Contents

Item No.	Classification:	Date:	Meeting Name:
6.1	OPEN	9 June 2021	Planning Committee

Report title:	**Development Management planning application:** Application 20/AP/0944 for: Full Planning Application **Address:** BECKET HOUSE, 60-68 ST THOMAS STREET, LONDON, SE1 3QU. **Proposal:** Redevelopment of the site to include demolition of Becket House and the erection of a 27 storey building with additional level of plant and basement levels in order to provide office use (Class B1), retail (flexible Class A1/A3), cycle parking, servicing, refuse and plant areas, public realm improvements and other associated works incidental to the development.
Ward(s) or groups affected:	London Bridge and West Bermondsey
From:	Director of Planning and Growth

Application Start Date	24.04.2020	**PPA Expiry Date**	31.12.2021
Earliest Decision Date	10.04.2021		

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. That, should planning permission be granted, it be confirmed that an Environmental Impact Assessment has been undertaken as required by Regulation 3 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2017.

3. That following issue of the decision it be confirmed that the Director of Planning shall place a statement on the Statutory Register pursuant to Regulation 30 of the Town and Country Planning (Environmental Impact Assessments) Regulations and for the purposes of Regulation 30(1) (d) the main reasons and considerations on which the Local Planning Authority's decision is based shall be set out as in this report.

4. In the event that the requirements of paragraph 1 above are not met by 31 December 2021, the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 371.

EXECUTIVE SUMMARY

5. The proposal is for a large commercial development comprising mainly office with some ancillary retail use at ground floor level. At 27 commercial storeys, the proposed development would be classed as a tall building and would be located on the Becket House site which is bounded by St Thomas Street, Fenning Street, Melior Street and the Capital House site.

6. The proposed development would be a constituent part of a wider development framework that covers the eastern St Thomas Street area running from Weston Street to Bermondsey Street and includes the neighbouring sites known as Capital House; Vinegar Yard; and the buildings at the northern end of Bermondsey Street/Snowsfields and the Vinegar Yard Warehouse. The sites' landowners have sought to coordinate an approach for comprehensive redevelopment and have established a framework for developing the area.

7. The framework envisages a series of individual buildings that reinforce the street edges of Weston Street, St Thomas Street and Snowsfields and define a public garden to the rear towards Melior Street and a new public plaza towards Snowsfields. It retains north-south routes across the site and opens up a new east-west pedestrian route that bisects the framework area, linking Weston Street with the two new public spaces and through to Bermondsey Street. The application site is not located within a conservation area nor does it contain any listed buildings. The Bermondsey Street conservation area sits to the south and the east of the site.

8. The development has been conceived as a single, tall building, set back from its western boundary to create a generous new pocket park which would wrap around the southern boundary of the site and create new north-south pedestrian linkages and visual connections. The development would see the open space on site more than double in size which would be a suitable and high quality replacement for the current Melior Street Garden. The development would achieve an Urban Greening Factor of 0.3 which is in line with the London Plan requirements. At street level the proposed building would be much more engaging with active frontages and visual interest along St Thomas Street, Melior Street and the edge of the proposed pocket park.

9. The design of the new office building is considered to be of the highest quality befitting of a building of this scale in such a central London location where the standard of new development architecture is one of excellence. The proposed office accommodation would be of a high standard and would meet the needs of modern office users. The development would include 10% of the uplift in office floorspace as affordable workspace which would meet the demands of micro to medium sized businesses as well as start-ups and enterprises looking to expand.

10. The development would be highly energy efficient and sustainable with an on-site carbon reduction of 55.1% above the 2013 Building Regulations in addition to a carbon offset payment that would help the development achieve Carbon Zero targets. It is expected that the development would achieve BREEAM 'Outstanding' and this would be a conditioned requirement of any consent.

11. The site is located in the Central Activities Zone, the Bankside Borough and

London Bridge Opportunity Area and the London Bridge District Town Centre, and is allocated in the New Southwark Plan as NSP50. The proposals are consistent with the site allocation and the objectives of the development plan for this area.

12. The impact on the amenity of neighbours in terms of privacy, outlook and daylight/sunlight is set out in the report, and it is noted that the daylight/sunlight impacts on a small number of residential properties closest to the site are significant. These impacts need to be considered in the context of the character of the area in line with the flexibility expected by the BRE when looking at dense urban environments. These impacts also need to be balanced against the significant benefits of delivering this scheme.

13. A total of 1373 letters were sent to local residents as part of the neighbour consultation exercise and 72 letters of objection were received. A total of 12 letters of support have also been received. The main points of the objections are set out below along with the number of times they have been raised. A detailed breakdown of the objections is included at paragraph 379.

Objection topic	Number of time raised
Height/scale/massing	38
Heritage issues	25
Post Covid office requirements	21
Transport and traffic	19
Wind	17
Overbearing	14
Daylight/sunlight/overshadowing	12
Pressure on community facilities	6
Fire and emergency services	5
Lack of public benefits	4
Construction impacts	4
Consultation	4
Detailed design	4
Impact on the Shard	4
Privacy	4
Views	4
Noise	3
Pollution	3
Community garden	1
Light pollution	1
Safety and security	1
Vinegar Yard	1

BACKGROUND INFORMATION

Site location and description

14. The application site is located on the south side of St Thomas Street, diagonally opposite the entrance to London Bridge Station. The 0.27 hectare site forms one half of a street block that runs between Weston Street to the west and Fenning Street to the east, with Melior Street to the south. The western boundary is formed by the Capital House site. The generally rectangular site comprises a freestanding six storey office building that is aligned with St Thomas Street and

includes a large area of hardstanding used for ancillary car parking at the rear. Also to the rear of the site is the Melior Street Garden which is positioned at the corner of Melior Street and Fenning Street. This garden is classed as Other Open Space in the New Southwark Plan and is managed by Team London Bridge in association with St Mungo's charity. Becket House is currently in use by The Home Office for immigration services. The Home Office are in the process of relocating this service to their facility at Royal Victoria Docks.

Existing Site Plan

15. London Bridge Station is located to the north of the site whilst the 310m tall London Bridge Tower (known as the Shard) is located to the north west. The redeveloped London Bridge Station, approved by the Council in 2012, includes a new entrance to St Thomas Street opposite the site. The new Shard Place building next to the Shard (on the former Fielden House) is currently nearing completion.

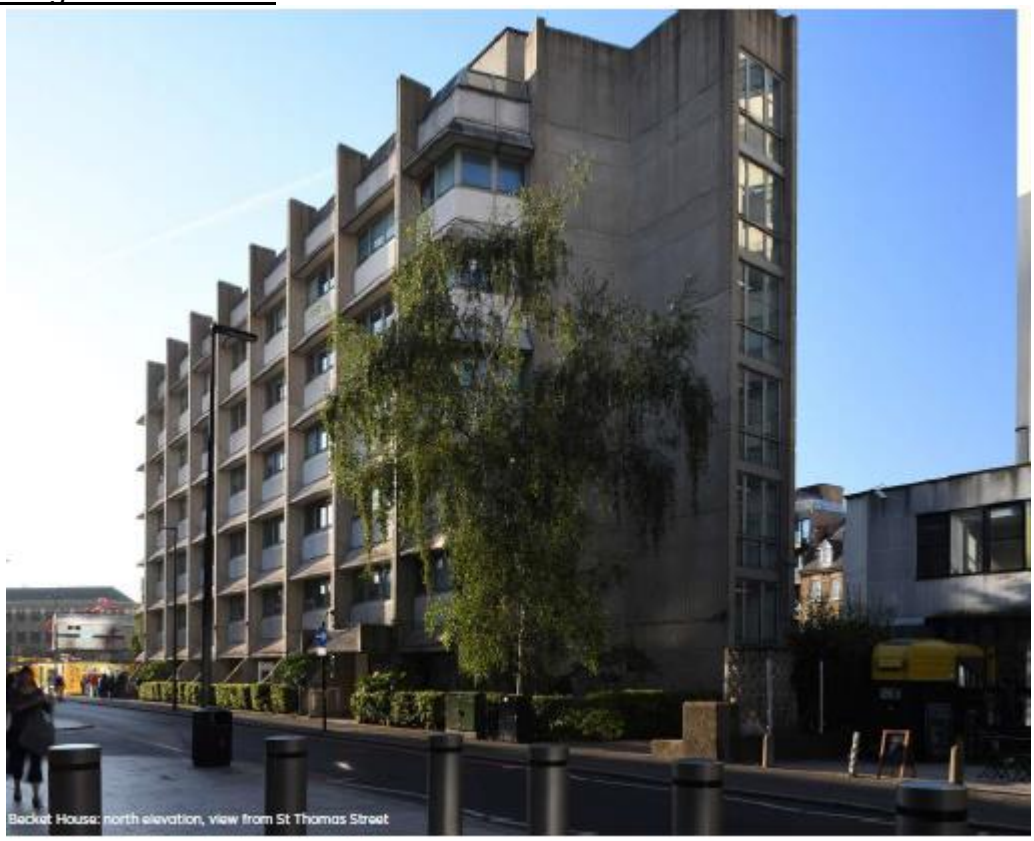
16. The Capital House site marks the western boundary of the application site and benefits from planning permission for a 39 storey tower comprising student accommodation. Just beyond this on the opposite side of Weston Street is the York Clinic, a five storey building, and Guy's Hospital Tower, a 34 storey building behind the York Clinic. To the southwest is Wolfson House, a 16 storey tower which is on a long-lease to Kings College for student accommodation. Wolfson House includes a swimming pool in its basement for use by Kings College students.

17. Immediately to the west of the application site on the opposite side of Fenning Street is the site known as Vinegar Yard which is a live application currently with the Mayor for determination. To the south, on Melior Street, is a seven storey residential building and adjoining two storey church.

18. With the exception of the Horseshoe In and 9 Fenning Street to the east; the railway arches to the north; and a church to the south west, the immediate

context of nearby buildings date from the 1970s to 1980s. The application site is not in a Conservation Area but the Bermondsey Street Conservation Area is adjacent to the site, to the south and south east (taking in the southern side of Melior Street). The Borough High Street Conservation Area lies some 180m to the west and the Tooley Street Conservation Area lies to the north of London Bridge Station (approximately 140m from the site).

Existing Becket House



19. Nearby listed buildings include; The George Inn (Grade I listed, 300m from the site to the west); Guys Hospital Main Building (Grade II*, 180m to the north-west); 4-16 St Thomas Street (Grade II, 280m to the north-west); 9A-13 St Thomas Street (Grade II, 270m to the north-west); 15 St Thomas Street (Grade II, 240m to the north-west); 55, 59-63 and 68-76 Bermondsey Street (all Grade II, approximately 220m to the south-east). A more recent listing is the Railway Viaduct Arches on Crucifix Lane (Grade II), which are on the northern side of St Thomas Street.

Details of proposal

20. Planning consent is sought for the redevelopment of the site to include demolition of Becket House and the erection of a 27 storey building with additional plant level and four levels of basement.

21. The principal use of the building would be for Class B1 office space (36,786sqm GIA) however there would be a small retail unit at ground floor (40sqm GIA). An auditorium would be provided at first floor level for use by the buildings tenants and affordable workspace users on specified terms. Additional access to the auditorium would be made available for local community groups. Cycle parking and cyclist facilities such as showers, changing rooms and bicycle repair stations

would be provided within the basement alongside plant and an ancillary gym space. Servicing would take place from Fenning Street where a servicing layby would be positioned immediately adjacent to the loading bay entrance.

Proposed Site Plan

22. The development would include a generous pocket park along the western boundary which would extend along the southern edge and would replace and extend the current Melior Street Garden which is designated as Other Open Space within the New Southwark Plan. This would create a generous new north-south route from St Thomas Street through to Melior Street and beyond as well as opening up views to the south. The pocket park would be extensively planted and would provide opportunities for outdoor seating. The planting would not be limited solely to the pocket park as it would extend into the ground floor area of the new building as well as the upper floor terraces.

Planning history of the site

23. Whilst there is no specific history for the application site that is of relevance, the site has been the subject of two pre-application enquiries under references 18/EQ/0374 and 19/EQ/0198. The main issues discussed during these pre-application enquiries related to height, scale massing, land use and impact on views and heritage assets. Additional issues discussed included the interaction of the proposed development with the other St Thomas Street schemes and amenity impacts on adjoining and nearby occupiers.

Planning history of adjoining or nearby sites.

24. London Bridge Tower (Shard of Glass) (ref 01/AP/0476):
Redevelopment of Southwark Towers for a 306m tower for offices, hotel, residential and public viewing areas. This development is now complete.

25. Guys Hospital new Cancer Building (ref: 12/AP/2062 granted January 2013):
Demolition of existing buildings on the corner of Great Maze Pond and Snowsfields and erection of a 14 storey building for a Cancer Treatment Centre (with an additional 2 storeys of roof plant) 71 metres in height and 29,000sqm floor area, with preservation in situ of a Scheduled Ancient Monument (Roman Boat), public realm works, disabled parking, cycle parking facilities and basement link to hospital campus. This development is now complete.

26. 14-16 Melior Street and Land adjoining to the rear of Our Lady of La Sallete and Saint Joseph Catholic Church (ref: 13/AP/3059 granted May 2014):
Part demolition and part refurbishment / change of use of existing buildings and erection of new buildings ranging from 4-7 storeys in height to provide 37 residential units (Class C3); a community centre (Class D1) and flexible commercial space at ground floor level (Class A1/A3/B1); cycle storage, new landscaping and associated works.

27. 147 Snowsfields (reference 20/AP/0744):
Demolition of existing buildings and construction of a 10 storey building plus basement consisting of 17 residential units, commercial at ground floor and basement and associated cycle and waste storage and other associated works. This application was refused planning permission on 6 July 2020 .

St Thomas Street East Framework

28. The application site forms one of the central sites of a series of adjacent development plots that have become known as St Thomas Street East. The adjacent sites include Capital House at 42-46 Weston Street; Vinegar Yard (including 1-7 and 9 Fenning Street); and the site known as Snowsfields which includes the Vinegar Yard Warehouse as well as the buildings at the top west side of Bermondsey Street. Details of these applications are set out below:

18/AP/0900 – CAPITAL HOUSE, 42-46 WESTON STREET, SE1 3QD

29. Redevelopment of the site to include the demolition of Capital House and the erection of a 39-storey building (3 basement levels and ground with mezzanine and 38 storeys) of a maximum height of 137.9m (AOD) to provide up to 905 student accommodation units (Sui Generis use), flexible retail/café/office floorspace (Class A1/A3/B1), cycle parking, servicing, refuse and plant areas, public realm improvements and other associated works incidental to the development. The application is accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

30. This application was approved with a Legal Agreement on 17 December 2020. The applicant is currently in the process of discharging pre-commencement

conditions.

19/AP/0404 - 40-44 BERMONDSEY STREET, VINEGAR YARD WAREHOUSE 9-17 VINEGAR YARD AND LAND ADJACENT TO 1-7 SNOWSFIELDS SE1

31. Demolition of existing buildings at 40-44 Bermondsey Street including partial demolition, rebuilding and refurbishment of existing Vinegar Yard Warehouse and erection of three new buildings (two linked) with up to two levels of basement and heights ranging from five storeys (24.2m AOD) to 17 storeys (67m AOD) to provide office space (Class B1); flexible retail space (Classes A1/A2/A3/A4/A5); new landscaping and public realm; reconfigured pedestrian and vehicular access; associated works to public highway; ancillary servicing; plant; storage and associated works.

32. This application was originally scheduled to be determined at the Planning Committee on the 29 June 2020. At this meeting, the chair of the planning committee moved a motion to defer this item to a future meeting of the committee so that certain aspects of the application and its planning impact on the conservation area could be considered in more detail in a future report. The applicant is currently considering amendments to the scheme and how the development interacts with the conservation area.

18/AP/4171 - LAND BOUNDED BY ST THOMAS STREET, FENNING STREET, VINEGAR YARD AND SNOWSFIELDS, INCLUDING NOS. 1-7 FENNING STREET AND NO. 9 FENNING STREET, SE1 3QR

33. Redevelopment of the site to include the demolition of the existing buildings and the erection of a building up to 20 storeys in height (maximum height of 86.675m AOD) and a 3 storey pavilion building (maximum height of 16.680m AOD) with 3 basement levels across the site providing . The development would include use classes A1/A2/A3/A4/B1/D2 and sui generis (performance venue), cycle parking, servicing, refuse and plant areas, public realm (including soft and hard landscaping) and highway improvements and all other associated works.

34. This application was recommended for approval however the recommendation was overturned at Planning Committee on the 29 June 2020. Planning Committee members resolved to refuse planning permission for the following reason:

35. The proposed development by virtue of its excessive height, scale and massing would result in the loss of 9 Fenning Street and have an adverse impact on the Horseshoe Inn, both of which are undesignated heritage assets which make a positive contribution to the Bermondsey Street Conservation Area. The proposed development would therefore fail to preserve or enhance the character and appearance of the Conservation Area. The heritage harm would not be outweighed by the public benefits. The proposed development is therefore contrary to Policy 3.15 Conservation of the Historic Environment: 3.16 Conservation Areas; 3.18 Setting of Listed Buildings, Conservation Areas and World Heritage Sites of the Saved Southwark Plan 2007; SP12 – Design and

Conservation of the Core Strategy 2011 and Policy 7.8 - Heritage Assets and Archaeology of the London Plan 2016 and paragraphs 196 and 197 of the NPPF.

36. The resolution recommending refusal of planning permission was referred to the Mayor of London on 23 July 2020 for Stage II in accordance with the Mayor of London Order 2008. On 21 December 2020, the Mayor of London confirmed that he will act as local planning Authority for the purposes of determining the application for the following reasons:

37. a) The development would have a significant impact on the implementation of the London Plan because of the potential for the scheme to contribute towards the aims of the 2016 London Plan Policies 2.10, 2.11, 2.13, 3.2, 3.16, 3.17 and 4.2. The development would also support London's economy and role as a centre of excellence, and would have implications for London's continued success as a world city.

38. b) The development would have a significant effect on more than one London Borough because of a clear functional relationship with the wider Central Activities Zone, an area of nationally significant economic activity which contributes towards the strategic employment function of London as a whole, as well as the provision of specialised CAZ uses in the form of an outpatients facility that would benefit residents in other boroughs.

39. c) There are sound planning reasons for the Mayor's intervention because failure to promote appropriate development on sites such as this could potentially impact upon the economic wellbeing of the Central Activities Zone, the London Bridge, Bankside & Borough Opportunity Area and London as a whole, London's role as a centre of excellence, and the wider regeneration objectives for the Opportunity Area.

40. In making this decision the Mayor also clarified that he had considered the targets identified in development plans. The Mayor recognised that Southwark has experienced a borough-wide net loss of business floorspace in recent years and that new employment floorspace is required in order to deliver 400,000 – 500,000sqm of business floorspace within the London Bridge, Bankside & Borough Opportunity Area over the period 2009-2026 as set out in Southwark's Core Strategy. This application will be determined at a Hearing and this is not expected to be held before September 2021.

41. As previously stated these sites together have come to be known collectively as St Thomas Street East. The various landowners have been co-operating on an informal basis about a range of issues including design, public realm, new pedestrian routes, and the management of the construction and operational phases of the proposed developments. The landowners have devised a framework document which sets out the co-operation and co-ordination on these issues between the proposed developments and this has been subject to community consultation. The framework is a tool to bring the landowners together to work collaboratively to address the main issues of the redevelopment of these sites. The framework itself is an informal document and is not an instrument of planning policy and as such it does not form part of the development plan.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

42. The main issues to be considered in respect of this application are:

- Principle of the proposed development in terms of land use;
- Affordable workspace
- Environmental impact assessment
- Design, including layout, building heights, landscaping and ecology;
- Heritage considerations
- Archaeology
- Impact of proposed development on amenity of adjoining occupiers and surrounding area, including privacy, daylight and sunlight
- Transport and highways, including servicing, car parking and cycle parking
- Environmental matters, including construction management, flooding and air quality
- Energy and sustainability, including carbon emission reduction
- Ecology and biodiversity
- Planning obligations (S.106 undertaking or agreement)
- Mayoral and borough community infrastructure levy (CIL)
- Consultation responses and community engagement
- Community impact, equalities assessment and human rights

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

Legal context

44. 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.

45. 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

46. The statutory development plans for the Borough comprise the London Plan 2021, Southwark Core Strategy 2011, and saved policies from The Southwark Plan (2007). 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 below. Any policies which are particularly relevant to the consideration of this application are highlighted in the report.

47. The site is located within the:

- Air Quality Management Area
- Bankside, Borough and London Bridge Strategic Cultural Area
- Bankside, Borough and London Bridge Opportunity Area
- Borough, Bermondsey and Rivers Archaeological Priority Zone
- Central Activities Zone
- London Bridge District Town Centre
- The Thames Special Policy Area

48. The site has a Public Transport Accessibility Level (PTAL) of 6b where 1 is the lowest level and 6b the highest, indicating excellent access to public transport.

49. 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.

The following listed buildings are either adjacent to or near the site:

- 55 Bermondsey Street – Grade II
- Numbers 59, 61 and 63 Bermondsey Street and attached railings – Grade II
- 68-76 Bermondsey Street – Grade II
- Guys Hospital main building – Grade II*
- Railway Arches Crucifix Lane – Grade II

50. The site itself is not located within a conservation area however the Bermondsey Street Conservation Area lies immediately to the south whilst the Tooley Street and the Borough High Street Conservation Areas lie to the north and west respectively.

51. The application site is located within London View Management Framework (LVMF) protected view 2A.1 from Parliament Hill summit to St Paul's Cathedral, and 3A.1 from Kenwood viewing gazebo to St Paul's Cathedral.

National Planning Policy Framework (NPPF)

52. The revised National Planning Policy Framework ('NPPF') was published in February 2019 which sets out the national planning policy. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental. Paragraph 212 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.

53. Chapter 2 Achieving sustainable development
Chapter 6 Building a strong, competitive economy
Chapter 7 Ensuring the vitality of town centres

Chapter 8 Promoting healthy and safe communities
Chapter 9 Promoting sustainable transport
Chapter 11 Making effective use of land
Chapter 12 Achieving well-designed places
Chapter 14 Meeting the challenge of climate change, flooding and coastal change
Chapter 15 Conserving and enhancing the natural environment
Chapter 16 Conserving and enhancing the historic environment

The London Plan 2021

54. GG1: Building strong and inclusive communities
GG2: Making the best use of land
GG3: Creating a healthy city
GG5: Growing a good economy
GG6: Increasing efficiency and resilience
SD1: Opportunity Areas
SD4: The Central Activities Zone
SD5: Offices, other strategic functions and residential development in the CAZ
SD6: Town centres and high streets
SD7: Town centres development principles and Development Plan Documents
D1: London's form, character and capacity for growth
D2: Infrastructure requirements for sustainable densities
D3: Optimising site capacity through the design-led approach
D4: Delivering good design
D5: Inclusive design
D8: Public realm
D9: Tall buildings
D10: Basement development
D12: Fire safety
D14: Noise
S1: Developing London's social infrastructure
E1: Offices
E2: Providing suitable business space
E3: Affordable workspace
E9: Retail, markets and hot food takeaways
E11: Skills and opportunities for all
HC1: Heritage conservation and growth
HC2: World Heritage Sites
HC3: Strategic and local views
HC4: London View Management Framework
G1: Green infrastructure
G4: Open space
G5: Urban greening
G6: Biodiversity and access to nature
G7: Trees and woodlands
SI1: Improving air quality
SI2: Minimising greenhouse gas emissions
SI7: Reducing waste and supporting the circular economy
SI12: Flood risk management
SI13: Sustainable drainage
T1: Strategic approach to transport

T2: Healthy streets
T3: Transport capacity, connectivity and safeguarding
T4: Assessing and mitigating transport impacts
T5: Cycling
T6: Car parking
T7: Deliveries, servicing and construction
T9: Funding transport infrastructure through planning
DF1: Delivery of the Plan and Planning Obligations.

