GREATER**LONDON**AUTHORITY

[redacted]
(By email)

Our Ref: MGLA030920-3059

28 September 2020

Dear [redacted]

Thank you for your request for information which the Greater London Authority (GLA) received on 2 September 2020. Your request has been dealt with under the Environmental Information Regulations (EIR) 2004.

You asked for:

1) *Full dates and details (including all correspondence) of the referral from Southwark. If you aren't able to share this voluntarily please treat this as a request under FOIA.*
2) *An indication of the expected timeframe for a representation hearing including any preparatory work - for example the work noted in paras 48 and 51 of your report.*

Our response to your request is as follows:

Please find attached the information held by the GLA within scope of your request. Please note that personal information (Names, direct contact details etc.) is exempt from disclosure under Regulation 13 (Personal information) of the EIR.

Information that identifies specific individuals constitutes as personal data which is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual. It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject

With regards to the date of the hearing, you will appreciate we are very early on in the process. We usually confirm hearing dates 21 days prior to the hearing session but we will publish the confirmed hearing date as soon as possible. The following link may prove useful to you in understanding the public hearings procedure: https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/public-hearings.

If you have any further questions relating to this matter, please contact me, quoting the reference at the top of this letter.

Yours sincerely

[redacted]
Information Governance Officer

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information

From: [redacted]
To: Planning Support
Subject: FW: Stage II Referral - 18/AP/4171 - GLA 4822 - Land Bounded by St Thomas Street, Fenning Street, Vinegar Yard And Snowfields
Date: 11 August 2020 13:31:00

Hi,
Please can this Stage 2 be validated today please (11/08/2020).
Thanks
[redacted]

From: [redacted]
Sent: 11 August 2020 13:29
To: [redacted] southwark.gov.uk>
Subject: RE: Stage II Referral - 18/AP/4171 - GLA 4822 - Land Bounded by St Thomas Street, Fenning Street, Vinegar Yard And Snowfields
Hi [redacted]
Thanks for that.
I will have the case validated today, to go to the Mayor August 24.
Kind regards,
[redacted]

From: [redacted] southwark.gov.uk>
Sent: 11 August 2020 10:33
To: [redacted] london.gov.uk>
Subject: RE: Stage II Referral - 18/AP/4171 - GLA 4822 - Land Bounded by St Thomas Street, Fenning Street, Vinegar Yard And Snowfields
Hi [redacted]
Yes, they were included on the link. The WeTransfer link included 27 documents in total. I have reattached some of the other objections. They were included on the link either as stand alone documents or as part of the larger Word document containing the objections that are published on the website but for clarity I have attached them to this email.
[redacted]

From: [redacted] [mailto:[redacted] london.gov.uk]
Sent: Monday, August 10, 2020 4:43 PM
To: [redacted]
Subject: RE: Stage II Referral - 18/AP/4171 - GLA 4822 - Land Bounded by St Thomas Street, Fenning Street, Vinegar Yard And Snowfields
Hi [redacted]
I think I have them – are they all part of that 108 slide presentation dated 15 June 2020?
Thanks
[redacted]

From: [redacted] southwark.gov.uk>
Sent: 10 August 2020 16:34
To: [redacted] london.gov.uk>
Subject: Re: Stage II Referral - 18/AP/4171 - GLA 4822 - Land Bounded by St Thomas Street, Fenning Street, Vinegar Yard And Snowfields
Hi [redacted]
I thought the images were included in the link but I'll double check today.
[redacted]

On 10 Aug 2020, at 3:13 pm, [redacted] london.gov.uk> wrote:

Hi [redacted]
Thanks for your email.
I can confirm we have received the single document you refer to and the objections from OBNF (and others). Apparently some images were provided to the LPA ahead of the committee meeting and I don't think these were provided as part of the referral package. Perhaps they weren't submitted as part of a representation?
If you can provide these pictures or let me know their status I can start the clock on the Stage 2; preferably tomorrow and we can get it to the Mayor's meeting on 24 August?
Thanks
[redacted]

From: [redacted] southwark.gov.uk>
Sent: 07 August 2020 09:54
To: [redacted] london.gov.uk>
Subject: RE: Stage II Referral - 18/AP/4171 - GLA 4822 - Land Bounded by St Thomas Street, Fenning Street, Vinegar Yard And Snowfields
Hi [redacted]
Do you mean letters of objection and support? I will check but I did include them on the link. They are not summary documents, the are the objections made online and pasted into a single document for ease of transfer and review. Other objections have been saved and included in the link individually such as those from OBNF etc.
Thanks
[redacted]

From: [redacted] [mailto:[redacted] london.gov.uk]
Sent: Tuesday, August 04, 2020 5:00 PM
To: [redacted]
Subject: FW: Stage II Referral - 18/AP/4171 - GLA 4822 - Land Bounded by St Thomas Street, Fenning Street, Vinegar Yard And Snowfields
Importance: High
Hi [redacted]
We have received your Stage II referral documents – however the application has not been validated yet. Could you please provide the representations received on this application (I know you sent the summary document, but I will need copies of the representations made on the application).
Many thanks and kind regards,

[redacted] **MRTPI**
Senior Strategic Planner
GREATER**LONDON**AUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
[redacted]
london.gov.uk/what-we-do/planning
[redacted] london.gov.uk

From: Planning Support <planningsupport@london.gov.uk>
Sent: 03 August 2020 16:21
To: [redacted] <[redacted]london.gov.uk>
Cc: Planning Support <planningsupport@london.gov.uk>
Subject: FW: Stage II Referral - 18/AP/4171 - GLA 4822 - Land Bounded by St Thomas Street, Fenning Street, Vinegar Yard And Snowfields
Importance: High

Hi [redacted]
You might be in a better position to email [redacted] about this. Is there anything you'd like planning support to do regarding it?
Cheers
Alan

From: [redacted] [mailto:[redacted]southwark.gov.uk]
Sent: 03 August 2020 11:33
To: Planning Support <planningsupport@london.gov.uk>
Cc: Justine Mahanga <Justine.Mahanga@london.gov.uk>
Subject: RE: Stage II Referral - 18/AP/4171 - GLA 4822 - Land Bounded by St Thomas Street, Fenning Street, Vinegar Yard And Snowfields
Importance: High

Dear Planning Support,
We sent this Stage II referral last week. As the Stage I referral was not completed via the new portal, there is no option available for us to submit this Stage II via the portal, hence the email with a link to the documents.
Can you please confirm that this has been received and that the relevant documents have been downloaded?
Kind regards

[redacted] **MA (Hons) MSc**
Team Leader – Strategic Applications | Planning Division
Chief Executive's Department | London Borough of Southwark
160 Tooley Street |London SE1 2QH
[redacted] | (E): [redacted]southwark.gov.uk
www.southwark.gov.uk
Please note the advice given in this email is an informal Officer opinion, given without prejudice to any future decision of the Council or application made under the Planning Acts.

From: [redacted]
Sent: Wednesday, July 29, 2020 11:56 AM
To: 'planningsupport@London.gov.uk'
Subject: RE: Stage II Referral - 18/AP/4171 - GLA 4822 - Land Bounded by St Thomas Street, Fenning Street, Vinegar Yard And Snowfields
Importance: High

Development Control
Direct Line - 0207 525[redacted]
Facsimile - 0207 525[redacted]
Our ref 18-AP-4171
Your ref

Greater London Authority
Planning Decisions Unit
Attention: [redacted]
Senior Strategic Planner
City Hall
The Queens Walk
More London SE1 2AA

29 July 2020
Dear [redacted]

TOWN AND COUNTRY PLANNING (MAYOR OF LONDON) ORDER 2008 – STAGE II REFERRAL

In accordance with the above Directions, I enclose for your consideration the following planning application:

Site Address: Land Bounded By St Thomas Street, Fenning Street, Vinegar Yard And Snowfields (Including Nos. 1-7 Fenning Street And No. 9 Fenning Street), SE1 3QR.
Name of Applicant: St Thomas Bermondsey Limited.
Reference 18/AP/4171 - Description of development: 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 provide a total of 30,292 sqm (GIA) of commercial floorspace comprising of 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.
The following documents are submitted via the WeTransfer link provided:

1. Copies of representations made to the authority in respect of the application
2. Planning committee report and addendum
3. Draft decision notice
4. Minutes of the committee meeting

Link:
https://wetransfer.com/downloads/7e70e27c4e611c9027ca33d01916e56620200729100112/95b4bfdb68d02838c595dce71fd494e020200729100127/4b6717
We have been unable to provide these documents via the portal as the application does not appear on the online case history. I suspect this is because the Stage I Referral was not completed via the portal. Please note that we have not provided a draft S106 Agreement as the recommendation was reversed at committee and the application is now recommended for refusal.
Should you require any further information please do not hesitate to contact me.
Yours sincerely

[redacted]
Team Leader
Strategic Applications
[redacted] **MA (Hons) MSc**
Team Leader – Strategic Applications | Planning Division
Chief Executive's Department | London Borough of Southwark
160 Tooley Street |London SE1 2QH
(T): 0207 525[redacted] | (E): [redacted]southwark.gov.uk
www.southwark.gov.uk
Please note the advice given in this email is an informal Officer opinion, given without prejudice to any future decision of the Council or application made under the Planning Acts.
The email you received and any files transmitted with it are confidential, may be covered by legal and/or professional privilege and are intended solely for the use of the individual or entity to whom they are addressed.

If you have received this in error please notify us immediately.

If you are not the intended recipient of the email or the person responsible for delivering it to them you may not copy it, forward it or otherwise use it for any purpose or disclose its contents to any other person. To do so may be unlawful.

Where opinions are expressed in the email they are not necessarily those of Southwark Council and Southwark Council is not responsible for any changes made to the message after it has been sent.

Development Control
Direct Line - 0207 525 [redacted]
Facsimile - 0207 525 [redacted]

Greater London Authority
Planning Decisions Unit
Attention: [redacted]
Senior Strategic Planner
City Hall
The Queens Walk
More London SE1 2AA

Our ref 18-AP-4171
Your ref

23 July 2020

Dear [redacted]

TOWN AND COUNTRY PLANNING (MAYOR OF LONDON) ORDER 2008 – STAGE II REFERRAL

In accordance with the above Directions, I enclose for your consideration the following planning applications:

Site Address: Land Bounded By St Thomas Street, Fenning Street, Vinegar Yard And Snowfields (Including Nos. 1-7 Fenning Street And No. 9 Fenning Street), SE1 3QR.

Name of Applicant: St Thomas Bermondsey Limited.

Reference 18/AP/4171 - Description of development: 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 provide a total of 30,292 sqm (GIA) of commercial floorspace comprising of 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.

The application is accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. A hard copy of the application documents is available for inspection by prior appointment at Southwark Council's offices, 160 Tooley Street, SE1 2QH (Monday to Friday 9am to 5pm) and is viewable online at the LBS Planning Portal: https://planning.southwark.gov.uk/online-applications/applicationDetails. Printed and electronic copies of the Environmental Statement and Non-Technical Summary are available to purchase from Trium Environmental Consulting LLP: 68 - 85 Tabernacle St, Old Street, London EC2A 4BD. For further information and prices, please contact Trium at hello@triumenv.co.uk or by calling 0203 887 7118. Re-consultation is being undertaken based on updated Environmental Impact Assessment information and design amendments to the scheme including: updated landscape design; drainage strategy and flood protection; relocated loading bay; increased planting on terraces; updated energy strategy; revision to building maintenance equipment; change to materiality of main building to brick with elements of pre cast concrete.

The following documents are submitted:

1. copies of representations made to the authority in respect of the application
2. planning committee report and addendum
3. draft decision notice

Please note that we have not provided a draft S106 Agreement as the recommendation is for refusal.

Should you require any further information please do not hesitate to contact me.

Yours sincerely

[redacted]
Team Leader
Strategic Applications

Planning Committee

MINUTES of the OPEN section of the virtual Planning Committee held on Monday 29 June 2020 at 6.30 pm

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PRESENT:	Councillor Martin Seaton (Chair) Councillor Kath Whittam (Vice-Chair) Councillor Barrie Hargrove Councillor Adele Morris Councillor Margy Newens Councillor Damian O'Brien Councillor Catherine Rose Councillor Cleo Soanes
OTHER MEMBERS PRESENT:	Councillor Humaira Ali
OFFICER SUPPORT:	Simon Bevan (Director of Planning) [redacted] (Legal Officer) [redacted] (Design & Conservation) [redacted] (Development Management) [redacted] (Transport Policy) [redacted] (Constitutional Officer)

1. APOLOGIES

There were none.

2. CONFIRMATION OF VOTING MEMBERS

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

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

The chair gave notice of the following additional papers which were circulated before the meeting, as part of supplemental agendas No.1 and No.2:

- Addendum report relating to items 6.1 and 6.2

- Members pack relating to items 6.1 and 6.2.

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

There were none.

5. MINUTES

RESOLVED:

That the minutes of the meeting held on 1 June 2020 be approved as a correct record of the meeting and signed by the chair.

6. DEVELOPMENT MANAGEMENT

RESOLVED:

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

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

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

6.1 40-44 BERMONDSEY STREET, VINEGAR YARD WAREHOUSE, 9-17 VINEGAR YARD AND LAND ADJACENT TO 1-7 SNOWSFIELDS SE1

Planning application number: 19/AP/0404

PROPOSAL

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); new landscaping and public realm; reconfigured pedestrian and vehicular access; associated works to public highway; ancillary servicing; plant; storage and associated works.

The chair moved a motion to defer this item to a future meeting of the planning committee so that certain aspects of the application and its planning impact on the conservation area can be explained more fully in a future report.

This motion was seconded, put to the vote and declared carried.

RESOLVED:

That planning application number 19/AP/0404 be deferred to a future meeting.

6.2 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

Planning application number: 18/AP/4171

PROPOSAL

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.

The committee heard the officers' introduction to the report and the addendum report. Members of the committee asked questions of the officer. At 7.30pm the meeting took a five-minute comfort break after which councillors' questions resumed.

The meeting took a five-minute break from 8pm to allow officers to share material that had been asked for.

The objectors addressed the committee, and answered questions put by the committee.

The applicant's representatives addressed the committee. At 9pm the meeting took a five-minute comfort break after which councillors asked questions of the applicant's representatives.

A supporter who lived within 100 metres of the development site addressed the meeting and responded to questions from councillors.

Councillor Humaira Ali addressed the meeting in her capacity as a ward councillor, and answered questions put by the committee.

The meeting took a five-minute comfort break at 10.07pm, which was followed by further questions put to officers by members of the committee.

Members of the committee then discussed the application.

At 10.35pm a motion was moved to exclude the public from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in paragraphs 1 - 7 of the access to information procedure rules of the constitution. The motion was seconded, put to the vote and declared carried. Following this, the meeting went into closed session until 11.15pm.

A motion to grant the application was moved, seconded put to the vote and declared lost.

Following this, a motion to refuse the application was moved, seconded, put to the vote and declared carried.

RESOLVED:

That planning application number 18/AP/4171 be refused, as its excessive height, scale and massing immediately on the boundary of and within the Bermondsey Street Conservation Area, would have an adverse impact on the Horseshoe Inn as a heritage asset, result in the loss of two existing heritage assets (Nos. 1-7 and 9 Fenning Street) and therefore have an adverse impact on the character and setting of the conservation area.

The meeting ended at 11.15pm.

CHAIR:

DATED:

Item No: 6.1/6.2	Classification: Open	Date: 26/06/2020	Meeting Name: Planning Committee
Report title: DRAFT		**Addendum report** Late observations and further information	
Ward(s) or groups affected:		London Bridge and West Bermondsey	
From:		Director of Planning	

FINAL report issued on 29/06/2020

PURPOSE

- To advise members of observations, consultation responses and further information received in respect of the following planning applications on the main agenda. These were received after the preparation of the report and the matters raised may not therefore have been taken in to account in reaching the recommendation stated.

RECOMMENDATION

- That members note and consider the late observations, consultation responses and information received in respect of each item in reaching their decision.

FACTORS FOR CONSIDERATION

Item 6.1 - 19/AP/0404 – 40-44 Bermondsey Street Vinegar Yard Warehouse 9-17 Vinegar Yard and Land Adjacent to 1-7 Snowfields SE1

1. Clarifications

It should be clarified that the total number of jobs being provided by the Development would be:

Class B1 - 1628
Class A uses – 68

As such the development would be capable of providing up to 1,696 full time jobs.

2. Late consultation responses

Following publication of the Committee Report, three additional objections have been received raising the following points:

- The development would be too tall and would be out of keeping with the area;
- The development would be contrary to policy;
- The development would have impacts on the skyline;
- There would be wind impacts;
- Overdevelopment;
- Harmful to the conservation area and heritage assets.

These points have all been dealt with in detail in the Committee Report and no new issues have been raised.

3. Updated information

Updated supplementary views and information have been uploaded to the Councils website to support the application. This includes information on views and elevations as well as a note on wind.

Item 6.2 – 18/AP/4171 - Land Bounded by St Thomas Street, Fenning Street, Vinegar Yard and Snowfields, Including Nos. 1-7 Fenning Street and No. 9 Fenning Street, London SE1 3QR.

PURPOSE

- To advise members of observations, consultation responses and further information received in respect of the following planning applications on the main agenda. These were received after the preparation of the report and the matters raised may not therefore have been taken in to account in reaching the recommendation stated.

RECOMMENDATION

- That members note and consider the late observations, consultation responses and information received in respect of each item in reaching their decision.

FACTORS FOR CONSIDERATION

1. Clarifications

It should be clarified that the number of jobs proposed by the development would be as follows:

Class B1 – Up to 1,845 full time jobs
Remaining flexible Class A uses, Class B1 and Class D2 uses – Up to 149 jobs.

The development as a whole would be able to support up to 2003 full time jobs.

2. Late consultation responses

Following publication of the Committee Report there have been a further 62 letters of support for the application and five additional objections.

The main points of support are:

- The development would provide much needed affordable workspace for artists;
- The development would be good for the borough;

- An underused site would be brought into beneficial use; and
- The development would bring jobs to the area.

- The main points of objection include:

- The development is excessive in height, scale and massing;
- The development is out of keeping/character with the area and would harm heritage assets;
- Would be in increase in noise, disturbance, pollution and traffic;
- There would be wind, ecology and daylight impacts;
- There would be a strain on local infrastructure/facilities
- The proposed represents overdevelopment;
- More open space is needed
- The development would be contrary to policy
- The proposed basements are excessive
- There would be no local benefits.

These points have been dealt with in detail in the case officer's report. Further points of objection include:

Objection - Given the likely long-term impact of Covid-19 in terms of fewer people in offices in central London, this is not the time to approve a vast office structure.
Response – Whilst offices have not been intensively used during the Covid-19 lockdown period their use is expected to pick up again and a supply of office accommodation will still be required. It may be the case going forward that more office space is needed in order to accommodate new working practices and social distancing..

Objection –The loss of the communal park is not acceptable and this should be allowed to stay instead of having a manicured garden. This space has been created and worked on by the local community and should be allowed to stay.
Response – The park on the corner of Fenning Street and Melior Street is not part of the proposed development.

3. Further Observations

A further letter setting out full support for the proposed development has been received from Network Rail. The main points of support relate to the benefits that the scheme would bring forward and are set out as follows:

Employment
Network Rail are fully supportive of the proposals intention to deliver a significant amount of high quality, modern and flexible commercial floorspace which in turn would lead to the creation of more than 2,000 jobs once the development is completed not to mention the substantial employment that would take place during construction.

Open space
The creation of high quality public open space and associated landscaping improvements are a beneficial part of the development and would create an

environment and destination where people would choose to spend time. The development would also improve pedestrian linkages and connectivity..

Design & views
The design of the development is considered to reflect the character of the surrounding area and would relate to the warehouses within the area with appropriate materials that are well reflected locally. The design of the new buildings is therefore considered appropriate in this location. The height and massing of the proposed development will complement the existing tall buildings which are situated near to the site and they have been designed to ensure there would be no detrimental impact on the local townscape and wider conservation area.

Transport
The proposed development will be car-free and office workers will be encouraged to use sustainable modes of transport to travel to work. The site is in close proximity to London Bridge station and there are dedicated cycle lanes on the surrounding road network. A car-free development will ensure there is no negative impact on existing vehicle capacity on surrounding roads and will also assist with controlling levels of air pollution in this part of London. The proposed servicing and delivery strategy intends to reduce the number of vehicle trips/deliveries generated by and associated with the development.

Local amenity
Network Rail consider that the proposals have been sensitively designed to ensure that the scheme does not negatively impact on the amenity of nearby existing residents.

Construction period
The application is supported by a Construction Management Plan (CMP) pro-forma which sets out the protection and control measures that will be put into place to manage all potential environmental risks generated through the construction phase of the development. The construction working hours, hours for deliveries and servicing and site traffic management will be agreed with Southwark Council as part of the planning determination process. Therefore, this procedure will mitigate any potential detrimental impact on surrounding residents during the construction period.

Sustainable construction
The proposed development also provides environmental benefits, including the reduction of surface water run-off and the adoption of energy saving techniques. These have the potential to result in significant carbon savings and to improve the environmental quality of the area.

Summary
In summary, Network Rail fully supports the proposed development and respectfully requests that Councillor's allow the full potential of the area to be realised by approving the planning application. The proposals would optimise the development potential of an under-utilised employment site which Southwark Council have earmarked for comprehensive redevelopment. The scheme will create a high-quality office-led mixed-use development which will provide a multitude of benefits to the local area.

