the pre-application service was used for this application, was the advice given followed? | YES |
| 207. Was the application validated promptly? | YES |
| 208. If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval? | YES |
| 209. To help secure a timely decision, did the case officer submit their recommendation in advance of the agreed Planning Performance Agreement date? | YES |

CONCLUSION

210. The proposal represents an opportunity to make more efficient use of this existing plot by providing a new orthopaedic centre which will improve the quality of treatment offered as well as providing opportunities for teaching and research. The principle of which is supported by the New Southwark Plan and the Intend to Publish London Plan.
211. In terms of design the proposal represents a quality, robust building and whilst considered a tall building, its location close to the existing Guy's Tower and Shard mean that it does not dominant the space or appear uncharacteristic. The building is considered to be a positive addition to the hospital campus and to the wider area.
212. The proposed building is not considered to result in any significant harm in relation to the daylight and sunlight of adjoining buildings, nor is it considered to result in any harmful overlooking or overshadowing.
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213. The proposal whilst extending the services provided at the hospital is not likely to result in any significant increase in patient or staffing numbers. The location of the hospital within PTaL 6B provides excellent public transport facilities and previous travel surveys demonstrate that the majority of staff, visitors and patients use public transport to access the site. The servicing of the new building will be facilitated by the existing servicing regime.
214. In terms of the sustainability credentials of the building, it is acknowledged that there will be a shortfall in terms of meeting the carbon savings. Notwithstanding due to the specialist clinical nature of the development the energy demand from the use is unusually high. The building will connect to the existing CHP and will include the provision of 740 sq metres of PV's. The BREEAM accreditation of excellent would comply with the New Southwark Plan.
215. Overall the proposal would offer wider benefits to the community and is generally in overall compliance with the objectives of the New Southwark Plan and the Intend to Publish London Plan.
216. 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 INFORMATION

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents See weblink below:	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
https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/local-plan		

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Recommendation

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Sonia Watson, Team Leader	
Version	Final	
Dated	26 February 2021	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team		2 March 2021