The Core Strategy 2011

55. 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 Targets Policy 1 – Achieving growth
Strategic Targets Policy 2 - Improving places
Strategic Policy 1 - Sustainable development
Strategic Policy 2 - Sustainable transport
Strategic Policy 3 - Shopping, leisure and entertainment
Strategic Policy 10 - Jobs and businesses
Strategic Policy 12 - Design and conservation
Strategic Policy 13 - High environmental standards

The Southwark Plan 2007 (Saved policies)

56. In 2013, the Secretary of State issued a saving direction in respect of certain policies. These saved policies continue to form part of the statutory development plan. 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 1.1 Access to Employment Opportunities
Policy 1.4 Employment Sites
Policy 1.7 Development within Town and Local Centres
Policy 2.5 Planning Obligations
Policy 3.1 Environmental Effects
Policy 3.2 Protection of Amenity
Policy 3.3 Sustainability Assessment
Policy 3.4 Energy Efficiency
Policy 3.6 Air Quality
Policy 3.7 Waste Reduction
Policy 3.8 Waste Reduction
Policy 3.9 Water
Policy 3.11 Efficient Use of Land
Policy 3.12 Quality in Design
Policy 3.13 Urban Design

Policy 3.14 Designing Out Crime
Policy 3.15 Conservation of the Historic Environment
Policy 3.16 Conservation Areas
Policy 3.18 Setting of Listed Buildings, Conservation Areas and World Heritage Sites
Policy 3.19 Archaeology
Policy 3.20 Tall Buildings
Policy 3.22 Important Local Views
Policy 3.28 Biodiversity
Policy 3.29 Development within the Thames Policy Area
Policy 3.31 Flood Defences
Policy 5.1 Locating Developments
Policy 5.2 Transport Impacts
Policy 5.3 Walking and Cycling
Policy 5.6 Car Parking
Policy 5.7 Parking Standards for Disabled People and the Mobility Impaired
Policy 5.8 Other Parking

Supplementary Planning Documents

57. Design and Access Statements SPD 2007
Section 106 Planning Obligations and CIL SPD 2015 and 2017 addendum
Sustainability Assessment 2007
Sustainable Design and Construction SPD 2009
Sustainable Transport Planning SPD 2009

Greater London Authority Supplementary Guidance

58. Central Activities Zone (SPG 2016)
Character and Context (SPG, 2014)
Energy Assessment Guidance (2018)
London View Management Framework (2012)
London's World Heritage Sites (SPG 2012)
Sustainable Design and Construction (Saved SPG, 2006)
Town Centres (SPG, 2014)
Use of Planning Obligations in the Funding of Crossrail 2010

Emerging policy

New Southwark Plan (NSP)

59. 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.

60. The Examination in Public (EiP) commenced on 22nd February and the amendments within the Proposed Changes to the Submitted New Southwark Plan will be considered along with the consultation responses received at each stage of public consultation. It is anticipated that the plan will be adopted later this year following the EiP.

61. 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. The most relevant policies of the NSP are as follows:

P12 Design of places
P13 Design quality
P15 Designing out crime
P16 Tall buildings
P17 Efficient use of land
P18 Listed buildings and structures
P19 Conservation areas
P22 Archaeology
P48 Public transport
P49 Highway impacts
P50 Walking
P52 Cycling
P53 Car parking (no substantial objections were received, comments related to minimising residential car parking)
P55 Protection of amenity
P58 Green infrastructure
P59 Biodiversity
P60 Trees
P61 Reducing waste
P63 Contaminated land and hazardous substances
P64 Improving air quality
P67 Reducing flood risk
P68 Sustainability standards.

62. Where draft policies are different from the adopted policy (or are completely new policies) and objections were received, the specifics of those objections and the differences from the adopted policy need to be considered for each planning application proposal. For example:

- P27 - Access to employment and training – objection was received relating to the financial burden.
- P29 - Office and business development – objections related to the two year marketing justification and differentiation of B Class uses.
- P30 - Affordable workspace – objections relating to strengthening the policy and including viability testing.
- P34 - Town and local centres – objections relate to a lower threshold and strengthening the policy.
- P46 - Community uses – objections to strengthening this policy.
- P65 - Reducing noise pollution and enhancing soundscapes – the agent of change principle in the NPPF must also be considered.

63. Where objections were received to a draft policy and these have not been resolved through revisions, that policy can have only limited weight. In these instances, the degree of change from adopted policy on these topics should also be considered. Examples of these policies include:

- P54 - Parking standards for disabled people and mobility impaired people.
- P69 - Energy – objections that the December 2017 version P62 being too onerous for the carbon reductions

64. The NSP responds positively to the NPPF, by incorporating area visions, development management policies and 82 site allocations which plan for the long term delivery of housing. The NSP responds to rapid change which is occurring in Southwark and London as a whole and responds positively to the changing context of the London Plan.

Site allocation NSP50

65. The application site is located within New Southwark Plan site allocation 50 – Land between Melior Street, St Thomas Street, Weston Street and Fenning Street.

66. The site allocation sets out that redevelopment of the site must:

- Provide at least the amount of employment floorspace (B use class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater; and
- Enhance St Thomas Street by providing high quality public realm and active frontages including town centre uses (A1, A2, A3, A4, D1, D2) at ground floor.

67. The site allocation also considers that redevelopment should provide new housing.

ASSESSMENT

Principle of the proposed development in terms of land use

Introduction

68. The redevelopment of the site would be office led, creating a significant uplift in Class B1 office space in addition to the introduction of retail opportunities and an extensive new public realm which would improve animation, activity and interest at street level.

Policy background

69. The National Planning Policy Framework (NPPF) was updated in 2019. At the heart of the NPPF is a presumption in favour of sustainable development. The framework sets out a number of key principles, including a focus on driving and supporting sustainable economic development. Relevant paragraphs of the NPPF are considered in detail throughout this report

70. The NPPF also states that permission should be granted for proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.

London Bridge, Borough and Bankside Opportunity Area

71. The London Plan designates Bankside, Borough and London Bridge as one of four Opportunity Areas in the London South Central area.

72. The London Plan notes that this area has considerable potential for intensification and scope to develop the strengths of the area for strategic office provision. This is further reflected in Policy SD2 – Opportunity Areas of the London Plan which sets a target of 5,500 new jobs.

73. Strategic Targets Policy 2 of the Core Strategy underpins the London Plan and states that Southwark's vision for Bankside, Borough and London Bridge is to continue to provide high quality office accommodation, retail and around 25,000 jobs by 2026. Additionally, Strategic Policy 10 states that between 400,000sqm and 500,000sqm of additional business floorspace will be provided within the Opportunity Area to help meet central London's need for office space.

Central Activities Zone and London Bridge District Town Centre

74. The site is located within the CAZ which covers a number of central London boroughs and is London's geographic, economic, and administrative core. The London Plan recognises the well-established long term demand for office space within the CAZ and strongly promotes office provision within this policy area.

75. Strategic Targets Policy 2 – Improving Places of the Core Strategy states that development in the CAZ will support the continued success of London as a world-class city as well as protecting and meeting the more local needs of the residential neighbourhoods. It also states that within the CAZ there will be new homes, office space, shopping and cultural facilities, as well as improved streets and community facilities.

76. In addition the site is within the London Bridge District Town Centre. Saved policy 1.7 of the Southwark Plan states that within the town centre, developments will be permitted providing a range of uses, including retail and services, leisure, entertainment and community, civic, cultural and tourism, residential and employment uses.

Bankside, Borough and London Bridge Strategic Cultural Area

77. The application site lies within the Bankside, Borough and London Bridge Strategic Cultural Area. Strategic Cultural Areas have been designated as such in order to protect and enhance the provision of arts, culture and tourism uses. Development of the tourism sector has significant local economic benefits through employment, regeneration and visitor spending in other local businesses. However, these developments must focus on effective visitor management and accessibility for all. Policy 1.11 of the Southwark Plan states that permission will be granted for new facilities provided they do not unacceptably compromise the character of an area. Whilst the proposed development does not include any visitor facilities the improved and extended open space will be of value to visitors.

Draft New Southwark Plan Site Allocation NSP50

78. The New Southwark Plan is in its Proposed Modifications for Examination version and was submitted to the Secretary of State in January 2020 for Local Plan Examination. The examination in public is currently underway and formal adoption is set to take place this year. Until formal adoption takes place, the policies will continue to have limited weight. The site is listed as an allocated site under the New Southwark Plan. The site allocation (NSP50) covers the application site as well as the Capital House site to the west.

79. The site allocation sets out that redevelopment of the site must:

- Provide at least the amount of employment floorspace (B use class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater; and
- Enhance St Thomas Street by providing high quality public realm and active frontages including town centre uses (A1, A2, A3, A4, D1, D2) at ground floor.

80. The site allocation also considers that redevelopment should provide new housing and this requirement is considered to be satisfied by the Capital House development.

Conclusion on policy designations.

81. The principle of a large scale development containing a mix of uses including Class B1 office space and Class A1/A3 retail would support the role and functioning of the Central Activities Zone and the London Bridge District Town Centre, as well as being consistent with the policies for the Opportunity Area and the NSP designation. The acceptability of each use will be considered below.

Offices

82. The site falls within the CAZ, which contains London's geographical, economic and administrative core. The London Plan does not protect office floorspace in the CAZ; it strongly promotes the provision of office space and identifies office use as an appropriate land use in the CAZ, noting that there is capacity for 5,500 jobs in the Opportunity Area. This is further supported by the Mayoral Supplementary Planning Guidance – Central Activities Zone (2016).

83. Core Strategy Strategic Policy 10 Jobs and Businesses states that the council will increase the number of jobs in Southwark and create an environment in which businesses can thrive. The policy goes on to state that existing business floorspace would be protected and the provision of around 400,000sqm-500,000sqm of additional business floorspace would be supported over the plan period in the Bankside, Borough and London Bridge Opportunity area to help meet central London's need for office space.

New office space

84. Saved policy 1.4 of the Southwark plan states that development will be permitted subject to there being no net loss of Class B floorspace (subject to a number of exceptions including)

85. The site currently provides 4,262sqm of employment floorspace. The proposed development would provide a total of 36,786sqm of Class B1 floorspace resulting in an uplift of 32,524sqm which meets the policy objectives of protecting employment floorspace and is welcomed as a significant benefit of the scheme. The provision of 36,786qm of Class B1 floorspace would have the potential to provide up to 1,900 jobs which would be an uplift of approximately 1,430 jobs and satisfies the aims of the Core Strategy and London Plan in creating new jobs and high quality office space within the Central Activities Zone and the Opportunity Area.

Retail

86. The development would incorporate a small retail space at ground floor measuring approximately 40sqm. The provision of new town centre uses such as retail is supported by saved Southwark Plan Policy 1.7 since the site lies within the London Bridge District Town Centre. The introduction of retail use is welcomed and is considered to be entirely appropriate given that the site is within the London Bridge CAZ retail cluster and also accords with London Plan Policy SD4

Conclusion on land use

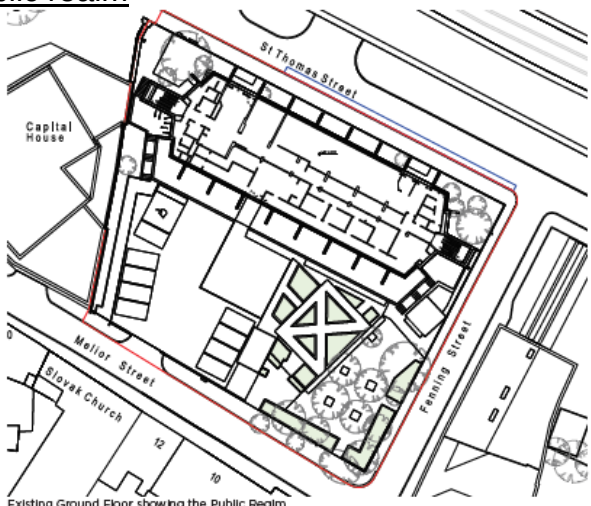
87. The proposal involves the provision of high quality office floorspace alongside a small retail space which is an acceptable town centre use. It is noted that the site allocation says that housing should be required however the site allocation covers the application site and the Capital House site and the provision of student housing on the Capital House site is considered to satisfy the housing requirement in the site allocation. The provision of new offices is fully supported and the provision of modern, high quality offices is considered to be a benefit of the scheme and would facilitate the growth of employment within the Central Activities Zone and the Opportunity Area. The proposed development would include a mix of uses that are appropriate for the site's location within the CAZ,

Opportunity Area and District town centre.

Other Open Space (OOS)

88. The application site includes the Melior Street Garden which is positioned on the corner of Melior Street and Fenning Street. The garden space is classed as Other Open Space within the New Southwark Plan and as such Policy P56 – Open Space, would apply. This policy states that development would only be considered in exceptional circumstances where it would consist of a replacement open space of equivalent or greater size or indeed if development would result in a substantially better quality space.

Proposed new public realm



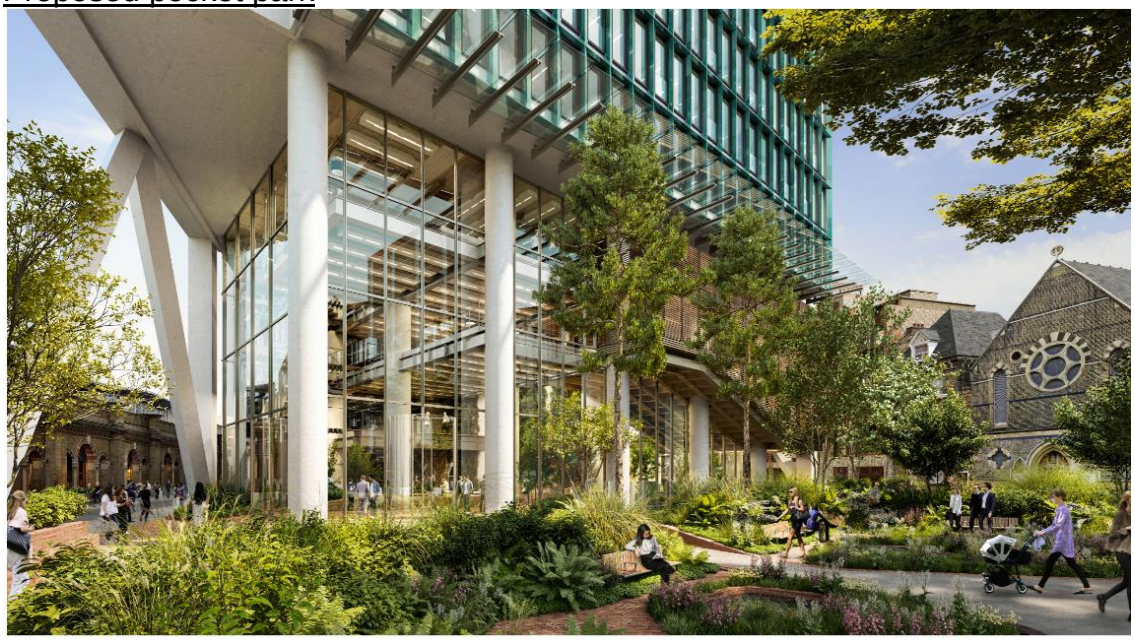
Existing Ground Floor showing the Public Realm

Proposed Ground Floor showing the Public Realm

89. The current Melior Street Garden provides approximately 576sqm of space. The proposed redevelopment of the site would create a public realm measuring approximately 1,183sqm in size, consisting of a pocket park which would extend along the western boundary of the site and along the southern boundary at Melior Street. This park would include larger areas of planting as well as opportunities for outdoor seating and would be substantially larger than the current garden space. The applicant is in discussions with St Mungo's charity, who currently manage the Melior Street Garden, in order to secure their continued involvement on-site in managing the landscaped space. The proposed pocket park is considered to be a suitable and high quality replacement for the Melior Street Garden, being both more generous in size and

more visible given its location between St Thomas Street and Melior Street. It should also be noted that the pocket park would assist the development in achieving an Urban Greening Factor of 0.3 which would be compliant with London Plan requirements.

Proposed pocket park



Affordable workspace

90. London Plan Policy E2 - Providing suitable business space, seeks the provision of low cost B1 business space to meet the demand of micro to medium sized business as well as start-ups and enterprises looking to expand. The policy is clear that proposals for new B1 spaces over 2500sqm in size (or a locally deemed lower threshold) should consider the provision of a proportion of workspace that would be suitable for these target businesses.

91. London Plan Policy E3 relates specifically to affordable workspace and states that “In defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purposes”. The policy identifies the circumstances in which it would be appropriate to secure affordable space. Part B of the policy specifically identifies the CAZ as an important location for securing low cost space for micro, small and medium sized enterprises.

92. Emerging Policy P30 of the New Southwark Plan deals with affordable workspace. Criterion 2 of the policy requires Major ‘B Class’ development proposals to deliver at least 10% of the new floorspace as affordable workspace on site at a discounted market rent for a period of at least 30 years. The policy recognises that there are many different forms that such a space could take depending on the site location, characteristics and existing/proposed uses on site.

93. Taking into account the requirements of emerging policy P30, the proposed development would need to provide at least 10% of the new Class B1 floorspace

as an affordable workspace. This would equate to 3,252sqm affordable workspace being required. The current offer is to provide 3,683qm of affordable workspace which would equate to 11%. As such the quantum of affordable workspace being provided is compliant with the London Plan and New Southwark Plan policies.

Proposed auditorium

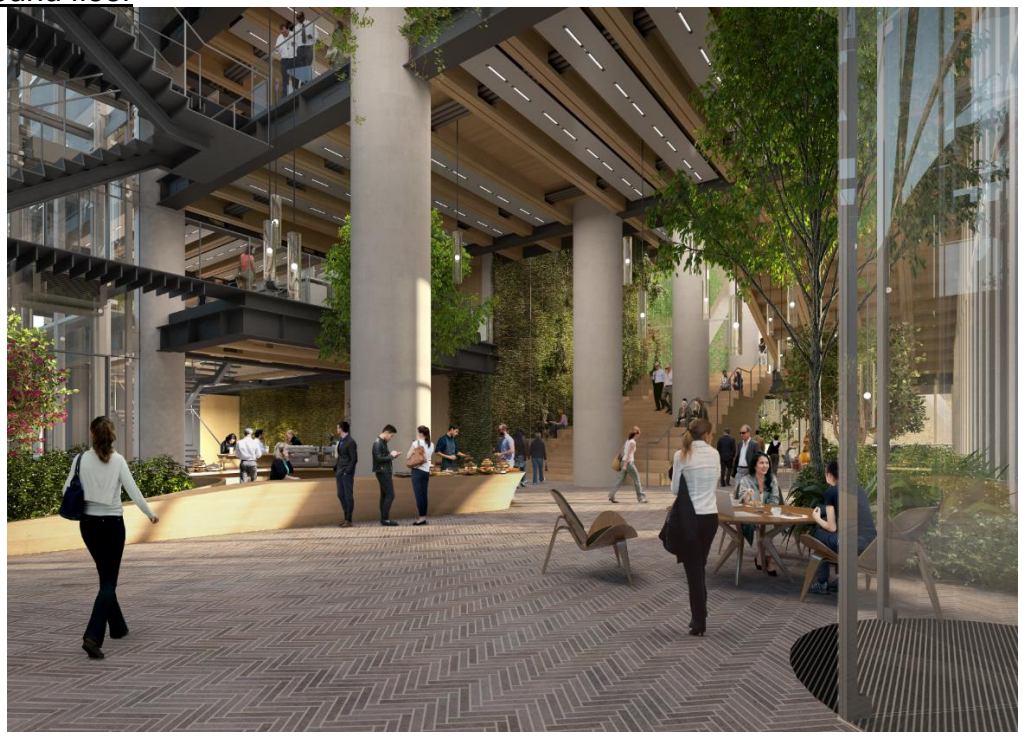
94. The affordable workspace offer would be made up of four distinct elements as set out below:

95. Ground floor – At ground floor level a flexible workspace would be provided for all users. This space would be available for walk in use and would also be bookable via an app. This space would be operated by the building manager and the affordable workspace provider and would be offered for free at all times. The ground floor would make up 9% of the affordable workspace offer.

96. Auditorium – An auditorium would be provided between first and second floor levels. This would have capacity for 180 people and could be used for training, product launches and meetings. The auditorium would be offered for free for 20% of the available hours and would be bookable by small/medium sized business via the affordable workspace provider. The auditorium would make up 10% of the overall affordable workspace offer.

97. Basement studios – Studio space would be provided at basement level and would be made available for free for 20% of the available hours. This space could be used for sound recording, video calls or fitness instructors/therapists that require self-contained studio space. The studios would be bookable via the affordable workspace provider and would constitute 6% of the affordable workspace offer.

Ground floor



98. Rented affordable workspace – Demised affordable workspace would be provided at lower ground, first and second floor level. These spaces would be operated by the affordable workspace provider and would provide office accommodation/flexible workspace with a capacity for up to 274 workstations. This space would comprise 75% of the affordable workspace offer and would be provided at a 25% discount on the market rent with an additional discounted period at the beginning of the lease which would staircase from a pepper corn rent to the 25% discount over a two year period as set out below:

- 0-6 months at 100% discount;
- 7-13 months at 60% discount on the Local Open Market Rent;
- 14-22 months at 40% discount on the Local Open Market Rent; and
- month 23 onwards at 75% of the Local Open Market Rent.

99. In addition, the Section 106 Agreement will include a dedicated 'affordable workspace' schedule. This will ensure, among other things, that:

- the workspace is provided for a 30-year period at the discounts set out above;
- no more than 50% of the market rate floorspace can be occupied until the affordable workspace has been fitted-out ready for occupation;
- detailed plans showing final location of affordable workspace;
- a management plan is in place to secure the appointment of a Workspace Provider and a methodology for that Provider to support the occupiers;
- appropriate marketing of the affordable workspace will be conducted; and
- the rates and service charges payable by the tenant will be capped.

100. The proposed Affordable Workspace Offer meets the policy requirement in terms of quantum of space. The demised workspace which makes up 75% of the overall offer will be offered on acceptable discounted terms whilst the

auditorium, basement studios and the ground floor shared working space will be offered for free which is a significant benefit. The Council's Local Economy Team have reviewed the offer and are supportive of the proposal.

Environmental impact assessment

101. The proposed development falls within Schedule 2, Category 10(b) 'Urban Development Project' of the EIA Regulations 2017 and constitutes EIA development having regard to its potential for likely significant environmental effects.

102. Regulation 3 of the EIA Regulations precludes the granting of planning permission unless the Council has undertaken an Environmental Impact Assessment, taking account of the environmental information, which includes the ES, any further information, any representations made by consultation bodies, and any other person, about the environmental effects of the development.