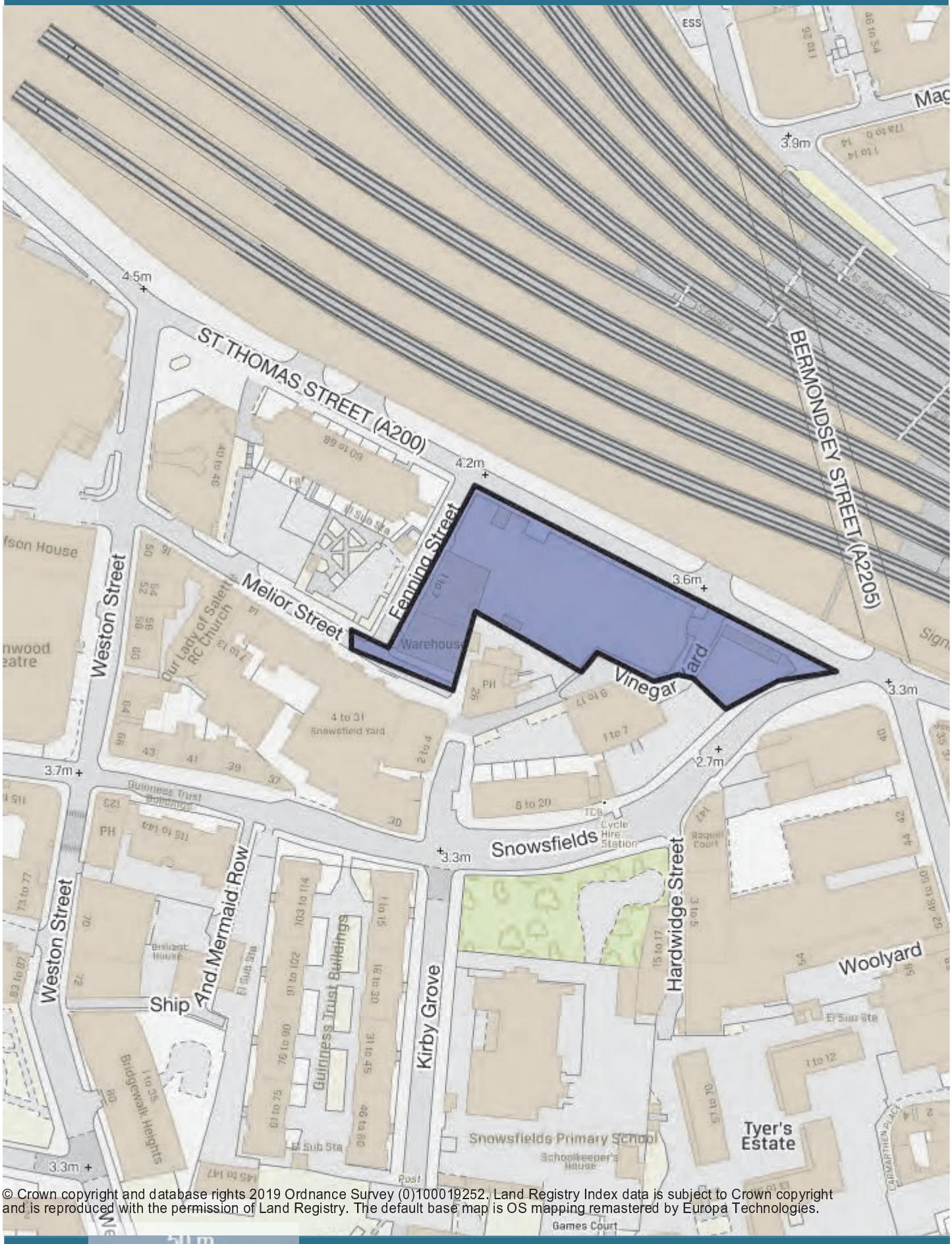
4. Updated information

Updated supplementary information has been uploaded to the Councils website to support the application. This includes information on views and elevations as well as information relating to overshadowing and microclimate.

Background Papers	Held At	Contact
Individual files	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403

Agenda Item 6.2

Land Bounded by St. Thomas Street, Fenning Street, Vinegar Yard & Snowfields including Nos. 1-7 Fenning Street & No 9 Street SE1 3QR



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8-Jun-2020

CONTENTS

Item No. 6.2	Classification: Open	Date: 29 June 2020	Meeting Name: Planning Committee
Report title:	**Development Management planning application:** Application 18/AP/4171 for: Full Planning Application **Address:** 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 **Proposal:** 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.		
Ward(s) or groups affected:	London Bridge & West Bermondsey		
From:	[redacted]		

Application Start Date 15/04/2019	**Application Expiry Date** 15/07/2019
Earliest Decision Date 17/12/2019	**PPA Date** 30/11/2020

RECOMMENDATIONS

1. That the planning committee grant planning permission 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. That in the event that the requirements of paragraph 1 above are not met by 30 November 2020, the director of planning be authorised to refuse planning permission, if appropriate, for the reasons set out under paragraph 290.

EXECUTIVE SUMMARY

5. The proposal is for a large office led mixed use development with new retail provision and a music venue/cultural space on a large development site located on St Thomas Street between Fenning Street and Snowsfields. The site itself has been largely cleared and is now in temporary use for food and drink stalls, retail units and a bar and events space, along with art installations and artist studios.

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, Becket House, 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 perimeter buildings that reinforce the street edges of Weston Street, St Thomas Street and Snowsfields and define a public garden to the rear towards Weston 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.

8. In this instance, the current planning application seeks to redevelop the site known as Vinegar Yard for the complete redevelopment of the site to provide two buildings (one up to 20 storeys in height and one up to three storeys in height) to provide new offices, retail opportunities and a new music venue/cultural space alongside a substantial new public realm and pedestrian routes that would improve both north south and east west linkages.

9. The application has been accompanied by and environmental impact assessment which has assessed the potential for the development to cause impacts on a range of environmental topics such as wind, daylight and sunlight, townscape and transport. These issues are covered in detail in the relevant sections of the report.

10. A total of 78 objections have been received in response to the proposed development. 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 along with a detailed officer response is set out in paragraphs 331-371.

Objection topic	Number of time raised
Heritage/conservation areas/local character	59
Height/scale/massing	52
Wind	34
Transport/Traffic	18
Insufficient benefits	16
Infrastructure pressures	16
Retail issues	15
Disruption during construction	15
Overshadowing of spaces	12
Overdevelopment	10
Music venue/cultural space	10
Sustainability	10
Poor design	9

Noise impacts	7
Pollution air quality	7
Affordable workspace	6
Daylight and sunlight to homes	6
Consultation issues	5
Overbearing	5
Trees and landscaping	4
Loss of privacy	2

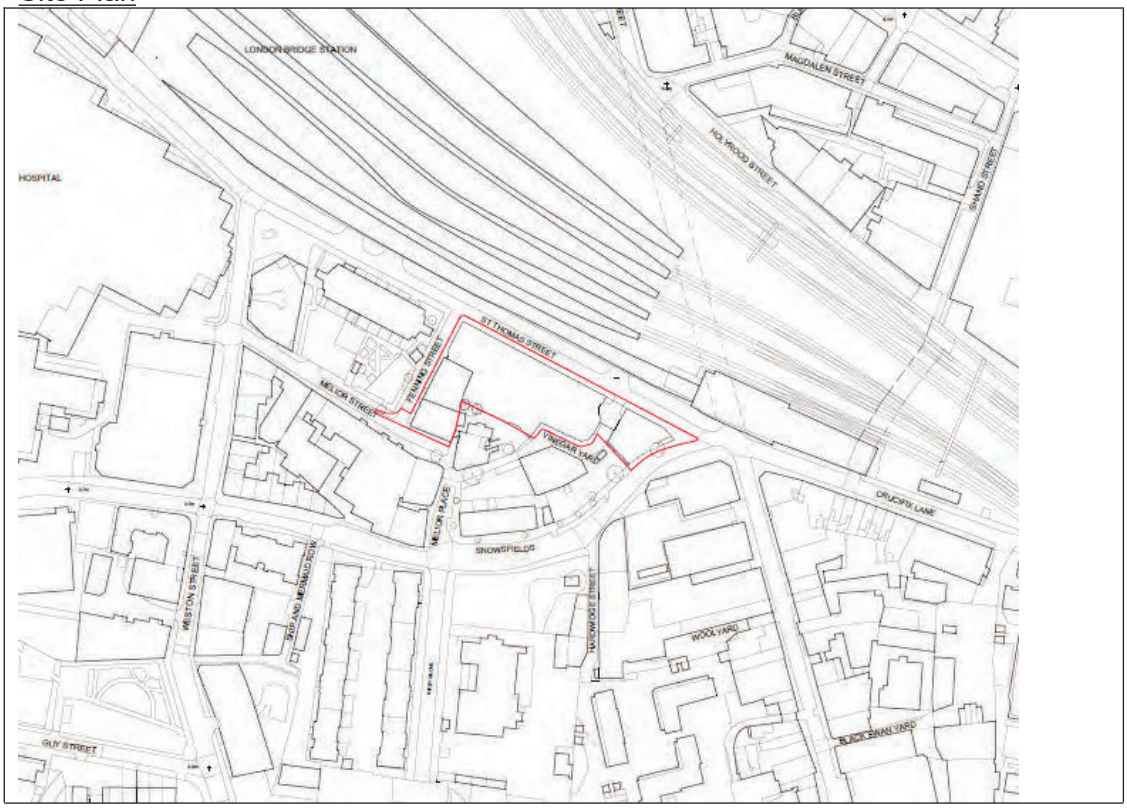
BACKGROUND INFORMATION

Site location and description

11. The application site refers to approximately 0.3 hectares of land bound by St Thomas Street, Fenning Street, Vinegar Yard and Snowsfields. The site comprises Nos. 1-7 Fenning Street and No. 9 Fenning Street which are three storey buildings to the south west corner; the rest of the site does not comprise any buildings.

12. The site has historically been in industrial and commercial uses. It has also been used as an open car park and more recently to house temporary offices and for storage related to the redevelopment of London Bridge Station. At present the site benefits from a temporary permission for food and drink stalls, retail units and a bar and events space, along with art installations and artist studios (Use Class Sui Generis). This space is known as Vinegar Yard and is facilitated through the provision of hoarding and associated alterations, as well as the use of the existing buildings on site.

Site Plan



13. The surrounding area comprises a mix of uses including office, retail and residential. There are also cultural uses within the area. Directly to the north of the site is London Bridge Station, whilst to the north west is the 310m tall London

Bridge Tower (known as the Shard). The recent redevelopment of the station includes an entrance to St Thomas Street, opposite the site, which also provides a range of commercial units within the railway arches fronting onto St Thomas Street

14. To the west of the site, across Fenning Street, is 60-68 St Thomas Street (known as Beckett House), a six storey office building used by the Home Office Border and Immigration Service. Beyond this is the York Clinic on Weston Street, a five storey building, and Guy's Hospital Tower, a 34 storey building.

15. Immediately to the south and adjacent to the existing buildings on the site is the Horseshoe Inn Public House which also comprises residential accommodation to the upper floors, and to the east of this is a large warehouse building. Residential dwellings are located along Snowsfields.

16. The southern most parts of the application site are located within the Bermondsey Street Conservation Area. The conservation area incorporates one of the existing buildings to the south west corner of the site and a portion of the land to the south, centrally within the site. Further to the west, beyond the Guy's Hospital Tower by approximately 280m, is the Borough High Street Conservation Area. The Tooley Street Conservation Area lies to the north of London Bridge Station, approximately 100m from the site. Nearby listed buildings include; the Railway Viaduct Arches on Crucifix Lane (Grade II, to the north of the site on St Thomas Street); The Shipwright Arms (Grade II listed, approximately 180m to the north-west); 55, 59-63 and 68-76 Bermondsey Street (Grade II listed, approximately 80m – 110m to the south east); Guys Hospital Main Building (Grade II*, approximately 250m to the west).

17. In terms of accessibility, the application site benefits from the highest level of public transport accessibility with a PTAL rating of 6B reflecting the proximity of London Bridge Railway Station and associated Jubilee and Northern lines of the London Underground. Bus routes are available to the north of the site on Tooley Street and west on Borough High Street.

Details of proposal

18. Planning consent is sought for the redevelopment of the site to provide new offices Class (B1); retail space (Class A1/A2/A3/A4); and a music venue/performance space Class D2/Sui Generis across two new buildings.

Proposed use	Proposed floorspace (sqm GIA)
Class B1 Office	24,120
Class A1/A2/A3/A4	650
Flexible Class A1-A4/B1	4,420
Flexible Class A1-A4/B1/D2/Sui Generis	150
Flexible Class B1/D2/Sui Generis	88
Class D2/Sui Generis	1038

19. The main building would be located on St Thomas Street and Fenning Street and would be up to 20 storeys in height. The second building, the pavilion, would be located close to the apex of the site at St Thomas Street and Snowsfields. Both buildings would be linked by three levels of basement.

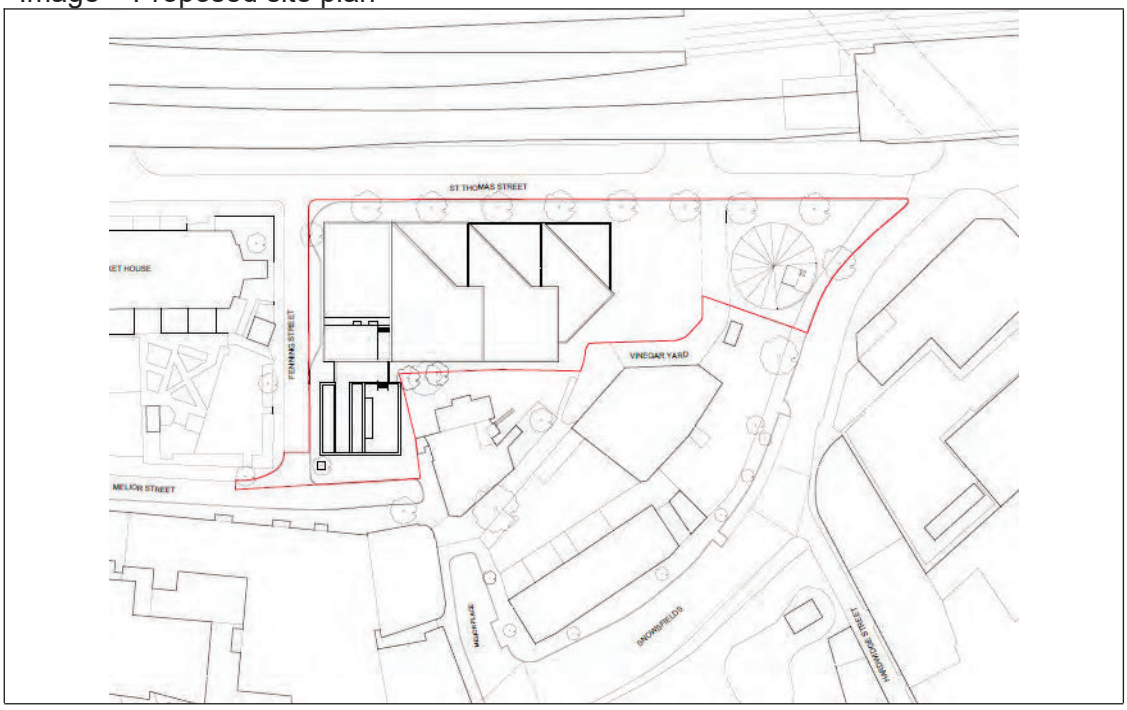
20. Basement level one, ground floor and the mezzanine level would provide a mix of retail floorspace and workspace. All proposed upper floors would provide Class B1 office floorspace. The separate pavilion building would provide access to the 200 person capacity music and performance venue on basement level two and would

provide ancillary office space within the upper floors of the pavilion itself.

21. The proposal includes public realm works and the provision of a new public plaza between the main building and pavilion, adjacent to the current Vinegar Yard access, and would provide a new east to west pedestrian route through the site.

22. Servicing would take place from the west of the site on Fenning Street where the lower levels of the building would be set back to allow for the loading bay. A total of 413 cycle storage spaces and six fold-up cycle lockers would be provided at basement level two directly accessed from Fenning Street. An additional 116 short-stay cycle storage spaces would also be provided across the application site.

Image – Proposed site plan



23. In terms of design the building would be arranged as three key elements comprising the main building, its offset core and the pavilion. The offset core would be to the south west of the site and would comprise cycle lifts, emergency access, a small retail unit and allowance ventilation to the basement plant. The tallest element would be located to the west of the site and the wider development would step down to the east. As such, external terraces would be located on levels six, 14, 15, 17 and 18 of the main building. The building would be read as four vertical strips of a range of pigments and grades of aggregates when viewed from St Thomas Street. The main material would be brick with some elements of precast. The pavilion would be circular in form and a large proportion of the ground and upper floor facades would be openable.

Planning history

24. Whilst there is no specific history for the application site that is of relevance, there is a varied and significant planning history for adjoining and nearby sites. Those that are most recent and relevant are set out below:

London Bridge Tower (Shard of Glass) (ref 01/AP/0476):

25. Redevelopment of Southwark Towers for a 306m tower for offices, hotel, residential and public viewing areas. This development is now complete.

Guys Hospital new Cancer Building (ref: 12/AP/2062 granted January 2013):

26. 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.

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):

27. 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.

147 Snowsfields (reference 20/AP/0744):

28. 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 has not yet been decided.

St Thomas Street East Framework

29. The application site forms the eastern boundary 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, Beckett House at 60 St Thomas 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 (as set out below). The site at Beckett House has been part of an ongoing pre-application enquiry. A planning application for Becket House has recently been received and is out to public consultation. The site at Capital House has a resolution to grant consent (reference 18/AP/0900) for a 39 storey building comprising new student homes and some retail/office space, having been received positively by the Planning Committee on 14 May 2019. Officers are finalising the S106 Agreement with the applicant and then it will be referred to the Mayor of London in accordance with the regulations Details of these applications are set out below:

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

30. *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.*

31. This application has been approved by the planning committee and is awaiting referral to the Mayor following negotiation of the S106 Agreement.

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

32. *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.*

33. This application has been recommended for approval.

20/AP/0944 – BECKET HOUSE, 60-68 ST THOMAS STREET, SE1

34. *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.*

35. This application has yet to be determined and is currently out to public consultation.

36. 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.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

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

- Principle of the proposed development in terms of land use;
- Environmental impact assessment;
- Design, layout, heritage assets and impact on Borough and London views;
- Landscaping and trees;
- Impact of proposed development on amenity of adjoining occupiers and surrounding area;
- Transport and highways;
- Noise and vibration;
- Energy and sustainability;
- Ecology and biodiversity;
- Air quality;
- Ground conditions and contamination;
- Water resources and flood risk;
- Archaeology;

- Wind microclimate;
- Planning obligations (S.106 undertaking or agreement);
- Mayoral and borough community infrastructure levy (CIL);
- Community involvement and engagement;
- Consultation responses, and how the application addresses the concerns raised;
- Community impact and equalities assessment;
- Human rights;
- All other relevant material planning considerations.

38. These matters are discussed in detail in the 'Assessment' section of this report.

Legal context

39. 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.

40. 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

41. The statutory development plans for the Borough comprise the London Plan 2016, Southwark Core Strategy 2011, and saved policies from The Southwark Plan (2007 - July). The National Planning Policy Framework (2019) and emerging policies constitute material considerations but are not part of the statutory development plan.

42. 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.

43. 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.

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

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

- London bridge Station, Platforms 9-16 (Brighton Side) – Grade II
- 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 Tower – Grade II.

46. The site is partially located within the Bermondsey Street Conservation Area and the Tooley Street Conservation Area is located to the north on the opposite side of London Bridge Railway Station.

47. The application site is located with 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)

48. 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.

49. 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

London Plan 2016

50. Policy 2.5 Sub-regions
Policy 2.10 Central Activities Zone – Strategic priorities
Policy 2.11 Central Activities Zone – Strategic functions
Policy 2.13 Opportunity Areas and intensification areas
Policy 2.15 Town Centres
Policy 3.1 Ensuring equal life chances for all
Policy 4.1 Developing London's economy
Policy 4.2 Offices
Policy 4.3 Mixed use development and offices
Policy 4.7 Retail and town centre development
Policy 4.12 Improving opportunities for all
Policy 5.1 Climate change mitigation
Policy 5.2 Minimising carbon dioxide emissions
Policy 5.3 Sustainable design and construction

Policy 5.5 Decentralised energy networks

Policy 5.6 Decentralised energy in development proposals

Policy 5.7 Renewable energy

Policy 5.9 Overheating and cooling

Policy 5.10 Urban greening

Policy 5.11 Green roofs and development site environs

Policy 5.12 Flood risk management

Policy 5.13 Sustainable drainage

Policy 5.15 Water use and supplies

Policy 5.16 Waste net self-sufficiency

Policy 5.17 Waste capacity

Policy 5.18 Construction, excavation and demolition waste

Policy 5.21 Contaminated land

Policy 6.1 Strategic approach (Transport)

Policy 6.2 Providing public transport capacity and safeguarding land for transport

Policy 6.3 Assessing effects of development on transport capacity

Policy 6.5 Funding Crossrail

Policy 6.6 Aviation

Policy 6.9 Cycling

Policy 6.10 Walking

Policy 6.11 Smoothing traffic flow and tackling congestion

Policy 6.12 Road network capacity

Policy 6.13 Parking

Policy 7.1 Building London's neighbourhoods and communities

Policy 7.2 An inclusive environment

Policy 7.3 Secured by design

Policy 7.4 Local character

Policy 7.5 Public realm

Policy 7.6 Architecture

Policy 7.7 Location and design of tall and large buildings

Policy 7.8 Heritage assets and archaeology

Policy 7.10 World heritage sites

Policy 7.11 London View Management Framework

Policy 7.12 Implementing the London View Management Framework

Policy 7.14 Improving air quality

Policy 7.15 Reducing noise and enhancing soundscapes

Policy 7.21 Trees and woodlands

Policy 8.2 Planning obligations

Policy 8.3 Community infrastructure levy

The Core Strategy 2011

51. 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)

52. 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

53. 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

54. 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

Draft New London Plan

55. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2 March 2018. Following an Examination in Public, the Mayor then issued the Intend to Publish London Plan, which was published in December 2019.

56. The Secretary of State responded to the Mayor in March 2020 where he expressed concerns about the Plan and has used his powers to direct changes to the London Plan. The London Plan cannot be adopted until these changes have been made.

57. The draft New London Plan is at an advanced stage. Policies contained in the Intend to Publish (ItP) London Plan published in December 2019 that are not subject to a direction by the Secretary of State carry significant weight. 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 following policies are relevant to this proposal:

58. 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
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
E10: Visitor infrastructure
E11: Skills and opportunities for all
HC1: Heritage conservation and growth
G1: Green infrastructure
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.

New Southwark Plan (NSP)

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

60. These documents and the New Southwark Plan Submission Version (Proposed Modifications for Examination) were submitted to the Secretary of State in January 2020 for Local Plan Examination. The New Southwark Plan Submission Version (Proposed Modifications for Examination) is the council's current expression of the

New Southwark Plan and responds to consultation on the NSP Proposed Submission Version.

61. In April 2020 the Planning Inspectorate provided their initial comments to the New Southwark Plan Submission Version. It was recommended that a further round of consultation take place in order to support the soundness of the Plan. Consultation is due to take place on this version of the NSP between June and August 2020. The final updated version of the plan will then be considered at the Examination in Public (EiP).

62. It is anticipated that the plan will be adopted in late 2020 following the EiP. As the NSP is not yet adopted policy, it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.

Assessment

Principle of the proposed development in terms of land use

Introduction

63. This would be an office led redevelopment scheme that would create a significant uplift in Class B1 office space in addition to retail opportunities at street level and provision of a music venue/performance space. The development would result in the creation active frontages and animation where there are currently inactive or dead frontages.

Policy background

64. 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 to deliver homes.

65. 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

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

67. 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 New London Plan which sets a target of 5,500 new jobs.

68. 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

69. The site is located within the CAZ which covers a number of central boroughs and is London's geographic, economic, and administrative core. 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.

70. In addition, part of the site is within the London Bridge District Town Centre. Saved policy 1.7 of the Southwark Plan states that within the 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

71. The application site lies within the Bankside, Borough 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 the do not unacceptably compromise the character of an area. The policy states that management plans will be required for these uses in order to mitigate and manage impacts on local amenity.