103. In accordance with the EIA Regulations, an Environmental Statement (ES) comprising a Non-Technical Summary, Environmental Statement and Technical Appendices accompanies the application. That information has been taken into account. Officers are satisfied that the ES is up to date and that the effects described in the ES properly identify the likely significant effects of the proposed development on the environment.

Alternatives

104. The EIA Regulations require the ES to provide information on the alternative options considered by the applicant and this includes a 'Do Nothing' scenario. It is stated by the applicant's consultants and accepted by officers that the 'Do Nothing' alternative would leave the application site in its current state.

105. This scenario is considered in the ES to have no environmental benefits compared with the proposed redevelopment of the site as the 'Do Nothing' scenario would leave a sustainable, brownfield site in central London under used and would not bring forward the various benefits associated with development such as improved pedestrian connections, improved public realm and employment opportunities.

106. No alternative sites or locations have been considered for the proposed development as the site benefits from a site allocation and policy support to deliver a strategic development in this location.

107. The ES also describes the design evolution of the scheme which has been influenced by environmental factors, particularly townscape, LVMF Views and how the development responds to heritage assets. As such, the final version of the scheme has been designed having full regard to the constraints and opportunities presented by the site as well as issues raised during the process.

Cumulative impacts

108. The ES considers cumulative effects arising from the proposed development in combination with other surrounding consented and planned developments and where relevant these effects are discussed further in the topic specific chapters later in the report.

Conclusions on the EIA

109. A detailed assessment of the likely potential and residual impacts of the scheme is provided in the relevant sections of this report, taking into account the ES and the material planning policy considerations. In summary, officers are satisfied that the ES is adequate to enable a fully informed assessment of the environmental effects of the proposal.

Design

110. The NPPF at Paragraph 124 stresses the importance of good design, considering it to be a key aspect of sustainable development. Chapter 3 of the London Plan deals with design related matters. In particular, Policy D4 focuses on delivering and maintaining good design and Policy D9 sets out the requirements for the development of tall buildings. The heritage polices of the London Plan, set out in Chapter 7, assert that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail.

111. The relevant Southwark design and conservation policies are Strategic Policy 12 of the Core Strategy and Saved Policies 3.12, 3.13, 3.15, 3.16, 3.17, 3.18 and 3.20 of the Southwark Plan. These policies require the highest possible standards of design for buildings and public spaces. The principles of good urban design must be taken into account in all developments including height, scale and massing, consideration of local context including historic environment, its character, and townscape strategic and local views.

Site context

112. The existing Becket House building dates from the late 1970s and has an architecture to match, with its strongly expressed concrete structural grid and profiled concrete cladding, with ribbon windows, beige coloured infill panels and aluminium flared soffits. The building features two simple entrances located towards either end of its St Thomas Street frontage, with adjacent end cores. The ground floor is generally disengaged from the street, behind mirrored glazing and a planted boundary. Its robust appearance is distinctive within the street scene, but of no particular architectural merit. It is distinctly of its period, and has a heavy, functional character that is unrelenting. The building is not listed and is not regarded as a non-designated heritage asset.

113. The site sits within a varied context of the grade II listed railway arches on St Thomas Street; the hoarded 0.3 ha Vinegar Yard site to the immediate east, with its pop-up retail, street food market and re-purposed industrial units onto Fenning Street; the 1970s part 2/ 10-storey Capital House (40-46 Weston St) to the west, and the 1980s, 16-storey Wolfson House (49 Weston Street) and the more recent

7-storey Bermondsey Wing of Guy's Hospital beyond; and the mixture of modest-scaled workshops, warehousing, housing and social infrastructure that date from the late Victorian through to the 1930s to the south. The nearby Horseshoe Inn Public House (no.26) and Our Lady of Salette and St Joseph Church with its adjacent staff house (nos.14-16) are notable buildings within Melior Street.

114. Melior Street forms the northern edge of the Bermondsey Street Conservation Area (Sub Area 3), which runs from Weston Street through to Snowsfields, returning briefly onto Fenning Street to include the 2-storey Victorian workshop (no.9) immediately south of the site. The application site itself is entirely outside the conservation area. Tooley Street and its conservation area are located just to the north of the site, immediately beyond London Bridge station and its viaducts; whilst Borough High Street Conservation Area and Tower Bridge Conservation Area are located some 400m to the west and north-east respectively.

115. The site falls within the Central Activities Zone (CAZ) and the Bankside, Borough and London Bridge (BBLB) Opportunity Area that are characterised in this location by a rich mix of historic and modern buildings, streets and places; the vibrancy and diversity of its uses; and by landmark buildings and infrastructure, including most noticeably the Shard, which dominates the skyline with its monumental scale and outstanding architecture.

Proposal

116. The scheme is conceived as part of a wider development framework that runs between Weston Street to the west and the head of Bermondsey Street to the east and includes the neighbouring development plots of Capital House, Vinegar Yard and Snowsfields (1-7 Vinegar Yard and 40 Bermondsey Street). The sites' landowners have sought to coordinate an approach for comprehensive redevelopment and have established a development framework for the area.

117. Briefly, the framework envisages a series of individual buildings that reinforce the street edges of Weston Street, St Thomas Street and Snowsfields, and define a public garden to the rear towards Melior Street and a new public plaza towards Snowsfields. It retains north-south routes across the site and opens up a new east-west pedestrian route that bisects the framework area, linking Weston Street with the two new public spaces and through to Bermondsey Street. The redevelopment schemes are mostly for commercial offices, but with significant elements of retail, leisure and student accommodation, and are mainly conceived as tall buildings.

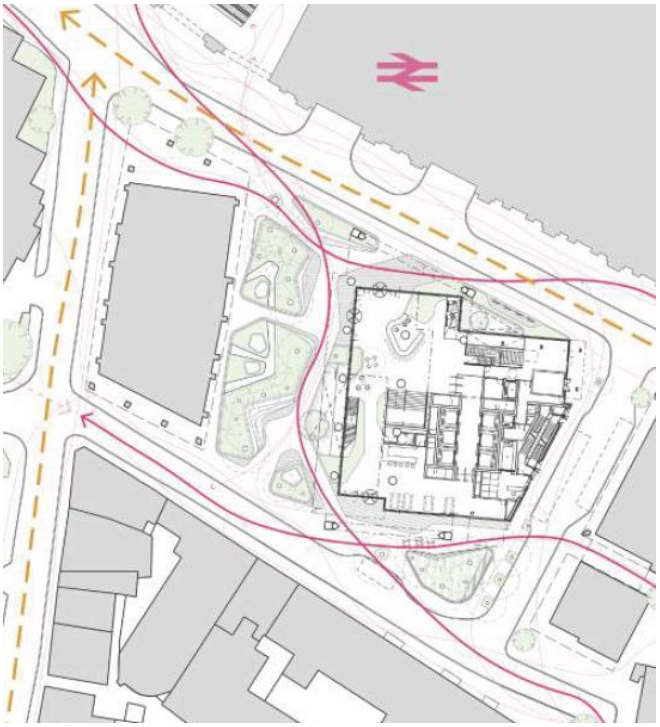
118. The planning application scheme is for the clearance of the site; the excavation of four basement levels; and the construction of a new tall building within the northeast quadrant of the site, comprising 27 storeys, plus an additional storey of plant, reaching a maximum height of 113.67m (AOD). The development would include the re-landscaping of the remaining space to provide a pocket park on the western section of the site and this would extend along the southern boundary with Melior Street to create an additional landscaped space. The building provides commercial offices but includes an extensive ground/1st floor lobby area that is open to the public as an indoor amenity/ informal office space with supporting café. The basement includes an additional level of commercial

offices, as well as ancillary cycle storage and changing facilities, gym and plant room.

Site layout

119. The proposed site layout and building footprint is well-conceived both in presenting an engaging built form but also in organising the intervening public realm, providing a high quality public realm with high levels of access and informal surveillance.

Site layout



120. The building is positioned towards the south of the site, with its north and east facades aligned with the adjoining street geometry of St Thomas Street and Fenning Street, reinforcing the urban form. The north façade is positioned to respond to the emerging general building line along St Thomas Street, ensuring good continuity of the three dimensional public realm. The building's massing is then undercut onto St Thomas Street, with the ground to third floors recessed to provide a generous threshold space, soft landscaping and a basement lightwell. The main entrance is highly legible beneath the tall undercut, angled towards the direction of London Bridge Station. Fenning Street provides access to the servicing bay and other back-of-house services (including means of escape), which is a sensible arrangement, reflecting the secondary character of the street.

121. The building's footprint is then articulated to present its bulk into the site, with its main elevation facing westwards and running parallel with that of the approved built form of Capital House. The intervening pocket park is mainly soft landscaping with trees and large planters, with the two parallel built forms bringing a visual coherency to the new gardens. The space fronts directly onto St Thomas Street and runs through to Melior Street at the rear, with the railway viaduct and terraced buildings at either end of the space visually closing the space to form a central garden square. The proposed building includes an

additional ground floor entrance and a public auditorium space onto the west elevation, providing an active and engaging façade onto the new garden square.

122. The new pocket park works well to open up an engaging pedestrian pathway north south between Melior Street and St Thomas Street and onwards to the east-west onward route through the local area, as well as a better reveal of Our Lady of La Salette and St Joseph's Church with its attractive rose window.

123. Lastly, the building's south elevation is similarly articulated to chamfer back from the junction of Melior Street and Fenning Street, providing room for an additional, tree-lined pocket park space. This cut back similarly works well in several ways, promoting the onward east-west pedestrian route through the wider masterplan area; easing the sense of scale and amenity onto Melior Street; and opening up and softening the eastward townscape view along Melior Street towards the Horseshoe Public House and neighbouring Victorian warehouse. The south façade includes an entrance and café that would help animate the public realm.

Built form and scale

124. The proposal is for a large floorplate building, typically providing just over 1200sqm of floorspace (GIA) on each of its upper floors, which is double that of the current building. The new building covers almost half of the site when assessed at upper floor level and, at 27 storeys above grade, the scheme makes for a substantial new office building. Nonetheless, the proposed built form carries this scale well, with its height and massing skilfully orchestrated to ease its sense of bulk.

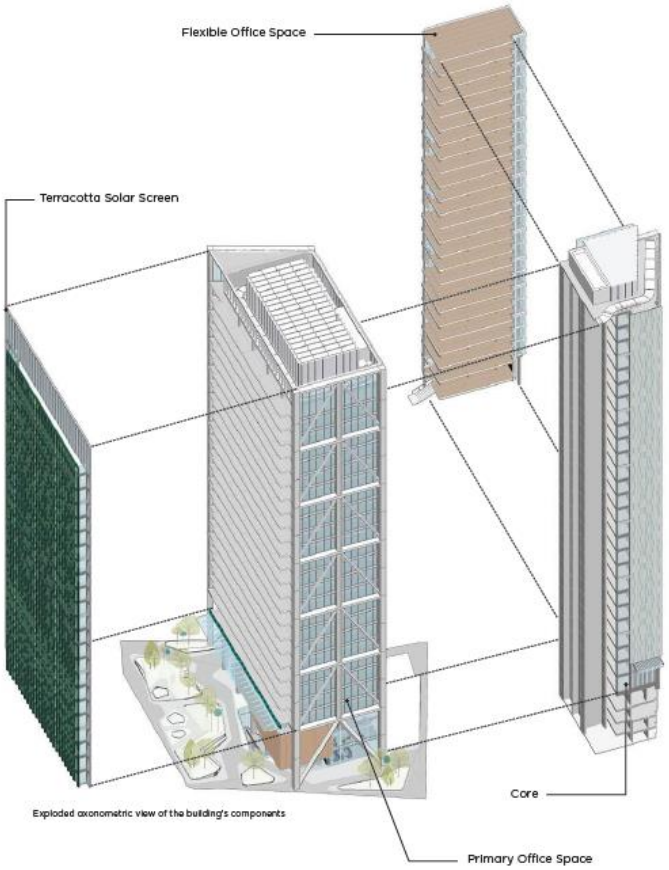
125. The generous cutbacks over ground to third floor level reduces the sense of scale experienced at street level, whilst reducing the actual footprint or ground-take of the building to a third of the site, with the remainder being open space and mainly public realm. By then twisting the planform the development turns the bulk of the building inwards into the site. Eventually, this bulk will become mostly obscured from wider view by the neighbouring large-scale developments such as the approved Capital House.

126. The building's more outward-facing north and south elevations are narrower in breadth, but nonetheless articulated into a series of vertical elements, greatly reducing their visual bulk. This articulation is part and parcel of the building's clever architectural programme of 'served and servant' in which the main office floors and the service core form two adjoining but discrete volumes, with a supplementary office zone with stacked amenity spaces forming a third volume. By shaping, recessing and dressing each volume differently, the building is made to appear slender and well proportioned, particularly for an office building of this scale.

127. Whilst the building is approximately 40m wide onto St Thomas Street, this clever arrangement has the visual effect of presenting a main front façade of approximately 21m in width, with the remaining volume articulating back and reading secondary in appearance. As such, the street façade is given a slender appearance with a width to height ration of 1:5, with the secondary element given a similar proportion. Returning to the west (pocket park) elevations, whilst it is broader at 49m, its façade is articulated at either end and has a projecting

terracotta façade that helps to reduce its sense of scale. The east façade features a terracotta finish, though its massing is relieved by articulating the service core and amenity volume as visually distinct elements.

Built form



128. Importantly, the articulation of the massing is carried the full height of the building, with the three volumes stepping in height, giving the built form a visual integrity. The stacked terraces end with a roof top garden on the twenty fourth floor, whilst the service core ends on the twenty sixth floor with plant above that which is setback and hidden. The main office volume continues an additional floor, expressing its predominance and bringing a confident top of the building. As a detail, the terracotta framework on the garden façade finishes two floors below, allowing the main volume to read as a final flourish on the west elevation.

129. Overall, the massing is well-conceived, maximising the floorspace provision, whilst bringing a seemingly slender scale to the built form. The composite volumes bring visual interest, with the articulation effective and engaging in-the-round. It is noted that the building would be tall and distinctly taller than the current building on site. However, its proposed height is intended to be seen in relation to the commercial/ institutional centre of London Bridge and its emerging cluster of tall buildings. At this height, the building sits comfortably within the range of tall buildings in the wider area.

130. In its more immediate setting, the scale is intended as an obvious and comfortable step down in height from the approved Capital House development which is consented at thirty nine residential storeys. The proposed height forms part of a series of tall buildings along St Thomas Street that continue to step

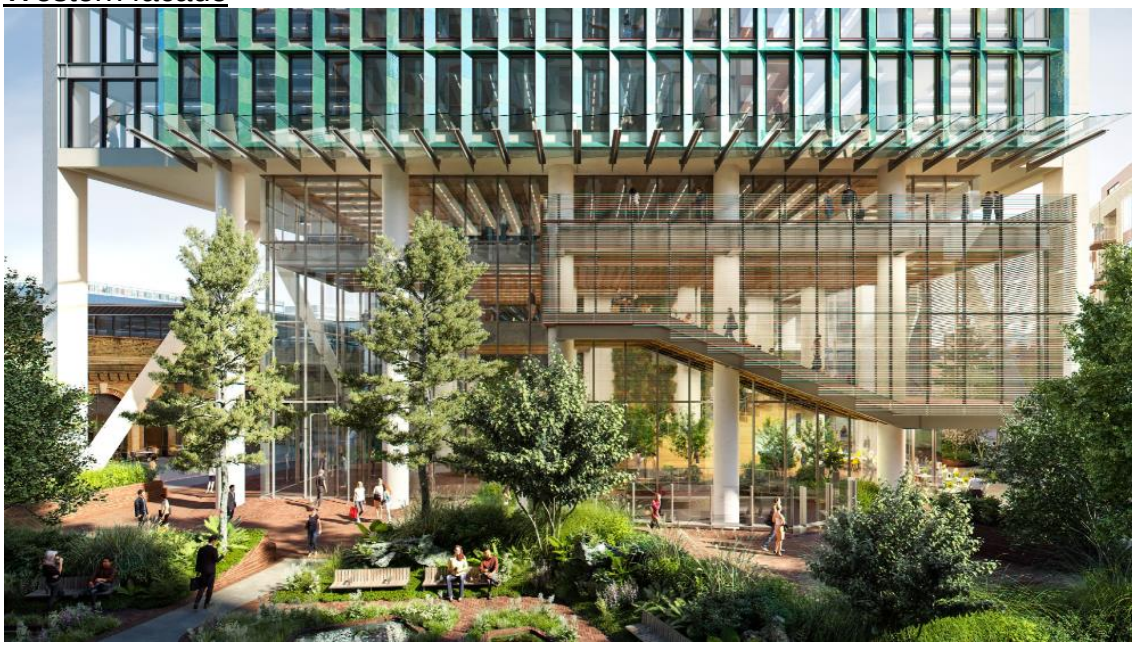
down in height towards Bermondsey Street, with the proposed building playing its role in transitioning down to the hinterland's more domestic scale.

Architectural treatment

131. The detailed elevational architecture of the building complements its massing strategy, working together to reinforce the slender, composite built form. This is supplemented by introducing an elevational hierarchy of expressing a base, middle and top to the building that likewise eases the building's apparent scale.

132. The base reads mostly as a four storey high undercut onto St Thomas Street with a multi-level foyer/ public workspace that is continued round onto the West elevation which looks onto the new garden space. Its height and architectural treatment offers a highly transparent and engaging base, with large structural columns and bracing running through the space confirming its sense of scale and bringing something of a civic quality to the space. Whilst the tall base can be read on the south (Melior Street) elevation, the introduction of the auditorium and mezzanine floors brings a more intimate scale to the elevation and adjoining public realm. Overall, the base is well articulated and proportionate to the building's height and massing.

Western facade



133. At the other end, the design of the top is understated, but nonetheless works well, reading as the simple conclusion of each of the composite volumes. The volumes are seen to step in height, with the main office volume offering the final flourish. The outcome is more a composed roofscape than a singular roof form, with the rooftop gardens above the amenity deck providing an element of rooftop greenery. In terms of the main body of the building, the elevational architecture is both engaging in itself and works well in the round, reinforcing the building's articulated massing.

134. The facades mainly comprise high quality, high performance unitised glazing with aluminium framing. For the main street-facing facades (north and south), the glazing is set deeply recessed within an expressed structural concrete frame with

additional steel K-bracing, giving the building a robust, engineered appearance. The framework groups the elevation into four storey groups, giving the elevations a finer scale and strong visual order that is effective.

Fenning Street corner

135. The west façade has a softer and more intricate appearance, with a green terracotta screen that projects as a single bay in front of the glazing. The bay covers most of the façade, bringing a depth and texture to its appearance, with the underlying unitised glazing exposed on the façade's margins and for the uppermost two floors, adding further visual interest. The screen is a clever device: Composed of terracotta horizontal and vertical fins it is arranged to provide solar shading to the offices and to direct outward views generally northwards and away from nearby residential buildings and Capital House, whilst maintaining good daylight penetration. Moreover, the green screen gives the elevation a distinct and engaging identity that contrasts well with the street facades, and sits well amongst the tree cover of the new pocket park. The use of terracotta is especially welcome, with its high quality ceramic finish providing a depth of colour and visual richness, albeit this should be confirmed by condition.

136. The east (Fenning Street) façade has a more closed character, reflecting the fact that it mainly contains the service core. Nonetheless, the façade is finished in the same high quality terracotta, in this instance comprising large, vertical cladding panels. The elevation is not without interest, however, with the panels arranged in a staggered pattern, following the rise of the scissor-stairs, and in a stacked pattern for the landings. The panels are profiled with flared edges rather than set flush, bringing a subtle dynamic quality to the elevation, whilst tall slotted windows add further visual relief, as well as daylight to the service cores.

137. Overall, the elevational architecture is well conceived, expressing the building's component parts well and giving the building a clear and coherent identity that is more Southwark than corporate London, with its quasi-industrial character, richness of materials and engaging public feel.

138. Brief mention should be made of the functionality of the office accommodation. Positioning the core to one side rather than central creates the opportunity for large, uninterrupted open-plan offices, as well as supporting cellular layouts. The offices have floor to ceiling heights of 3.1m with a minimum of 2.9m (clear) with exposed services, making for generous and well-lit spaces when combined with the full-height window openings. The windows are openable, with the building featuring mixed-mode ventilation and solar shading where necessary. Whilst the main building structure comprises efficient post-tension concrete, part of the office floorplate is nonetheless constructed in steel and cross laminated timber (CLT).

139. This hybrid component provides further local flexibility in office layouts, with the opportunity for floors to become interconnected with additional staircases or double and triple-height spaces, allowing companies to tailor their floorplans, independent from the main core. In addition, every other floor features a large balcony, giving staff access to north facing river views and to extensive outdoor seating and planting; whilst the rooftop garden on the 24th floor is intended as a communal amenity space for all staff. Whilst the building includes offices at basement level, the offices nonetheless benefit from equally generous ceiling heights, and benefit from daylight and outlook, with large sunken garden lightwells, as well as from the ocular windows set within the new pocket park. Overall, the office accommodation is of a very high standard, with the development targeting a BREEAM Outstanding rating.

Tall buildings

140. The building is reaches a maximum height of approximately 113.66m above grade, and is significantly taller than its immediate surroundings to the south and east, which is characterised by buildings of between 12 and 20m in height. However, the contextual scale rises considerably towards Guy's Hospital and the Shard, and the site is located within the CAZ and the Opportunity Area, where such high-rise intensification of development is generally appropriate. Nevertheless, the tall building is expected to also comply with policy 3.20 in full. Looking at the requirements in turn:

Positive contribution to the landscape

141. The development includes additional public open space and a number of significant improvements to the public realm; most notably the new pocket park located to the west of the tall building. The pocket park provides a generous and attractive soft landscaped public area that would be in a prominent position, opening directly onto St Thomas Street and enhancing the visual amenity of the street. The park would also open up an attractive, new pedestrian route through the site, connecting though to Melior Street.

North and south elevations

142. Elsewhere, the development sets back the tall building along St Thomas Street, allowing the provision of a generous new tree-lined pavement (subject to TfL approval) and additional boundary landscaping; whilst the building line cutback at the junction of Melior Street with Fenning Street provides replacement public gardens and new street trees, as well as facilitating a north-south pedestrian route that in time will connect through the masterplan area. Overall, the landscape contribution is commensurate with the scale of development.

Point of landmark significance

143. The application site sits directly opposite London Bridge Station, one of London's major transport interchanges and sits opposite one of the main entrances. Additionally, the site is located within the CAZ and within the immediate surroundings of other tall buildings (both existing and consented). As such the application site is considered to be appropriate for a tall building.