Draft New Southwark Plan Site location NSP51

72. 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 and formal adoption is set to take place in late 2020 and as such the policies currently have limited weight. The site is listed as an allocated site under the New Southwark Plan. The site allocation (NSP51) sets out that development 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; provide a new north-south green link from Melior Place to St Thomas Street; 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; and provide new open space of at least 15% of the site area. NSP51 also states that the development 'should' provide housing as opposed to it being a mandatory requirement under 'must'.

<u>Conclusion on policy designations</u>

73. The principle of a large scale development containing a mix of uses including Class B1 office space, retail use and a music venue would support the role and functioning of the Central Activities Zone; the London Bridge District Town Centre; and the Bankside, Borough and London Bridge Strategic Cultural Area as well as being consistent with the policies for the Opportunity Area. The acceptability of each use will be considered below:

Offices

74. 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 simply identifies office use as an appropriate land use in the CAZ and notes that there is capacity for 25,000 jobs in the Opportunity Area. This is further supported by the Mayoral Supplementary Planning Guidance – Central Activities Zone (2016).

75. 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.

76. 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 with the following exceptions:

- The applicant can demonstrate that convincing efforts to dispose of the premises, either for continued B Class use, or for mixed uses involving B Class, including redevelopment, over a period of 24 months, have been unsuccessful; or
- the site or buildings would be unsuitable for re-use or redevelopment for B Class use or mixed use, having regard to physical or environmental constraints; or
- The site is located within a town or local centre, whereby suitable Class A or other town centre uses will be permitted in the place of Class B uses.

77. The site was previously in use as temporary offices for the London Bridge Station redevelopment. The remaining buildings on site at Nos. 1-7 and 9 Fenning Street provide approximately 848sqm of Class B1 floorspace. The proposed development would provide a minimum of total of 24,120sqm of Class B1 floorspace resulting in an uplift of 23,272sqm which meets the policy objectives of protecting employment floorspace and is welcomed as a significant benefit of the scheme. The provision of this Class B1 floorspace could provide up to 1,508 jobs which is a significant uplift on the current employment provision on site 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

78. The development would include new retail units (A1/A2/A3/A4) at ground floor level of all buildings. In total, 5,220sqm (GIA) of retail floorspace is proposed.

79. The provision of new town centre uses such as retail is supported by saved Southwark Plan Policy 1.7 since the site lies partially in a town centre. The retail use would activate the ground floor of the development, particularly on St Thomas Street which is a main route to London Bridge Station. The retail units would serve the existing population as well as providing for new employees as part of the proposed development. The retail units and the associated active frontages would contribute to the vitality and viability of the London Bridge Town Centre. The current use of the site is temporary and whilst pleasant it is hidden behind large hoardings and offers no activity or animation to the street. The proposed development would be a significant improvement and would create a much more

attractive and vibrant street environment with retail opening out onto streets as well as the newly formed public space adjacent to the Vinegar Yard Warehouse and the Pavilion. The amount and type of retail provision is considered to be acceptable and would help to meet the needs of residents, workers and visitors in the area.

80. In order to protect the amenities of the area and to provide a mix of retail units it is suggested that a cap be placed on the amount of floorspace that could be used for Class A4 (drinking establishments). A condition would be attached to this effect.

Music Venue

81. The development has made provision for a small music venue/performance space within the pavilion and basement levels two and three. The music venue would be small and intimate with a capacity for 200 people. As no operator has been found at this stage, due to the development being at planning stage only, a flexible use of Sui Generis/Class D2 has been applied for. Under Class D2, the space could be used as a cinema, bingo hall or gym in addition to a music venue. As such it is recommended that a condition be imposed to secure the specific use and restrict those that would not be suitable. Given the small size of the D2 space and its location at basement levels two and three, it is considered that the inclusion of this space would not significantly alter the local character of the area and as such would comply with saved policy 1.11 as well as meet the requirements for development within the Strategic Cultural Area.

Conclusions on land use

82. The proposal involves the provision of high quality office floorspace alongside a range of acceptable town centre, cultural and retail uses. New office space is welcomed and is supported by policy. The provision of new high quality offices is considered to be a benefit of the scheme and will improve employment opportunities within the Central Activities Zone and Opportunity Area. The proposed development includes a mix of uses that are considered to be appropriate for the site's location within the CAZ, Opportunity Area, Strategic Cultural Area and district town centre.

Affordable workspace

83. Draft 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.

84. Draft 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.

85. Emerging Policy P30 of the New Southwark Plan deals with affordable workspace. Criterion 2 of the policy requires Major 'B Use Class' development proposals to deliver at least 10% of the floorspace as affordable workspace on site at a discounted market rent for a period of at least 30 years. The policy recognises that

there are many different forms that such space could take depending on the site location, characteristics and existing/proposed uses on site. Only where on-site provision would be impracticable are developers permitted to make an in lieu payment

86. Taking into account the requirements of emerging policy P30, the proposed development would need to provide at least 10% of the Class B1 floorspace as an affordable workspace. This would equate to 2,412sqm affordable workspace. The current offer is to provide 1,242qm of affordable workspace which would equate to 5.15%. The applicant proposes to make up the balance of the affordable workspace requirement by way of an in lieu payment. The on-site affordable workspace would be located at basement level one and at present the applicant is in talks with Southwark Studios to operate the space.

87. Whilst office space is traditionally provided on upper levels, the needs and requirements of Southwark Studios and their prospective tenants are such that the proposed space at basement level one is attractive and would meet the needs of the artists and makers who would occupy the space. Another benefit of the space being provided in the basement is that the discount over the market rent is more substantial than it would be on the upper levels of the building and as such the space would be offered to Southwark Studios at a 60% reduction on market rent levels.

The remaining 4.85% affordable workspace requirement that would be outstanding would be satisfied by an in lieu payment of £3,638,959 which has been determined in line with the council's calculations and is considered acceptable.

88. In order to ensure the space is attractive to potential occupiers, conditions will be imposed requiring the affordable workspace to be fitted out to a minimum specification and for the common facilities (such as the bike store, showers and lifts) to remain accessible to staff throughout the lifetime of the affordable workspace unit.

89. 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 a discount of 25% on the market rent level;
- 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;
- the rates and service charges payable by the tenant will be capped, and;
- a rent-free period is offered to incentivise uptake.

Environmental impact assessment

90. 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.

91. 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.

92. 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

93. The EIA Regulations require the ES to provide information on the alternative options considered by the applicant. The 'Do Nothing' alternative would leave the application site in its current state. 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 undeveloped and would not bring forward the various benefits associated with development such as improved pedestrian connections, improved public realm and employment opportunities.

94. The ES details that no alternative sites were sought for the development as the site represents a sustainable, brownfield site recently cleared of the temporary office accommodation for Network Rail associated with the London bridge Station redevelopment.

95. The ES also describes the design evolution of the scheme which was led by an evaluated according to the following key points:

- London View Management Framework viewing corridors;
- Scale and relationship to existing buildings; and
- Enhancement of St Thomas Street and surrounding streets.

96. Various iterations of the design were worked on that sought to respond to the key points set out above as well as environmental factors including townscape; wind microclimate; daylight and sunlight; impacts on views; and air quality. As such, the current version of the scheme that forms this application has been informed by testing various options and having full regard to the constraints and opportunities presented by the site as well as potential impacts.

97. Officers are satisfied that the ES prepared by Trium has investigated alternatives for the site and that the proposed development maximises the development potential of the site whilst seeking to minimise environmental impacts. The site occupies a prominent central London location in the Bankside, Borough and London Bridge Opportunity Area. To not develop the site would lead to a missed opportunity to secure a high quality scheme and the provision of significant employment opportunities and other benefits.

Cumulative impacts

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

Conclusions on the EIA

99. 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

100. The NPPF at Paragraph 124 stresses the importance of good design, considering it to be a key aspect of sustainable development. Chapter 7 of the London Plan deals with design related matters. In particular, Policy 7.1 sets out the design principles required for new development and Policy 7.6 requires architecture to make a positive contribution to the public realm, streetscape and cityscape. Policy 7.8 asserts that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail.

101. 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

102. The application site is in a prominent location to the south of St Thomas Street and London Bridge Station, running between Fenning Street to the west and Snowsfields to the east. The 0.3 ha site comprises mostly brownfield land with the exception of two small industrial units that sit at the junction of Fenning Street with Melior Street to the southwest. Previously used for off-street parking and until recently by Network Rail for site offices and a construction yard, the land is presently the venue for a pop-up retail and street food market, which is housed in a mix of timber sheds and adapted shipping containers. It also includes several temporary artist studios and art installations, most notably the raised train carriage and giant red ants. The venue is enclosed by hoarding, with two entrances located at either end onto St Thomas Street. The south-western portion of the site is within the Bermondsey Street conservation area and includes one of the two industrial units (9 Fenning Street), although neither of the buildings are statutory listed.

103. The site sits within a varied context of the grade II listed railway arches on St Thomas Street and Crucifix Lane opposite; the 1970s, 7 and 10-storey office buildings of Becket House (60-89 St Thomas St) and 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 and east. Its immediate neighbours are the former leather warehouse at 1-7 Snowsfields and the Horseshoe Inn Public House (26 Melior Street) that with the application building (9 Fenning Street) form the northeast part of the Bermondsey Street 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 Conservation Area and Tower Bridge Conservation Area are located some 400m to the west and north-east respectively.

Image – Pavilion

104. 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.

105. 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, Becket House 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.

106. Briefly, the framework envisages a series of perimeter buildings that reinforce the street edges of Weston Street, St Thomas Street and Snowsfields, and define a public garden to the rear towards Weston 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.

Image – St Thomas Street elevation

107. The planning application scheme is for the clearance of the site, including the demolition of the two remaining buildings; the excavation of three basement storeys across the full site; the construction of a new tall building that steps from seven to 20-storeys at its highest point (86.7 AOD) and a new pavilion building of three storeys above grade (11.6 AOD); and the re-landscaping of the intervening space as a public plaza. The tall building provides mainly flexible offices, but includes an indoor retail, food and beverage market with commercial workshops (including affordable workspace) over basement, ground and mezzanine levels. The retail basement links through to the pavilion building, which provides a music venue with some further retail at ground and offices at first floor levels.

Site layout

The proposed site layout and building footprints are simple and well-conceived both in presenting an engaging built form, but also in organising the intervening public realm. The large-scale building is laid out in generally an 'L'- shaped form that is set in from the site's edge at its northeast corner at the junction of St Thomas Street and Fenning Street, and runs parallel with both streets. The built form is broken over ground and mezzanine floor levels midway along Fenning Street, creating an arched passageway. The much smaller building is set out as a free-standing 'pavilion' building at the eastern end of the site, towards the junction of St Thomas Street and Snowsfields. It has a circular footprint.

108. Overall, the layout is highly permeable and legible, offering a choice of routes that look and feel public, and that benefit from good informal surveillance, and is

supported on urban design grounds. The 'L' shaped block strongly defines Fenning Street and particularly St Thomas Street, where an active street frontage works in tandem with the re-purposed railway arches opposite to create an engaging street form. The arched entrance on Fenning Street offers an inviting and potentially characterful pedestrian through-route that, subject to the architectural treatment (see later), connects the public garden space of the neighbouring Becket House site through to Vinegar Yard, Snowsfields and eventually Bermondsey Street beyond.

109. The multiple entrances on all sides of the main building bring a rhythm and perforate design to the ground floor that optimises the activation of the adjoining public realm, as well as offering visual and physical connections between St Thomas Street and the new central pedestrian route, which is welcome. The circular footprint of the smaller building cleverly works to announce the street corner, but also helps to define the intervening public plaza and to open up the site, providing pedestrian routes that criss-cross the land. It too has a glazed, open character that encourages good activation.

110. The positioning of additional office entrance lobbies and a cafe onto Melior Street is notable for helping to spread activity to all corners of the site and activating the adjacent public realm. This will benefit interest and public safety, albeit it will bring a distinct change to the character of this intimate, backstreet space outside the Horseshoe Inn, which becomes widened at this point. However, the sense of scale of the space could be partly addressed by further tree planting.

Built form and scale

111. Looking at the main building, whilst its footprint may well have a relatively simple 'L' shaped footprint, the massing is not a simple extrusion upwards. The architecture is more complex, designed to offer a transition between the more monolithic, large scale buildings of London Bridge and the finer grained buildings of Snowsfields and Bermondsey Street. Above the retail base, the main body of the building is articulated to read as several volumes, each expressed by varying their height profiles and by rotating the end element and penthouse floorplans. The effect is then reinforced by varying their elevational treatments (see below) to suggest a terraced group of discrete buildings. When seen from St Thomas Street the volumes cascade in height from 20 storeys (including plant) to 18, 16 and 6 storeys, stepping down towards the new pavilion building and neighbouring warehouse (1-7 Vinegar Yard).

112. Overall, the massing diagram is well-conceived, maximising the floorspace provision, whilst bringing a seemingly finer grain. The articulated form is reinforced by the elevational designs to suggest a series of tall and mid-rise, slender volumes that help to handle the transition of scales. The outcome is effective in alleviating the height and massing of the new building, but also in providing an engaging roofscape and in easing how the large building fits within its context. The composite volumes bring rhythm and visual interest to the street, easing their three-dimensional impact. Despite the overall height, the massing cascades to a more comfortable, human scale around the new plaza that sits comfortably with the new pavilion and neighbouring warehouse and Horseshoe Inn. Importantly, the articulated massing is effective and engaging in-the-round.

113. The uppermost floors of the intermediate elements are recessed at an angle behind the front (St Thomas Street) parapets, but are expressed in full on the 'rear' elevation, where the profiled massing steps from 19 storeys (service core) to 17 storeys, but with a 14-storey end element that is rotated 45 degrees and is presented corner-on towards the new plaza. The outcome of canting back the

uppermost floors and rotating the end element is to present a number of different and distinctly cascading profiles, depending on where you view the development from. The articulation is particularly evident, when viewed from the east (see Views 16 and 17).

Image – Materials

114. From the west, the massing is articulated as two 20-storey volumes that separate the offices and access core into two visual discrete elements, connected by a recessed bridging link (see Views 22 and 23). The two slender 'towers' are similar in height, albeit the main office element is expressed as being slightly taller with its extended roof parapet.

115. Regarding the pavilion building, it has a rotund built form that is modestly scaled, comprising a circular footprint that is 15m in diameter and over three well-proportioned storeys that reach an apex height of 13m above grade. Its massing is in distinct contrast to the accompanying office building and serves as a strong counterpoint to the tall building.

116. As a free-standing structure, the pavilion will be overtly legible within the local townscape and should function well to express the building's more civic use as an events space and performance venue. The rotund form has a soft, engaging profile that recedes and opens up views on either side of the public realm beyond. The unusual built form is distinctive and memorable. Its height is not dissimilar to the

neighbouring warehouse and railway viaducts on either side, and as such its scale helps to integrate the development into the local context. Overall, the building has the potential to become a local landmark, enhancing a sense of place and helping people to navigate through the area.

Architectural treatment

117. The detailed architecture of the main building complements its massing strategy, working together to reinforce the composite built form. This is supplemented by introducing an elevational hierarchy of expressing a base, middle and top to the building that likewise eases its apparent scale. The base reads for the most part as a double-height glazed volume set in from the outer columns that support the main mass of the building above, rising to a triple-height space for the tallest, 20 storey corner element. The base is proportional in height. The elevations are articulated to read as a series of vertical elements rather than a single mass, easing the building's broad bulk. The built form is read as several tall, slender buildings, with the sequence of stepped heights adding to the effect. The top(s) of the building is denoted by a slight exaggeration of the final storey height and the integral use of plant screening. The understated manner of the designs has a simple, contemporary elegance.

Image - Public realm

118. The elevations of each of the volumes maintain the same underlying architectural grid, lending a visual coherency, albeit the rhythm and proportional emphasis of the openings change for each component 'building', with the effect reinforced by different masonry colours and fenestration details. The overall facade design is well-mannered and engaging. Moreover, it has a character and tone redolent of traditional warehouse architecture with its expressed brick framework, deep-set reveals and dark metalwork window frames. The use of light and shade, texture and tone bring a warmth and visual richness that is engaging. The designs should make for an attractive, robust, compositional quality and an architecture that works with its context. The service tower sits in contrast, detailed as a visually transparent off-set core with its curtain wall glazing and glazed lift cars. Although more corporate in character, its appearance is distinct from the main building and legible as a slender,

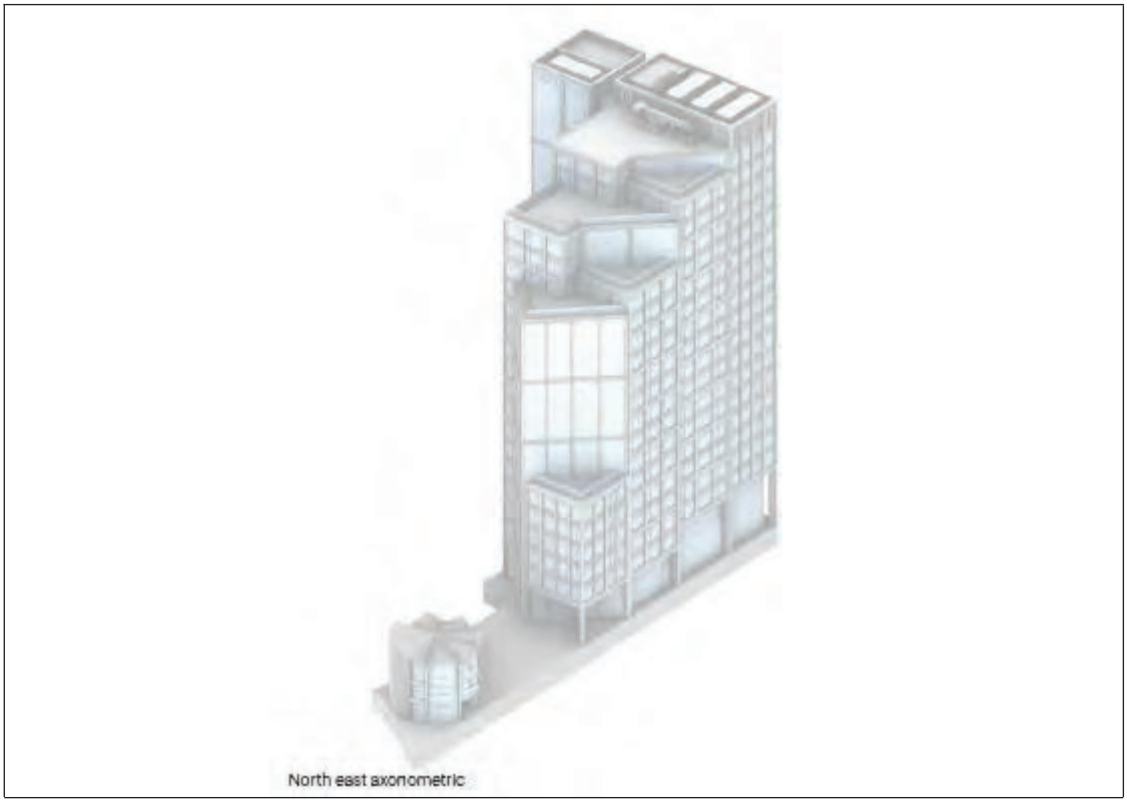
modern ‘building’ and office entrance in the townscape. The quality of all finishes, including the brickwork, precast, metalwork and glazing is critical to the design and should be reserved by conditions that include the requirement of robust masonry (no brick-slips).

119. Regarding the pavilion, the architecture takes its design cue from a traditional bandstand, with its circular footprint and slender vertical structure, topped by an undulating, geometric roof. The structure comprises reinforced in-situ concrete and glazing with dark metal frames, and is designed to be transparent. The large glazed facades undulate in plan for visual interest and include wide sections of bi-fold doors that create a permeable ground floor and Juliette balconies at first floor level overlooking the new plaza. The few solid sections of concrete wall have vertical ribbing to add texture and visual interest; whilst the roof and expressed floor slabs also comprise in-situ concrete that give a seamless quality. The detailed architecture supports its functional and landmark qualities; albeit the material colour and finish require further careful consideration (particularly at roof level) if the building is not to appear too sterile or monotone. Subject to conditions confirming the materials and final detailing (including bay details), the architecture of the pavilion building is welcome.

Tall buildings

120. The main building would be significantly taller than its immediate surroundings to the south and east, which is generally between 12 to 20m in height, although the contextual scale rises considerably towards Guy’s Hospital. It is located within the CAZ and the BBLB 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:

Image – Scale



Positive contribution to the landscape

121. The development provides a number of significant extensions to the public realm; most notably the new plaza within the southern half of the site. This provides welcome hard-landscaped public space, but also the opportunity for new public routes that criss-cross the site, including the new east-west pedestrian route. Elsewhere, the development sets back the tall building onto St Thomas Road, allowing the provision of a generous new tree-lined pavement; whilst the setback onto Melior Street provides a new forecourt that doubles as an extended public space outside the Horseshoe Inn. Overall, the landscape contribution is commensurate with the scale of development.

Point of landmark significance

122. The application site sits at the point of convergence of St Thomas Street, Crucifix Lane, Bermondsey Street and Snowsfields immediately to the south of London Bridge Station, one of London's major transport interchanges. As such the application site is considered to be a point of landmark significance.

Image – View along St Thomas Street

Highest architectural standard

123. The building has been designed in two parts: the indoor marketplace at its base, and the general offices above. Each part of the building is well-designed in terms of their individual functional qualities, but also in working together to support a well-activated and seemingly 'public' building.

124. The perforate ground floor and extensive glazing draw visitors into the main building, where the escalators leading to the retail at basement and mezzanine levels are obvious, as is the onward connection through the building to the adjacent street. Those working or visiting the offices add to the 'crowd', before passing upwards beyond the mezzanine to the main office foyer at first floor level. An alternative lift-access is provided within the dedicated service core, with its own entrance onto Melior Street. The ground and mezzanine floors are tall and mainly column-free, providing flexible and adaptable spaces. The offices above have decent ceiling heights (2.75m clear) and benefit from the amenity of several large roof terraces created by the building's stepped form, with the chamfering of the uppermost floors sheltering the outdoor spaces against the predominant southwesterly wind.

125. Regarding the main architecture, as set out earlier, the designs are well conceived and executed. The detailed massing and façade treatments work well together to articulate a composite built form, reminiscent of terraced warehouses. The architecture brings a rhythm and visual interest to the adjoining public realm; a variety and clever transition of scale across the development; and a familiarity that supports the local context. Overall, the architecture is effective and engaging. However, much will depend on the final materials and detailing, and therefore the highest quality should be ensured by conditions.

Relates well to its surroundings

126. The tall building relates well to its immediate surroundings both in terms of the building's base and its general design. The double-height base has a public focus that is evident, drawing people into the building with its sense of openness and permeability, and the seamless flow of paving that continues from the street into the building itself. The scale and the robust quality of the outer brick columns relate well to the railway arches opposite, bringing a coherent appearance to the street.