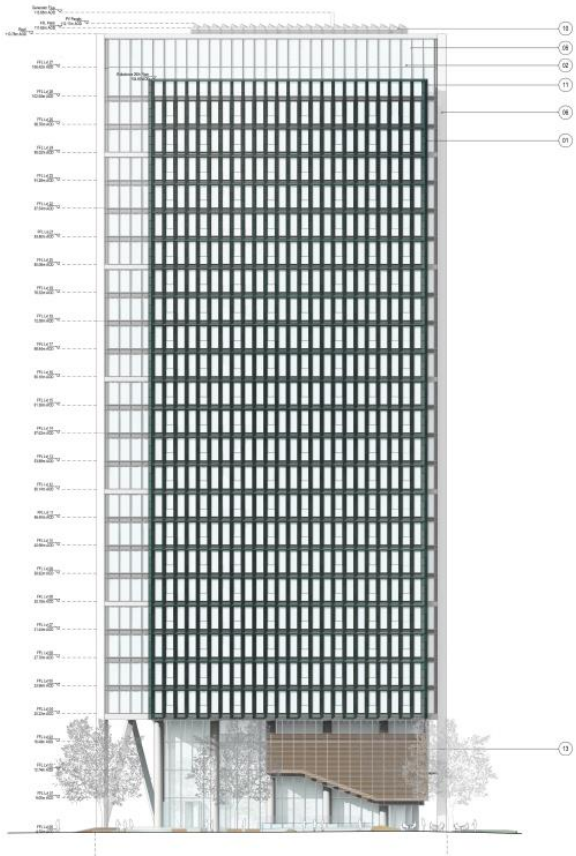
Highest architectural standard

144. This is an excellently designed tall office building, with its use of high performance material finishes, clever building orientation, massing and internal organisation, and high functional quality of its accommodation, with the building aimed at achieving the highest BREEAM rating and an exemplary standard of sustainability.

145. As set out earlier, the building is designed in three inter-related parts: the main office floorplate; the services core; and ancillary amenity space. The layout is well conceived to maintain the offices as an open, flexible space with excellent daylighting and outlook; locates the core to a discrete section of the building adjacent to the servicing street; and provides river facing terraces with adaptable floorplates that can be customised to meet the occupiers' needs. This

organisation is cleverly expressed in the external massing of the building, generating its distinctive character and elegant proportions.

Proposed west elevation



146. The offices floors benefit from excellent floor-to-ceiling heights and mixed-mode ventilation, as well as easy access to the terrace spaces. The building's base is well-conceived as a public space, with its perforate design, open access and relaxed fit-out making for an inclusive space that engages well with the public realm. Lastly, the architecture is highly sustainable in its use of post-tension concrete, CLT, high performance facades, green roofs and green building technology. Overall, the architecture is very well considered, effective and engaging.

Relates well to its surroundings

147. The tall building relates well to its immediate surroundings both in terms of the building's base and its general design. The building's base draws back from the general building line to strengthen its connection to the street and new pocket park. The open, permeable character of its ground floor, with its generous scale, the continuation of the high quality paving into the foyer area and extensive interior soft landscaping, make for a seamless transition between the public realm and publically accessible lobby, inviting people into the building. In addition, the building's café and public auditorium space work well with the pocket park to bring a more intimate, but public quality to the south side of the site relating well to the more local scale and character of Melior Street.

148. Its elevational architecture also relates well to its wider context, with the building's modern office aesthetic on the one hand reflecting the high quality, commercial

character of London Bridge as a business district; and its structural detailing of expressed concrete framework and columns and steel bracing on the other hand reflecting the industrial overtones of the wider Bermondsey area and London Bridge Station itself.

Positive contribution to the London skyline

149. The building is intended to help consolidate the cluster of tall buildings within St Thomas Street and the wider London Bridge area. Its contribution is positive, with its elegant form, clear architectural identity and confident rooftop finish. It should play its part well in mediating the distinct changes in scale from the very tall buildings of the Shard and nearby Guy's Tower down towards the more mid-rise and domestic scales of Bermondsey. As set out above, it provides a comfortable step change in height down from the recently approved development of Capital House. Its articulated built form and slender design is engaging and brings a distinctive and pleasing appearance to the skyline.

150. Overall, the development's design readily meets the policy criteria for a new tall building. A significant outcome of a tall building is its visibility and whilst this is not considered harmful in itself, the potential effects on the 'receptor' townscape and heritage assets are of special concern and are considered further below.

Heritage and townscape

151. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to consider the impacts of proposals upon a conservation area and its setting and to pay "special regard to the desirability of preserving or enhancing the character or appearance of that area". Section 66 of the Act also requires the Authority to consider the impacts of a development on a listed building or its setting and to have "special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses". The NPPF provides guidance on how these tests are applied, referring in paras 193-196 to the need to give great weight to the conservation of the heritage asset (and the more important the asset, the greater the weight); evaluate the extent of harm or loss of its significance; generally refuse consent where harm is substantial; and, where necessary, weigh this harm against the public benefits of the scheme. Para 197 goes on to advise taking into account the effect of a scheme on the significance of a non-designated heritage asset.

152. The submission includes a Zone of Visual Influence map (ZVI) and a townscape visual impact assessment that provides verified images of the development when viewed from 44 locations in and around the London Bridge and Bermondsey areas, as well as when viewed within the relevant protected London panoramas and the setting of the Tower of London.

153. In general, the tall building is less widely visible than the height suggests. In part, this is because of other large buildings located mainly to the north and west that often mask the development from wider view; but also because of the adjacent railway viaduct and tight, historical urban form to the south and east that offers limited visual prospects. Nonetheless, it does remain visible in a number of nearby and distant views where it affects the settings of designated heritage

assets and the townscape. Looking at the categories of views and townscape in turn:

Impacts on Protected Views

154. The LVMF seeks to protect and manage 27 views across London and those of some of its major landmarks. The submission demonstrates that at the proposed height the development will be visible above the threshold plane and in close proximity to St Paul's Cathedral when viewed from Alexandra Palace (view #1) and Kenwood House (view #3) and immediately behind the cathedral's dome when seen from Parliament Hill (view #2). However, its scale and material finish are not visually disruptive and are generally lost against the backdrop of the Shard, with the cathedral's silhouette remaining clear and identifiable. In the views from Primrose Hill, Greenwich and Blackheath (views #4, 5 and 6), the change in perspective pushes the new building distinctly to one side of St Paul's, with the setting of the strategic landmark remaining unaffected. It is also notable that despite its height, the building remains below the ridgeline of the distant Surrey Hills, and that whilst the building partly obscures the Shard, this is at low level only, with the Shard's distinctive form remaining easily visible and its contribution to the skyline similarly unaffected.

155. Looking at the riverside prospects, the new building would form part of the London Bridge cluster of tall buildings. As such, it would be largely obscured from view in the protected view from Tower Bridge (view #7), with part of the upper floors emerging beyond the curved profile of City Hall. Nonetheless, the two buildings would appear of similar overall height and much the same as Guy's Tower, which is seen further to the right; whilst in the downstream view from Southwark Bridge (view #8), the new building is completely obscured from view by the new development in Shard Place. The proposal would have a neutral effect on the townscape in these views, which remains dominated by the river and the Shard.

156. In terms of the borough's protected views towards St Paul's, the building would be visible in the panorama from One Tree Hill (view #9), but would appear distinctly remote from the cathedral and as part of the tall buildings cluster around the Shard. The new building would not be visible in the narrow linear view of the cathedral from Nunhead Cemetery (view #10), being located to the right and obscured by intervening tree cover.

157. Overall, officers consider that the development has a neutral impact upon the protected view of St Paul's and little or no discernible impacts upon the protected London panoramas or the additional protected panoramas within Southwark.

Impacts on the World Heritage Site

158. The Tower of London is a heritage asset of the highest order. It is grade I statutory listed and certified as a World Heritage Site of Outstanding Universal Value. As such any development that intrudes upon views within the Tower complex must be carefully considered, albeit with varied sensitivity depending on whether the development is visible from within the inner ward and close to the site of the scaffold, or is seen looking outwards from the ramparts.

159. For the most part the development would not be seen from within the Tower of London complex. Where it does become visible, its impact is modest and generally within the lesser sensitive parts of the World Heritage Site. However, it does appear briefly in the more sensitive views of the Queen's House from the White Tower (view #17) and from the Scaffold Site (view #18). From the entrance courtyard of the White Tower it would be glimpsed above the roofline of the Queen's House, although this would be through the trees and would be read as one of several tall buildings in the distance; whilst from the scaffold site it is just visible among the gables of the historic building's roof. In these views, whilst the sensitivity of the views is high, the visual intrusion is minor and the harm negligible.

160. The development has a modest impact on the wider setting of the Tower (views #11-15), where it is generally read as part of the backdrop of tall buildings that cluster around the London Bridge area, and as such has a neutral effect on the heritage environment. It is notable that to date Historic England has made no reference to any impacts of the development on the WHS in its consultation response.

Impacts on local heritage assets - conservation areas and listed buildings

161. The application site is outside, but adjacent to the Bermondsey Street conservation area, which has the Grade II* listed Church of St Mary Magdalen and the village-like high street as its focus, but extends westwards to include the south side of Melior Street, a short return onto Fenning Street and Melior Place. It therefore includes the neighbouring Church of Our Lady of Salette and St Joseph and the Horseshoe Public House and several Victorian workshop buildings (incl. no.9 Fenning Street), which are regarded as positive contributors to the local townscape. The local area also includes a number of listed buildings, the closest to the site being the Grade II listed railway viaduct opposite the site.

162. The special interest of the Bermondsey Street conservation area is its historic development of tightly packed 18th century housing, many with shops, and late 19th/ early 20th century warehouses and workshops that have adopted the medieval pattern of narrow streets and plots, arched alleyways and rear yards. The tight urban scale, simple classical architecture and industrial detailing create an evocative and characterful townscape. The townscape impact analysis demonstrates that the scheme is likely to be seen from a number of vantage points around the Bermondsey Street conservation area and within the settings of a number of listed buildings, albeit the overall extent and degree of visibility are moderate.

163. It is notable that the view from St Mary's Churchyard (view #25), the building will be seen distinctly above the generally consistent roof heights surrounding the churchyard and would interfere in reading the nave and gable end to the church. This, however, is little different from the impacts of Guy's Tower and the Shard, and as such the harm caused by the additional appearance of the development in this view would be minor.

View Bermondsey Street

164. When viewed from along Bermondsey Street (views #36 and 37), the proposed building's rooftop would be glimpsed among the dormers and mansards of the foreground buildings, with the Shard particularly present in the background. The new building becomes more obvious, however, from Tanner Street park on the corner of Bermondsey Street/ Tanner Street (view #35), where the townscape opens up and the new building is an overt addition to the skyline, catching the eye along with Guy's Tower and the Shard. The development would be seen to sit in front of the Shard, partially obscuring the main body of the building. However, this view of the Shard is not of heritage significance and in time the Shard's silhouette would be partly obscured behind the consented Capital House scheme.

165. In this and several other instances (views #38-42), the new building is visible, but it does not especially compromise the townscape experience. Any harm experienced is less than substantial, having minor impacts. The new tall building is an overt addition to the skyline when seen from Leathermarket Gardens, but again would be seen alongside Guy's Tower and the Shard (views #38 and #40). It would present an isolated tall building in the backdrop to the view along Weston Street (view #39), though it would remain sufficiently distant from the Grade II listed Leathermarket building and would in time be joined by the consented Capital House.

166. The exception is within Kirby Grove (view #41), where its appearance would be more emphatic, rising above the Guinness Trust buildings towards the junction with Snowsfields. Its high-rise form and material finishes would contrast strongly with the estate's terraced block form and red brickwork, detracting from the linear, residential character of the street. However, the Capital House scheme would have a similar effect. The harm remains less than substantial, with a moderate impact.

167. Not illustrated is the likely effect on the setting of the conservation area immediately adjacent to the site. The layout of the site and the inclusion of the garden square will open up views of Melior Street from St Thomas Street and provide an attractive vista of the Church of Our Lady of Salette and St Joseph, which is of moderate benefit. Furthermore, whilst the building's west corner is

brought down onto Melior Street, it would be as a double-height columns with the floorplate recessed on ground and first floor levels; and with the main bulk of the building drawn in at an angle and the pocket park provided onto the street. This layout would provide a sense of openness at the rear as well as retain the eastwards view along Melior Street from the junction with Weston Street. The associated re-landscaping of the corner space, the new pedestrian route and pocket park would improve this part of the local conservation area, enhancing access and the vista towards the Horsehoe Pub and neighbouring warehouses at the junction with Fenning Street and Melior Place. This too would be of moderate benefit.

168. The new development has minor effects on other surrounding conservation areas and listed buildings, the more sensitive views being the churchyard of the Grade I Southwark Cathedral in Cathedral Street (view #29); the view along Borough High Street towards the Grade II* St George the Martyr (view #22); within Merrick Square with its Grade II terraces; the Grade II terraces of Bedale Street (view #30); and the more overt views from Tooley Street looking towards the Grade II viaduct (views #27 and 28). In these views the new building is often read as one of several tall buildings affecting the view, and its additional impacts are neutral or of negligible harm.

Conclusion on heritage

169. The development is discernible within the backdrops to the Tower of London and is visible within several of the protected panoramas. However, its appearance causes no or negligible harm, preserving these sensitive views. The tall building is more evident from within those conservation areas and listed building settings closer-by, though for the most part it is read as one of several similar tall buildings and as such the harm caused to the settings is negligible. It does have more of an impact on the west and southwest parts of the Bermondsey Street conservation area and within Kirby Street in particular, where its appearance is more emphatic, though the harm caused would be remain less than substantial. However, the development would better reveal views of Melior Street, enhancing this part of the conservation area. In other nearby conservation areas, the impact is negligible.

170. Overall, whilst the development causes harm in some instances that harm is primarily to parts of the Bermondsey Street conservation area and would be at the lower order of less than substantial. The character and appearance of the conservation area as the heritage asset would be sufficiently preserved. As set out in para 196 of the NPPF, where there is less than substantial harm, this should be weighed against the public benefits that arise from the scheme. These benefits include the high quality architecture, new pedestrian-routes, improved public realm, pocket park, significant employment creation and the provision of affordable workspace.

Impacts on the townscape outside of conservation areas

171. The submission includes several views from the general area that are outside the local conservation areas, showing the development within the general townscape. Where the tall building is seen, the views tend to show it within a fragmented townscape with groups of buildings of varied scale and architecture.

The development is read as part of this varied townscape or part of the backdrop of large scaled buildings within the London Bridge area, and therefore has a modest impact (views #31, 32, 33 and 43). In the instance of the eastwards view along Crucifix Lane, the new building would take the place of Guy's Tower, with its more composed and articulated west elevation offering a more engaging focal point to the view, albeit of a slightly taller building in these perspectives. The effect is modestly beneficial.

Design Review Panel

172. The proposals were reviewed by the Council's DRP at the pre-application stage in December 2019. The scheme was presented within the context of the wider development framework, which the panel has generally endorsed when assessing previous proposals for this and neighbouring sites.

173. The DRP was comfortable with the general scale and design approach for the new building. It found the massing strategy convincing and thought that the general layout worked really well, particularly in opening up the view through to the church and interface with the new gardens. However, it advised further consideration of the layout onto Melior Street, where the proposed building line caused a pinch-point onto the street. It also expressed concern regarding the extensive basements and how this would affect the long-term viability of the landscaping. The panel supported the concept of the public foyer, but thought this needed further exploration to ensure its delivery as a lively, engaging space. It suggested the architectural expression needed greater coherency. Lastly, it supported the scheme's ambition to be a highly sustainable building, but wanted this widened to consider other non-technical aspects.

174. The scheme architects responded positively to the DRP comments and adjustments have been made to the scheme, which have been to the officers' satisfaction. They include drawing back the south building line onto Melior Street to relieve the pinch-point; increasing soil depth for planting through a combination of raised planters and revisions to the basement footprint, allowing more trees to planted directly into ground. The detailing of the terracotta screening has been progressed, as has the detailed layout of the public foyer.

Landscaping, trees and urban greening

175. As referenced above, the scheme includes a number of public realm benefits, including the potential for a tree lined pavement on St Thomas Street (subject to TfL approval) that is widened by the four-storey undercroft, supporting its function as the main local thoroughfare; and most notably the new pocket park, which makes for an attractive, permeable public space. The proposed pocket park would be a suitable and high quality replacement for the existing Melior Street Garden which is classed as Other Open Space within the New Southwark Plan. The pocket park would create new open space and landscaped areas which would be attractive and well planted, assisting the development to achieve an Urban Greening Factor of 0.3 which meets the requirement set out in the London Plan 2021.

New park

176. The hard landscaping throughout comprises high quality materials, with coarse grained granite paving onto St Thomas Street to match the streetscape outside the refurbished London bridge Station; natural stone paving onto Melior Street; and recycled brick for the footways within the site. The pocket park has a contemporary design, with planters arranged to provide a series of smaller landscaped spaces and informal terraced seating; whilst the smaller, corner pocket park at the junction of Melior Street/ Fenning Street provides a small plaza. The new trees along St Thomas Street, Fenning Street and Melior Street are planted at grade, which is welcome in maintaining the natural topography; although elsewhere within the scheme others are contained within planters that are raised above the basement slab, which is less effective, but occasional and provides opportunities for outdoor seating..

177. The palette is high quality, although the landscaping (including perimeter footway materials, tree species, planting and street furniture) should be conditioned to confirm this and to ensure a wider seamless public realm that avoids a corporate feel. This should include a requirement for new public art which will add to the sense of place.

178. Lastly, the new landscaping extends to include balcony and roof terraces, which incorporate raised planters and provide greenery on every other floor of the building and a green ‘fringe’ above the building’s parapet. The terraces provide good amenity for the offices, as well as softening the roof profile. Overall, the landscaping is high quality and commensurate with the scale of development both in terms of its extent and quality of finishes.

Conclusions on design

179. The application is for a new tall building of 27 storeys on a site within the Central Activities Zone and adjacent to London Bridge Station. The site is outside, but adjacent to the Bermondsey Street conservation area, and is within the vicinity of a number of other heritage assets, including the Grade II railway viaduct. It replaces an existing 7-storey office building that dates from the late 1970s, but is of no architectural or townscape merit. The development is of a high architectural quality and with significant urban design benefits.

180. The proposed site layout and building footprint are well-conceived, presenting an engaging built form and positioning the building to allow a new pedestrian route through the site and extended and improved public garden spaces that present onto St Thomas Street and opens up an attractive view through to the Roman Catholic church in Melior Street. The public realm is well-activated, with the base of the building designed to be perforate and flowing with the adjacent public realm, and providing a welcoming public foyer space.

181. The tall building is within an appropriate location for high rise development. Its scale is generally well judged, with its height responding to the emerging cluster of tall buildings within the London Bridge area and mediating the change is height downwards towards Bermondsey Street as part of the informal St Thomas Street masterplan. The proposed height does not interfere in the protected strategic and borough views of St Paul's, and whilst seen within the riverside panoramas it would be read as part of the London Bridge cluster, with its slender form evident and the primacy and iconic quality of the Shard as a landmark building maintained. The development would also be seen from the Tower of London, where the impact would be minor and not dissimilar in impact to other background tall buildings.

182. More locally, the building will affect the settings of local heritage assets, being visible above the local roofscapes or breaking the skyline, albeit for the most part its appearance is moderate and has a negligible or minor effect. It sits comfortably with the adjacent Grade II listed railway arches, but will be distinctly evident in more open views within the Bermondsey Street and surrounding conservation areas.

183. The proposed architecture is engaging and high quality in its massing, elevational detailing and functional qualities. Its articulated form is clever, presenting a slender, elegant profile and an interesting architecture that works well in the round. It also supports flexible and adaptable floorplates with good office amenities. The design is confident in its appearance, with its expressed structural framework and steel bracing providing a robust city-facing character, with its terracotta screening providing a softer, richer local character that works well within the new garden square. The material finishes are high quality, whilst the construction and operation of the building are welcome in their approach to sustainability.

184. Lastly, the scheme provides significant improvements to the public realm, including new public open space and new pedestrian routes through to Melior Street, as well as connecting across to the neighbouring Vinegar Yard site. The re-orientated and re-landscaped pocket park is proportional and commensurate

with the large scale of development, and an important enhancement to the local area. The gardens bring welcome visual and physical amenity to St Thomas Street and to the setting of the conservation area in particular.

Ecology and biodiversity

185. The application site presently has very low ecological value. The Council's Ecologist has reviewed the application and raises no objection. There is an opportunity, as part of the redevelopment, to provide ecological enhancement and the Council's Ecologist has recommended conditions relating to planting species, the installation of bird boxes and the provision of an Ecological Management Plan. Conditions would be imposed to secure the Swift bricks and biodiverse roofs whilst the Ecological Management Plan would be secured as part of the S106 Agreement.

Archaeology

186. The site lies at an exceptionally interesting location within the 'Borough, Bermondsey and Rivers' Archaeological Priority Zone (APZ) and is extremely sensitive for archaeological matters. When the New Southwark Plan is adopted the site will lie within the newly extended 'North Southwark and Roman Roads ' Archaeological Priority Area (APA). Saved Policy 3.19 of the Southwark Plan (2007) requires that proposals for development in APZ/As should be accompanied by an archaeological desk-based assessment (DBA) and an evaluation report (the results of digging archaeological trial trenches).

187. The applicants have submitted a desk based assessment and environmental statement which is included within the ES at appendix 7 and reviewed within Chapter 12 of the main ES report and this details the impacts of the proposal upon buried archaeological remains as well as an assessment of previous impacts. These documents provide a suitable baseline which adequately summarises the archaeology present on site.

188. The archaeological desk based assessment demonstrates that remains of international and national significance that would require preservation in-situ are not expected within the site study area. It is concluded that the site has the potential to contain archaeological heritage of local and county importance only.

189. The ES states that any impacts and effects to archaeological remains would occur during the construction works and excavation of the basement and that these impacts would be permanent. The site has the potential to include archaeological remains from different periods including paleo-environmental remains, later medieval land reclamation remains, early post-medieval industrial remains, early post-medieval reclamation remains and post-medieval building remains.

190. Mitigation measures suggested in the environmental statement include archaeological evaluation and geo-archaeological works, and monitoring of geotechnical investigations. This represents a suitable first stage for works and subsequent to these results conditions are recommended to secure the archaeological interests of the site. These include conditions for foundation and basement design, evaluation, mitigation works and a condition to secure the final

report, archive and publication of the archaeological results. These conditions will ensure that adverse impacts are reduced as far as possible and that no significant effects will occur as a result of the proposed development.

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

191. Strategic Policy 13 of the Core Strategy sets high environmental standards and requires developments to avoid amenity and environmental problems that affect how we enjoy the environment. Saved Policy 3.2 of the Southwark Plan states that planning permission for development will not be granted where it would cause a loss of amenity, including disturbance from noise, to present and future occupiers in the surrounding area or on the application site. Furthermore, there is a requirement in Saved Policy 3.1 to ensure that development proposals will not cause material adverse effects on the environment and quality of life.

192. A development of the size and scale proposed will clearly have potential significant impacts on the amenities and quality of life of occupiers of properties both adjoining and in the vicinity of the site. The proposal has required an EIA in order to ascertain the likely associated environmental impacts and how these impacts can be mitigated. The accompanying Environmental Statement (ES) and addendum deals with the substantive environmental issues. An assessment then needs to be made as to whether the residual impacts, following mitigation, would amount to such significant harm as to justify the refusal of planning permission.

Outlook and privacy

193. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear. The closest neighbours are those dwellings on the opposite side of Melior Street. The design of the proposed building is such that there is a single closest point between the proposed building and the adjacent neighbours with the proposed building stepping away as it moves east. At the closest point measured on the proposed ground floor plan, the separation distance would be 14.7 metres.

Daylight

194. A daylight and sunlight report has been submitted as part of the Environmental Statement. The report assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.