127. Part of its contextual relationship is the detailing and material finishes of the building itself, with its elevational architecture picking up on the character and tones of Bermondsey's historic warehouse building stock, which should help it to sit comfortably in the street scene regardless of its height.

Positive contribution to the London skyline

128. 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 generally positive. It mediates reasonably well the distinct change in scale from the taller context of Guy's Tower and the Shard beyond, down to the finer grain of Bermondsey Village. Its articulated built form and slender warehouse-style design is engaging and brings a distinctive and pleasingly understated appearance to the skyline.

129. Overall, the development's designs sufficiently meet the policy criteria for a new tall building. However, a significant outcome of a tall building is its visibility and whilst this is not harmful in itself, the potential effects on the 'receptor' townscape and heritage assets should be considered.

Heritage and townscape

130. 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 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 pay special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Chapter 16 of the NPPF contains national policy on the conservation of the historic environment. It explains that great weight should be given to the conservation of heritage assets. The more important the asset, the greater the weight should be (paragraph 193). Any harm to, or loss of significance of a designated heritage asset should require clear and convincing justification (paragraph 194). Pursuant to paragraph 195, where a proposed development would lead to substantial harm or total loss of significance of a designated heritage asset, permission should be refused unless certain specified criteria are met. Paragraph 196 explains that where a development would give rise to less than substantial harm to a designated heritage asset, the harm should be weighed against the public benefits of the scheme. Paragraph 197 deals with non-designated heritage assets and explains that the effect of development on such assets should be taking into account, and a balanced judgment should be formed having regard to the scale of any harm or loss and the significance of the asset. Working through the relevant paragraphs of the NPPF will ensure that a decision-maker has complied with its statutory duty in relation to Conservation Areas and Listed Buildings.

131. The submission includes a townscape visual impact assessment that provides 25 verified images of the development (including two night-time images) when viewed from 25 locations in and around the Bermondsey and London Bridge area; and a

further 18 modelled views that includes the relevant protected London panoramas.

132. 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 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 impacts on the settings of designated heritage assets and on the townscape. Looking at the categories of views and townscape in turn:

Protected views

133. 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 have no impact upon the protected view of St Paul's and little discernible impact upon the protected London panoramas in general. Similarly, the development has no or little discernible impact upon the additional views within Southwark that are protected by policies in the borough's development plan.

134. The tall building is visible in the views from Alexandra Palace (view A1), Primrose Hill (view A4), Greenwich Park (view A5) and Blackheath Point (view A6); but does not break the skyline and is seen within a cluster or backdrop of similar scaled or taller buildings that include Guys Tower and the Shard. Importantly, it is positioned sufficiently away from the cathedral not to have an effect. In the view from Parliament Hill (view A2) the development is fully obscured from view; and whilst it can be seen as relatively close to the cathedral in the view from Kenwood (view A3) it is nonetheless separated by and partly obscured by the Shard, and has comparatively little impact.

135. Looking at the river prospects, from upstream the development cannot be seen in the view from Tower Bridge (view A7), being obscured by the context of More London; whilst downstream the situation is the same, with the proposed tall building not visible from Southwark Bridge (view A8), being obscured from view by the News Building (3 London Bridge Street) and by the Shard.

136. In a similar way, the development has no or little discernible impact upon the additional views protected by policies within the Southwark Plan. The tall building is remote from and not visible in the key-hole view towards St Paul's from Nunhead Cemetery (view A7); and whilst it can be seen in the panoramic view from One Tree Hill (view 8), it is again remote from St Paul's and is read as part of a loose cluster of tall buildings near the Shard that remains below the ridge line of the hills in North London.

<u>Impacts on the World Heritage Site</u>

137. 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.

138. Looking in detail, the development will not be seen when standing close to the site of the scaffold. As illustrated in the view southwards across Tower Green the attractive roof profile of the Queen's House remains unaffected (view 1); the

development being obscured by the Tudor building itself. Further back, however, from the courtyard between the White Tower and Waterloo Barracks, the stepped elements of the development's uppermost three floors become discernible above the roof of the Queen's House towards its eastern end (view 2). In this more oblique and middle distance view several incursions appear on the roofline, most notably Guy's Tower and the Shard, albeit the latter is itself of landmark quality. This glimpsed view of the development remains a low incursion that will become lost in tree cover during the summer months. It adds to the cumulative effect during wintertime, although the new incursion is minor and more neutral than harmful in its effect.

139. The final two floors of the building are also glimpsed above the ramparts to the right of Lanthorne Tower when looking southwards across the gardens of the innermost ward (view 3). The incursion is small in scale and continues the run of low-rise incursions created by the More London buildings along this stretch of wall and that appear secondary in their impact compared to Guy's Tower. The new incursion is minor and neutral.

140. Standing on the ramparts of the Inner Curtain Wall (view 4), the stepped outline of the building's uppermost floors will be visible above the buildings of More London when looking southwards across the River Thames. The development will be read as part of the wider panorama of modern, large-scale buildings along the London Bridge and Bankside areas. Importantly, it will not detract from the immediate view of the Traitor's Gate in the foreground, preserving its setting.

141. The submission includes three views from nearby to the Tower of London that look towards the development and illustrate the setting of the World Heritage Site. From the raised view outside Tower Hill station, the proposed development is in line with the Middle Tower on the outer edge of the grass moat. Whilst the new building is largely obscured by foreground buildings, its uppermost articulated floors are visible above the More London buildings that form the backdrop to this setting. This detracts from the ordered appearance of the backdrop, albeit the impact on the skyline is minor and does little to draw attention, particularly compared to the Shard, which imposes to the right of the view. It will, however, become more apparent as part of the cumulative impact of the framework schemes, with the proposed replacement Capital House, Becket House and Vinegar Yard schemes designed to be seen stepping down in height eastwards. The outcome alters the setting of this outer part of the World Heritage Site, albeit the backdrop remains that of a modern context with its cluster of tall buildings around London Bridge and the Shard acting as the focal point. The cumulative harm, if any, is modest.

142. Looking from the Royal Mint towards the Tower (view 6), the proposed tall building is obscured from view by the former hospital building within the Tower of London complex and therefore has no effect upon the setting. Similarly, from Tower Gateway (view 7), the proposed building is obscured from view by the Jewel Tower and adjoining Waterloo Barracks and has no effect on the setting.

143. For the most part the development cannot be seen from within the Tower of London. Where it does become visible, its impact is modest and within the lesser sensitive parts of the World Heritage Site. Similarly, it has a modest impact on the wider setting of the Tower, where it is generally read as part of the backdrop of tall buildings that cluster around the London Bridge area. It is notable that 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

144. 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 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 pay special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Chapter 16 of the NPPF contains national policy on the conservation of the historic environment. It explains that great weight should be given to the conservation of heritage assets. The more important the asset, the greater the weight should be (paragraph 193). Any harm to, or loss of significance of a designated heritage asset should require clear and convincing justification (paragraph 194). Pursuant to paragraph 195, where a proposed development would lead to substantial harm or total loss of significance of a designated heritage asset, permission should be refused unless certain specified criteria are met. Paragraph 196 explains that where a development would give rise to less than substantial harm to a designated heritage asset, the harm should be weighed against the public benefits of the scheme. Paragraph 197 deals with non-designated heritage assets and explains that the effect of development on such assets should be taking into account, and a balanced judgment should be formed having regard to the scale of any harm or loss and the significance of the asset. Working through the relevant paragraphs of the NPPF will ensure that a decision-maker has complied with its statutory duty in relation to Conservation Areas and Listed Buildings.

Significance

145. Part of the application site is within the Bermondsey Street conservation area, which has the grade II* listed Church of St Mary Magdalen and village-like high street as its focus, but spurs both eastwards and westwards; the latter spur extending to include the 2-storey, pre-1916 warehouse at 9 Fenning Street. 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.

146. The special interest is the area's historic development of tightly packed 18th century housing, many with shops, and late nineteenth / early twentieth 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. All but cut-off from the riverside by the construction of London Bridge station in the 1830s, the area has evolved as a quiet hinterland that is distinctly different in purpose, scale and character from the wharves, warehouses, institutions and commerce of the nearby Tooley Street and Tower Bridge conservation areas. As the CAA records, this clear change in character has prevailed and is made evident by the close proximity to the hub of activity and large developments associated with Guy's Hospital and the London Bridge area.

147. The proposed scheme affects the Bermondsey Conservation Area in two ways: the demolition of 9 Fenning Street within the conservation area; and the impact of the new development on the setting of the conservation area. It has a neutral impact on the area's listed buildings.

148. Looking at the demolition, the warehouse is identified within the Conservation Area Appraisal (CAA) as making a positive contribution to the local conservation area. The building is altered and in need of refurbishment, but fits with the character of the area and forms part of a group of buildings that defines an intimate space

around the Horseshoe Inn, which is identified within the CAA as a local landmark building. The pub will remain the focal point when viewed along Melior Street and arguably its presence is enhanced by pulling back the replacement building line and increasing its visibility and forecourt area. The loss of the existing warehouse building, would cause less than substantial harm to the heritage asset as a whole and would be offset by the various benefits of bringing the proposed scheme forward, including the provision of new routes and a substantial public realm in addition to opening up views of the Horseshoe Inn along Melior Street.

149. 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, albeit the overall extent and degree of visibility is moderate. Whilst visible, particularly in close views, it would not compromise the townscape experience (views 20, 24 and 25). The harm is less than substantial harm, having minor or moderate impacts. The new development has neutral or minor effects in other surrounding conservation areas and neutral or positive impact on townscape outside conservation area. Some harm to setting of listed buildings can be identified (19), but not to buildings of grade I or II*; whilst the impacts are relatively modest. The development has a neutral impact on the wider settings of the Borough, Tower Bridge and Tooley Street Conservation Areas.

150. As there is less than substantial harm to the Bermondsey Conservation Area, there is the need to consider whether the harm is offset by the public benefits of the proposals. They include the design benefits of the high quality architecture, new pedestrian through-routes, employment opportunities, the provision of new retail opportunities and a music venue and the creation of a new public open space.

Impact on townscape outwith the conservation area

151. 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. In the case of the local view eastwards along St Thomas Street (view 23), the tall building enhances the townscape, providing an attractive focal point and termination.

Landscaping and public realm

152. As referenced above, the scheme includes a number of public realm benefits, including the tree-lined pavement along St Thomas Street that is widened by the double and triple-height building undercroft, supporting its function as the main local thoroughfare; and most notably the new central space, which is open and makes for a highly permeable public plaza.

153. The hard landscaping throughout comprises high quality natural stone, using a mix of granite and York stone paving, and terrazzo for new street planters. The landscaping extends to include the new central pedestrian route and immediately adjoining pavements in Fenning Street and Snowsfields. The paving incorporates feathered steps that handle the changes in gradient across the site and provide for informal seating in addition to edges of the raised planters; whilst discreet ramps ensure good access for all. That the street trees along St Thomas are planted at grade is welcome in maintaining the natural topography; although those elsewhere within the scheme are contained within planters which will also provide opportunity

for outdoor seating and increased greening

154. The street furniture includes sculptural lighting columns and illuminated bollards. The palette is high quality, although the landscaping (inc. tree species and planting) should be conditioned to confirm this and to ensure a wider seamless public realm that avoids a corporate feel. The conditions should include the requirement for new public art, adding to the sense of place and replacing the engaging artwork currently provided in Vinegar Yard as part of the meanwhile use.

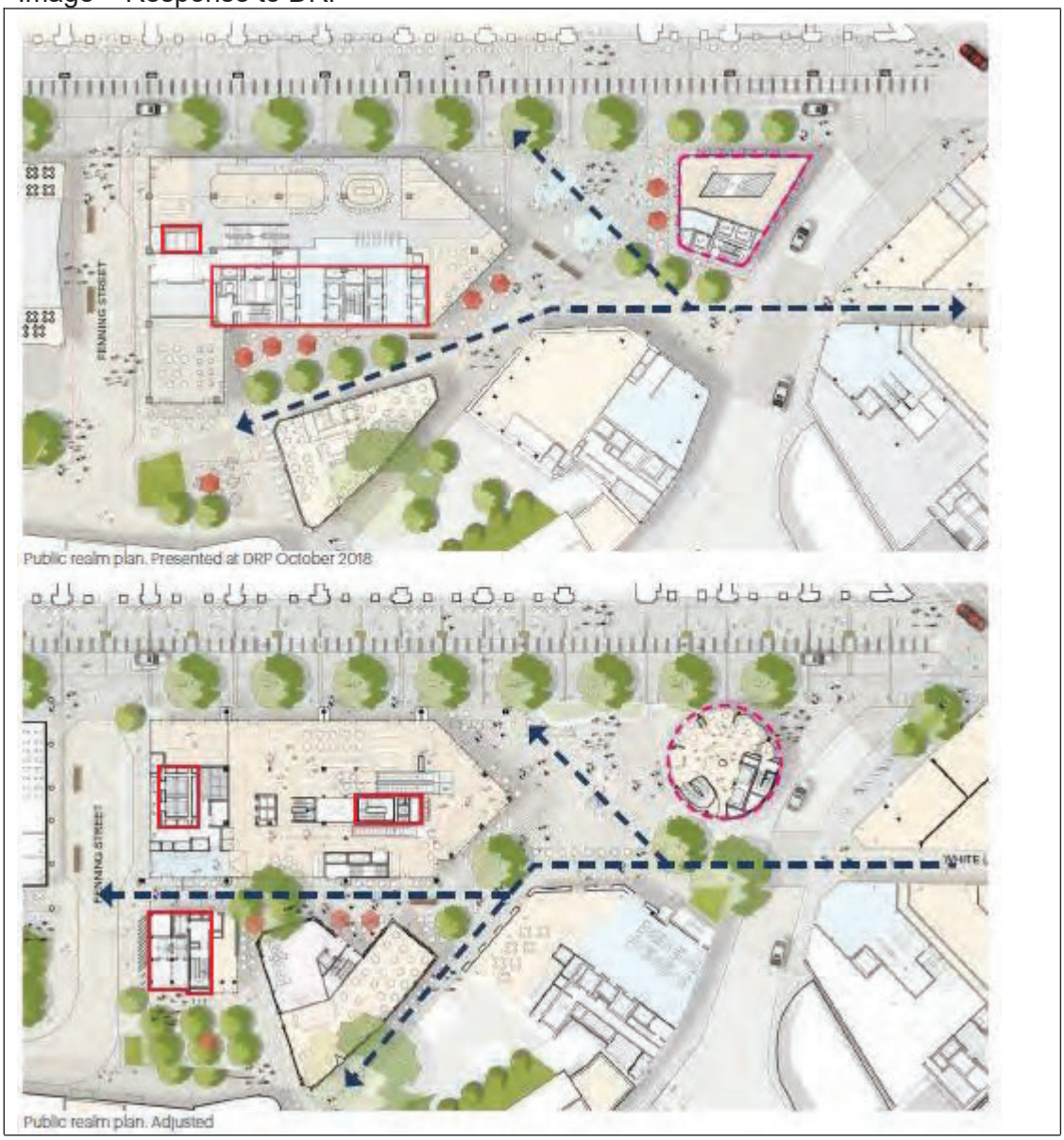
155. The new development generally creates benign climatic conditions, in that the central plaza is sunlight and shaded from winds. Parts of Fenning Street and the new pedestrian route beneath the main building could become subject to downdrafts. Windbreaks are shown on plan, although a condition requiring details of the screens is suggested to ensure they are designed well and do not present clutter on the building or within the street.

156. Lastly, the new landscaping extends to roof terraces that incorporate raised planters in organic shapes and form a green ‘fringe’ above the building’s parapet. The terraces provide good amenity for the offices and the opportunity for controlling water run-off, 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.

Design Review Panel

157. The proposals were considered by the council’s DRP at the pre-application in October 2018. At that time the scheme was presented within the context of the wider development framework, which the panel generally endorsed, subject to a clearer definition of the new east-west pedestrian route, better landscaping and confirmation of benign climatic conditions. The DRP generally supported the heights across the framework area, including the application development. It suggested adjusting the architecture to better ground the tall building and to refine the elevations at upper floor levels, including the service tower. It made similar comments regarding the pavilion building, but expressed their confidence in the scheme architects to deliver a high quality design. Subsequently, adjustments have been made to officers’ satisfaction.

Image – Response to DRP



Conclusions on design and heritage

158. The application is mainly for a tall building of up to 20 storeys, but includes a notable low-rise building of three commercial storeys. The mix of scales works well as an engaging counterpoint but also in helping to respond to the low-rise context. The massing of the tall building is articulated and has a cascading built form that eases the distinct transition in scales both within the site and across the wider development framework that includes the neighbouring Snowsfields, Becket House and Capital House sites. The cascading massing co-ordinates with the elevational designs that are likewise articulated, working together to suggest a series of tall slender built forms rather than a single development.

159. The tall building is within a policy-appropriate zone for high-rise development, but nonetheless is required to satisfy a series of requirements, among which is the need to preserve protected views and heritage assets. Albeit on occasions the new tall building will be seen above the roofscape or breaking the skyline, its appearance is moderate and generally has negligible or minor effects upon the protected views or settings of local heritage assets. It sits comfortably with the

adjacent grade II listed railway arches. There are exceptions, particularly to the immediate south, where the large scale of development impacts would be in direct contrast to the more domestic, intimate-scaled streetscape, including the designated local view within Melior Street. The development also involves the loss of an existing, characterful warehouse within the Bermondsey conservation area. Whilst this would be harmful in the sense that it would result in the loss of some historic fabric, the harm would be less than substantial and would be outweighed by the public benefits of the scheme. The primacy and iconic quality of the Shard as a landmark building is unaffected.

160. The proposed architecture is engaging and high quality both in its functional quality and material detailing. The tall building has a calm, ordered appearance and a robust, warehouse character that works well contextually. Its base is highly transparent and permeable, with wrap-around frontages that activate well the adjacent public realm and draw visitors into building. Its base should make for a lively place, set out as an indoor market space that seamless merges with the main office reception. The smaller pavilion building is equally well-designed and engaging as a performance venue. Its rotund form and attractive, open appearance complement the immediate townscape and offers a local landmark within the local network of fine-grained streets, improving the area's legibility.

161. The scheme provides significant public realm, including a new pedestrian through-route across the site and a new plaza. The public realm is proportional to and commensurate with the large scale of development, and is an important enhancement to the local area. The new plaza provides valuable public open space in a densely built-up area, although it would benefit from the inclusion of new public art.. It will be important to secure the materials and detailing of the architecture and landscaping to ensure the delivery of the high quality scheme, particularly given the tall building.

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

162. 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.

163. 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.

Overlooking

164. 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.

This minimum 12m distance as set out in the SPD is met between the proposed building and the adjacent flatted dwellings on both Melior Street and Snowsfields. It is acknowledged that the distance between the proposed building and the Horseshoe Inn is much closer however the primary use is as a public house and as such the proximity is considered acceptable.

Daylight

165. 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.

166. 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 as well as consented schemes at Capital House which are within close proximity to the site.

167. 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 impact
0-19.9%	Negligible
20-29.9%	Minor
30-39.9%	Moderate
40% +	Major

168. 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

169. The ES considers the impact on the following neighbouring buildings:
- 103-114 Guinness Court
- 1-15 Guinness Court
- The Glasshouse
- 16 Melior Street
- 8 Melior Street-36 Snowsfields
- Raquel Court
- 14 Melior Street
- 8-20 Snowsfields
- 38 Snowsfields
- 39 Snowsfields

- 40 Snowsfields
- 41 Snowsfields
- 42 Snowsfields
- 62 Weston Street
- 64 Weston Street
- 66 Weston Street.

170. The daylight report has considered a large number of windows and rooms around the site. It assessed 489 windows serving 272 rooms across 17 buildings for daylight amenity. Of the 489 windows assessed 310 (63%) would satisfy the BRE recommended levels for VSC. Of the 272 rooms assessed, 232 (85%) would meet the BRE standards for NSL. The following buildings would experience a negligible daylight impact as a result of the proposed development:

- 38 Snowsfields
- 39 Snowsfields
- 40 Snowsfields
- 42 Snowsfields
- 64 Weston Street
- 66 Weston Street.

171. 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 VSC

Property	No. of windows tested	No. retaining at least 80% of their baseline value	No. with minor adverse impact of up to 29.9% reduction in VSC	No. with moderate adverse impact of between 30%-39.9% reduction in VSC	No. with major adverse impact of over 40% reduction in VSC
The Glasshouse	5	0	1	0	4
16 Melior Street	66	54	6	1	5
8 Melior Street-36 Snowsfields	141	70	6	21	44
103-114 Guinness Court	42	42	0	0	0
1-15 Guinness Court	41	22	19	0	0
Raquel Court	55	29	26	0	0
14 Melior Street	7	0	7	0	0
Snowsfields Primary School	30	15	15	0	0
8-20 Snowsfields	24	0	0	0	24
41 Snowsfields	4	4	0	0	0
62 Weston Street	9	9	0	0	0
Total	489	310	80	22	77

Table – Impact of proposed development on NSL

Property	No. of rooms	No. retaining	No. with minor	No. with moderate	No. with major

	tested	at least 80% of their baseline value	adverse impact of up to 29.9% reduction in NSL	adverse impact of between 30%-39.9% reduction in NSL	adverse impact of over 40% reduction in NSL
The Glasshouse	2	1	0	0	1
16 Melior Street	18	18	0	0	0
8 Melior Street-36 Snowsfields	66	64	2	0	0
103-114 Guinness Court	30	27	3	0	0
1-15 Guinness Court	30	22	2	4	2
Raquel Court	27	27	0	0	0
14 Melior Street	3	3	0	0	0
Snowsfields Primary School	15	11	4	0	0
8-20 Snowsfields	19	0	5	2	12
41 Snowsfields	4	3	1	0	0
62 Weston Street	9	7	2	0	0
Total	272	232	19	6	15

The Glasshouse

172. A total of five windows serving two rooms have been assessed at this property. One of the rooms benefits from four windows whilst the remaining room is served by a single window. In both instances the rooms are classed as bedrooms which according to the BRE have a lower requirement for daylight. There would be noticeable changes to VSC at all five windows and alterations to NSL within one of the two rooms. In terms of the VSC, one of the windows would experience a minor loss of VSC of 25.3% and the remaining four windows would experience VSC losses of between 52.4% and 72.4% which are considered major adverse for the purposes of the ES. Residual VSC levels across all windows would be in the range of 6.4% - 18.3% which is considered acceptable on balance given their use as bedrooms. In terms of NSL only one of the two rooms would be affected and whilst the reductions in NSL would be classed as major adverse, the overall impact is considered acceptable given the central London location and the principal use of the affected rooms as bedrooms.