195. The BRE Guidance provides a technical reference for the assessment of amenity relating to daylight, sunlight and overshadowing. The guidance within it is not mandatory and the advice within the guide should not be seen as an instrument of planning policy. The guidance notes that within dense urban environments and areas of modern high rise buildings, a higher degree of obstruction may be unavoidable to match the height and proportion of existing buildings. This area south of St Thomas Street and the redeveloped London Bridge Station has been identified as an area where tall buildings are appropriate and there are existing tall buildings in the area such as the Shard and Guys Hospital Tower which are

in close proximity to the site as well as the consented scheme at Capital House which is the immediate neighbour to the west.

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

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

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

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

- 48-50 Weston Street/16 Melior Street
- Our Lady of La Salette and Saint Joseph Church/14 Melior Street
- 6-12 Melior Street/36 Snowsfields
- 2-4 Melior Place
- 37 Snowsfields
- 38 Snowsfields
- 39 Snowsfields
- 40 Snowsfields
- 41 Snowsfields
- 42 Snowsfields
- 43 Snowsfields
- 64-66 Weston Street
- 62 Weston Street
- 52-54 Weston Street
- Wolfson House, 49 Weston Street
- 115-122 Snowsfields
- The Rose Public House, 123 Snowsfields
- 115-144 Guinness Court
- 103-114 Guinness Court
- 1-15 Guinness Court
- 8-20 Snowsfields
- The Horseshoe Inn
- 147 Snowsfields, Raquel Court

- More Cooper House, 14 Magdalen Street

199. The Rose public house, 103-114 Guinness Court, 147 Snowsfields/Raquel Court and More Cooper House/14 Magdalen Street would all remain fully compliant with the BRE in terms of both VSC and NSL and will not be considered further in the report. The tables below outline the general results in terms of the loss of VSC and NSL that would be experienced by the remaining buildings and a more localised assessment of the affected properties is detailed below;

Table – Impact of proposed development on Vertical Sky Component (VSC) including cumulative results (*)

Property	No. of windows tested	No. retaining at least 80% of their baseline value	No. with minor adverse impact of up to 30% reduction in VSC	No. with moderate adverse impact of between 30%-40% reduction in VSC	No. with major adverse impact of over 40% reduction in VSC
48-50 Weston Street/16 Melior Street	66	18 (18)	0 (6)	0 (0)	48 (42)
Our Lady of La Salette and Saint Joseph Church/14 Melior Street	3	0 (0)	0 (0)	0 (0)	3 (3)
6-12 Melior Street/36 Snowsfields	135	68 (65)	6 (10)	12 (14)	49 (46)
2-4 Melior Place	16 (35)	12 (21)	3 (14)	1 (0)	0 (0)
37 Snowsfields	7	7 (7)	0 (0)	0 (0)	0 (0)
38 Snowsfields	5	0 (0)	2 (0)	3 (5)	0 (0)
39 Snowsfields	18	6 (5)	8 (2)	4 (10)	0 (1)
40 Snowsfields	18	11 (10)	5 (4)	2 (3)	0 (1)
41 Snowsfields	13	9 (9)	1 (1)	3 (1)	0 (2)
42 Snowsfields	13	13 (13)	0 (0)	0 (0)	0 (0)
43 Snowsfields	6	0 (0)	1 (0)	3 (2)	2 (4)
64-66 Weston	12	11 (11)	1 (1)	0 (0)	0 (0)

Street					
62 Weston Street	13	1 (1)	11 (4)	1 (8)	0 (0)
52-54 Weston Street	13	5 (5)	1 (1)	4 (3)	3 (4)
Wolfson House, 49 Weston Street	165	123 (146)	27 (19)	15 (0)	0 (0)
115-122 Snowsfields	34	34 (34)	0 (0)	0 (0)	0 (0)
The Rose Public House, 123 Snowsfields	14	14 (14)	0 (0)	0 (0)	0 (0)
115-144 Guinness Court	53	53 (51)	0 (2)	0 (0)	0 (0)
103-114 Guinness Court	23	23 (23)	0 (0)	0 (0)	0 (0)
1-15 Guinness Court	23	23 (23)	0 (0)	0 (0)	0 (0)
8-20 Snowsfields	58	29 (42)	22 (16)	7 (0)	0 (0)
The Horseshoe Inn	6	2 (2)	4 (4)	0 (0)	0 (0)
147 Snowsfields, Raquel Court	83	83 (83)	0 (0)	0 (0)	0 (0)
More Cooper House, 14 Magdalen Street	56	56 (56)	0 (0)	0 (0)	0 (0)
Total	853 (872)	601 (639)	92 (84)	55 (46)	105 (103)

Table – Impact of proposed development on Daylight Distribution / No Sky Line (NSL) including cumulative results (*)

Property	No. of rooms tested	No. retaining at least 80% of their baseline value	No. with minor adverse impact of up to 29.9% reduction in NSL	No. with moderate adverse impact of between 30%-39.9% reduction in NSL	No. with major adverse impact of over 40% reduction in NSL
48-50 Weston Street/16 Melior Street	18	13 (7)	5 (0)	0 (0)	0 (11)
Our Lady of La Salette and Saint Joseph Church/14 Melior Street	2	0 (0)	1 (0)	0 (1)	1 (1)
6-12 Melior Street/36 Snowsfields	59	37 (36)	5 (5)	4 (5)	13 (13)
2-4 Melior Place	3 (14)	3 (14)	0 (0)	0 (0)	0 (0)
37 Snowsfields	2	2 (2)	0 (0)	0 (0)	0 (0)
38 Snowsfields	5	5 (5)	0 (0)	0 (0)	0 (0)
39 Snowsfields	14	13 (13)	0 (0)	1 (1)	0 (0)
40 Snowsfields	14	12 (12)	2 (2)	0 (0)	0 (0)
41 Snowsfields	13	11 (11)	2 (2)	0 (0)	0 (0)
42 Snowsfields	13	13 (13)	0 (0)	0 (0)	0 (0)
43 Snowsfields	6	5 (5)	0 (0)	0 (0)	1 (1)
64-66 Weston Street	12	12 (12)	0 (0)	0 (0)	0 (0)

62 Weston Street	12	7 (7)	3 (3)	2 (2)	0 (0)
52-54 Weston Street	8	6 (6)	1 (1)	1 (1)	0 (1)
Wolfson House, 49 Weston Street	135	133 (135)	2 (0)	0 (0)	0 (0)
115-122 Snowsfields	10	9 (7)	1 (2)	0 (0)	0 (1)
The Rose Public House, 123 Snowsfields	6	6 (6)	0 (0)	0 (0)	0 (0)
115-144 Guinness Court	37	33 (33)	2 (2)	2 (2)	0 (0)
103-114 Guinness Court	15	15 (15)	0 (0)	0 (0)	0 (0)
1-15 Guinness Court	15	14 (10)	1 (5)	0 (0)	0 (0)
8-20 Snowsfields	51	46 (43)	2 (6)	2 (1)	1 (1)
The Horseshoe Inn	4	2 (4)	2 (0)	0 (0)	0 (0)
147 Snowsfields, Raquel Court	30	30 (30)	0 (0)	0 (0)	0 (0)
More Cooper House, 14 Magdalen Street	34	34 (34)	0 (0)	0 (0)	0 (0)
Total	518 (529)	461 (460)	29 (28)	12 (13)	16 (28)

48-50 Weston Street/16 Melior Street

200. A total of 66 windows serving 18 rooms have been assessed at this property for VSC and NSL respectively. 18 of the assessed windows would remain compliant with the BRE guidance in terms of VSC. The remaining 48 windows would see reductions in VSC of more than 40% which is considered to be a major reduction.

201. Of the 48 affected windows, 30 serve bedrooms and the remaining 18 serve living spaces (LKD). The 30 bedroom windows serve a total of 12 bedrooms, of which seven would remain compliant with the BRE in terms of NSL. The remaining five bedrooms would see minor reductions in NSL of between 23% and 27% which is considered acceptable given that bedrooms are less sensitive to reductions in light.

202. The 18 LKD windows that would see major VSC reductions serve a total of six LKD's. Each LKD is served by six windows and in the case of each LKD, three of these windows would remain fully compliant with the BRE in terms of VSC. It should also be noted that each LKD would remain fully compliant with the BRE in terms of NSL. Whilst the effect on this property is considered to be moderate adverse (and as such significant) the overall impact is considered acceptable given the central London location, the principal use of the most affected rooms as bedrooms and the fact that the living spaces would retain windows unaffected in terms of VSC and full compliance with NSL.

Our Lady of La Salette and St Joseph Church/ 14 Melior Street

203. A total of three windows serving two rooms have been assessed at this property. All three windows would see reductions in VSC of more than 40% which is considered to be a major reduction. Two of the windows serve a living room and the remaining window serves a bedroom. The living room would retain 78% NSL which is only 2% less than the BRE standard of 80% and represents a minor loss. The bedroom would see a greater reduction in NSL of 55% however the BRE accepts that bedrooms are less sensitive to reductions in daylight. Overall, whilst the effects on this property would be considered major adverse, they are considered acceptable given the context of the site and the fact that the living space would only marginally fall below the BRE standards of NSL.

6-12 Melior Street

204. A total of 135 windows serving 59 rooms have been assessed at this property in terms of VSC and NSL respectively. With regards to VSC, 68 of the 135 windows would remain compliant with the BRE. The remaining 67 windows can be broken down as 39 bedroom windows serving 22 bedrooms and 28 LKD windows serving 23 LKD's.

205. The 39 bedroom windows serve 22 bedrooms. Of these 22 bedrooms, 14 would benefit from windows that would remain compliant with the BRE in terms of VSC. The remaining eight bedrooms would experience varying levels of impacts with three bedrooms retaining VSC levels of between 10.8% and 11.9%, two with VSC levels of 12.3% and 15.6% and the remaining three windows all with VSC levels in excess of 22%.

206. The 28 LKD windows that would see reductions in VSC would serve 23 LKD's. 22 of these LKD's would benefit from windows that would remain fully compliant with the BRE in terms of VSC. The remaining LKD would see a reduction in VSC of 21% which is only 1% beyond the 20% considered noticeable by the BRE. Furthermore, it should be noted that this LKD would retain BRE compliant NSL and a VSC of 25.9% which is considered good for an urban area. It is noted that the one LKD that would see a reduction in NSL beyond the BRE guidance would

retain 100% VSC at one of the additional windows serving it. The effect on this property is concluded as moderate to major in the ES. Overall, the impact is considered acceptable given the central London location, the principal use of the most affected rooms as bedrooms and the fact that the living spaces would retain windows unaffected in terms of VSC and with good compliance with NSL.

2-4 Melior Place

207. A total of 16 windows serving three rooms have been assessed for VSC and NSL at this property respectively. All three rooms assessed for NSL would remain fully compliant with the BRE guidance as would 12 of the 16 windows assessed for VSC.

208. Three of the four windows that would see reductions in VSC beyond the BRE guidance would see proportional reductions of 21%-30% which would be categorised as minor and the remaining window would see a reduction of 34% which would be considered a moderate loss. In all cases the affected windows serve rooms that are served by additional windows that would remain unaffected in terms of VSC. The effect on this property is therefore considered to be minor and acceptable given the high level of compliance.

38 Snowsfields

209. Five windows serving five rooms have been reviewed for VSC and NSL. Whilst it is noted that all windows assessed would see losses of VSC in excess of the BRE standards, these losses are minor (three windows) and moderate (two windows) and all serve rooms that would remain fully compliant in terms of NSL. Overall the effect of the proposed development on this property would be minor and acceptable given the fact that there would be no major losses alongside full NSL compliance.

39 Snowfields

210. A total of 18 windows have been assessed for VSC at this property and six would remain compliant with the BRE. The remaining 12 windows would see reductions beyond the BRE with eight windows seeing minor reductions of between 25% and 29% and four windows with reductions of between 33% and 37% which would be considered a moderate loss.

211. NSL has been assessed for 14 rooms and all rooms bar one would remain fully compliant with the BRE. The one room that would see losses beyond the BRE would experience a moderate loss of 38%. Therefore, whilst there would be 12 windows affected in terms of VSC in all but one case these windows would serve rooms that would remain compliant NSL. The overall effect on this property is categorised as minor and acceptable given that there would be a high level of NSL compliance and no major VSC losses.

40 Snowsfields

212. A total of 18 windows have been reviewed for VSC at this property and 11 would remain fully compliant with the BRE. The remaining seven windows would see reductions in excess of 20% with five windows expected to experience minor

reductions of between 20% and 28% and two windows with moderate reductions of between 30% and 32%.

213. Of the 14 rooms assessed for NSL, 12 would remain compliant with the BRE. The two affected rooms would both see minor reductions in NSL of 24%. The overall effect on this property is categorised as minor and acceptable given that there would be a high level of NSL compliance and no major VSC losses.

41 Snowsfields

214. At 41 Snowsfields, 13 windows have been assessed for VSC and whilst nine would remain fully compliant with the BRE, one window would see a minor reduction in VSC of 21% and three windows would see moderate reductions in VSC of between 32% and 39%. A total of 13 rooms have been assessed for NSL and 11 would remain compliant with the BRE. The two rooms that would see NSL reduction would experience minor losses of between 25% and 26%. The overall effect on this property is considered to be minor.

43 Snowsfields

215. At 43 Snowsfields, six windows serving six rooms have been assessed for VSC and NSL. All of the assessed windows would see reductions in VSC beyond the BRE guidance and this would include one window with a minor reduction of 28%, three windows with moderate reductions of between 33% and 39% and finally, two windows with major reductions of 41% and 45%.

216. These six windows serve six rooms that will, in all but one case, remain fully compliant with the BRE in terms of NSL. The one room that would see a reduction in NSL beyond the BRE would experience a major loss of 53% and whilst the window serving this room would see a reduction in VSC, the actual real terms reduction in VSC would be just 3.5%. The effect on this property would be moderate.

64-66 Weston Street

217. A total of 12 windows have been assessed for VSC at this property and 11 would remain BRE compliant. The single window that would not comply with the BRE in terms of VSC would experience a minor reduction of 25% and would serve a room that would remain fully compliant in terms of NSL by retaining 85% daylight distribution. It should be noted that all rooms assessed for NSL would remain compliant with the BRE. The effect on this property is therefore considered to be negligible.

<u>62 Weston Street</u>

218. At 62 Weston Street 13 windows serving 12 rooms have been assessed for VSC and NSL. Whilst 12 of the 13 windows assessed for VSC would see losses beyond the 20% set out in the BRE, 11 of the windows would see minor losses of between 21% and 29% and the remaining window would see a moderate loss of 32%. As such there would be no major VSC losses

219. In terms of NSL, seven of the 12 rooms assessed would remain compliant with the BRE guidance. Of the five rooms that would see NSL reductions beyond the BRE guidance, three would see minor reductions of between 21% and 29% and the remaining two rooms would see moderate reductions of 36%. The overall effect on this property is considered to be minor.

52-54 Weston Street

220. A total of 13 windows have been assessed for VSC at this property and five would remain compliant with the BRE. Of the remaining seven windows, one would experience a minor reduction in VSC of 26% however it would serve a room that would remain fully compliant in terms of NSL.

221. Four windows would see moderate reductions in VSC of between 31% and 38%, three of which would retain VSC levels in excess of 20% which is positive for an urban area and the remaining window would serve a bedroom which is considered to be less sensitive to daylight effects.

222. The remaining three windows would experience major VSC losses of between 41% and 47%. Two of these windows serve bedrooms which are recognised as being less sensitive to daylight effects and in any event would remain fully compliant in terms of NSL. The remaining window would be situated in a room that would benefit from windows that would remain fully compliant in terms of VSC by retaining VSC levels in excess of 27%. This room would also remain fully compliant in terms of NSL. The overall effect on this property is therefore considered to be minor.

Wolfson House

223. A total of 165 windows have been assessed for VSC at this property and 123 would remain fully compliant with the BRE. Of the 42 windows that would see VSC reductions, 27 would experience minor reductions of between 21% and 30% and 15 would experience moderate reductions of between 31% and 33%. All windows that would see reductions in VSC beyond the BRE guidance would serve rooms that would remain fully compliant in terms of NSL.

224. Indeed only two of the 135 rooms assessed for NSL would see reductions beyond the BRE standards and in both cases the reductions would be minor (20% -22%) and both rooms would benefit from windows with compliant VSC levels. The effect on this property is therefore considered to be minor.

115-122 Snowsfields

225. All 34 windows assessed for VSC at this property would remain fully compliant with the BRE guidance. In terms of NSL, one of the 10 rooms assessed would experience a minor reduction of 28% however the affected room would benefit from VSC compliant windows. The overall effect of the development on this property is therefore considered negligible.

115-144 Guinness Court

226. A total of 53 windows have been assessed for VSC at this property and all of them would remain compliant with the BRE. A total of 37 rooms were assessed for NSL and 33 would remain compliant with the BRE. Of the four that would see NSL reductions beyond the BRE threshold two would experience minor reductions of 24% and 29% and two would see moderate reductions of 30% and 31%. In all cases the affected rooms would benefit from VSC compliant windows and as such the overall effect is considered to be negligible.

1-15 Guinness Court

227. The 23 windows assessed for VSC at this property would remain fully compliant with the BRE. A total of 15 rooms have been assessed for NSL and whilst 14 would remain compliant with the BRE one would experience a minor reduction of 20.3% which is very marginally over the 20% specified by the BRE. The overall effect on this property is negligible.

8-20 Snowsfields

228. A total of 58 windows have been assessed foe VSC at this property and 29 would remain compliant with the BRE. The remaining 29 windows would see reductions in VSC in excess of 20% with 22 windows seeing minor reductions of between 20% - 30% and seven windows seeing moderate reductions of between 30% - 40%.

229. In terms of NSL, 51 rooms have been assessed and 46 would continue to receive BRE compliant daylight distribution. The rooms that would experience NSL losses beyond the BRE threshold can be broken down as follows.

230. Two rooms would experience minor reductions of 22% and 28% and both of these rooms would benefit from windows that would each retain at least 23% VSC which is positive for such an urban area. Two rooms would see moderate reductions in NSL with losses of 34% in both cases and whilst these rooms would be served by windows that would experience losses of VSC, the actual real terms VSC reductions would be just 2.1% and 2.5%.

231. The remaining affected room would experience a major loss of NSL of 50%. It should be noted that this room would have a window that would experience a minor loss of VSC of 28% which would equate to a real terms VSC loss of just 2.7%. Overall the effect of the development on this property would be minor.

The Horseshoe Inn

232. Six windows have been assessed at this property in terms of VSC. Two of the windows would remain compliant with the BRE whilst four windows would experience minor losses of between 26% and 28%. Two of these windows would serve a room that would benefit from an additional window that would remain unaffected in terms of VSC as well as the room itself retaining 98% NSL which would comply with the BRE.

233. The remaining two windows would serve rooms that would also experience minor

NSL reductions (23% and 25%) however these reductions are minor and are acceptable in the context of the retained VSC levels of at least 18%. The development would therefore have a minor effect on this property.

Cumulative daylight impacts

234. The applicant has considered the cumulative daylight effects of the proposed development. A scenario has been tested that reviews the effect of the proposed development alongside other consented schemes on nearby affected properties. The Rose public house, 103-114 Guinness Court, 147 Snowsfields/Raquel Court, 37 Snowsfields, 42 Snowsfields and More Cooper House/14 Magdalen Street would all remain fully compliant with the BRE in terms of both VSC and NSL and will not be considered further in the cumulative scenario. As before, the daylight assessment considered windows and rooms within the vicinity of the site with the daylight effects summarised below:

48-50 Weston Street/16 Melior Street

235. As part of the cumulative scenario 66 windows have been assessed for VSC impacts and 18 windows would remain fully compliant with the BRE which is the same as under the existing versus proposed scenario. 48 windows would experience reductions in VSC that would be categorised as noticeable under the BRE guidance. Six of the affected windows would have minor reductions of between 20% - 30% and the remaining 42 windows would see major reductions in excess of 40%.

236. In terms of NSL, 18 rooms have been tested and seven would continue to achieve BRE compliant NSL. The remaining 11 rooms would see reductions in NSL in excess of 40% which would be categorised as major. All 11 affected rooms would be bedrooms which the BRE recognises as being less sensitive to daylight effects.

237. As mentioned previously there would be 48 windows that would experience noticeable loss of VSC. A total of 30 of these windows would serve 11 bedrooms and whilst it is noted that the VSC losses would be major (in excess of 40%), four of the 11 bedrooms would benefit from windows retaining at least 16% VSC which is acceptable given their use as bedrooms in addition to the urban nature of the locality.

238. The remaining 18 windows that would experience noticeable losses of VSC serve living spaces. Six of the 18 windows would experience minor reductions in VSC and the remaining 12 would experience major reductions in VSC. The 18 windows referred to would serve a total of six living spaces. Each of these living spaces is served by a total of six windows and in each case, three of these windows would remain compliant with the BRE in terms of VSC. It should also be noted that all six of these living spaces would remain fully compliant in terms of NSL. As with the existing versus proposed scenario, whilst the effect on this property is considered to be moderate adverse (and as such significant) the overall impact is considered acceptable given the central London location, the principal use of the most affected rooms as bedrooms and the fact that each of the living spaces would retain windows unaffected in terms of VSC alongside full compliance with NSL.

Our Lady of La Salette and Saint Joseph Church/14 Melior Street

239. A total of three windows serving two rooms have been assessed at this property. All three windows would see reductions in VSC of more than 40% which is considered to be a major reduction. Two of the windows serve a living room and the remaining window serves a bedroom. The living room would retain 69% NSL which would represents a moderate loss. The bedroom would see a greater reduction in NSL of 67%, however the BRE accepts that bedrooms are less sensitive to reductions in daylight. Overall, the effects on this property would be considered major adverse and comparable to the existing versus proposed scenario. The effects are considered acceptable given the context of the site and the fact that the living space would only experience moderate reductions in NSL.

<u>6-12 Melior Street</u>

240. A total of 135 windows have been assessed for VSC at this property and 65 would remain compliant with the BRE. The remaining 70 windows would see noticeable losses of VSC with ten windows experiencing minor reductions of 2%-30%, 14 experiencing moderate reductions of between 30%-40% and 46 windows seeing major reductions of more than 40%. This would be comparable to the existing versus proposed scenario.

241. A total of 59 rooms have been assessed for NSL and whilst 36 would meet the BRE standards, 23 rooms would see noticeable reductions with five minor, five moderate and 13 major reductions.

242. Of the 70 windows that would be affected in terms of VSC, 39 would be bedrooms and all losses would be categorised as major as they would be in excess of 40%. The 39 windows serve 22 bedrooms. Of these 22 bedrooms, 14 would benefit from additional windows that would remain unaffected in terms of VSC losses. The remaining eight bedrooms would experience varying levels of impacts with four bedrooms retaining VSC levels of between 7.8% and 8.5%, two bedrooms retaining between 14.6% and 18% and the remaining two bedrooms both achieving residual VSC levels in excess of 21%.

243. The remaining 31 windows affected in terms of VSC would serve a total of 26 living spaces and 22 of these rooms would benefit from additional windows that would remain unaffected in terms of VSC. The remaining four living spaces would see minor VSC reductions of between 21% and 24% and in all instances would retain 100% NSL. The cumulative effect on this property is concluded as moderate to major in the ES which is the same as the existing versus proposed scenario. Overall, the impact is considered acceptable given the central London location, the principal use of the most affected rooms as bedrooms and the fact that the living spaces would retain windows unaffected in terms of VSC and full compliance with NSL.