16 Melior Street

173. There are 66 windows serving 18 rooms at this property that have been assessed for VSC and NSL respectively. A total of 12 windows would experience changes beyond the BRE guidelines with the proposed development in place. Of the affected windows, there would be six with minor impacts of VSC reductions of between 21.6% and 27.6%; one window with a moderate reduction of 38.3%; and five with major reductions of between 40.4% and 51.4%. It should be noted that all of the windows that see reductions beyond the BRE guidance serve rooms that benefit from windows that would continue to meet the BRE standards. Additionally, all of the windows serve rooms that would continue to have BRE compliant NSL and as such would have good daylight access. All 18 rooms assessed for NSL would continue to have BRE compliant daylight distribution. On balance, the impact of the development on this building is considered acceptable and would be categorised as minor adverse.

8 Melior Street – 36 Snowsfields

174. VSC has been tested at 141 windows in this property and NSL has been tested within 66 rooms. A total of 70 windows would continue to have BRE compliant VSC and as such are considered to experience a negligible impact as a result of the development. Of the remaining windows there would be six with minor impacts of VSC reductions of between 22.4% and 29.9%; 21 windows with moderate reductions of between 31.2% and 39.8%; and 44 windows that would experience major reductions of between 40.3% and 82.7%. It is important to note that 44 of the 71 affected windows serve bedrooms which the BRE considers as having a lower requirement for daylight. Additionally, one of the six windows experiencing a minor impact, 12 of the 21 windows experiencing a moderate impact and 23 of the 44 windows experiencing a major impact serve rooms that benefit from other windows that would remain BRE compliant. It is also important to note that this property has large recessed balconies which themselves can be obstacles that restrict access to daylight and in many cases, as noted by the BRE, can be the main factor in the relative loss of light. In terms of NSL, it is positive to note that all of the assessed rooms would continue to have BRE compliant daylight. As such, whilst the impacts on VSC would be major adverse, the impacts on daylight distribution would be negligible. On balance, considering the overall impacts, form of the building with large recessed balconies and the central London location, the impact on this property is considered to be acceptable.

103-114 Guinness Court

175. A total of 42 windows serving 30 rooms have been assessed at this property for VSC and NSL respectively. All 42 windows would continue to receive BRE compliant VSC which is positive. In terms of NSL, 27 of the 30 rooms assessed would continue to have BRE compliant daylight distribution and the three rooms that would see reductions would only experience minor impacts with reductions in the range of 22.8% – 29.6%. Additionally, the affected rooms are bedrooms which are less sensitive to daylight impacts. The overall impact on this building is considered to be acceptable.

1-15 Guinness Court

176. There are 41 windows serving 30 rooms at this property. In terms of VSC, 22 windows would continue to meet the BRE guidance and the remaining 19 windows would experience minor VSC reductions of between 21.7% and 29.4%. Of the 30 rooms assessed for NSL, 22 would continue to meet the BRE guidance with two rooms seeing minor reductions in daylight distribution of between 23.5% and 28.5%; four rooms seeing moderate reductions of between 32.2% and 35.2%; and two rooms seeing major reductions of between 42.6% and 47.5%. Ten of the 19 affected windows would serve rooms that benefit from fully compliant NSL. Additionally, of the 19 windows experiencing a loss of VSC beyond the BRE guidance, 11 would serve bedrooms which are less sensitive to daylight loss. Overall the impact on this building is considered acceptable on balance given the type of room generally affected, the overall minor impact on VSC levels and the high proportion of rooms compliant for NSL.

Raquel Court

177. A total of 55 windows serving 27 rooms have been assessed at this property for VSC and NSL respectively. 29 of the windows would continue to achieve BRE compliant VSC whilst the remaining 26 windows would experience minor VSC

reductions of between 20.1% and 24.3% and in all instances, these windows serve rooms that would continue to be fully BRE compliant in terms of NSL as all 27 rooms assessed for NSL would continue to receive BRE compliant daylight distribution. The impact on this building is therefore considered acceptable.

14 Melior Street

178. In terms of VSC, seven windows have been assessed at this property and all seven would experience VSC changes however these reductions would be in the range of 24% - 29.7% and as such are considered to be minor. Furthermore, all three rooms assessed for NSL would remain BRE compliant and as such the rooms would achieve good daylight distribution. So whilst there would be reductions in VSC, this would be balanced by the fact that NSL would remain BRE compliant.

Snowsfields Primary School

179. A total of 30 windows serving 15 rooms have been assessed for VSC and NSL at Snowsfields Primary School. Whilst there would be reductions in VSC to 15 windows, these would all be categorised as minor as the reductions would be in the range of 20.4% - 22.4% which is only marginally beyond the BRE guidance. Similarly for NSL, four of the 15 rooms assessed would experience minor losses of between 20.3% and 22.1% which is also only marginally above the BRE guide. Given the high proportion of windows remaining compliant for both VSC and NSL and the fact that the losses would only be slightly above the BRE guidance, it is considered that the impact on Snowsfields Primary School is minor and acceptable.

8-20 Snowsfields

180. The building at 8-20 Snowsfields lies directly to the south of the application site on the corner of Melior Place and Snowsfields. The existing building rises to four storeys and accommodates commercial premises on the ground floor and maisonettes/flatted dwellings on the upper levels. The homes are accessed from a central stair core which leads onto deck access to the individual homes.

181. A total of 24 windows serving 19 rooms have been assessed at 8-20 Snowsfields for VSC and NSL respectively. In terms of VSC, all 24 windows would experience major loss of VSC with losses in the range of 51.8% - 98.8% and residual VSC levels ranging from 0.1% to 13.2%. With regard to NSL, five rooms would experience minor losses of between 22.7% and 29.4%; two rooms would have moderate losses of 33.6% and 35.1% and the remaining 12 rooms would see losses of between 42.8% - 79.8%. In terms of the loss of C NSL, this would be categorised as a major adverse impact.

182. The affected windows and rooms at 8-20 Snowsfields obtain most of their daylight directly from the north. The southern façade of the building fronting onto Snowsfields would remain unaffected by the proposal. At present, the northern façade, which would be affected by the proposed development, looks out over a very low rise and partially cleared site and as such has generally unhindered access to daylight. The site allocation makes reference to tall buildings and it is acknowledged that this is a currently underdeveloped site in a central and sustainable location which has been identified as being suitable for a tall building. As such, any building of scale on this site is likely to have an impact on the daylight of 8-20 Snowsfields.

183. As previously mentioned, the affected windows gain most of their daylight from the north. The façade of the existing building where the affected windows are located

contains the access stair way and deep deck access. The BRE recognises that backlines and overhangs can impact on a buildings ability to obtain daylight. As recommended by the BRE, it is appropriate to undertake a review whereby the balconies are removed in order to gauge how much of the impact is caused by balconies and overhangs. The 'No Balconies' assessment demonstrates that whilst there would be residual VSC values of between 0.1% - 13.2% with the proposed development in place, removing the balconies would see these residual values increase to between 7.7% - 13.2%. It can therefore be demonstrated that the most affected windows at 8-20 Snowsfields are compromised to a significant extent by the deck access overhangs.

41 Snowsfields

184. Four windows and four rooms have been assessed for VSC and NSL respectively. All four windows would continue to receive BRE compliant VSC whilst three of the four rooms assessed for NSL would continue to meet the BRE guidelines and the one room that would experience reductions would only experience a minor reduction of 21.1%. The overall impact on this building is considered acceptable

62 Weston Street

185. Nine windows and nine rooms have been assessed for VSC and NSL respectively. All nine windows would continue to receive BRE compliant VSC whilst seven of the nine rooms assessed for NSL would continue to meet the BRE guidelines and the two rooms that would experience reductions would only experience minor reductions of between 20.2% and 20.8%. The overall impact on this building is considered acceptable

Cumulative daylight impacts

186. The applicant has considered the cumulative daylight impacts of the proposed development. By comparing the impact of the proposed development alongside other planned and consented developments.

187. As before, the daylight assessment considered windows and rooms within the vicinity of the site with the daylight impacts summarised below:

Table – Cumulative scenario VSC results

Property	No. of windows tested	No. retaining at least 80% of their baseline value	No. with minor adverse impact of up to 29.9% reduction in VSC	No. with moderate adverse impact of between 30%-39.9% reduction in VSC	No. with major adverse impact of over 40% reduction in VSC
The Glasshouse	5	0	1	0	4
16 Melior Street	66	18	2	2	44
8 Melior Street – 36 Snowsfields	141	52	10	10	69
103-114 Guinness Court	42	25	15	2	0
1-15 Guinness Court	41	21	0	11	9
Raquel Court	55	10	2	3	40
14 Melior Street	7	0	0	4	3
Snowfields Primary School	30	9	0	7	14
8-20 Snowsfields	24	0	0	0	24
38 Snowsfields	8	4	3	1	0
39 Snowsfields	14	7	3	4	0
40 Snowsfields	14	7	7	0	0
41 Snowsfields	4	4	0	0	0
42 Snowsfields	20	10	7	3	0
62 Weston Street	9	6	3	0	0
64 Weston Street	8	6	2	0	0
66 Weston Street	1	1	0	0	0

Table – Cumulative scenario NSL results

Property	No. of rooms tested	No. retaining at least 80% of their baseline value	No. with minor adverse impact of up to 29.9% reduction in 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
The Glasshouse	2	1	0	0	1
16 Melior Street	18	12	5	1	0
8 Melior Street – 36 Snowsfields	66	61	4	1	0
103-114 Guinness Court	30	23	3	0	1
1-15 Guinness Court	30	18	5	2	5
Raquel Court	27	27	0	0	0
14 Melior Street	3	3	0	0	0
Snowfields Primary School	15	9	1	0	5
8-20 Snowsfields	19	0	0	0	19
38 Snowsfields	8	8	0	0	0
39 Snowsfields	8	8	0	0	0
40 Snowsfields	8	8	0	0	0
41 Snowsfields	4	3	1	0	0
42 Snowsfields	4	2	1	1	0
62 Weston Street	9	6	3	0	0
64 Weston Street	8	7	1	0	0
66 Weston Street	1	1	0	0	0

The Glasshouse

188. A total of five windows serving two rooms have been assessed at this property. One of the rooms benefits from four windows whilst the remaining room is served by a single window. In both instances the rooms are classed as bedrooms which according to the BRE have a lower requirement for daylight. Under the cumulative scenario there would be noticeable changes to VSC at all five windows and alterations to NSL within one of the two rooms which is the same outcome as set out under the proposed scheme in isolation.

16 Melior Street

189. At 16 Melior Street 66 windows serving 18 rooms have been assessed for VSC and NSL respectively. There would be a total of 48 windows that would experience VSC losses beyond the BRE guidelines however 42 of these windows would be located within rooms that would retain BRE compliant NSL. The remaining six affected windows serve bedrooms which are noted by the BRE as being less sensitive to daylight impacts. As the vast majority of affected windows would be positioned in rooms with retained NSL, the impacts on this building are considered acceptable.

8 Melior Street – 36 Snowsfields

190. A total of 141 windows have been assessed for VSC impacts and a further 66 rooms have been assessed for impacts to daylight distribution (NSL). The VSC results demonstrate that there would be 10 windows that would experience minor VSC losses of between 21.2% and 29.5%; 10 windows that would see moderate losses of between 31.3% and 38.5%; and 69 windows that would see major losses of VSC in excess of 40%. Of the 66 rooms assessed for NSL, 61 would remain fully compliant with the BRE whilst four rooms would see a minor impact and one room would see a moderate impact. It should be noted that of the 89 windows that would see losses of VSC beyond the BRE guidelines, a total of 85 would be positioned in rooms that would retain BRE compliant NSL. The impact on this building is therefore considered acceptable.

103-114 Guinness Court

191. In terms of VSC, 42 windows have been assessed at this property. With regard to NSL, 30 rooms have been reviewed. There would be a negligible VSC impact at 25 windows; a minor impact at 15 windows where there would be losses of between 20.1% and 29.3% and then moderate VSC impacts at two windows which would both see losses of 30.7%. When looking at NSL, 23 of the 30 rooms would have BRE compliant NSL and there would be six rooms that would experience minor impacts. One room would see a major impact on NSL however it would be served by windows that remain compliant with VSC. Likewise, the two windows that would experience moderate impacts on their VSC are located in rooms that remain compliant with NSL. As such, the impact on this building is considered acceptable.

1-15 Guinness Court

192. 41 windows serving 30 rooms have been assessed for VSC and NSL at this property. There would be 11 windows experiencing moderate impact on VSC with losses of 32.2% - 39.4% and nine windows with major impacts of 40.2% - 41.8%. In terms of NSL, there would be five rooms experiencing minor impacts, two with moderate impacts and five with major impacts. In this case, all of the rooms experiencing major VSC impacts would be bedrooms which are recognised as being less sensitive to daylight changes by the BRE. On balance the impact to this building is considered acceptable.

Raquel Court

193. At Raquel Court 55 windows have been assessed for VSC and 27 rooms have been assessed for NSL. There would be major VSC impacts to 40 windows; moderate impacts to three windows; and minor impacts to two windows. However, all of the rooms assessed for NSL would remain fully compliant with the BRE and there would be no noticeable impact on NSL. As such the impact on this building is considered acceptable.

14 Melior Street

194. Seven windows have been assessed for VSC and it is noted that there would be moderate impacts to four of the windows and major impacts to three of them. The seven windows assessed for VSC serve three rooms which have been assessed for NSL and would remain fully BRE compliant.

Snowsfields Primary School

195. 30 windows have been assessed for VSC at this property. These windows serve 15

rooms that have been assessed for NSL. In terms of VSC impacts, there would be seven rooms experiencing a moderate impact of between 37.5% and 39.8% and a further 14 rooms that would see major impacts of between 40.2% and 46.2%. It should be noted that nine of the rooms experiencing VSC impacts would be served by rooms that would be unaffected in terms of NSL. Furthermore, the average residual VSC level of the assessed windows would be 22% VSC. The overall impact to Snowsfields Primary School is considered acceptable on the basis that rooms affected by VSC would generally be compliant in NSL and that residual VSC levels are generally in line with what would be expected in a central urban area.

8-20 Snowsfields

196. At 8-20 Snowsfields 24 windows serving 19 rooms have ben assessed for VSC and NSL respectively. Under the cumulative scenario there would be major impacts on VSC and NSL to all of the assessed rooms. This would include some rooms where there would be 100% loss of VSC. These losses must be put in context and it is the case for all eight windows experiencing losses of 100% VSC that they had low existing VSC levels to begin with, being located at first floor and having their access to daylight hindered by the overhanging deck access. Given that they had low VSC levels to begin with, any change in VSC levels would represent a disproportionate percentage change and it should be noted that the real terms VSC losses to these windows ranges from 3.8% VSC to 6.9% VSC.

197. As previously mentioned, the affected windows and rooms at 8-20 Snowsfields gain their daylight from the north and the southern façade would remain unaffected by the proposal. At present 8-20 Snowsfields looks out over a largely cleared site with only the very low rise buildings remaining. As such, there is generally unhindered access to daylight over what is an undeveloped central London site. Furthermore, it has previously been demonstrated that part of the reason for poor daylight levels at 8-20 Snowsfields is the result of the deep deck access that overhangs and overshadows the first floor windows where the most intense impacts would be experienced.

38 Snowsfields

198. Eight windows have been assessed for VSC with three windows experiencing minor impacts of between 25.7% - 27.7% and one window having a moderate impact of 30.1%. The remaining four windows would remain BRE compliant for VSC. Whilst it is noted that there would be VSC impacts to four of the windows, it should be noted that all eight rooms assessed for NSL would remain BRE compliant. So whilst there would be some VSC impacts, they would be offset by the fully compliant NSL and as such the impact is considered acceptable.

39 Snowsfields

199. 14 windows have been assessed for VSC. Seven of the windows would remain BRE compliant. Three windows would experience minor losses of VSC (21.6%-28.8%) and four windows would see moderate losses of between 31.7% and 34.1%. With regard to NSL, all eight rooms assessed would remain fully compliant with the BRE.

40 Snowsfields

200. 14 windows were assessed for VSC and eight windows were assessed for NSL. Whilst there would be some minor impacts to seven of the windows in terms of

VSC, all windows assessed for NSL would remain fully compliant and a such the impact on this building would be acceptable.

41 Snowsfields

201. Four windows and four rooms have been assessed for VSC and NSL respectively. All windows would remain BRE compliant in terms of VSC and there would be a minor impact to one of the rooms assessed for NSL with a loss of 21.1% which is only marginally above the threshold and is considered acceptable.

42 Snowsfields

202. At 42 Snowsfields a total of 20 windows have been assessed for VSC and whilst 10 windows would remain fully BRE compliant there would be minor impacts at seven windows (20.4%-29.7%) and moderate impacts at the remaining three windows (30.7%-36.3%). Of the four rooms assessed for NSL, two would remain BRE compliant and there would be one minor and one moderate impact. The three windows experiencing moderate VSC impacts would serve rooms that would remain BRE compliant in terms of NSL. The impact on this building is therefore considered acceptable.

62 Weston Street

203. At 62 Weston Street, three of the nine windows assessed for VSC would experience minor impacts of between 20.4% and 24.4%. The remaining six windows would be unaffected. In terms of NSL, nine rooms have been assessed and there would be a minor impact within three rooms with the remaining six rooms being BRE compliant. The overall impact on this building is considered acceptable.

64 Weston Street

204. Eight windows have been assessed for VSC and there would be minor impacts at three windows, with the rest remaining compliant. Of the eight rooms assessed for NSL, seven rooms would remain BRE compliant and one would experience a minor reduction which is considered acceptable.

66 Weston Street

205. One window and one room have been assessed for VSC and NSL respectively and both would remain fully BRE compliant.

Conclusions on daylight

206. The results of the daylight assessment demonstrate that there would be a number of windows and rooms that would not meet the relevant daylighting standards of the BRE for the most part these impacts would be minor in nature and would be balanced out by compliant daylight distribution levels. It is noted that there would be major impacts to the buildings at 8 Melior Street - 36 Snowsfields and 8-20 Snowsfields. The impacts on 8 Melior Street – 36 Snowsfields are balanced by the fact that the vast majority of windows affected by VSC reductions would be located in rooms where daylight distribution would remain BRE compliant.

207. The impacts at 8-20 Snowsfields would be major adverse however due to the current site status as a largely cleared site, the building at 8-20 Snowsfields benefits from generally unhindered outlook which is uncommon for such a central urban location. It is therefore recognised that any development on the site would have a

impact on the daylight to 9-20 Snowsfields which is further impacted as a result of the existing deep deck access which overhangs and overshadows many of the affected windows.

208. The site has been identified in policy as being suitable for a tall building and it is anticipated that there would be a degree of impact as a result of redevelopment. Consideration should also be given to the fact that the BRE should not be applied rigidly as the site is in an Opportunity Area within a Central London location and accordingly the standards should be applied with some degree of flexibility. Given the small number of windows overall that would experience major adverse impacts 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.

Sunlight

209. All of the windows within 90 degrees of due south have been assessed with regards to impact on sunlight. The BRE guide states that if a window can receive 25% of summer sunlight, including at least 5% of winter sunlight between the hours of 21 September and 21 March, then the room would be adequately sunlight.

210. In terms of sunlight, 119 rooms residential (or similar use) across 10 properties have been assessed for sunlight amenity both in terms of total Annual Probable Sunlight Hours (APSH) and Winter APSH.

211. Of the 119 rooms that have been assessed for sunlight, 102 would remain BRE compliant (86%). The remaining 17 rooms would experience some sunlight reductions. Two of these windows are located at 16 Melior Street and the remaining 15 are located at 8 Melior Street – 36 Snowsfields and are considered in more detail below.

16 Melior Street

212. A total of 12 rooms were assessed for sunlight within this property rooms were assessed for sunlight amenity at this property and whilst 10 of the rooms would be fully compliant for both total and winter APSH. The two affected rooms would remain compliant for winter APSH but would see a reduction in total APSH min excess of 40% which would be a major adverse effect. However, given that all windows would be compliant for winter APSH and only two windows would be non compliant for total APSH, the overall impact is considered to be minor.

8 Melior Street – 36 Snowsfields

213. A total of 50 rooms have been assessed for sunlight amenity at this property, 35 of them would meet the BRE guidance for both winter and total APSH. All of the affected rooms would continue to meet BRE guidance for winter APSH as well and as such the only impact would be on total APSH where there would be two rooms with minor impacts, five with moderate impacts and eight with major impacts. Given the overall compliance rate with all rooms meeting the winter APSH, the overall impact on this property is considered acceptable.

214. In terms of the cumulative assessment, the total number of rooms that meet the BRE guidelines for APSH would reduce from 102 of 119 assessed rooms to 99 of 119 assessed rooms. As such the cumulative assessment would see three

additional rooms affected changing the compliance rate from 86% to 83% and the overall impact would remain as assessed with the development in isolation. The proposed development is therefore considered acceptable in terms of sunlight impacts.

Overshadowing

215. An overshadowing assessment has been undertaken for the following properties and amenity spaces:

- Johns Churchyard
- Communal Seating Area/garden at Fenning Street/Melior Street.

216. The proposed development would have a negligible impact on St Johns Churchyard in both the existing versus proposed and existing versus cumulative scenarios.

217. The pocket park on the corner of Melior Street and Fenning Street would be subject to some overshadowing impacts. This amenity space would be overshadowed between 08:00 and 12:00 on the 21 March. Overshadowing would also take place between 06:00 and 13:00 on the 21 June after which the space would then receive uninterrupted sunlight for approximately five hours. This level of overshadowing is considered to be a minor adverse impact.

218. On the 21 December the effects of overshadowing would be considered negligible as only a small portion of the overshadowing would be caused by the proposed building. The majority of the overshadowing would be caused by adjacent existing buildings and not as a result of scheme itself.

219. As all other amenity areas are unaffected, only the communal gardens serving Melior and Fenning Street could possibly experience cumulative effects from overshadowing. The results set out in the cumulative assessment demonstrate that this amenity space would receive two or more hours of sun on 29.4% of the area which is a reduction from the existing 67% and a reduction on the 38.9% that would be experienced as a result of the development in isolation. It should be noted that in the summer months, when these spaces are most used, the majority of the amenity space would receive at least five hours of sunlight. Overall, the effect to the pocket park on Melior and Fenning Street is considered to be moderate adverse.

Solar glare

220. Various nearby viewpoints have been considered for impacts as a result of solar glare. A total of 19 viewpoints have been considered and the development would not be visible from 11 of the viewpoints and as such there would be no impact at these locations. Of the remaining eight assessed locations, three locations (S3, TSE1 and TSE2) would not experience any significant effects as either the solar reflections occur at angles greater than 30° from the driver's line of sight and will not affect the driver's responsiveness, or the area of the building visible is very small and the distance is greater than 15° of a driver's line of sight.

221. Of the remaining five junctions, two (W2 and TNW3) would experience minor effects due to reflections from a small section of façade for a short period of time. This could be mitigated through use of the drivers visor and the fact that traffic signals would be unaffected.