2-4 Melior Place

244. A total of 14 rooms have been assessed for NSL at this property and it is noted that all rooms would continue to comply with the BRE. In terms of the VSC assessment, 35 windows have been tested and 21 of them would continue to

comply with the BRE guidance. The 14 windows that would see reductions beyond the BRE guidance would experience minor reductions of between 20% and 30% and in all cases the windows would serve bedrooms. Overall the cumulative effect on this building would be minor and the impact would be considered acceptable given the fact that the VSC reductions would be minor, all rooms would continue to comply with NSL and the affected rooms would be bedrooms which are considered less sensitive to daylight impacts.

38 Snowsfields

245. Five rooms have been tested for NSL at this property and all would remain compliant with the BRE guidance. The VSC assessment covered five windows all of which would see moderate reductions in VSC however it should be noted that the actual real terms VSC reductions would be low. The cumulative effect on this property would be classed as minor to moderate and would be acceptable given the fact that there would be full compliance in terms of NSL and that, despite the proportional VSC reductions being classed as moderate, the actual real terms VSC reductions would be low. This is comparable to the existing versus proposed scenario.

39 Snowsfields

246. A total of 18 windows have been tested at this property in terms of VSC. Whilst five windows would remain compliant there would be two windows that would experience minor reductions, ten windows that would see moderate reductions and one window that would see a major reduction. It should be noted that the real terms VSC reductions are generally low with half of all windows seeing reductions of less than 3%. In terms of NSL, 14 rooms have been tested and whilst 13 would remain compliant with the BRE there would be one room that would experience a moderate reduction. The cumulative effect on this building would be minor to moderate and would be acceptable given the high level of NSL compliance.

40 Snowsfields

247. At this property, 14 rooms have been tested for NSL and 12 would remain compliant. The two rooms that would see reductions in NSL beyond the BRE would only experience minor reductions. In terms of VSC, 18 windows have been tested and whilst ten would remain compliant there would be four windows seeing minor reductions, three experiencing moderate reductions and one window experiencing a major reduction. It should be noted that the single window that would experience a major reduction in VSC would retain at least 76% NSL which would only be 4% short of the BRE guidance. The cumulative effect on this building would be minor to moderate and would be acceptable on balance given the high level of NSL compliance and the fact that the real terms VSC reductions would be low.

41 Snowsfields

248. At this property 13 rooms have been tested for NSL and whilst 11 would remain compliant, two would experience minor reductions. The VSC assessment has considered 13 windows and nine would remain compliant. In terms of the

affected windows there would be one minor reduction, one moderate reduction and two major reductions. It should be noted that the two windows that would experience major VSC reductions would retain at least 75% and 74% NSL which would only be considered a minor NSL effect. The cumulative effect on this property would be minor to moderate.

43 Snowsfields

249. Six windows have been tested for VSC at this property and all of them would experience reductions beyond the BRE guidance. Two windows would experience moderate reductions in VSC whilst four windows would see major reductions. In terms of NSL, six rooms have been tested and five would remain compliant with the BRE. One room would experience a major reduction. It should be noted that the actual VSC reductions are small and all but one room would remain compliant with NSL. The room that wouldn't comply with NSL is served by a window that would see a real terms reduction in VSC of just 3.5%. The cumulative effect on this property is therefore considered to be moderate and the impact is considered acceptable.

64-66 Weston Street

250. All 12 rooms assessed for NSL at this property would remain compliant with the BRE. Of the 12 windows assessed for VSC, 11 would remain compliant with the remaining window experiencing a minor reduction of 25.6% and a real terms loss of just 2.9%. The cumulative effect on this property is therefore considered to be negligible.

62 Weston Street

251. A total of 13 windows serving 12 rooms have been assessed for VSC and NSL at this property. In terms of NSL, seven rooms would remain compliant whilst three rooms would see minor reductions in NSL and two rooms would experience moderate reductions. Of the 13 windows assessed for VSC, one would remain compliant whilst four would experience minor reductions and eight would experience moderate reductions. The overall cumulative effect on this property would be minor to moderate in magnitude.

52-54 Weston Street

252. At this property 13 windows and eight rooms have been assessed for VSC and NSL respectively. The VSC results show that five windows would remain compliant with the remaining windows experiencing minor losses (one window), moderate losses (three windows) and major losses (four windows) although it should be noted that 10 of the 13 windows assessed for VSC would retain residual VSC levels of at least 17.9% and the remaining three windows would serve bedrooms which are considered to be less sensitive to daylight effects.

253. The NSL results show that six of the eight assessed rooms would continue to comply with the BRE. The two affected rooms would see a minor and a moderate loss of NSL. The room that would experience a minor reduction would be a bedroom and the room that would experience a moderate reduction would retain at least 21% VSC which is good for an urban area. The cumulative effect on this

property is therefore considered to be minor.

Wolfson House

254. A total of 165 windows serving 135 rooms have been assessed at Wolfson House. All 135 rooms assessed for NSL would remain compliant with the BRE. In terms of the VSC assessment, 146 of the windows would remain compliant with the BRE whilst the remaining 19 windows would all see minor VSC reductions whilst retaining at least 15% VSC. The cumulative effect on this property is therefore considered minor.

115-122 Snowsfields

255. A total of 34 windows serving ten rooms have been assessed for VSC and NSL at this property. All 34 windows would remain compliant with the BRE in terms of VSC. Seven of the ten rooms assessed for NSL would remain compliant with the BRE and the affected rooms would see two minor reductions and one major reduction albeit that these rooms would benefit from windows that would remain fully compliant with the BRE for VSC. The cumulative effect on this property is considered to be negligible.

<u>115-144 Guinness Court</u>

256. VSC has been assessed at 53 windows whilst NSL has been assessed in 37 rooms at this property. In terms of VSC, 51 windows would remain compliant with the BRE and the remaining two would experience minor reductions of between 20% and 30%. It should be noted that the real terms VSC reductions at these windows would be 3.5% and 2.6% which is minor.

257. The NSL assessment has demonstrated that 33 of the 37 rooms would comply with the BRE whilst two rooms would see minor reductions and two would experience moderate reductions. It should be noted that the two rooms that would experience moderate reductions in NSL would benefit from windows that would continue to be compliant in VSC. The cumulative effect on this property is therefore minor.

1-15 Guinness Court

258. All 23 windows assessed for VSC at this property would remain compliant with the BRE guidance. Ten of the 15 rooms assessed for NSL would remain compliant with the BRE and the five rooms that would see reductions beyond the BRE would experience minor losses of between 20% and 30%. It should be noted that these rooms are all bedrooms and as previously mentioned, bedrooms are less sensitive to daylight effects. The cumulative effect on this property is therefore minor.

8-20 Snowsfields

259. A total of 58 windows serving 51 rooms have been assessed for VSC and NSL at this property. In terms of VSC, 42 windows would remain compliant with the BRE. The remaining 16 windows would see minor reductions and 15 of these windows are located at first floor under the access deck which itself impedes

access to daylight. It should be noted that the real terms VSC reductions to these windows is less than 2.6% and as such is very minor.

260. Of the 51 rooms assessed for NSL, 43 would remain compliant with the BRE and the remaining windows would see six minor reductions, one moderate reduction and one major reduction. The moderate and major reductions would both be located under the access deck at first floor level. The overall cumulative effect on this property would be minor.

The Horseshoe Inn

261. Six windows and four rooms have been assessed for VSC and NSL at the Horseshoe Inn. All four rooms assessed for NSL would continue to comply with the BRE. Two of the six windows assessed for VSC would comply with the BRE and the remaining four would see minor reductions. As such the cumulative effect on this property would be minor.

Sunlight

262. The only existing property with windows facing within 90 degrees of due south and as such requiring a sunlight assessment More Cooper House at 14 Magdalen Street. The results of the sunlight assessment demonstrate that the Annual Probable Sunlight Hours (APSH) would remain compliant with the BRE both after development and as part of the cumulative scenario set out above.

Overshadowing of amenity spaces

263. The effects of the development on overshadowing have been considered at the following amenity spaces:

- On-site pocket park
- Proposed public realm at Vinegar Yard
- St Johns Churchyard.

264. It should be noted that St Johns Churchyard will remain unaffected by the proposed development in terms of overshadowing. Likewise the proposed amenity space at the Vinegar Yard site would not be materially affected by the proposed development.

265. The proposed on-site pocket park would achieve 42.5% of the space with access to at least two hours of direct sun on March 21st which is only slightly below the 50% target set by the BRE. On June 21st, when the outdoor space is expected to be used more intensively, this figure would increase to 94.4% demonstrating that the space would be well lit. It is acknowledged that the consented Capital House scheme would, when completed, reduce sunlight amenity to the space, but that overall amenity would remain good during the summer months when the outdoor spaces are most used.

Conclusion on daylight and sunlight

266. The daylight and sunlight assessment presented as part of the ES demonstrates that there would be several windows that would see noticeable losses of VSC and rooms that would see noticeable losses of NSL beyond the BRE guidelines. A total of 24 receptor groups (groups of residential properties) were assessed (comprising 853 windows and 518 habitable rooms) in order to determine whether there would be a significant change in daylight levels as a result of the proposed development.

267. The majority of these residential properties would experience either negligible reductions (10 properties) or minor reductions (10 properties) and both of these categories are considered to be non-significant in terms of daylight effects.

268. It is noted that Our Lady of La Salette and St Jospeh Church would experience effects that would be considered major and the impact here is considered acceptable given that only a small number of windows and rooms (three windows and four rooms) would be affected. It should be noted that one of the rooms is a bedroom which the BRE recognises as being less sensitive to daylight loss and the other room would be a living space that would only marginally fall below the BRE standards of NSL by 2%. Consideration also needs to be given to the fact that this property would benefit from improved outlook as a result of facing directly onto the proposed pocket park.

269. Moderate to major effects would be experienced at 6-12 Melior Street/36 Snowsfields. Overall, the impact is considered acceptable given the central London location, the principal use of the most affected rooms as bedrooms which are less sensitive to daylight losses and most importantly to the fact that the living spaces would retain windows unaffected in terms of VSC as well as remaining fully compliant in terms of NSL.

270. The properties at 48-50 Weston Street/16 Melior Street and 43 Snowsfields would experience effects categorised as moderate. In the case of 48-50 Weston Street/16 Melior Street the overall impact is considered acceptable given the central London location, the principal use of the most affected rooms as bedrooms and the fact that the living spaces would retain windows unaffected in terms of VSC and full compliance with NSL. In terms of 43 Snowsfields the effect on this property would be moderate however it would be acceptable given the high level of compliance with NSL with five out of six rooms remaining compliant.

271. The application site has been identified in policy, including in the New Southwark Plan, as being suitable for a tall building and it is anticipated that there would be a degree of impact as a result of redevelopment. Developing sites in highly urbanised environments often results in some unavoidable impacts to daylight and sunlight. Recognising the challenges associated with developing inner city sites, the numerical targets given in the BRE are expected to be treated with a degree of flexibility, having due regard for the existing and emerging context within which these sites are located. The application site is within a Central London Opportunity Area and accordingly the standards should be applied with some degree of flexibility.

272. Looking at the nature of the rooms affected, many are bedrooms, where the primary use means that the BRE gives these rooms a lower expectation in terms of daylight. Other affected rooms are living spaces, many of which would benefit from windows that would remain unaffected in terms of VSC. Given the small number of windows overall that would experience significant effects and the site specific circumstances set out above, it is considered that the overall impact, both existing versus proposed and existing versus cumulative, would be acceptable on balance given the benefits of the proposed development in redeveloping a currently under developed site, the provision of new offices, retail and significant employment opportunities. On balance, officers consider that, when reading the BRE guidance with the required flexibility, and in view of the positive benefits of the development proposal, the degree of harm to amenity would not justify withholding planning permission in this case

Solar glare

273. Solar glare has been assessed in the ES as part of the section on daylight and sunlight (Chapter 11). The solar glare analysis considered the potential effects at eight viewpoints. These include five viewpoints on the westbound train line into London Bridge Station, one viewpoint travelling westbound on Crucifix Lane (at the junction with Bermondsey Street), one viewpoint travelling eastbound on St Thomas Street (at the junction with Weston Street) and a final viewpoint travelling northbound on Kirby Grove (at the junction with Snowsfields). All viewpoints assessed would experience minor effects which are not considered to be significant for reasons including low traffic levels, multiple traffic signals and a 20mph speed limit.

Noise and vibration

274. Noise and vibration have been assessed as part of the ES and the results of the assessment are presented within chapter 9. The main considerations assessed as part of the ES are:

- Construction noise and vibration impacts on the nearby noise sensitive receptors;
- The control of noise egress from building plant and services on nearby sensitive receptors; and
- The control of noise egress from operations of the building on nearby sensitive receptors.

275. The ES considers the high sensitivity receptors to be homes on Melior Street, Snowsfields and Weston Street in addition to Guys Hospital and the Kings College accommodation at Wolfson House. Our Lady of La Salette and St Joseph Church is included as a medium sensitivity receptor.

276. Baseline noise and vibration data has been gathered through monitoring within the vicinity of the proposed development. The surrounding noise conditions are predominantly characterised by the operation of London Bridge Station. The vibration survey indicated that there are negligible levels of vibration on the site.

277. During the demolition and construction phase effects categorised as both moderate and major have been identified at nearby sensitive receptors. The

noise predictions have been based on a worst case scenario and as such there will be an opportunity for the contractor undertaking construction to reduce noise impacts. This mitigation will include limiting noisy works to specific times of the day, keeping plant well maintained, using silencers on mechanically operated plant where possible as well as securing a Demolition and Construction Environmental Management Plan as part of the S106 Agreement.

278. With appropriate mitigation in place the nearest sensitive receptors along Melior Street and Weston Street would experience reduced effects, as far as possible however they would still be significant during the demolition and construction phase, due to their proximity to the site. Vibration effects would be moderate at 8-14 Melior Street and minor to negligible at all other receptors. These effects would be temporary and would be a result of construction activities.

279. Once the construction phase is finished and the development has been completed, the assessment reviewed permanent sources of noise such as from road traffic and plant equipment/services. It is noted that whilst additional vehicles will generate increased noise at some receptors the increase would not be significant. Additionally, the noise emitted from plant equipment and building services would not result in any significant effects. In terms of cumulative impacts, the completed and operational development, taken together with other schemes in the area, would not result in significant effects.

Transport and highways

280. 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.

The London Plan 2021 seeks to maximise sustainable forms of transport through the integration of land use and transport. Sustainable forms of transport include, walking, cycling and public transport and the London Plan aims to have these forms of transport make up 80% of all journeys by 2041.

281. 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.

Site context

282. The site is bounded by St Thomas Street to the north; Fenning Street and Vinegar Yard to the east; Melior Street to the south; and the Capital House development site to the west. St Thomas Street forms part of the Transport for London Road Network (TLRN), and the nearest section of the Strategic Road Network (SRN) is Cannon Street, which is located approximately 600m to the north of the site on the other side of the Thames at Monument.

283. The nearest station is London Bridge, which is served by the Underground (Jubilee and Northern lines) and National Rail services with entrances 200m and 300m from the western end of the site on St Thomas Street. Bus stops for routes 17, 21, 35, 40, 43, 47, 48, 133, 141, 149, 343, 344, 381, 521 and RV1 are within 300m of the site at London Bridge Bus Station, Borough High Street, and Tooley Street. River Services can be accessed approximately 620m to the north of the site from London Bridge Pier.

284. Due to the aforementioned public transport connections the site has a Public Transport Access Level (PTAL) of 6b, on a scale of 0 to 6b where 6b is the most accessible. The site is also served by the Mayor's cycle hire scheme. The nearest Cycle Hire docking stations are located at Snowfields, Potters Fields Road and Tanner Street.

285. The site is also in close proximity to several cycle routes. Cycle Superhighway 3 (CS3) can be accessed at Monument and (CS7) on Southwark Bridge Road approximately 400m and 600m respectively to the west of the site. Cycle Superhighway 34 (CS4) is planned to run between Tower Bridge and Greenwich with the nearest point being some 1km to the east, and there is an aspiration to extend this to London Bridge via Tooley Street. National Cycle Network Route 4 (NCN 4) can be accessed approximately 200m north of the site on Tooley Street. Union Street and Newcomen Street, approximately 310m to the south of the site forms part of the Central London Grid/proposed Quietway 14.

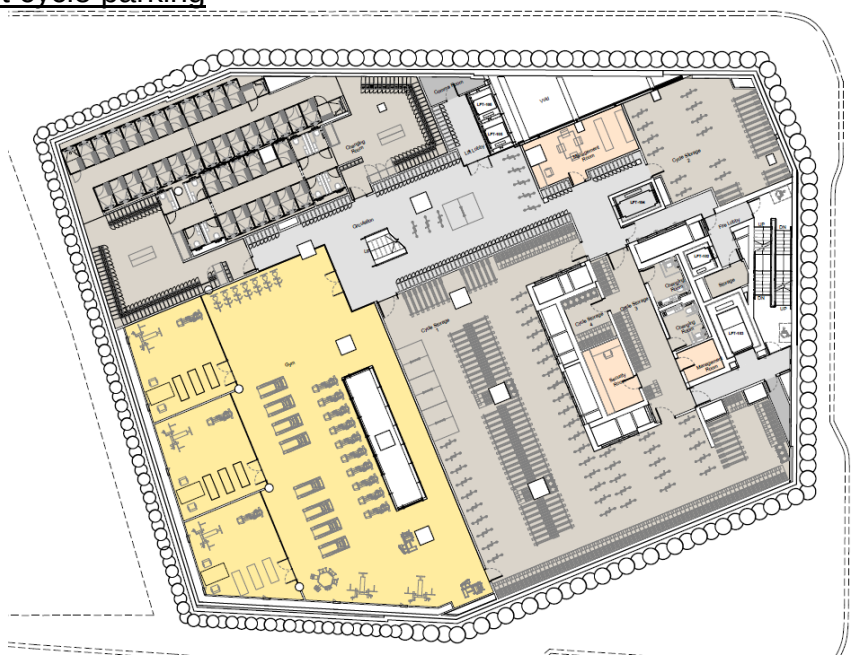
Site layout

286. The proposed site layout would be simple and rational given the proposal for a single building. The layout would improve legibility and connectivity, providing a generous and direct physical and visible link between London Bridge Station/St Thomas Street and Melior Street. A servicing bay would be provided on Fenning Street and a disabled parking bay would be provided on Melior Street.

Trip generation

287. The Council's transport officer has reviewed the proposed development in terms of trip generation and impacts on the local transport network. This has also been considered by Transport for London. As part of the Council's assessment, the TRICS database has been reviewed, looking at comparable developments and travel surveys in addition to the information submitted by the developer as part of the transport assessment and the ES.

Basement cycle parking



288. The proposed development is anticipated to generate 56 and 37 two-way vehicle movements in the morning and evening peak hours, respectively. Although these figures are significantly higher than the zero vehicle movements predicted by the applicant's consultants, the Council's transport officer considers that these levels of net supplementary vehicular traffic would not have any noticeable adverse impact on the prevailing vehicle movements on the adjoining roads. This is a view echoed by TfL who consider that the development would not have an adverse impact on the TLRN.

289. In terms of public transport, the applicant's consultants have estimated that this development would create an additional 802 and 828 two-way public transport trips in the morning and evening peaks hours and approximately 82 two-way service vehicle trips per day. It is envisaged that the projected reduced service vehicle figure would be achieved through the applicant's use of an off-site delivery consolidation centre. Both forecasted generated public transport and delivery vehicle trips compare with the Transport officer's own estimates and are therefore judged to be reasonable.

290. In any event, the applicant has proposed travel plan initiatives encompassing the provision of cycling facilities (40 shower cubicles and 447 lockers, bike maintenance space, plus cycle parking), travel information and appointment of a travel plan co-ordinator who would promote sustainable travel including organising and publicising sustainable travel events in addition to monitoring the travel plan. A Construction Logistics Plan, Demolition and Environmental Management Plan and Travel Plan will be secured in the S106 Agreement alongside contributions towards improved bus services.

Servicing and deliveries

291. The servicing arrangements for this development would involve servicing from a loading bay on Fenning Street. Given that there are several development sites on this stretch of St Thomas Street it is considered to be imperative that there

would be service and delivery consolidation. Details of delivery and servicing management would be secured under the S.106 Agreement and this should provide full details of how consolidation measures would be provided and demonstrate that the proposed servicing arrangements would be robust and sufficient to meet the requirements of the development and should be supported by a daily arrival unloading and departure profile showing how the proposed facilities will be used.

Refuse storage arrangements

292. Refuse will be stored within a central store in the basement which is sufficiently sized and located to accommodate all waste generate by the proposed development. The bins would be transferred to a ground floor holding area adjacent to the loading bay on Fenning Street on the day of collection. These details will be secured by condition.

Car parking

293. Saved Policy 5.6 (Car Parking) of the Southwark Plan and Core Strategy Policy 2 (Sustainable Transport) state that residential developments should be car free. For office use, a maximum of one space per 1500sqm is permitted which would equate to a maximum of six spaces. No parking (except disabled provision) is permitted for retail or culture uses. The development would provide one accessible car parking bay and whilst two would be required by the policy, one space is considered acceptable in this instance given the excellent availability of public transport in the area the high level of accessibility at London Bridge Station and Underground Station. The disabled parking bay will be secure by condition and this will also require the bay to be fitted with electric vehicle charging facilities. Conditions will be added in order to prevent occupiers of the proposed development from obtaining parking permits for any of the Southwark Controlled Parking Zones.

Cycle parking and cycling facilities

294. The development would provide 551 cycle parking spaces comprising; 62 folding bike spaces; 260 double-stack spaces; 8 disabled spaces (basement); and 4 Sheffield cycle racks containing 8 spaces on the ground floor. This would comply with the updated standards of Policy T5 of the London Plan 2021. A total of 447 cycle lockers and 40 shower cubicles in addition to two bicycle maintenance stations and ironing facilities would also be provided. These facilities are considered to be acceptable and would help to maximise the number of people cycling to and from work. It is noted that the cycle parking level is below the enhanced levels required in the New Southwark Plan however, it is considered that the sites location next to London Bridge Station and the enhanced facilities provided for cyclists on site would compensate for the shortfall given that the policy has limited weight at the moment. Contributions will be secured in the S106 agreement towards improved cycle hire facilities in addition to Legible London signage.

Environmental impacts

295. Transport has been fully reviewed for any potential environmental impacts and this information is set out in detail in chapter 7 of the ES which has looked at the potential effects on severance; pedestrian and cyclist delay; driver delay; accidents and safety, public transport; transport users; and pedestrian and cyclist amenity, fear and intimidation. During the demolition and construction phase, the ES concludes that there would be no significant impact on any of these parameters/receptors with effects being categorised as negligible. This would also be the case when assessing the impact of the completed development with all effects being categorised as negligible with the exception of one element of the severance category which would see a low adverse effect on St Thomas Street and this has been categorised as 'not significant' in the ES.

296. Consideration has also been given to the potential for cumulative effects that could occur during the construction phase and as part of the completed development. In both instances the effects are considered negligible and as such not significant.

297. Climate change has been considered as part of the traffic and transport ES assessment and it is concluded that it will not have a direct effect on severance; delay; or amenity, fear and intimidation. Changing to more sustainable and active travel modes, lower emission vehicles and improved technology (which would also increase telecommuting and flexible working) could result in a reduction in peak hour traffic and the consequent reduced emissions and traffic volumes could have a benefit for cyclists and pedestrians.