222. Two viewpoints have been assessed from Crucifix Lane. There would potentially be instances of solar reflection on the façade of the proposed building between 06:00 -

10:00MT and 14:00-16:00 from mid-January to mid-April and again from mid August to mid November. The articulated nature of the buildings façade is such that reflections would be highly scattered and visible for only a short period time. The assessment also assumes clear skies at the exact time the sun would be focused on the relevant part of the building façade. Taken together, the impact at these viewpoints would be minor.

223. On viewpoint has been considered at Weston Street whereby there would be the potential for an instance of reflection on the buildings façade in the morning s between mid January to mid February and again from mid October to mid November. Although the potential reflections occur close to the drivers' line of sight, it should be noted that only a thin portion of the façade would be visible at this location and as such the instances of reflection would be visible for only a few minutes. Again, the assessment assumes clear skies and owing to the limited visibility of the façade and short duration of reflection the effect of solar glare at this junction is considered to be minor.

224. A further viewpoint has been assessed at Kirby Grove where there would be the potential for reflection on the building façade in the mornings from mid August to mid April. Due to the articulated nature of the façade, the reflections would be scattered and would not be continuously visible. In addition, all potential solar reflections occur above the drivers visor cut-off line and therefore should reflections occur, the driver could deploy their visor to mitigate any reflections. Overall, owing to the broken-up nature of the façade and all solar reflections occurring above the drivers visor cut-off line, the effect of solar glare at this junction is considered to be moderate.

Light pollution

225. Light pollution has been assessed as part of the ES to gauge the extent to which light spillage from the completed development could reach nearby properties and cause disruption.

226. The properties located at 8 Melior St - 36 Snowsfields, The Glasshouse and 8 – 20 Snowfields would potentially experience significant light pollution effects. These impacts could be reduced through mitigation that could be incorporated into the detailed lighting design for the proposed development. This mitigation could include

- Providing a detailed lighting design that reduces the illuminance levels to the south-east end of the development;
- The dimming of lights at the perimeter of the development at night-time; and
- Automatic blinds.

227. With appropriate mitigation in place, the light pollution effects would be reduced to negligible levels and would not be significant. It should also be noted that the cumulative assessment has not identified any different or additional effects relating to light pollution.

Noise and vibration

228. Chapter 9 of the ES focuses on noise and vibration impacts. The ES sets out the main considerations to be noise and vibration effects from demolition and construction phases as well as associated traffic during this period and noise from the operation of the development and any associated plant.

229. Major and Moderate adverse noise impacts have been identified to surrounding

properties during demolition works, excavation and piling. Once the development reaches the stage of works to the superstructure then impacts would reduce to generally minor or negligible, with the exception of the Horseshoe Inn which would experience moderate impacts during this phase of construction. Whilst it is acknowledged that these noise impacts would lead to some disturbance, the impacts would be temporary, being limited to the demolition and construction phases of the development and they could be mitigated through the use of planning conditions.

230. Noise associated with construction traffic is categorised as negligible within the ES, indicating that there would be no significant adverse impact to the local area. In terms of vibration impacts, these are categorised as negligible, with the exception of Becket House (minor impact) ands the Horseshoe Inn (moderate impact). As with construction noise, these impacts would be short term, temporary and could be mitigated through planning conditions.

231. At the operational stage there are not expected to be any significant noise impacts to any sensitive receptors with the exception of Guys Hospital where there is considered to be the potential for a major adverse impact as a result of patrons leaving the performance venue on their way to London Bridge Station. The ES proposes that mitigation is required to reduce the potential for maximum noise levels produced by people leaving the venue. It is considered that the potential for impacts could be managed through the preparation and implementation of a management plan that aims to monitor noise levels and to reduce noise where practicable. Additional management measures would be identified through monitoring of dispersion and associated noise levels when in operation. Noise impacts to Guys hospital are considered by officers to be limited on the basis of the operating hours of the music venue, the limited capacity (200 people) and the location of the venue on St Thomas Street adjacent to London Bridge Station.

232. In terms of cumulative impacts, the completed and operational development, taken together with other schemes in the area, would not result in any additional long term or permanent significant adverse impacts.

Energy and sustainability

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

234. Policy 5.3 states that developments should demonstrate that sustainable design standards area integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process. LP5.7 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.

235. 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 strategy and a sustainability assessment for the proposed development which seek to demonstrate compliance with the above policy.

Be Lean

236. The measures proposed include

- Thermal modelling and façade optimisation;
- Mixed mode ventilation with natural ventilation in order to optimise the cooling demand of the building
- Reduced water flow outlets and appliances in order to reduce water usage;
- Air Handling Heat Recovery (AHU) system;
- Use of energy efficient lighting and lighting control that will enable lighting to respond to natural daylight levels;
- High efficiency lifts;
- Active cooling demand;
- Automatic monitoring and targeting which can provide significant savings in energy consumption.

Be Clean

237. Combined Heat and Power (CHP) is no longer considered suitable for office developments. There are currently no district energy networks near the site however the site has been designed to allow future connectivity.

Be Green

238. The measures proposed include:

- Use of High Efficiency Air Source Heat Pumps with simultaneous heating and cooling;
- Water Source Heat Pumps;
- Provision of photovoltaic panels.

239. Taken together, the Be Lean, Be Clean and Be Green measures would achieve a total carbon reduction of 46% taking into account SAP10 and decarbonising of the electricity grid and would exceed the requirements of the policy. The proposed office accommodation is expected to achieve a BREEAM 'Excellent' rating and there is a commitment to work towards achieving BREEAM 'Outstanding'. The proposed commercial use would likely achieve BREEAM 'Very Good'. The carbon reduction and sustainability measures are a positive aspect of the development and the relevant BREEAM ratings would be secured by condition and relevant carbon reduction would be secured as part of the S106 Agreement in the event that permission is granted.

Ecology and biodiversity

240. 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 the provision of biodiverse roofs, the installation of Swift bricks 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.

Air quality

241. The application site is located within an Air Quality Management Area. As such the applicant has assessed the potential impacts on air quality as part of the ES. Council have declared the borough to be an Air Quality Management Area. The ES has focused on potential impacts from:

- Impacts as a result of construction, including associated traffic and transport emissions; and
- Impacts from the completed and operational development.

242. The ES concludes that the development would not result in any significant adverse air quality impacts either as a result of the construction of the development or through operation of the completed development. It should also be noted that the development would be air quality neutral. The ES has also considered air quality as part of the cumulative assessment and concludes that impacts would be negligible and as such not significant. Whilst it is recognised that there can be some localised impacts from construction related activities, this can be appropriately managed and mitigated through a Construction Environmental Management Plan which would be a conditioned requirement of any consent issued.

Ground conditions and contamination

243. Ground conditions and potential land contamination have been assessed and no significant impacts are anticipated. As with all applications of this size it is recommended that the standard conditions around land contamination, 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. This condition would need to be satisfied prior to any development taking place on site.

Socio-economics

244. The impact of the development on socio-economics has been assessed as part of the ES and focuses on job creation and the impact on the local economy as a result of increased spending by employees at the site and the provision of the new public realm and outdoor space.

245. Many jobs would be created as a result of the construction of the proposed development and whist beneficial, these would not lead to a significant beneficial effect. Once the development is completed, an estimated 1,508 new jobs could be created on site.

246. Once completed, the Proposed Development will provide an improvement to the quality of the public realm offer in its immediate surroundings, and the wider London Bridge area more generally. Given the scale of the site and public realm improvement, the magnitude of the impact at the local area is estimated to be Minor Beneficial and is not considered to be significant.

247. Whilst beneficial socio-economic effects as a result of the Proposed Development have been identified as summarised above, the assessment has not identified any likely *significant* socio-economic effects. All the effects identified have been classified as minor beneficial and not significant and this is the case under the cumulative assessment as well.

Climate change

248. Climate change is an important issue that has the potential to alter the current environment. As part of the ES, a future climate scenario has been developed using Met Office projections that have been published. The ES notes that certain several environmental factors are likely to vary in the future, including rising average air temperatures, increased yearly rainfall and sea level rise.

249. Each topic as assessed in the ES has taken into account the possible implications of a different climate in the future and with the exception of noise, the likely effects identified for the technical topics are not expected to change as a result of climate change. Noise is potentially affected as the potential for increased and decreased temperatures in summer and winter respectively could result in an increased demand for cooling and heating plant as well as the potential for adjacent occupiers to open windows for longer durations. The potential impacts arise as a result of increased temperatures potentially resulting in residents in the vicinity of the development to open windows for longer and reduce the level of noise attenuation that their respective facades provide against the increased use of cooling plant. However, officers are of the view that could be overcome through the use of compliance conditions in order to restrict maximum noise levels from plant.

250. Greenhouse gas emissions 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. This includes greenhouse gas emissions generated through the fabrication of buildings materials. As such a greenhouse gas emissions assessment has been undertaken for the proposed development with the aim of this assessment being to try and quantify the estimated project emissions and set out the project's contribution to an existing carbon budget and the assessment concludes that the contribution of emissions in the context of the budget are considered to be low and that the greenhouse gas emissions arising from the project would represent a small proportion of national greenhouse gas emissions and that these emissions would be reduced over time as a result of mitigation and continued de-carbonising of the national grid.

Wind

251. A wind microclimate assessment as been completed as part of the ES and this assessment focuses on whether the development would create or exacerbate any undesirable wind conditions either on the site or within the surrounding area. High wind speeds can affect pedestrian comfort levels as well as potentially having safety implications unsuitable of an areas desired use. The assessment has focused on areas within and around the site at ground level, including areas of outdoor seating as well as roof terraces and conditions around the Pavilion building. Additionally, areas around other buildings surrounding the site and associated pedestrian crossings and thoroughfares have been tested.

252. 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.

253. Current wind levels at the application site are relatively calm and are considered suitable for the current uses. Once redeveloped, the conditions at the site would be windier but still appropriate for the intended use at most locations. The ES has identified that there would be some significant wind effects at; the north western corner of the development; at an existing railway vault on St Thomas Street located to the north of the site; at the amenity space on Melior Street and Fenning Street;

and also within the rooftop amenity space of the development itself.

254. In order to reduce the wind speeds in these areas, mitigation has been incorporated into the design of the building including the provision of canopies over building entrances, screening and appropriate landscaping. With the wind mitigation measures included in the design, the ES concludes that the development would not result in any major adverse wind impacts either as an individual development or when considered as part of a cumulative development with other schemes in the area. Some significant *beneficial* wind effects have been identified, meaning that some areas, both onsite and offsite, are calmer than the desired conditions.

255. In terms of the cumulative impact, it is noted that wind conditions in and around the site would be expected to range from suitable for sitting to walking use during the windiest season. During the summer season wind conditions would generally be expected to be one category calmer than those during the windiest season.

Flood risk

256. 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 Environment Agency and Thames Water have both been consulted on the proposed development and neither have raised any objections subject to conditions. The relevant conditions would be imposed on any consent issued.

Archaeology

257. 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).

258. The applicant has submitted an Archaeological Desk-Based Assessment (DBA) dated September 2018 which is presented within ES Volume 3: Appendix – Archaeology. The ES concludes that there would be no significant impacts. In addition a programme of archaeological evaluation fieldwork was undertaken on the site in November 2018. This involved the excavation of four trenches and boreholes across the site. The boreholes measured the depth of deposits in order to assess the nature of buried waterlogged deposits. The Summary Report of the Archaeological Evaluation by PCA and dated November 2018 has been submitted in the Environmental Statement as Annex A .

259. The evaluation revealed that significant archaeological remains survive on this site. As pre-determination evaluation has taken place there is now sufficient information to make a planning decision and determine whether this development is likely to cause harm to the buried historic environment and, if so, what measures need to be in place to manage this.

260. The archaeological potential of the general area is evidently high, particularly with regard to medieval and post-medieval settlement and water management regimes - as well as the potential for prehistoric deposits, structures and finds. The site has high potential for palaeoenvironmental remains and deposits dated from the earliest

times. It is also possible that Roman deposits may survive within the alluvial sequence at depth. Links to the historic route of Bermondsey Street and nearby Bermondsey Abbey may also be present. The 16th century mansion of Henry Goodyere, a rich merchant, may have been partially discovered during the predetermination evaluation works Subsequently, the area became a centre for post-medieval industries and warehouses, particularly relating to the tanning industry - with extensive archaeological remains surviving. The application scheme is for a large basement and if this were consented the applicant must be mindful that all archaeological remains within the area of impact (as these cannot be preserved in situ through sympathetic design options) must be fully excavated.

261. There is now sufficient information to establish that the development is not likely to cause such harm as to justify refusal of planning permission on the grounds of archaeological interest provided that robust archaeological conditions are applied to any grant of consent. So, if the application scheme gains consent the applicant must be mindful that for any archaeological remains that are encountered, if these cannot be preserved in situ under a foundation design condition, they must be prepared to pay for and manage the excavation of these remains entirely and/or potentially lift and preserve off-site or in the new development any previously unknown but important remains. Other requirements will also be to carry out full archaeological post-excavation mitigation, publication and deposition of the archaeological archive. Historic buildings on the site should also be recorded to Historic England Level 3 standard (see consultee response from Historic England).

262. In accordance with best practice as set out in current policy and guidance the applicant should consider opportunities for an appropriate programme of public engagement, for example: Historic England's 2015 publication 'Guidelines for Archaeological Projects in Greater London' provides advice on popular interpretation and presentation options.

Transport

263. 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.

264. 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

265. The site is bounded by St Thomas Street to the north; Snowsfields to the south, Vinegar Yard. The Bermondsey Snowsfields site, the Horseshoe Pub and Melior Street to the south and Fenning Street to the east. 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.

266. 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.

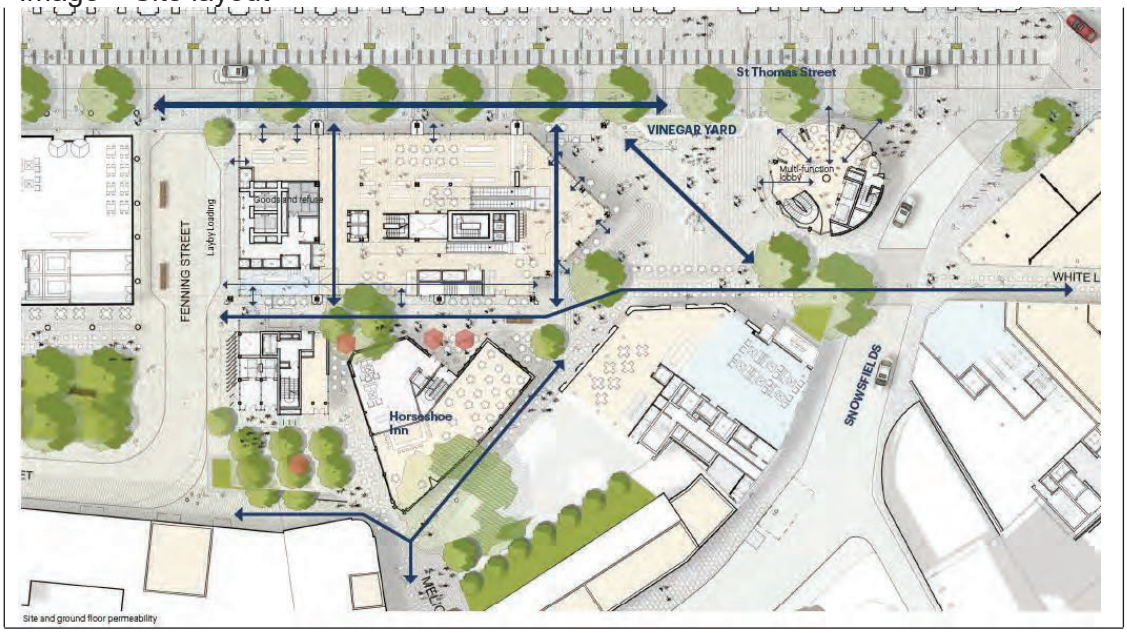
267. Due to the aforementioned public transport connections the site has a Public Transport Access Level (PTAL) of 6b, on a scale of 0 to 6b where 6b is the most accessible. The site is also served by the Mayor's cycle hire scheme. The nearest Cycle Hire docking stations are located at Snowfields, Potters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

268. 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

269. The site layout would be rational and legible, reinforcing the existing streets whilst providing new pedestrian routes that radiate from and across the new public realm creating through routes in a north south and east west direction linking to the other St Thomas Street sites and to the principle thoroughfares of St Thomas Street and Bermondsey Street. The layout would bring forward benefits in terms of connectivity, legibility and the creation of new spaces.

Image – Site layout



Cycling and cycle hire

270. The development would incorporate 413 basement cycle parking spaces as well as six folding bike lockers. This provision would sit alongside 116 short stay cycle parking spaces across the application site. The level of cycle parking is compliant with current and draft London Plan policies. The applicant would be required to make a financial contribution towards the Cycle Hire scheme and this would be secured under the S106 Agreement with on-going engagement with TfL. The provision of cycle parking spaces and associated facilities will be a conditioned requirement of any consent issued and this would be an opportunity to further refine the cycle parking provision and increase cycle parking numbers further.

Deliveries and servicing

271. 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.

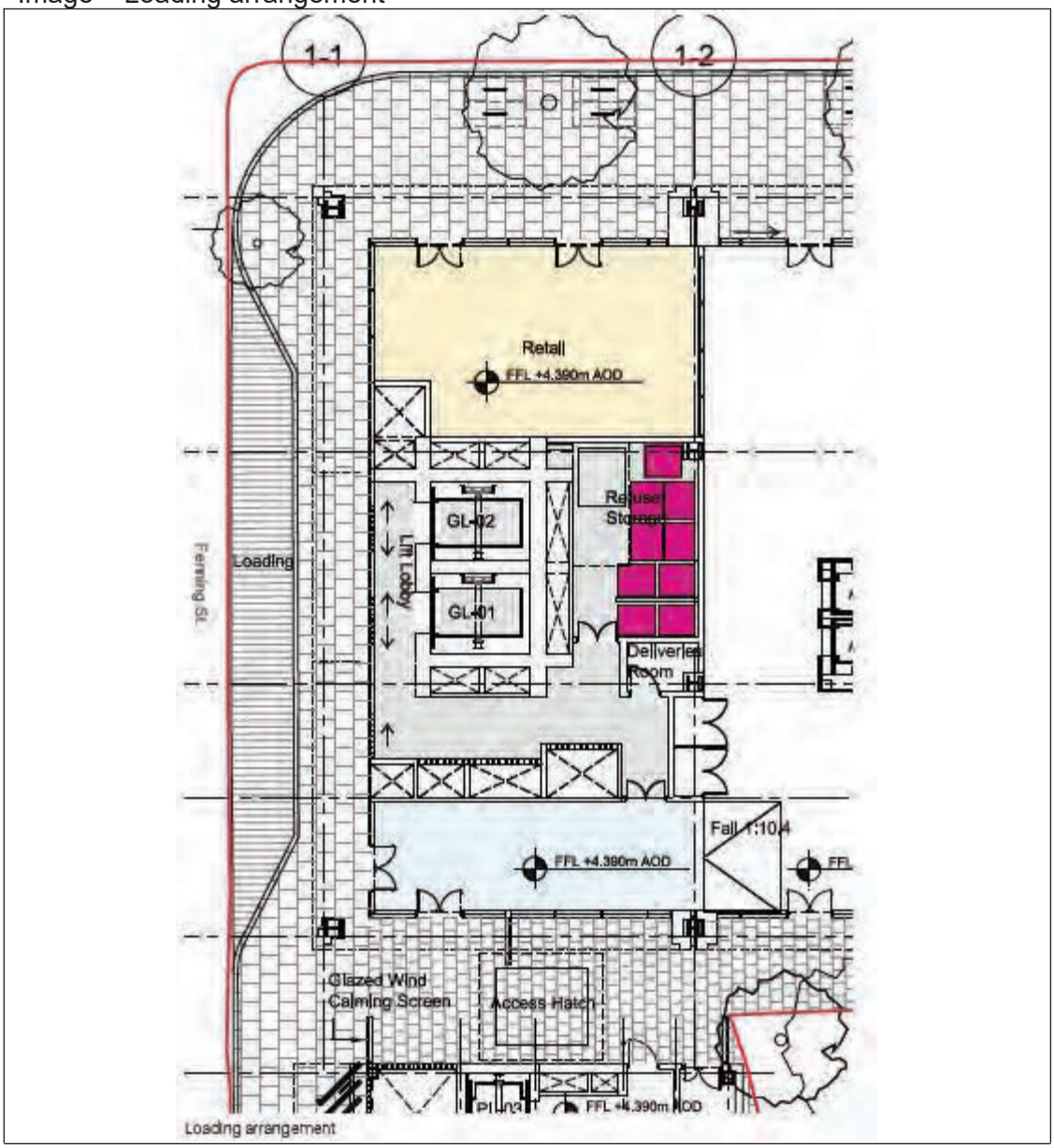
272. The proposed service arrangements have been reviewed by both TfL and the council's Transport officer and officers consider the proposal to be acceptable subject to securing the relevant strategies as part of the S.106 Agreement.

Traffic and transport impacts

273. In terms of vehicle movements, the applicants consultants have estimated that the development would generate one and six two-way vehicle movements in the morning and evening peak hours respectively. The council's transport officer has assessed the development on the basis of comparable scheme data on the TRICS travel database. This review has demonstrates that the office aspect of this

development would generate 41 and 30 two-way vehicle movements in the morning and evening peak hours respectively while the retail and cultural uses would create four and 33 two-way vehicle movements in the morning and evening peak hours, correspondingly. Overall, this development would produce 44 and 62 net additional two-way vehicle movements in the morning and evening peak hours correspondingly, once the 1 two-way vehicle movement predicted for the existing B1 use of this site has been deducted. This level of additional vehicular traffic would not have any noticeable adverse impact on the prevailing vehicle movements on the adjoining roads.

Image – Loading arrangement



274. Having consideration to the fact that there are other development sites in the area, it is imperative that the accumulated servicing demand of all potential developments in this locality be taken into account. As such, a service management plan and consolidation strategy would be required as part of the S106 Agreement similar to that of Guy's/St Thomas hospital and this would be anticipated to further reduce the servicing requirement of this development.

275. The applicant has proposed some travel plan initiatives encompassing provision of

shower/changing facilities for cyclists, the use of off-site delivery consolidation, provision of public transport and walking/cycling information plus monitoring. The travel plan initiatives identified are supported and would be secured as a combination of planning conditions and S106 obligations.

276. In terms of public transport, the development proposal would produce around 607 and 813 net supplementary two-way public transport trips in the morning or evening peak hours respectively and as such is not anticipated to have any adverse impacts on the public transport network.

Car parking

277. 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 however two would be required and as such a condition will be imposed to secure the provision of two accessible car parking bays as well as requiring the parking bays to be fitted with electric vehicle charging facilities.

Environmental impacts

278. Transport has been considered as part of the ES and the assessment has focused on the potential effects on roads, traffic, transport and pedestrian and cyclist routes. The ES has considered possible effects relating to: severance; pedestrian and cyclist amenity; fear and intimidation; delay for drivers, pedestrians and cyclists; accidents and safety; bus passenger delay; public transport service capacity; and hazardous loads.

279. As previously mentioned the site is located in an area with the highest availability and access to public transport. A series of site visits and traffic surveys have been undertaken to inform the ES and gain an appreciation of the current traffic and transport conditions

280. Construction traffic would undoubtedly be at its highest during the construction phase and the ES has not identified any significant adverse impacts in relation to severance, pedestrian and cyclist delay, pedestrian and cyclist amenity, fear and intimidation, driver delay or accidents and safety. Mitigation in the form of a Construction Logistics Plan and Construction Environmental Management Plan. Would be secured as part of the S106 Agreement. No hazardous loads are anticipated throughout the construction works and as such no significant adverse effects have been identified in relation to this.

281. The development would be car free, including during the construction period and the number of people travelling to the site to work throughout the construction works would not generate any significant adverse effects on the capacity of the public transport serving the area.

282. Once the development has been completed and is operational, the development would create a number of road trips associated with deliveries to and from the development in addition to taxi trips however the ES has not identified any significant adverse effects to severance, pedestrian and cyclist delay, pedestrian and cyclist accessibility and amenity, fear and intimidation, driver delay or accidents and safety. Additionally, no significant adverse effects are anticipated in terms of public transport capacity. In order to mitigate any potential servicing or public

transport impacts, a Delivery and Servicing Management Plan and a Travel Plan would be secured as part of the S106 Agreement. In summary, no likely significant traffic and transport related effects have been identified. All effects have been defined as negligible and not significant and this would be the case under the cumulative scenario as well.

Conclusions on transport

283. The proposed development would have a rational, legible open and well considered site layout that would reinforce streets, provide new pedestrian routes and improve connectivity. The development would be car free which would meet the councils objectives of reducing trips by car and minimise car parking whilst at the same time promoting public transport and encouraging walking and cycling which would support the council's sustainability goals.

284. The impacts of the development on the road network as well as impacts on pedestrians, cyclists and amenity has been fully considered as part of the ES with the outcome of the assessment demonstrating that the development would have no significant impacts. 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.

285. The S106 Agreement should secure details of a Demolition/Construction Environmental Management; Construction Logistics Plan, Delivery Consolidation Strategy; Service Management Plan; Car Parking Exemption; and Travel Plan.

Planning obligations (S.106 undertaking or agreement)

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

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

287. 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
Affordable Workspace PiL	£3,638,959	Agreed
Employment During Construction	Provide 67 jobs, 67 short courses and 16 construction industry apprentices for Southwark residents or make a payment of £322,150.	Agreed

Employment in the Development	Provide 227 sustained jobs for unemployed Southwark residents or make a payment of £984,700.	Agreed
Transport for London	The applicant must pay a contribution towards the cycle hire scheme and a contribution will also be required for updated/new legible London signage. In addition to this, Transport for London will be seeking a contribution towards the Healthy Streets Programme. Transport for London to confirm figures.	Agreed
Transport (site specific)	£180,000 towards provision of raised tables; £37,400 towards footway re-construction; £270,000 towards bus improvements; £100,000 towards cycle hire provision; £4,000 towards resurfacing works on Melior Street.	Agreed
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 - £5,000 per tree.	Agreed
Admin Fee	2% of total	Agreed

S106 Provisions

288. The legal agreement will also secure an Affordable Workspace Strategy; Estate Management Plan; Construction Environmental Management Plan; Construction Logistics Plan; Delivery Consolidation Strategy; Site Wide Energy Strategy; Service Management Plan; Landscaping Strategy; Music Venue Management Plan; Basement Impact Assessment Review; Parking Permit Exemption; and Wind Mitigation Strategy. The agreement will also secure an admin charge of 2% of the total contributions.

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

- Repave the footway including new kerbing fronting the development in accordance with the SSDM requirements.
- Construct proposed vehicle crossover using materials in accordance with SSDM requirements.
- Reconstruct any redundant vehicle crossovers as footway along Bermondsey Street and Snowfields in accordance with the SSDM requirements.
- Install any new signage/posts related to the proposed vehicle entrance/exit located in Snowfields due to the one way system along the road. (Promote a TMO to amend any parking arrangements). Works to include road markings and signage.
- Change all utility covers on footway areas to recessed type covers.
- Upgrade street lighting to current LBS standards, including on private roads. Please contact [redacted]@southwark.gov.uk for further details.
- Rectify any damaged footways, kerbs, inspection covers and street furniture due to the construction of the development.

290. In the event that an agreement has not been completed by 30 November 2019, the Committee is asked to authorise the Director of Planning to refuse permission, if appropriate, for the following reason:

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

Mayoral and borough community infrastructure levy (CIL)

291. 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. While Southwark's CIL will provide for infrastructure that supports growth in Southwark. In this instance an estimated Mayoral CIL payment of £5,222,090.46 and a Southwark CIL payment of £2,926,269.61

Community involvement and engagement

292. The developer has undertaken a long, detailed and comprehensive public consultation on the development proposals prior to and during the planning application and they have sought to engage with residents, the community and stakeholder groups.

293. Following some initial pre-application discussions with the council, the developer undertook public consultation beginning with a presentation to the members of the Old Bermondsey Neighbourhood Forum (OBNF) on the 14th November 2018. This included presentations by the applicant alongside the other St Thomas Street landowners. Further resident group meetings were undertaken on the 14 March 2019 and 17 October 2019.

294. In addition to the resident group meetings set out above, a series of public

exhibitions took place as follows:

- 29 September 2018 and 1 October 2018 (250 attendees);
- 10 and 12 November 2018 (75 attendees);
- 21 February 2019 (70 attendees); and
- 23 June 2019.

295. Further public meetings with OBNF took place on the 14 November 2018 and 20 February 2019.

296. Further to this, a series of five public workshops were undertaken as follows:

- Workshop 1 – Jobs and Opportunity – 4 February 2019;
- Workshop 2 – Culture and Curated Retail – 9 February 2019;
- Workshop 3 – Bringing People Together – 26 February 2019;
- Workshop 4 – Health and Wellbeing – 4 March 2019;
- Workshop 5 – London's Next Cultural Hub – 5 March 2019

297. Further engagement that has taken place includes:

- Meetings with ward Councillors
- Meetings with local businesses
- Creation of a project website
- Newsletters
- Newspaper adverts
- Door to door engagement.

298. 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. The responses received are summarised later in this report.

Consultation responses from external consultees

299. Summarised below are the consultation responses raised by external consultees, along with an officer response:

300. Environment Agency: No objections subject to conditions.
Response: Noted.

301. Greater London Authority: Broadly supportive of the proposal. The GLA note that there would be some harm to heritage assets but that this harm would be less than substantial and would be outweighed by the wider benefits of the proposal. The GLA consider the heights to be appropriate for this location. Additional information is required in terms of energy in order to demonstrate that the Mayoral policies are being satisfied and additional information on drainage to ensure that greenfield run off rates would be achieved along with additional attenuation storage and appropriate SUDS maintenance information. Transport issues include updating cycle parking to draft London Plan Standards, revisions to the number of blue badge spaces and adopting Healthy Streets and making appropriate provisions for contributions as set out by TfL in the S106 Agreement.
Response: The issues surrounding energy and drainage have now been resolved by the developer. The number of blue badge spaces and cycle parking have been

updated to meet the TfL requirements and the draft London Plan Standards. Provisions would be made within the S106 Agreement for appropriate contributions, a servicing strategy and Healthy Streets.

302. Historic England: There are concerns about the application on heritage grounds as a result of the demolition of the existing warehouse.
Response: The development would result in the loss of an existing, unlisted building that is located within the conservation area. The loss of the existing warehouse building, would cause less than substantial harm to the heritage asset as a whole and would be offset by the various benefits of bringing the proposed scheme forward, including the provision new jobs, affordable workspace, new retail, new public realm, world class architecture, provision of new routes and the opening up of views of the Horseshoe Inn along Melior Street

303. London Fire Authority: An undertaking should be given that, access for fire appliances as required by Part B5 of the current Building Regulations Approved Document B and adequate water supplies for fire fighting purposes will be provided.
Response: Noted and agreed, the relevant undertaking will be secure by condition on any planning consent issued.

304. London Underground: No comment.
Response: Noted.

305. Metropolitan Police: It is possible for the scheme to achieve Secured by Design standard and a condition should be added to that effect.
Response: Noted and agreed, the relevant condition will be attached to any consent issued.

306. Natural England: No objection.
Response: Noted.

307. Network Rail: No objections.
Response: Noted.

308. Thames Water: No objections subject to conditions.
Response: Noted, the relevant conditions which relate to water supply, proximity to water infrastructure and proximity to Thames Water assets.

309. Transport for London: Have commented that they would like to see the overarching landscaping design process progressed with reference to Healthy Streets and to demonstrate how Mayoral policies are being delivered. TfL requires no further information with regards to trip generation. Cycle parking should be updated to draft London Plan standards and accessible car parking bays should be increased to two spaces. Consolidation of services is supported and contributions are sought towards cycle hire, legible London and Healthy Streets.
Response: Noted and agreed, the landscaping strategy secured as part of the S106 agreement would be progressed in consultation with TfL. Cycle parking and accessible bays have been updated in line with TfL comments and are now considered compliant. The relevant contributions and strategies would be secured as part of the S106 agreement.

Local Groups

310. The Victorian Society: Objection on the basis that the height of the building would be out of character with the conservation area. The proposed building would be overbearing to the Horseshoe Inn and would shift focus away from this building.

The development would be harmful to the conservation area and would set an unwelcome precedent.

Response: The height of the proposed building is considered acceptable and appropriate and would not cause substantial harm to the conservation area or heritage assets. The development would result in the loss of an existing, unlisted building that is located within the conservation area. The loss of the existing warehouse building, would cause less than substantial harm to the heritage asset as a whole and would be offset by the various benefits of bringing the proposed scheme forward, including the provision new jobs, affordable workspace, new retail, new public realm, world class architecture, provision of new routes and the opening up of views of the Horseshoe Inn along Melior Street

311. Old Bermondsey Neighbourhood Forum: OBNF object to the proposed development on the basis that they view the application process and engagement arrangements for the development as flawed. Further objections are made in terms of the impact of the development on heritage assets and the conservation area; the inappropriate scale of the proposal; harm cause by the development; environmental impacts such as wind and overshadowing; disruption during and after construction; and insufficient public benefits.

Response: In terms of the engagement process, the applicant (and other land owners forming the St Thomas Street East group) has held consultation events that have been well attended. Additionally, the council has undertaken two rounds of comprehensive consultation on the application. The engagement and consultation process is considered to be robust and comprehensive. With the wind mitigation measures included in the design, the ES concludes that the development would not result in any major adverse wind impacts either as an individual development or when considered as part of a cumulative development with other schemes in the area. The pocket park on the corner of Melior Street and Fenning Street would be subject to some overshadowing impacts. This amenity space would be overshadowed between 08:00 and 12:00 on the 21st March. Overshadowing would also take place between 06:00 and 13:00 on the 21st June after which the space would then receive uninterrupted sunlight for approximately five hours. This level of overshadowing is considered to be a minor adverse impact. Whilst it is acknowledged that there would be unavoidable disruption during construction, this would be short term and temporary and could be mitigated by conditions. The scale of the proposed development is considered to be acceptable for the site and its surroundings, including the emerging context and the harm to the conservation area and loss of the warehouse building would be less than substantial, being outweighed by the various benefits of the development.

312. Team London Bridge – Important to achieve a design at ground level that would be of a human scale and to address shadowing to St Thomas Street. There are concerns that the music venue, having been reduced in size, would now be too small to serve the anticipated increase in the number of people in the area and the layout of the venue (being mostly below ground) could present a challenge. The market space and retail space is supported but strong visual prompts may be required to help draw people into this space. It will be important to keep the public realm open in character in order to improve pedestrian flows and avoid congestion. There are concerns with the free standing building on Fenning Street and how this would contribute to the area. The level of greening should be improved especially on roof terraces and green walls and increased greening may help alleviate the impact on the view from Leathermarket gardens. There is a lack of clarity on servicing and cycle parking.

Response: Conditions would be attached to any consent issued regarding signage strategies that would help draw people into the retail space. Further conditions are imposed to secure further details of landscaping and planting and the S106

Agreement would provide for a detailed servicing strategy. Cycle parking is now in line with London Plan Standards.

313. WSET - Objection on the basis that there would be disruption/disturbance, the design is not in keeping with the area, the building scale is disproportionate and would be damaging to the historic area. The proposed development would harm the operations of the school and lead to significant disruption for staff and students. Concerns are also raised as to daylight impacts.
Response: Whilst it is acknowledged that there would be some disturbance as a result of construction, this would be temporary and short term. It could also be mitigated by way of planning conditions. The daylight impacts have been set out in detail in the report and are not considered to be significant to warrant refusal of the application. The scale, massing and detailing of the building are considered to be acceptable and would not be damaging to the heritage asset.

Consultation response from neighbours and representees

314. In response to public consultation, a total of 76 responses have been received. Of these, 72 were in objection and four were in support of the application. Summarised below are the objections raised by members of the public with an officer response:

315. Objection – The proposed development would be excessive in scale, height and massing.
Response – The application site is located within an area that is considered appropriate for the provision of tall buildings and would provide an appropriate bridge between the taller buildings at London Bridge Station and the lower scale buildings to the east.

316. Objection – The development would be overbearing to the local area.
Response – Whilst the proposed building would be tall and in some instance s visible from surrounding streets, it is not considered to be overbearing. On Melior Street the development would allow for improved views of the Horseshoe Inn and on St Thomas Street and Snowsfields there would be a highly visible and generous public realm.

317. Objection – The proposed development would dominate the local area and Bermondsey Street.
Response – The proposed building would be a contrast in scale from the low rise buildings of Bermondsey Street and whilst it would be visible from within some viewpoints on Bermondsey Street and the surrounding area, its visibility would not adversely affect the local area or Bermondsey Street nor would it dominate its surroundings.

318. Objection – The development would cause harm to the Vinegar Yard Warehouse.
Response – The development does not include any works to the Vinegar Yard Warehouse which sits outwith the application site.

319. Objection – The development would result in the loss of the historic two storey warehouse building and would harm listed buildings/structures such as the railway arches on St Thomas Street.
Response – The development would result in the loss of an existing, unlisted building that is located within the conservation area. The loss of the existing warehouse building, would cause less than substantial harm to the heritage asset as a whole and would be offset by the various benefits of bringing the proposed

scheme forward, including the provision new jobs, affordable workspace, new retail, new public realm, world class architecture, provision of new routes and the opening up of views of the Horseshoe Inn along Melior Street.

320. Objection – The proposed development is out of keeping with the character of the area.
Response – As previously set out, the proposed buildings would be visible and of a distinctly scale to the surrounding buildings however the warehouse style of the architecture is represented locally. Whilst the development would be in contrast to the scale of the surrounding area this is not considered to be detrimentally harmful and would provide a pleasant contrast.

321. Objection – The development would result in harm to local heritage assets and the Bermondsey Street Conservation Area and the demolition of the warehouse is unacceptable.
Response – The scale, massing and detailed design of the proposed development is considered to be acceptable and would not detrimentally harm the character of the conservation area. The development would result in the loss of an existing, unlisted building that is located within the conservation area. The loss of the existing warehouse building, would cause less than substantial harm to the heritage asset as a whole and would be offset by the various benefits of bringing the proposed scheme forward, including the provision of new routes and a substantial public realm in addition to opening up views of the Horseshoe Inn along Melior Street.

322. Objection – The development would have a significant adverse impact on views, both strategic and local.
Response – The development would be visible in some views however the small incursions into views is not considered to be harmful.

323. Objection – The development would be overbearing to the Horseshoe Inn.
Response – Whilst the development would be much taller than the existing building next to the Horseshoe Inn, it would be set back from the current building line and as such will open up views of the Horseshoe Inn when viewed along Melior Street which is considered positive.

324. Objection – The harm to the heritage assets is not justified in line with the NPPF.
Response – The harm to the heritage assets would be less than substantial and would be outweighed by the benefits of the proposed development.

325. Objection – The architectural design is poor and out of character with the area.
Response – The architecture is considered to be of the highest standard and the warehouse style of the proposed building facades is well represented in the local area.

326. Objection – The Design Review Panel recommended that a strategic approach to landscaping, public realm and environmental impacts should be undertaken. This does not appear to be the case.
Response - The proposals were considered by the council's DRP at the pre-application in October 2018. At that time the scheme was presented within the context of the wider development framework, which the panel generally endorsed, subject to a clearer definition of the new east-west pedestrian route, better landscaping and confirmation of benign climatic conditions. The DRP generally supported the heights across the framework area, including the application

development. It suggested adjusting the architecture to better ground the tall building and to refine the elevations at upper floor levels, including the service tower. It made similar comments regarding the pavilion building, but expressed their confidence in the scheme architects to deliver a high quality design. Subsequently, adjustments have been made to officers' satisfaction.

327. Objection – The development would result in excessive wind impacts and the mitigation is not a committed part of the development.
Response - With the wind mitigation measures included in the design, the ES concludes that the development would not result in any major adverse wind impacts either as an individual development or when considered as part of a cumulative development with other schemes in the area.

328. Objection – Part of the wind mitigation would rely on trees which may not all be feasible due to location issues; ownership; and underlying services.
Response – A Wind Mitigation Strategy and Landscaping Strategy would both be required as part of the S106 Agreement and would ensure appropriate wind mitigation, including additional wind tunnel testing as well as new planting locations should they be required..

329. Objection – There is no cumulative wind impact study.
Response – Cumulative wind impacts have been assessed as part of the ES. In terms of the cumulative impact, it is noted that wind conditions in and around the site would be expected to range from suitable for sitting to walking use during the windiest season. During the summer season wind conditions would generally be expected to be one category calmer than those during the windiest season.

330. Objection – There would be a loss of light to adjacent properties.
Response - The results of the daylight assessment demonstrate that there would be a number of windows and rooms that would not meet the relevant daylighting standards of the BRE for the most part these impacts would be minor in nature and would be balanced out by compliant daylight distribution levels. It is noted that there would be major impacts to the buildings at 8 Melior Street - 36 Snowsfields and 8-20 Snowsfields. This issue is dealt with in detail within the main body of the report under the section title Conclusions on daylight.

331. Objection – St Thomas Street would be very overshadowed.
Response – St Thomas Street would experience some overshadowing as the sun moves wes. Any buildings on the south side of St Thomas Street would cause overshadowing as a result of the streets alignment.

332. Objection – The development would result in overshadowing to public spaces.
Response - The pocket park on the corner of Melior Street and Fenning Street would be subject to some overshadowing impacts. This amenity space would be overshadowed between 08:00 and 12:00 on the 21st March. Overshadowing would also take place between 06:00 and 13:00 on the 21st June after which the space would then receive uninterrupted sunlight for approximately five hours. This level of overshadowing is considered to be a minor adverse impact.

333. Objection – The new public spaces would be overshadowed, windy and not green enough.
Response – The public open spaces would include new trees and green areas as well as wind conditions appropriate for the relevant uses. The new public realm

would be well lit throughout the day with some overshadowing as the sun moves west in the late afternoon.

334. Objection – The development would result in noise, dust, pollution and would affect physical and mental health.
Response - During the demolition and construction phase it is recognised that there would be impacts such as dust in the air as well as dust and dirt on the highway as a result of construction vehicle movements. This can be suitably managed and mitigated through a Construction Environmental Management Plan which would be a conditioned requirement of any consent issued. The impact of construction vehicle traffic emissions is not considered to be significant. Planning conditions would be capable of managing any potential impacts during the operational phase of the development.

335. Objection – The development would adversely affect local business and make it difficult for them to hire and retain the best staff and offer them a suitable work life balance due to the impacts on the local area.
Response – Impacts during construction would be short term, temporary and managed by condition. The operational development would provide an attractive public realm and new retail with improved pedestrian connectivity. Officers do not consider that this would impact on local businesses ability to attract and retain staff.

336. Objection – There would be excessive levels of disturbance during demolition and construction works and as part of the completed development..
Response - All developments cause a degree of disturbance during their construction as a result of associated demolition, site clearance and construction works. These types of disturbance are generally unavoidable in order to allow development to take place however they are short term and temporary and can be effectively managed by condition. The applicant would be required to submit a Demolition and Construction Environmental Management Plan and a Construction Logistics Plan in advance of any work taking place in order to ensure that any potential for disturbance can be managed and minimised. Once the development is complete it is not anticipated that there would be any adverse impacts in terms of noise and disturbance with the exception of the potential impact at Guys Hospital which is discussed in more detail on the body of the report.

337. Objection – The proposed music venue is unacceptable, would lead to disturbance and would not be viable. There do not appear to be any parties interested in running the music venue.
Response – It would be unlikely for an operator to be secured for a new venue at planning stage. The music venue itself, being located on basement levels two and three, would not result in any disturbance to residents on Bermondsey Street, Crucifix Lane or Snowsfields and the Management Strategy would be secured as part of the S106 Agreement that would ensure appropriate management and mitigation would be in place.

338. Objection – Transport facilities are inadequate for the proposed development and services from London Bridge are already under a lot of pressure at peak hours.
Response – The development would not be expected to result in any adverse impact on the public transport network or capacity and Transport for London have not raised this as an issue. A contribution would be secured towards bus service improvements and the development would be subject to the Community Infrastructure Levy that can fund infrastructure improvements.

339. Objection – The construction and servicing plans are insufficient.
Response – The scope of the servicing strategy is supported by the council's Transport Team and Transport for London. Further details would be required as part of the Construction Environmental Management Plan and a Delivery and Servicing Management Plan as part of the S106 Agreement.

340. Objection – The proposed landscaping is not 'green' enough and does not meet the Mayor's policy on Urban Greening. Nor does it demonstrate how green infrastructure has been incorporated.
Response – The proposed landscaping scheme is considered to be high quality with an appropriate balance between hard and soft spaces as well as planting and opportunities for street furniture. Further landscaping details would be secured as part of a Landscaping Strategy in the S106 Agreement and this would provide an opportunity for additional planting and greening should this be considered optimal.

341. Objection – The proposal would represent overdevelopment of the area.
Response – The proposed development would be a marked increase compared to the currently underdeveloped site however the development would be acceptable in its scale and massing and would provide a high quality and generous new public realm which is proportionate to the scale of the development.

342. Objection – The development would result in the loss of community space.
Response – The development site was previously in use as a car park and then temporary office space. At present it is in temporary use for food, beverage and retail. The site is not a community space and would not result in the loss of a community facility.

343. Objection – The number and depth of basements is inappropriate and would affect the water table.
Response – Flood risk has been assessed as part of the ES and the application has been reviewed by the Environment Agency who consider it to be acceptable subject to conditions.