Conclusions on transport

298. The proposed development would have a simple, open and well defined site layout that would improve legibility and connectivity by providing generous and direct new routes between London Bridge and Melior Street and onwards to Bermondsey Street and area south of Snowsfields. The development would be car free and would encourage the adoption of more sustainable forms of transport such as walking, cycling and public transport.

299. The proposed development would provide a range of cycle parking options as well as extensive facilities to encourage cycling to work. A financial contribution towards extending the cycle hire scheme would also be secured as part of the S106 agreement.

300. The ES has given an in depth assessment of the possible environmental impacts that could arise as a result of the development and has concluded that there would be no significant effects. The development has been shown to have a very limited impact on the public transport network. Vehicle trips would also be limited and the proposed servicing arrangements would minimise any highways impacts.

Environmental matters

Ground conditions and contamination

301. A land contamination assessment has been prepared with regard to the advice contained in the Contaminated Land (England) Regulations 2006 and associated statutory guidance.

302. The Phase 1 Assessment has considered historical uses; environmental permits, incident and registers; landfill and other waste sites; current land uses; and other hydrological, geological and natural/man made ground conditions.

303. The assessment notes that there are no records of any potentially contaminative historical uses on the site itself. In terms of the current site there is one potentially contaminative industrial site on the plot and that is the electricity substation which is situated in the eastern part of the site. Within the existing building itself, the report notes that there is the potential for the presence of asbestos, hydrocarbons, Polycyclic Aromatic Hydrocarbons (PAH's) and metals.

304. As with all applications of this size it is recommended that the standard conditions around land contamination, surface runoff, protection of groundwater, asbestos, soil sampling and remediation measures be imposed to ensure that there would be no adverse impacts resulting from the proposed development in terms of ground conditions or contaminants within the existing building. These conditions would need to be satisfied prior to any development taking place on site and would provide appropriate mitigation for any potential land contamination issues.

Fire safety

305. The applicant has submitted a Fire Safety Strategy as part of the application in response to the requirements of Policy D12 – Fire Safety of the London Plan 2021. This policy requires developments to achieve the highest standards of fire safety and ensure that they identify suitably positioned unobstructed outside space for appliances, incorporate features to reduce risk to life and injury in the event of a fire; designed and constructed in order to minimise the spread of a fire; and provide suitable and convenient means of escape for all building users.

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

307. The submitted Fire Statement has been prepared in accordance with Policy D12 of the London Plan. The Fire Statement sets out the risk profile for the building; confirms that there would be an automatic fire suppression system installed; provides information on length of evacuation routes; provides details of refuge areas; provides fire alarm category information; and also confirms that fire risk areas such as kitchens, engineering services, stores and service risers will be located within fire compartments.

308. The building will be provided with 2 firefighting shafts containing a firefighting stair, firefighting lobby with fire main and a firefighter lift. Fire mains enable firefighters within a building to connect their hoses to a water supply. In buildings fitted with fire mains, pumping appliances need access to the perimeter at points near the mains, where firefighters can enter the building to make a hose connection from the appliance to pump water into the main. As the building is fitted with dry fire mains, there will be access for a pumping appliance to within 18 m of each fire main inlet connection point, typically on the face of the building, and the inlet will be visible from the appliance. Drawings have been provided showing access routes. Overall the Fire Strategy is considered to comply with the requirements of Policy D12 of the London Plan 2021.

Flood risk

309. The application site is located within Flood Risk Zone 3A and as such a Flood Risk Assessment, Basement Impact Assessment and Drainage Strategy have been submitted as part of the application. The main source of flood risk in Southwark is as a result of tidal activity within the River Thames which lies approximately 400m to the north of the site. It should be noted that the site would benefit from protection by the Thames Barrier up to the 1 in 1000 year event.

310. The Environment Agency have been consulted on the proposed development and have not raised any objections subject to conditions. The relevant conditions would be imposed on any consent issued.

Sustainable urban drainage

311. The sustainable urban drainage (SUDS) proposals for the site includes a combination of a blue roof system covering part of the roof of the main building and a permavoid geo-cellular storage layer at podium level in order to limit discharge rates.

312. The blue roof would span the south eastern part of the main roof and would have an area of 243 square metres and a depth of up to 0.108m Overall this would provide up to 18 cubic metres of storage. The permavoid geo-cellular layer would be part of the surface treatment which would include a permeable paving system. The storage layer would have an area of approximately 1000 square metres and a depth of 0.150m which would give a storage capacity of 143 cubic metres. The combination of the blue roof and geo-cellular storage layer would provide sufficient storage for the 1 in 100 year storm event as well as an additional 40% climate change capacity.

Socio Economics

313. The impact of the development on socio-economics has been assessed as part of the ES (chapter 6) and focuses on key social and economic considerations such as job creation, local economy, provision of employment floorspace and provision of public open space.

314. During the demolition and construction phase of the development, it is estimated

that up to 2,200 temporary construction jobs could be created. This employment would include a range of job types and would not just be limited to on-site jobs. The creation of construction related employment would be beneficial.

315. Once the proposed development has been completed and is operational it is estimated that up to 1,900 full time jobs would be created on-site which is a significant beneficial effect at local level. The current office on site supports 330 jobs therefore the proposed development would create an uplift of approximately 1,570 full time positions. In addition to the on-site jobs, the development could create up to 470 full time off-site jobs. The ES estimates that the additional employment generated at the site would lead to increased economic output in the region of £98.9 million annually within Southwark and Greater London.

Air quality

316. The application site is located within an Air Quality Management Area and the impact of the development on air quality has been assessed as part of the ES. The results of this assessment are reported in Chapter 8 of the ES. In terms of potential air quality effects, the assessment has considered:

- The impacts of the demolition and construction phase of the proposed development on dust soiling and concentrations of PM10 at existing sensitive receptors during the construction period;
- The impact of construction of the proposed development from construction traffic;
- Whether or not the proposed development is ‘air quality neutral’; and
- The cumulative impacts on air quality of the proposed development in combination with cumulative schemes identified in the local area.

317. The ES therefore considers the impact of the construction and operational phases of the development on air quality. The key considerations during the demolition and construction phase of the development have been dust emissions as well as emissions from heavy goods vehicles. The impacts considered as part of the operational phase of the development (the building once completed) include emissions from road traffic generated by the development and emissions from the stand by emergency diesel generator.

318. The demolition and construction phase of a development is temporary and short term. It is acknowledged that there would be an increase in the number of heavy duty vehicles on the roads as a result of the demolition and construction phase of the development. The ES has demonstrated that this increase would have a negligible impact on air quality at such sensitive receptors as homes and schools. Additionally, with mitigation measures in place, the development would not result in any significant dust effects.

319. Once the development is completed and occupied it would become operational. Road traffic emissions associated with the operational phase of the development are not considered to have any significant effect on local air quality and would not lead to the national air quality objectives being exceeded. The heating, cooling and hot water would be provided by heat pumps and as such there would be no emissions associated with the building. It is noted that there would be an emergency stand by diesel generator and this would be operational for a

maximum of 4.5 hours per year for testing and maintenance purposes. The operational development would also be considered air quality neutral.

Wind

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

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

322. Areas within and around the site at ground level, including areas where outdoor seating is proposed have been considered in addition to the terraces of the proposed building itself. Areas around other surrounding buildings, nearby bus stops, pedestrian thoroughfares and crossing have also been tested.

323. As existing, wind conditions on the site and the surrounding area are considered suitable for sitting to strolling use during the windiest season and for sitting and standing use during the summer. As construction of the development progresses wind conditions would generally adjust from the baseline (existing) to those of the completed development. It should be noted that windier conditions are considered tolerable across the active demolition and construction site as this area would not be for pedestrian use at this time.

324. The ES has assessed wind microclimate under a scenario whereby the proposed development has been completed alongside existing off site landscaping and proposed on site landscaping (mitigation). In terms of pedestrian comfort, wind conditions under this scenario would range from suitable for sitting to walking during the windiest season. In the summer months the conditions would generally be calmer and would range from being suitable for sitting to strolling use.

325. Wind conditions at the majority of on- site and off site thoroughfares would range from suitable for sitting to strolling during the windiest season and as such would not constitute any significant effects. Wind conditions at two locations (one on-site at probe location 54 and one off-site at probe location 62) would remain suitable for walking use during the windiest season and would represent a minor adverse effect.

326. Wind conditions at all entrances (both on-site and off-site) would range from suitable for sitting to standing use during the windiest season and would represent minor beneficial to negligible effect.

327. Further assessment under this scenario notes that the proposed on-site amenity space would have some instances of wind speeds that would be one category windier than suitable and would represent a minor adverse effect. It should be noted that all off-site amenity spaces as well as the on-site balconies and roof terraces would see wind conditions suitable for their intended use and as such would represent negligible effects. The ES notes that under this scenario there would be one instance of strong winds (probe location 62 on St Thomas Street) however with the approved Capital House development in place this instance of strong winds would not occur.

328. The wind microclimate assessment considers further scenarios including a scenario whereby the proposed building is completed alongside other committed developments (those benefitting from planning permission) including both off-site existing landscaping and proposed on-site landscaping (mitigation).

329. This scenario includes the Capital House development which has been approved and is in the process of discharging pre-commencement conditions. Under this scenario, pedestrian comfort levels would range from being suitable for sitting/strolling during the windiest season and sitting/strolling during the summer months. Wind conditions at all on-site and off-site thoroughfares would range from suitable for sitting/strolling use during the windiest season which is considered to be a moderate beneficial to negligible effect.

330. Wind conditions at the majority of both on-site and off-site entrances would be suitable for sitting to standing use during the windiest season and would be a minor beneficial to negligible effect. Wind conditions at one off-site entrance (probe 91 on Fenning Street) would remain suitable for strolling use during the windiest season which would be one category higher than suitable. This would represent a minor adverse effect and further mitigation would be required.

331. In terms of amenity spaces, the proposed on-site amenity space would have conditions suitable for sitting/standing during the summer months and one category higher during the windiest season which would represent a negligible and minor adverse effect. All off-site ground floor amenity spaces would maintain suitable conditions for their use and it should be noted that all of the on-site balconies and roof terraces would see wind conditions suitable for their intended use and as such this would represent a negligible effect. There would be no instances of strong winds or significant effects relating to safety as a result of the proposed development in this scenario.

332. Climate change has been considered as part of the Wind Microclimate Assessment and it has been concluded that the probable changes in median wind speed from current figures to those expected in 2080 are not likely to have any significant effect on the predicted wind and microclimate conditions in and around the site.

333. The ES demonstrates that window conditions across the site and surrounding area would range from sitting to walking use throughout the year with generally calmer conditions in the summer months. Proposed mitigation would help reduce unsuitable conditions and it is noted that there would be no major effects as a result of the development. With the appropriate mitigation in place and taking into account permitted and progressing schemes such as Capital House, there would

be no instances of strong winds or significant effects that would compromise safety. In order to ensure the outcomes of the ES are realised with regards to wind microclimate and to ensure a suitable process to mitigate any further wind impacts that may be identified during and post construction, a Post Construction Wind Mitigation Review will be required as part of the S106 agreement.

Light pollution

334. The ES has considered light pollution as part of Chapter 11 and notes that whilst some light levels on Melior Street could exceed the post curfew (11pm) limit of 5 lux. However, the ES notes that this is based on a worst case scenario of all lights within the building remaining on and no use of shading devices such as blinds.

335. Occupancy of the building post curfew would be significantly reduced compare to business hours and the building would be largely unoccupied at this time. The use of blinds in addition to occupancy sensors that can automatically turn off the lights unoccupied parts of the buildings will result in minimal light spillage post curfew and the effect of light spillage/pollution on nearby properties is considered negligible and not significant. This would also be the case when reviewing the cumulative scenario.

Climate change

336. Climate change has the potential to alter and affect the current environment and the applicant has Met Office projections to develop a future climate scenario to assess how environmental and socio-economic effects might change as a result of a changing climate. These projections look at a series of different greenhouse gas emissions scenarios and how they would impact on the climate.

337. Climate change is likely to result in changes to average air temperatures, increased yearly rainfall and sea level rise. It is also considered that cloud cover could slightly decrease. Taking all of these matters into account on the relevant topics that have been assessed throughout the ES it is not anticipated that the likely effects identified would change as a result of climate change.

338. Greenhouse gas emissions have the potential to increase air temperature and are described as significant in accordance with the relevant guidance for the assessment of greenhouses gases as part of the Environmental Impact Assessment process. This is a result of the fact that all development projects create greenhouse gas emissions that contribute to climate change; and climate change has the potential to lead to significant environmental effects.

339. The design has incorporated a number of measures to minimise the creation of greenhouse gases including the type of materials being used, construction site management, the use of a building management system and the use of low carbon technologies. It is anticipated that greenhouse gas emissions from transport and servicing will reduce throughout the development lifetime with decarbonising of the national grid as well as the improved use of electric and low emission vehicles.

Energy and sustainability

340. The London Plan Policy SI 2 – Minimising greenhouse gas emissions, sets out that development proposals should be net zero carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the energy hierarchy. The energy hierarchy is as follows:

- Be lean: use less energy;
- Be clean: supply energy efficiently;
- Be green: use renewable energy.
- Be seen: monitor, verify and report on energy performance.

341. This policy requires major development to be zero carbon and achieve an on-site reduction in carbon dioxide emissions of 35% beyond Building Regulations Part L 2013 as specified in Mayor's Sustainable Design and Construction SPG. The policy requires that the 35% minimum be achieved on site and acknowledges that the remaining 65% reduction can be achieved through a cash in lieu contribution to the borough's carbon offset fund or through identified off-site measures where delivery can be assured..

342. 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. Within the framework of the energy hierarchy major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.

343. 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. The applicants have submitted an Energy and Sustainability Statement for the proposed development which seek to demonstrate compliance with the above policy. The various measures proposed under the energy hierarchy are set out in detail below:

Be Lean

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

Thermal insulation and air tightness targets exceeding the Building Regulations;
Solar control glazing to maximise daylight whilst mitigating excess solar gains;
Mixed mode ventilation with openable windows to enable purging of excess heat.

345. Active measures would include:

- Energy efficient lighting will be used alongside low power sensors, time switch controls and automatic on/off control;
- Air handling units fitted with heat recovery to improve energy performance;
- Use of a panelised chilled ceiling system to provide heating and cooling at the perimeter;
- Displacement ventilation in the reception area;
- Use of cooling towers combined with the use of air source heat pumps to provide space heating, cooling and domestic hot water;
- Energy efficient lifts and escalators;
- Employment of 'Category A' energy efficient equipment and appliances;
- Installation of a building management system to monitor and control building services and enable optimum operation.

Be Clean

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

Be Green

- Use of High Efficiency Air Source Heat Pumps with simultaneous heating and cooling;
- Provision of photovoltaic panels on the roof to generate electricity.

Be Seen

347. Introduced as part of the London Plan 2021, 'Be Seen' is the newest addition to the GLA's energy hierarchy. It requires developments to predict, monitor, verify and improve their energy performance during actual operation.

348. In order to meet the requirements of Be Seen under Policy SI 2, the development is required to monitor and report on energy performance, such as through displaying a Display Energy Certificate (DEC) and reporting to the Mayor for at least five years.

349. The applicant is proposing to display a DEC and put in place a plan to monitor energy demand and carbon emissions and report to the GLA on an annual basis for at least five years.

350. Effective metering and monitoring will be enabled so that at least 90% of the estimated annual energy consumption is assigned to specific end users, such as space heating, hot water heating, cooling, ventilation etc). Meters will be linked to the appropriate Building Energy Management System (BEMS) and this will allow further monitoring. This approach will ensure energy efficiency is delivered in reality, and is identified as best practice within GLA 'Be Seen' draft guidance.

Carbon reduction

351. Taken together, the Be Lean and Be Green measures would achieve a total carbon reduction of 55.1% taking into account SAP10 and decarbonising of the electricity grid and would exceed the requirements of the policy. A financial contribution to the carbon offset fund of £512,145 would bring the development to carbon zero and would fully comply with policy SI 2. The development would also meet the requirement to generate 20% of this carbon reduction through the use of on-site renewable energy. The proposed office accommodation is expected to achieve a BREEAM 'Outstanding' which is an excellent indicator of the schemes energy efficiency and sustainability. The carbon reduction and sustainability measures are a positive aspect of the development. The relevant BREEAM rating would be secured by condition and the relevant carbon reduction would be secured as part of the S106 Agreement.

Whole life cycle and carbon capture

352. Policy SI 2 – Minimising Greenhouse Gas Emissions of the London Plan requires developments to calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken that would serve to reduce life-cycle carbon emissions.

353. As set out in the Energy and Sustainability Statement, construction materials with a low environmental impact over the full life cycle of the building will be employed wherever possible. Life-Cycle Assessments (LCAs) have been carried out to help identify materials with low impact and assess the possibility to meet the RIBA embodied carbon targets for 2020, 2025 and 2030. The applicant's structural engineer has undertaken various studies including structural frame, slab options and timber mix as being the lowest carbon solution that was practicable for a building of this height and form. Further strategies have been identified that would assist the development in exceeding the current 2020 targets and meeting the 2025 target by further reducing embodied carbon.

Circular Economy

354. Policy SI 7 Reducing Waste and Supporting the Circular Economy of the London Plan requires referable applications to promote circular economy outcomes and aim to be net zero-waste. These applications are required to submit a Circular Economy Statement to demonstrate:

1. How all materials arising from demolition and remediation works will be re-used and/or recycled.
2. How the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life.

3. Opportunities for managing as much waste as possible on site.
4. Adequate and easily accessible storage space and collection systems to support recycling and re-use.
5. How much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy.
6. How performance will be monitored and reported.

355. The Energy and Sustainability Statement sets out that the deconstruction of the existing buildings will be undertaken carefully to ensure that building elements or materials would be appropriately recycled and/or used within the proposed development used or off-site.

356. As part of the BREEAM provisions, the applicant has completed a pre-demolition audit of the existing building, structure and hard surfaces. This survey will be used to maximise the recovery of material for subsequent use. Additionally, the applicant has conducted a study to explore the ease of disassembly and the functional adaptation potential of different design and has developed recommendations or solutions, based on this study, with the aim to enable and facilitate disassembly and functional adaptation. The applicant will then produce a building adaptability and disassembly guide to communicate these characteristics allowing functional adaptability and disassembly to prospective tenants.

Overheating

357. London Plan Policy SI4 Managing heat risk and The New Southwark Plan policy P68: Sustainability standards set out the cooling hierarchy that should be followed when developing a cooling strategy for new buildings. The hierarchy is as follows:

- Minimise internal heat generation through energy efficient design; then
- Reduce the amount of heat entering the building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
- Manage the heat within the building through exposed internal thermal mass and high ceilings; then
- Use passive ventilation; then
- Use mechanical ventilation; then
- Use active cooling systems (ensuring they are the lowest carbon options).

358. The steps set out in the hierarchy have been applied to the proposed development in sequence and systematically as part of the design process and is set out below in sequential order.

Minimise internal heat generation through energy efficient design

359. The development incorporates the use of internal light fittings with high efficacy, controlled by daylight and/or occupancy sensors where appropriate. All equipment and appliances within the building will be energy efficient. All pipes, especially domestic hot water pipes, will be well insulted and this will include all

header pipes and pumps.

Reduce heat entering the building

360. The proposed building would include balconies, vertical shading, internal shading and a facade structure that blocks solar heat before it enters conditioned spaces. The facades will incorporate solar control glazing to reduce solar gains and high visible transmittance to improve daylight availability. In construction, insulation and air tightness targets will be employed that reduce conduction gains without trapping excessive heat in the building. The development will also incorporate low-albedo materials and greenery in the form of vegetated balconies and green substrate over blue roofs to mitigate the urban heat island effect.

Manage the heat within the building

361. The development would incorporate the use of an underfloor air distribution system that maximises the floor-to-ceiling height and enables access to the thermal mass at ceiling level to temper space air and radiant temperatures.

Use passive ventilation

362. Openable windows will enable natural ventilation and free cooling.

Use mechanical ventilation

363. In terms of mechanical ventilation, the proposal includes:

- Mechanical ventilation with energy recovery wheels in AHUs that serve office spaces.
- Increased ventilation rates that deliver free cooling for extended periods.
- Demand controlled ventilation in office spaces that adapts the ventilation rate based on gas sensors.

Use active cooling systems (low carbon)

364. Whilst the cooling hierarchy set out above will significantly reduce the need for cooling, they will not be sufficient to avoid overheating risk throughout the year. As a result, the building will be provided with comfort cooling through a combination of chilled ceilings in the upper levels, displacement ventilation at the podium level and perimeter trench units with low specific fan power to meet the specific thermal comfort requirements of the building occupants. To meet this cooling demand in the most energy efficient and low-carbon manner, high efficiency air source heat pumps will be employed.

Planning obligations (S.106 agreement)

365. Saved Policy 2.5 of the Southwark Plan and Policy DF 1 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

366. 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
Archaeology	£11,171	Agreed
Carbon offset	£512,145	Agreed
Employment during construction	Provide 80 jobs, 80 short courses and 20 construction industry apprentices for Southwark residents or make a payment of £386,000.	Agreed
Employment in the development	Provide 186 sustained jobs for unemployed Southwark residents or make a payment of £799,800.	Agreed
Transport for London	A contribution is sought towards the St Thomas Street Healthy Streets scheme. Cycle hire - £160,000. Legible London - £16,000.	Further discussions are taking place with TfL regarding the final Healthy Streets contribution figure and this would be finalised as part of any Stage II Mayoral referral.
Transport (site specific)	Reconstruction of footway on Fenning Street/Melior Street - £17,376 Road resurfacing Melior Street - £4,000.	Agreed

	Extended raised tables - £40,000. Bus improvement - £135,000.	
Trees	Not specifically required unless unforeseen issues prevent trees from being planted or they die within five years of completion of the development in which case a contribution will be sought - £8,000 per tree.	Agreed.
Admin fee	2% of total contributions	

S106 Provisions

367. The legal agreement will also secure an Affordable Workspace Strategy (including marketing and management); Estate Management Plan; Demolition and Construction Environmental Management Plan; Construction Logistics Plan; Delivery Consolidation Strategy; Site Wide Energy Strategy (including post construction review); Service Management Plan; Landscaping Strategy; Basement Impact Assessment Review; Parking Permit Exemption; and Wind Mitigation Post Construction Review. The agreement will also secure an admin charge of 2% of the total contributions.

368. The Legal Agreement will also secure the following S.278 works:

- Repave the footway including new kerbing fronting the development on Fenning Street, and Melior Street (London Borough of Southwark' roads) in accordance with the SSDM standards.
- Plant trees and construct tree pits in accordance with the SSDM standards.
- Change all utility covers on footway areas to recessed type covers.
- Reconstruct any redundant vehicle crossovers fronting the development as footway in accordance with the SSDM standards.
- Any highway works in Southwark Council's roads (I.e. Pedestrian crossing, raised entry treatments, etc.) to be constructed in accordance with the SSDM standards.
- Upgrade street lighting to current LBS standards (including on private roads). Investigate the possibility to provide lamp columns mounted to the building walls in order to improve effective footway widths. Please contact Perry Hazell at Perry.Hazell@southwark.gov.uk for further details.

- Review existing and proposed signage fronting the development and investigate the possibility to install any existing / proposed signs on the building walls in order to improve effective footway widths.
- Provide appropriate dropped kerbs for refuse bin collection.
- Rectify any damaged footways, kerbs, inspection covers and street furniture due to the construction of the development.

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

370. 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 DF 1 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)

371. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material 'local financial consideration' in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport invests in London as a whole, primarily Crossrail. Southwark's CIL will provide for infrastructure that supports growth in Southwark. In this instance, based on information provided by the applicant, an estimated Mayoral CIL payment of £1,936,080 and a Southwark CIL payment of £2,528,368 would be due. This figure is an estimate only, and would be calculated in more detail when CIL Additional Information and Assumption of Liability forms are submitted prior to implementation.

Community involvement and engagement

372. The developer has completed an extensive programme of pre-application meetings in addition to consultation and engagement with key stakeholders and the wider community. The consultation area contained approximately 4,654 addresses surrounding the site, with a mix of residential and commercial uses. In addition to consulting with residents, the consultation programme identified the following political consultees:

- Councillor Peter John (former Leader of Southwark Council)
- Councillor Johnson Situ (Cabinet Member for Growth, Development and Planning);
- Councillor Stephanie Cryan (Cabinet Member for Jobs, Business and Innovation);
- Councillor Richard Livingston (Cabinet Member for Environment, Transport and Climate Emergency);
- Ward Members for London Bridge and West Bermondsey;

373. The following community stakeholders were identified:

- Old Bermondsey Neighbourhood Forum;
- The Bermondsey Village Action Group;
- Team London Bridge;
- St Mungo's;
- Better Bankside;
- Living Bankside;
- Better Bankside BID;
- Manna Day Centre;
- Southwark Chamber of Commerce
- Horseshoe Inn

374. The applicant has set out in their Statement of Community Involvement, the series of meetings, workshops and events undertaken in order to ensure a fulsome consultation process. This is detailed below:

Event	Date
Introductory stakeholder letters	18/10/2019
Exhibition invitation (1)	25/10/2019
Public exhibition (1)	08/11/2019 09/11/2019
Update to project website (including information boards and feedback form available at the public exhibition)	11/11/2019
Meeting with Councillor Stephanie Cryan	13/12/2019
Meeting with St Mungo's	21/11/2019
Meeting with Team London Bridge	25/11/2019
Meeting with Councillor Johnson Situ and Councillor Richard Livingstone	02/12/2019
Exhibition invitation (2)	20/12/2019
Public realm and landscaping workshop	08/01/2020
Public exhibition (2)	14/01/2020
Update to project website (including information boards and feedback form available at the public exhibition)	15/01/2020
Meeting with the Manna Day Centre	14/02/2020
Meeting with Living Bankside	19/03/2020

375. Public exhibitions of Pilbrow and Partners emerging proposals for the redevelopment of the site were held on 8 and 9 November 2019. A follow-up exhibition was held on 14 January 2020, at which substantially developed proposals for the site were presented.

376. As part of its statutory requirements the Local Planning Authority sent letters to surrounding residents, displayed site notices in the vicinity, and issued a press notice publicising the planning application. Adequate efforts have, therefore, been made to ensure the community has been given the opportunity to participate in the planning process. Details of consultation and any re-consultation undertaken by the Local Planning Authority in respect of this application are set out in the appendices.

Consultation responses from members of the public and local groups

377. Following neighbour consultation, a total of 72 objections were received which are summarised below:

- The proposed development is too tall.
- The development would have an adverse impact on the character nearby conservation area.
- The development would have an adverse impact on the setting of listed buildings
- There will be reduced demand for office space post Covid.
- The proposed building is excessive in scale and would be overbearing.
- The development would impact on the setting of the Shard.
- The development would block out light.
- The development would block views.
- There will be an increase in disturbance due to construction.
- There has been little to no consultation.
- The development would lead to congestion and traffic problems.
- The development would lead to wind impacts.
- Retail space is not needed in this area.
- The development will result in excessive noise and disturbance.
- The privacy of nearby residents will be compromised.
- The development would reduce safety and security.
- There would be light pollution affecting residents.
- How will the use be secured and change of use post covid prevented?
- The community garden will be lost.
- Emergency vehicles won't be able to access the building.
- The development would be a threat to fire safety and would create congestions preventing emergency services from accessing the site/area.
- More social community spaces are needed.
- A museum with housing on top would be better.
- There would be a strain on community facilities.
- The process is flawed with poor consultation.
- Wind impacts would be a danger to pedestrians and cyclists.
- It would result in an increase in pollution.
- The building is poor design.
- The application has failed to take account of the refusal of permission for the adjacent proposed tower.
- There are no benefits to the scheme or public benefits.
- The development would damage the conservation area and listed railway arches.
- The development would result in poor public realm.
- The area should be turned into open space for the community. Preferably with oxygen generating trees for people to breathe the limited oxygen we have in this densely populated area.
- It would exacerbate parking problems.
- Construction and operational traffic from this scheme and the adjacent schemes will impact on local roads and guys Hospital.

- The development will have an adverse impact on people's health.
- The surrounding streets are too narrow to accommodate this scale of development and will lead to congestion that will affect safety.
- The development would lead to vehicle conflict on Weston Street/Melior Street.
- The applications fail to quantify the amount of construction traffic.
- The development doesn't meet the requirements of Southwark's Movement Plan.

378. Team London Bridge - There are a number of outstanding issues where further clarity is sought. Further information is required in terms of what the affordable workspace offer would be. The base of the building could be more active on St Thomas Street and the removal of the core and services to Fenning Street is unappealing. Team London Bridge consider that the public use of the building should extend to the first floor as well as the ground floor and that this should be clear to visitors.

379. It is acknowledged that the landscaping offer has improved with each iteration of the scheme and that the current proposal has strengthened the quality of its public realm and taken the opportunity to create a more mature landscape. Further greening of the building could take place and internal greening needs to have the quality of an indoor park.

380. Whilst it is encouraged that St Mungo's will continue to be involved in the landscape management the proposal would go wider in terms of place making, regeneration, reforestation and biodiversity. The applicant also needs to do more to demonstrate the appeal of the new public realm as a place to linger as well as a new route taking into account environmental conditions such as sun/light/wind.

381. In design terms further consideration should be given as to whether this is a Bermondsey building and there would be a more visible response to the Covid-19 pandemic and the future public expectations and requirements (such as fresh air provision in the building, filtration systems, touchless systems, anti-viral coatings). There remain concerns that the servicing strategy and layby on Fenning Street will not be adequate for the development. Increased cycle parking should be provided and the commitments in the energy strategy should be secured to ensure implementation.

382. The Victorian Society - Unlike the other St Thomas Street schemes, no part of the site in question is included within the conservation area. The site does occupy a highly sensitive location, however, sandwiched between the Grade-II listed Railway Viaduct Arches, and the Bermondsey Street Conservation Area. Melior Street, and in particular the Slovak Church, would be negatively impacted by the construction of such a towering structure, especially given the proposals to move the building further south than the existing structure. The office block would become the dominant feature of the street, and remaining historical features, thrown into obscurity. It is noted that the existing building on the site is not overly attractive, but it is at least more sensitive in terms of scale than what is proposed. Any new use of the site should aim to mimic this height which references the lower heights of the conservation area.

383. A total of 12 responses supporting the development have been received

recording support for the following reasons:

- The new park /garden on St Thomas Street
- Encouraged to see affordable workspaces
- This is the ideal site for redevelopment
- Support for the emphasis on sustainability
- Welcome employment opportunities
- Attractive greenspaces at ground floor
- Welcome the provision of a sustainable and healthy workplace
- Green space is much needed
- The development will add to the vibrancy of the area
- The site is currently underutilised and unattractive

Consultation responses from external and statutory consultees

384. Environment Agency – No objections subject to conditions.
Response – Noted and agreed.

385. Greater London Authority - The principle of the redevelopment of the site for a significant new office development is fully supported, subject to confirmation that appropriate alternative accommodation has been identified for the Home Office. Further details should be provided in relation to the public/community use of the lower levels; as well as how St Mungos have fed into the design of the public realm and would continue to be involved in the management of the public realm.

386. The design of the scheme is of high quality and would not result in harm to any of the identified LVMF views. In height and massing terms, the development is generally considered acceptable subject to points of clarification regarding public access. The development would give rise to some harm to the setting and significance of the Bermondsey Street Conservation Area towards the lower end of the less than substantial scale. This would need to be weighed against the public benefits of the scheme.

387. The energy strategy for the scheme is supported overall subject to investigating the potential for connection to the local heat network options and provision of further information on heat pumps.

388. Further details on how SuDS measures at the top of the drainage hierarchy will be included in the development, and how greenfield runoff rate will be achieved should be provided. Additional attenuation storage volume calculations, attenuation tank dimensions, and SuDS maintenance information should also be provided. Furthermore, the development does not meet the London Plan water consumption targets and should be revised accordingly.

389. The development would achieve an UGF of 0.3 which is welcomed. The development is generally supported in transport terms; however, further information is required in respect of the provision of electric charging points, access to the cycle stores, building line and public access.

390. Further discussion with the Council is required regarding the general approach to S106 pooling in the St Thomas Street area to deliver the Healthy Streets scheme, Legible London and Cycle hire capacity expansion. The Travel Plan, CLP and DSP should be submitted for approval by the Council, in consultation with TfL, prior to commencement, to be secured by condition/s106 planning obligation.

391. **Response** – It is noted that the principle of the development is supported and it is confirmed that The Home Office have found suitable alternative accommodation. With regards to St Mungo's, the applicant is currently in discussions with St Mungo's in order to secure their continued involvement in the landscaped spaces and a MOU has been signed. Officers agree with the GLA that the impact on heritage assets and LVMF views would be less than substantial. The applicant has provided further information on energy and SUDS and this will be considered further by the GLA at Stage II, should the committee resolve to grant planning permission. The requested transport clarifications have been provided and whilst the Council fully support Transport for London in their request for funds towards the Healthy Streets scheme it is understood that the applicant and TfL are still discussing the method of calculation and final overall figure. This would also be confirmed at Stage II.

392. Guys and St Thomas NHS Trust - The Trust supports the redevelopment of the site however it must be brought forward sensitively with regard to the Trust's assets and operation. As such the Trust seek to engage and work collaboratively with the applicant on a number of matters. The Trust welcomes the provision of affordable workspace, adequate cycle parking and public realm improvements, providing engaging spaces and local amenities for its users.

393. The proposals will make the area more secure and well-lit, providing a safer space to travel through and spend time in for visitors and workers. The trust notes that various documents and strategies will be required either as conditions or as obligations within the S106 Agreement including a Demolition and Construction Environmental Management Plan, Construction Logistics Plan, Delivery and Servicing Management Plan and a Travel Plan and request that they are involved in their preparation and consulted on these documents.

394. The Trust must be considered as a key local receptor within these documents when assessing the impacts of both construction and operational traffic on their operations, to ensure that appropriate mitigation measures are put in place. The Trust request that they are consulted during the preparation of these documents to enable them to comment. The Trust requests engagement on the Construction and Environmental Management to ensure that there would be no negative impacts on the hospital's own arrangements and operations and that an agreement is secured, prior to commencement, with the Trust that details the specific controls to the construction process to ensure the proper management of the development given the nature of the Trusts' activities.

395. **Response** – Noted and agreed, the documents referred to will be secured as part of the S106 Agreement and appropriate wording will be included on those obligations to ensure that the Trust are listed as a statutory consultee to ensure full and appropriate engagement.

396. Heathrow Airport – No safeguarding objections.
Response – Noted.

397. Historic England – Historic England have reviewed the potential views of the development from within the Tower of London (Views 1, 17 and 18) and taking account of existing and approved tall building developments in the London Bridge area (many of which are taller than the Becket House proposals), they consider this harm to be relatively minor. HE have also acknowledged that the proposed tall building would be located directly behind the Grade I listed St Paul's Cathedral in two Landmark Viewing Corridors (LVMF 2A.1 and 3A.1). Historic England have concluded, taking account of the existing and consented tall building developments that fall within these views, that it appears very unlikely that the proposed tall building at Becket House would have any noticeable visual impact in these views. Whilst Historic England have raised concerns about a number of tall buildings in Southwark in the past, they recognise that this site is not located within a conservation area and does not refer to any listed buildings. Furthermore, Historic England acknowledge that the development site is located in an area containing a number of built and consented tall buildings, and that the proposals appear to broadly reflect the Council's strategic policies. As such, Historic England do not object to the proposal.

Response – Officers note that Historic England do not object to the proposed development and that the impact on views would be relatively minor. The impact on the LVMF views would not be significantly impacted by the proposed development. In terms of views from within the Tower of London, Officers acknowledge that the proposal would appear briefly in the more sensitive views of the Queen's House from the White Tower (view #17) and from the Scaffold Site (view #18). From the entrance courtyard of the White Tower it would be glimpsed above the roofline of the Queen's House, although this would be through the trees and would be read as one of several tall buildings in the distance; whilst from the scaffold site it is just visible among the gables of the historic building's roof. In these views, whilst the sensitivity of the views is high, the visual intrusion is minor and the harm negligible.

398. Historic Royal Palaces - As guardians of the Tower of London World Heritage Site (WHS) on the north side of the Thames, Historic Royal Palaces' principal concern is the potential impact the proposed tall building might have on the setting of the WHS and on important views south-west from it, particularly the views outwards from the Tower's Inner Ward. The *Townscape, Visual Impact and Built Heritage Assessment* for the redevelopment of Becket House (Environmental Assessment, Volume 2: Part 1), shows that the proposed 27 storey building would group visually with Capital House to the east of the Shard as seen from the Tower of London WHS and the north bastion of Tower Bridge. Although lower overall than Capital House, the proposal would be markedly taller than the general height of buildings along the South Bank opposite the Tower WHS, currently interrupted only by the existing tower of Guy's Hospital. It would thus contribute to the perception of a build-up in the height of new buildings in the vicinity of the Shard. Whilst the Becket House proposal in and of itself might not be considered objectionable, in the context of the other consented and pending proposals, it would contribute to the build-up from the east in the height of buildings adjacent to the Shard.

399. **Response** – The impact on views from within the Tower of London has been fully considered in the ES. Further assessment of the impact on these views has been undertaken by officers and by the GLA and Historic England as a result of consultation. As set out in the report, the proposal would appear briefly in the more sensitive views of the Queen's House from the White Tower (view #17) and from the Scaffold Site (view #18). In these views, whilst the sensitivity of the views is high, the visual intrusion is minor and the harm negligible.

400. The London Borough of Tower Hamlets - Concerns have been raised regarding the impact of the development on some protected views including View 17 and 18 from within the Tower of London and clarifications on Views 11 and 12 (Royal Mint and Tower Gateway).
Response - The development is discernible within the backdrops to the Tower of London and is visible within several of the protected panoramas. However, Officers consider that its appearance causes no or negligible harm, preserving these sensitive views.

401. London Underground – No comment.
Response – Noted.

402. Metropolitan Police – No objection subject to appropriate conditions.
Response – Noted.

403. NATS – No objections.
Response – Noted.

404. Natural England – No objections.
Response – Noted.

405. Network Rail - Given the proximity of the proposed development to Network Rail's infrastructure, Network Rail strongly recommends the developer contacts Network Rail's Asset Protection and Optimisation (ASPRO) team prior to works commencing. The applicant will need to demonstrate to our Asset Protection team that there is no risk of glare impacting driver's ability to see signals as well as provide design details for the use of the Tower Cranes and scaffolding during construction. Network Rails ASPRO team will ensure the works can be carried out safely and not pose a risk to Network Rail's Infrastructure. The applicant may also be required to enter into an Asset Protection Agreement to get the required resource and expertise on-board to enable approval of detailed works. Further informatives are recommended.
Response – Noted, the relevant informatives will be added to any consent issued.

406. Thames Water – Recommend conditions and informatives in addition to concerns regarding proximity of a sewage pumping station.
Response - Thames Water have recommended various conditions and informatives which will be added to any consent issued. Concerns were raised about the proximity of the development to a sewage pumping station and as such Thames Water have recommended a specific informative to cover this issue and this will be attached to any consent issued.

407. Transport for London – Transport for London consider the proposed car parking to be acceptable given the central London location of the site and the proximity to London Bridge Station subject to the space being provided with an electric vehicle charging point. Cycle parking would be compliant with the London Plan however further consideration should be given to the access to cycle parking area to reduce potential queuing at the lifts or staircases within the development. As with the other development proposals on St Thomas Street, a s106 contribution should be sought to deliver the Healthy Streets scheme

408. TfL consider that the development is unlikely to have a significant adverse residual impact on the operation of the TLRN, assuming that deliveries are managed to ensure the loading bay on Fenning Street operates within capacity. Bus capacity in the London Bridge area on the routes and at the times likely to be used by office workers is adequate.

409. The high level of development activity along St Thomas Street and more generally in the London Bridge area will require additional Cycle Hire capacity. As acknowledged in the TA, a contribution towards expansion would be appropriate. Contributions are also sought towards legible London signage and conditions/s106 obligations should secure a Travel Plan, Construction logistics Plan and Delivery Servicing Plan.

Response – The applicant is in further discussions with TfL regarding the final figure and method of calculation for the Healthy Streets contribution and this will be finalised as part of any Stage II referral process. The developer has provided additional information to address the access to the cycle parking area and the S106 agreement would secure the various plans and strategies as recommended by TfL.

Community impact and equalities assessment

410. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights

411. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.

412. 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.

413. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

414. The principle of the use proposed by the application is acceptable in planning terms as the site is allocated under the NSP. The NSP was itself the subject of a detailed equalities impact assessment. There is nothing in the principle of the redevelopment of the site for the uses proposed in the application that should cause a fundamental inconsistency with the Public Sector Equality Duty (PSED).

415. Becket House is currently occupied by the Home Office as an Immigration Reporting Centre with associated offices. Subject to the terms of its lease, there is nothing preventing the Home Office vacating the existing premises at a time of its choosing. In planning terms, there is nothing preventing another office occupier taking occupation of the existing building.

416. The Home Office is itself subject to the PSED. There are existing Immigration Reporting Centres in Hounslow and Croydon – all of which are/will be accessible by public transport and so the loss of the centre at Becket House will not prevent access to a centre. In addition, the Home Office plans to open a further centre in Docklands.

417. There is nothing in the proposal that contributes to the discrimination, harassment, victimisation or any other conduct that is prohibited by or under this Act. The existence or absence of the current Home Office facility at Becket House does not, and does not contribute to, the said discrimination, harassment or victimisation.

418. There will be access to other centres in London as set out above. Accordingly, there is no impact on the equality of opportunity for those currently using Becket House and others requiring access to an Immigration Reporting Centre in London. Nationally, the centres are provided at regional level meaning that across the country a degree of travel is required, including in areas that lack the comprehensive public transport system that is available in London.

Human rights implications

419. 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.

420. This application has the legitimate aim of providing new offices. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

Positive and proactive statement

421. 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.

422. The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.

Positive and proactive engagement: summary table

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

CONCLUSION

423. The intention to redevelop the Becket House site for a commercial scheme within a tall building is one that is supported by current and emerging planning policy. The substantial uplift in jobs and employment opportunities through the creation of high quality offices and commercial floorspace in addition to new retail opportunities that will enliven the streets whilst supporting the functions of the London Bridge District Town Centre, is consistent with the NSP site allocation and the objectives for the Opportunity Area.

424. The development would result in a significant increase in commercial floorspace on a central, sustainable, highly connected brownfield site. The development has the potential to provide up to 1,900 jobs on a site that benefits from the highest levels of public transport availability. The provision of extensive and high quality cyclist facilities including parking, showering facilities, changing rooms, ironing rooms and bike repair stations will serve to encourage sustainable forms of transport. The provision of much needed affordable workspace will secure discounted workspace and facilities for micro to medium sized enterprises and is a benefit of the scheme. The proposed Affordable Workspace Offer meets the policy requirement in terms of quantum of space and various components of the offer will provide a meaningful choice and significant discount to potential users with the auditorium, basement studios and the ground floor shared working space being offered for free which is a significant benefit. The Council's Local Economy Team have reviewed the offer and are supportive of the proposal.

425. The surrounding townscape is varied with taller buildings to the west and north such as Guys Hospital Tower and The Shard as well as the consented Capital House development which would rise to 39 storeys on the immediately neighbouring site. Building heights then step down significantly towards Bermondsey Street and to the south. As such the proposed building, which would be of a significant scale, would directly contrast with the lower scale buildings located to the east and south, particularly those within the Bermondsey Street Conservation Area. This site, along with the other St Thomas Street sites, including the Vinegar Yard development which is with the Mayor for determination, therefore has an important role to play in managing this transition in scale between the taller buildings to the west and the lower rise buildings to the east. Having reviewed the information presented as part of the Townscape, Visual Impact and Built Heritage Assessment, officers are of the view that the proposed building is successful in its role in managing that change in scale and character.

426. It should be noted that the site is not located within a conservation area however it is acknowledged that it sits close to the boundary with the Bermondsey Street Conservation Area and will impact on its setting. The proposed building will be visible in some views from within the conservation area however the visibility of the proposed building from within the conservation area is not considered to cause substantial harm and the less than substantial harm would be significantly outweighed by the public benefits of redeveloping the site including the provision of high quality architecture, significant new employment provision, affordable workspace, new retail opportunities, new pedestrian linkages with improved connectivity and a significant new public realm.

427. The development would bring forward significant public realm benefits including a generous pocket park that would provide improved pedestrian and visual linkages between St Thomas Street and Melior Street whilst opening up views of the church. This park would be well landscaped and planted and would provide a much needed green space in a central location that would be a benefit enjoyed by residents, workers and visitors. The proposed pocket park is considered to be a suitable and high quality replacement for the Melior Street Garden, being both more generous in size and more visible given its location between St Thomas Street and Melior Street. It should also be noted that the pocket park

would assist the development in achieving an Urban Greening Factor of 0.3 which would be compliant with London Plan requirements.

428. The development would achieve Carbon Zero status through a combination of an in lieu payment and a 55.1% carbon reduction on site. The on-site carbon reduction of 55.1% alongside the scheme being expected to achieve BREEAM Outstanding will result in one of the most energy efficient and sustainable buildings in London.

429. Developments of this size and nature have the potential for significant environmental impacts and therefore an Environmental Statement has been submitted. The impacts identified in the Environmental Statement have been assessed and taken into account and should be considered in determining the application. It is noted that there would be significant impacts on daylight and sunlight to a small number of properties, most notably Our Lady of La Salette and St Jospeh Church as well as properties 6-12 Melior Street/36 Snowsfields and 48-50 Weston Street and 43 Snowsfields. On balance, given the small number of properties affected and the site specific circumstances leading to those impacts, the benefits of the proposed scheme are considered to outweigh the potential harm and as such the impacts are considered acceptable.

430. The application is considered to be in compliance with the development plan, and emerging documents, when read as a whole, and It is therefore recommended that planning permission be granted, subject to conditions, the timely completion of a S106 Agreement and referral to the Mayor of London.

BACKGROUND INFORMATION

BACKGROUND DOCUMENTS

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

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received.
Appendix 3	Recommendation (draft decision notice)

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth
Report Author	Terence McLellan, Team Leader Planning
Version	Final
Dated	27 May 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		27 May 2021