344. Objection – The area does not need any more shops or retail.
Response – The site is located within a district Town centre and the provision of retail use is supported by policy and will help provide additional shops for residents and visitors to the area.

345. Objection – The large areas of paving are unnecessary as are some of the new routes and should be reconsidered.
Response – The new routes improve connectivity and legibility and are a benefit of the scheme as are widened pavements and generous spaces.

346. Objection – in the current Climate Emergency, the sustainability credentials of the development are insufficient.
Response – The development would exceed London Plan standards and would provide for a 46% carbon reduction.

347. Objection – The increase in traffic will affect the operation of Guy's Hospital.
Response – The proposed traffic levels for the development are not considered to be excessive and would not lead to any significant adverse impact on the local road

network. This has been assessed as part of the ES.

348. Objection – The consultation process has been poor, insufficient and not meaningful.
Response - 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. The responses received are summarised later in this report.

349. Objection – The process of developing these applications has been flawed and consultation with the local community has been ineffective.
Response – The developer has undertaken a significant amount of public consultation. 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. The responses received are summarised later in this report.

350. Objection – The development would be contrary to planning policy and does not meet the requirements of the site allocations in the New Southwark Plan.
Response – The development would provide all of the mandatory requirements of the site allocations of the New Southwark Plan which is still in draft form at the moment as it awaits an examination in public.

351. Objection – The harm caused by the development would not be outweighed by benefits.
Response – The proposed benefits of the scheme including a significant number of new jobs, affordable workspace, new retail, provision of a music venue, high quality architecture, a generous public realm and new pedestrian routes and site legibility/connectivity are considered to be benefits of the proposed development that would significantly outweigh any harm caused.

352. Objection - The updates to the Environmental Statement have not resulted in any scheme amendments and the Environmental Impact Assessment has not considered a fully cumulative impact.
Response – Additional cumulative assessments were included as part of the revisions to the ES alongside some minor scheme amendments.

353. Objection – The servicing requirements of the development would result in increased traffic and nuisance.
Response – This has been assessed as part of the ES and it is not considered that there would be an increase in traffic levels that would result in any significant adverse impacts. The delivery and Servicing Management Plan would allow the council to set what times the development could be serviced at and using what type of vehicles. The Consolidation Strategy would secure the ability to link up with other development (notably the other St Thomas Street developments) in order to consolidate services and delivery.

354. Objection – The proposed development would result in excessive pressure on local infrastructure.
Response – The development is not anticipated to have an adverse impact on local infrastructure and would be subject to the Community Infrastructure Levy that can fund infrastructure improvements.

355. Objection – The development would result in the loss of privacy.
Response - 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. This minimum 12m distance as set out in the SPD is met between the proposed building and the adjacent flatted dwellings on both Melior Street and Snowsfields. It is acknowledged that the distance between the proposed building and the Horseshoe Inn is much closer however the primary use is as a public house and as such the proximity is considered acceptable.

356. Four letters of support have been received on the following points:
- Good design;
- Supports independent retail;
- Nice architecture with a warehouse feel;
- Exciting new development with independent food, retail, artists and creatives; and
- Much needed new employment and will bring life to the area.

Community impact and equalities assessment

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

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

359. 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.

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

Human rights implications

361. 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.

362. This application has the legitimate aim of providing new comes, offices, retail opportunities and cultural space alongside a new and enhanced public realm. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

Positive and proactive statement

363. 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.

364. 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

Other matters

Conclusion

365. The intention to redevelop the site with a tall building and a high density, mixed use development is one that is supported by current planning policy. The provision of a substantial uplift in employment space through the creation of high quality offices is welcomed and the provision of new retail opportunities will enliven the streets whilst supporting the functions of the London bridge District Town Centre. The provision of new retail opportunities will provide appropriate shops and services for the uplift in residents, workers and visitors to the area and aligns with policy requirements.

366. The currently underdeveloped site would be capable of providing a substantial uplift in office and employment floorspace and could provide up to 1,508 new jobs through maximising the development potential of the site. The provision of affordable workspace through a combination of on site provision and an in lieu payment would meet the requirements of emerging New Southwark plan and Draft London plan policies and is an added benefit of the scheme.

367. The provision of a music venue/cultural space, would further enhance the range of uses being proposed on this site as well as strengthening the entertainment and cultural provision within the area. The provision of a music venue/cultural space would be in accordance with planning policy and is considered appropriate given the location of the application site within the Strategic Cultural Area.

368. The proposed buildings are of a significant scale and would directly contrast with the lower scale buildings located to the east and south, particularly those within the Bermondsey Street Conservation Area, however they would also bridge the rise in scale towards the west and the more substantial buildings located around London Bridge Station. As such this site has an important role to play in managing the transition in height, scale and massing and it is considered that the development is successful in this regard.

369. The existing warehouse buildings on Fenning Street are not listed however they contribute to the conservation area and their loss, to a degree, would result in some harm. However, the harm would be less than substantial and would be significantly outweighed by the benefits of redeveloping the site including the provision of high quality architecture, significant new employment provision, affordable workspace, new retail opportunities, a new music venue, new pedestrian linkages with improved connectivity and a significant new public realm.

370. The public realm improvements with the creation of a new east-west route and a new piazza would result in much improved permeability and connectivity in the area and would provide key linkages to other adjacent development sites as well as providing a key element of the public realm. The proposal would provide an extensive improvement to the streetscape together with new active frontages which would improve the experience for pedestrians, and provide for natural surveillance. The new public spaces are a particular benefit of this development.

371. 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 notable 8 Melior Street-36 Snowsfields and 8-20 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.

372. Further impacts identified in the Environmental Statement would generally be capable of being mitigated through detailed design, through conditions, or through

provisions in the s106 agreement.

373. It is therefore recommended that planning permission be granted, subject to conditions, the completion of a S106 Agreement and referral to the GLA.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Place and Wellbeing 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

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning		
Report Author	[redacted] Team Leader		
Version	Final		
Dated	10 June 2020		
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			10 June 2020

APPENDIX 1

Consultation undertaken

Site notice date:
Press notice date: 17/10/2019
Case officer site visit date: n/a
Neighbour consultation letters sent: 03/12/2019

Internal services consulted

Flood Risk Management & Urban Drainage
Highways Licensing
Highways Development and Management
Waste Management
Ecology
Archaeology
Design and Conservation Team [Formal]
Urban Forester
Flood Risk Management & Urban Drainage
Archaeology
Design and Conservation Team [Formal]
Ecology
Highways Development and Management
Highways Licensing
Flood Risk Management & Urban Drainage
Urban Forester
Waste Management
Design and Conservation Team [Formal]
Archaeology
Ecology
Local Economy
Environmental Protection
Highways Development and Management
Highways Licensing
Housing Regeneration and Delivery

Flood Risk Management & Urban Drainage
Transport Policy
Urban Forester
Waste Management

Statutory and non-statutory organisations

Environment Agency
Thames Water
Transport for London
Network Rail

Great London Authority
EDF Energy

London Fire & Emergency Planning Authori
London Underground
Metropolitan Police Service (Designing O
Natural England - London & South East Re

Planning Policy

London Underground
Thames Water

Natural England - London & South East Re
Metropolitan Police Service (Designing O
London Fire & Emergency Planning Authori
Great London Authority

EDF Energy

Environment Agency

Great London Authority

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London Underground
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Network Rail
Planning Policy
Metropolitan Police Service (Designing O
Transport for London

Thames Water

EDF Energy

Environment Agency
Great London Authority
London Fire & Emergency Planning Authori
London Underground
Natural England - London & South East Re
Network Rail
Metropolitan Police Service (Designing O
Transport for London
Thames Water

Neighbour and local groups consulted:

23 Guinness Court Snowsfields London
Third Floor 7 Holyrood Street London
114 Guinness Court Snowsfields London
Fourth Floor Shand House 14-20 Shand Street
Flat 2 80 Bermondsey Street London
46 Tyers Estate Bermondsey Street London
49 Tyers Estate Bermondsey Street London
52 Tyers Estate Bermondsey Street London
53 Tyers Estate Bermondsey Street London
50 Tyers Estate Bermondsey Street London
53 Guinness Court Snowsfields London

54 Guinness Court Snowsfields London
57 Guinness Court Snowsfields London
6 Guinness Court Snowsfields London
16 Tyers Estate Bermondsey Street London
28 Tyers Estate Bermondsey Street London
29 Tyers Estate Bermondsey Street London
26 Tyers Estate Bermondsey Street London
27 Tyers Estate Bermondsey Street London
30 Tyers Estate Bermondsey Street London
33 Tyers Estate Bermondsey Street London
144 Guinness Court Snowsfields London
147 Guinness Court Snowsfields London
1 Black Swan Yard London SE1 3XW
4 Crucifix Lane London SE1 3JW
First Floor To Third Floor Part Fourth And Part Fifth Floor 39-45 Bermondsey Street London
Third Floor 40 Bermondsey Street London
132 Guinness Court Snowsfields London
129 Guinness Court Snowsfields London
Flat 11 Artbrand House 7 Leathermarket Street
14 Ship And Mermaid Row London SE1 3QN
3A Bridgewalk Heights 80 Weston Street London
Sixth Floor And Seventh Floor Capital House 42 Weston Street
Unit 1 72 Weston Street London
Flat 2 99 Bermondsey Street London
Flat 2 7 Tyers Gate London
Flat 1 99 Bermondsey Street London
Basement And Ground Floor 130-132 Tooley Street London
First Floor And Second Floor 130-132 Tooley Street London
Basement To Third Floor 37-37A Snowsfields London
West Wing Nurses Home Guys Hospital Great Maze Pond
Third Floor And Fourth Floor 130-132 Tooley Street London
Flat 4 8 Tyers Gate London
Second To Fifth Floors Capital House 42 Weston Street
Flat 3 7 Tyers Gate London
Flat 3 8 Tyers Gate London
Flat 12 22E Leathermarket Street London
Flat 13 22E Leathermarket Street London
22D Leathermarket Street London SE1 3HP
22B Leathermarket Street London SE1 3HP
Flat 14 22E Leathermarket Street London
Fourth Floor 7 Holyrood Street London
Ground Floor Raquel Court 147 Snowsfields
Ground Floor Rooms 2 And 3 77 Weston Street London
15 Hardwidge Street London SE1 3SY
The Wine And Spirit Trade Association Ltd 39-45 Bermondsey Street London
Part Ground Floor 17 Hardwidge Street London
17 Hardwidge Street London SE1 3SY
4 Carmarthen Place London SE1 3TS
2 Carmarthen Place London SE1 3TS
62-64 Weston Street London SE1 3QJ
56 Bermondsey Street London SE1 3UD
43 Snowsfields London SE1 3SU
1 Tyers Gate London SE1 3HX
10 Whites Grounds Estate Whites Grounds London
Flat 2 40 Snowsfields London
Flat 2 42 Snowsfields London
Flat 1 40 Snowsfields London
Flat 1 42 Snowsfields London
1 Guinness Court Snowsfields London
20 Guinness Court Snowsfields London
21 Guinness Court Snowsfields London
19 Guinness Court Snowsfields London
2 Guinness Court Snowsfields London
22 Guinness Court Snowsfields London
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41 Snowsfields London SE1 3SU
Flat 1 62 Weston Street London
Flat 1 64 Weston Street London
Flat 10 64 Weston Street London
Flat 11 64 Weston Street London
Flat 2 62 Weston Street London
81 Weston Street London SE1 3RS
Munro Clinic Snowsfields London
Flat 14 22 Leathermarket Street London
Third Floor 4-8 Whites Grounds London
Flat 12 22 Leathermarket Street London
Flat 13 22 Leathermarket Street London
First Floor Flat 72 Bermondsey Street London
Third Floor Bramah House 65-71 Bermondsey Street

Fourth Floor Bramah House 65-71 Bermondsey Street
Ground Floor To Second Floor 22 Shand Street London
Ground Floor Bramah House 65-71 Bermondsey Street
Flat 3 22 Leathermarket Street London
Flat 4 22 Leathermarket Street London
Flat 1 22 Leathermarket Street London
Flat 2 22 Leathermarket Street London
Flat 6 22 Leathermarket Street London
Flat 10 22 Leathermarket Street London
Flat 11 22 Leathermarket Street London
Flat 7 22 Leathermarket Street London
Flat 8 22 Leathermarket Street London
Ground Floor 48-50 Weston Street London
Flat 3 16 Melior Street London
Flat 4 16 Melior Street London
Flat 1 16 Melior Street London
Flat 2 16 Melior Street London
Flat 5 16 Melior Street London
Second Floor Bramah House 65-71 Bermondsey Street
Ground Floor 72 Bermondsey Street London
Arthurs Mission Hall Snowsfields London
Atrium 2 Guys Hospital St Thomas Street
Rooms 2 To 6 Second Floor 3-5 Hardwidge Street London
Flat 9 22 Leathermarket Street London
Second Floor East 136-148 Tooley Street London
Flat 5 22 Leathermarket Street London
Maisonette Second Floor And Third Floor 109 Bermondsey Street London
Flat 6 16 Melior Street London
Second Floor And Third Floor Flat 72 Bermondsey Street London
Flat C Second Floor 2 Whites Grounds London
Flat D Third Floor And Fourth Floor 2 Whites Grounds London
Second Floor And Third Floor Flat 96 Bermondsey Street London
Flat B First Floor 2 Whites Grounds London
Unit 12 52 Bermondsey Street London
Flat 3 64 Weston Street London
Flat 4 62 Weston Street London
Flat 2 64 Weston Street London
Flat 3 62 Weston Street London
3 Tyers Estate Bermondsey Street London
4 Tyers Estate Bermondsey Street London
12 Tyers Estate Bermondsey Street London
2 Tyers Estate Bermondsey Street London
5 Tyers Estate Bermondsey Street London
8 Tyers Estate Bermondsey Street London
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7 Tyers Estate Bermondsey Street London
Flat 4 64 Weston Street London
16 Snowsfields London SE1 3SU
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14 Snowsfields London SE1 3SU
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18 Snowsfields London SE1 3SU
38 Snowsfields London SE1 3SU
39 Snowsfields London SE1 3SU
20 Snowsfields London SE1 3SU
Flat 7 64 Weston Street London
Flat 8 64 Weston Street London
Flat 5 64 Weston Street London
Flat 6 64 Weston Street London
Flat 9 64 Weston Street London
Flat Above 10-11 Snowsfields London
12 Snowsfields London SE1 3SU
10-11 Snowsfields London SE1 3SU
27 Guinness Court Snowsfields London
109 Guinness Court Snowsfields London
110 Guinness Court Snowsfields London
107 Guinness Court Snowsfields London
108 Guinness Court Snowsfields London
111 Guinness Court Snowsfields London
Flat 36, Rochfort House Grove Street London
115 Guinness Court Snowsfields London
112 Guinness Court Snowsfields London
113 Guinness Court Snowsfields London
100 Guinness Court Snowsfields London
101 Guinness Court Snowsfields London
8 Guinness Court Snowsfields London
9 Guinness Court Snowsfields London
Flat 3 Lion Court 12 Shand Street
Flat 35 Lion Court 12 Shand Street
Flat 32 Lion Court 12 Shand Street
Flat 33 Lion Court 12 Shand Street
Flat 36 Lion Court 12 Shand Street
Flat 10 Lion Court 28 Magdalen Street
Flat 11 Lion Court 28 Magdalen Street
Flat 1 Lion Court 28 Magdalen Street
Flat 2 Lion Court 28 Magdalen Street
Flat 23 Lion Court 12 Shand Street
Flat 25 Lion Court 12 Shand Street
Flat 21 Lion Court 12 Shand Street
Flat 22 Lion Court 12 Shand Street
Flat 26 Lion Court 12 Shand Street
Flat 30 Lion Court 12 Shand Street
Flat 31 Lion Court 12 Shand Street
Flat 27 Lion Court 12 Shand Street
Flat 29 Lion Court 12 Shand Street
Flat 19 Lion Court 28 Magdalen Street

Flat 5 St Lukes Court 124-126 Tooley Street
Flat 6 St Lukes Court 124-126 Tooley Street
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Flat 4 St Lukes Court 124-126 Tooley Street
Flat 7 St Lukes Court 124-126 Tooley Street
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Flat 9 St Lukes Court 124-126 Tooley Street
Flat 28 Lion Court 28 Magdalen Street
154 Tooley Street London SE1 2TZ
Flat 20 Lion Court 28 Magdalen Street
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Flat 1 St Lukes Court 124-126 Tooley Street
Flat 2 St Lukes Court 124-126 Tooley Street
Third Floor Shand House 14-20 Shand Street
Flat 18 Lion Court 12 Shand Street
6 Carmarthen Place London SE1 3TS
14 Bermondsey Street London SE1 2EG
Unit 2 7-13 Melior Street London
12 Melior Street London SE1 3QP
102 Guinness Court Snowsfields London
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75 Guinness Court Snowsfields London
72 Guinness Court Snowsfields London
73 Guinness Court Snowsfields London
119 Guinness Court Snowsfields London
61 Guinness Court Snowsfields London
Unit 6B 7 Tyers Gate London
Railway Arch 6 Crucifix Lane London
60A Weston Street London SE1 3QJ
5A Tyers Gate London SE1 3HX
Flat 1 80 Bermondsey Street London
56-58 Weston Street London SE1 3QJ
76A Bermondsey Street London SE1 3UD
128 Tooley Street London SE1 2TU
Flat 8 Lion Court 12 Shand Street
Flat 9 Lion Court 12 Shand Street
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Flat 13 Lion Court 12 Shand Street
Flat 15 Lion Court 12 Shand Street
29 Shand Street London SE1 2ES
1 Magdalen Street London SE1 2EN
Flat 5 Lion Court 12 Shand Street
43 Barnham Street London SE1 2UU
Flat 12 St Lukes Court 124-126 Tooley Street
47 Tyers Estate Bermondsey Street London
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63 Tyers Estate Bermondsey Street London
60 Tyers Estate Bermondsey Street London
61 Tyers Estate Bermondsey Street London
35 Tyers Estate Bermondsey Street London
68 Bermondsey Street London SE1 3UD
88 Bermondsey Street London SE1 3UB
Woolpack 98 Bermondsey Street London
80 Bermondsey Street London SE1 3UD
14 Tyers Estate Bermondsey Street London
15 Tyers Estate Bermondsey Street London
99-101 Bermondsey Street London SE1 3XB
13 Tyers Estate Bermondsey Street London
1 Melior Place London SE1 3SZ
Flat 13 St Lukes Court 124-126 Tooley Street
Flat 14 St Lukes Court 124-126 Tooley Street
47 Bermondsey Street London SE1 3XT
66 Weston Street London SE1 3QJ
79 Weston Street London SE1 3RS
Navigator House 4A Tyers Gate London
6 Crucifix Lane London SE1 3JW
34 Tyers Estate Bermondsey Street London
31 Tyers Estate Bermondsey Street London
32 Tyers Estate Bermondsey Street London
5 Guinness Court Snowsfields London
50 Guinness Court Snowsfields London
64 Whites Grounds Estate Whites Grounds London
65 Whites Grounds Estate Whites Grounds London
62 Whites Grounds Estate Whites Grounds London
63 Whites Grounds Estate Whites Grounds London
66 Whites Grounds Estate Whites Grounds London
69 Whites Grounds Estate Whites Grounds London
70 Whites Grounds Estate Whites Grounds London
67 Whites Grounds Estate Whites Grounds London
68 Whites Grounds Estate Whites Grounds London
5 Tyers Gate London SE1 3HX
60 Whites Grounds Estate Whites Grounds London
61 Whites Grounds Estate Whites Grounds London
71 Whites Grounds Estate Whites Grounds London
83 Whites Grounds Estate Whites Grounds London
84 Whites Grounds Estate Whites Grounds London
81 Whites Grounds Estate Whites Grounds London
82 Whites Grounds Estate Whites Grounds London
85 Whites Grounds Estate Whites Grounds London
88 Whites Grounds Estate Whites Grounds London
89 Whites Grounds Estate Whites Grounds London
86 Whites Grounds Estate Whites Grounds London
87 Whites Grounds Estate Whites Grounds London
74 Whites Grounds Estate Whites Grounds London
75 Whites Grounds Estate Whites Grounds London
72 Whites Grounds Estate Whites Grounds London
73 Whites Grounds Estate Whites Grounds London
76 Whites Grounds Estate Whites Grounds London
79 Whites Grounds Estate Whites Grounds London
80 Whites Grounds Estate Whites Grounds London

77 Whites Grounds Estate Whites Grounds London
78 Whites Grounds Estate Whites Grounds London
Basement To First Floor 150-152 Tooley Street London
Second Floor 150-152 Tooley Street London
145 Guinness Court Snowsfields London
146 Guinness Court Snowsfields London
143 Guinness Court Snowsfields London
Basement 60 Weston Street London
Part Ground Floor And First Floor Capital House 42 Weston Street
Part Ground Floor And Eighth Floor Capital House 42 Weston Street
First Floor 134 Tooley Street London
Second Floor 134 Tooley Street London
2 Crucifix Lane London SE1 3JW
Snowsfields Primary School Kirby Grove London
136 Guinness Court Snowsfields London
137 Guinness Court Snowsfields London
134 Guinness Court Snowsfields London
135 Guinness Court Snowsfields London
138 Guinness Court Snowsfields London
141 Guinness Court Snowsfields London
142 Guinness Court Snowsfields London
139 Guinness Court Snowsfields London
140 Guinness Court Snowsfields London
6 Melior Street London SE1 3QP
94 Bermondsey Street London SE1 3UB
Flat B 90 Bermondsey Street London
81 Bermondsey Street London SE1 3XF
96 Bermondsey Street London SE1 3UB
9 Fenning Street London SE1 3QR
Flat 3 94 Bermondsey Street London
Flat A 90 Bermondsey Street London
Flat 1 94 Bermondsey Street London
Flat 2 94 Bermondsey Street London
80A Bermondsey Street London SE1 3UD
1 Tanner Street London SE1 3LE
Unit 1 7 Tyers Gate London
Horseshoe 26 Melior Street London
8 Crucifix Lane London SE1 3JW
133 Guinness Court Snowsfields London
87 Guinness Court Snowsfields London
88 Guinness Court Snowsfields London
85 Guinness Court Snowsfields London
86 Guinness Court Snowsfields London
89 Guinness Court Snowsfields London
92 Guinness Court Snowsfields London
93 Guinness Court Snowsfields London
90 Guinness Court Snowsfields London
91 Guinness Court Snowsfields London
78 Guinness Court Snowsfields London
Montessori 7-13 Melior Street London
Third Floor Shiva The Tannery Bermondsey Street
Ganesh The Tanneries 55 Bermondsey Street
Manasa The Tanneries 55 Bermondsey Street
Fourth Floor Shiva The Tannery Bermondsey Street
Sati The Tanneries 55 Bermondsey Street
Unit 31 56 Bermondsey Street London
Medical School Borough Wing And Tabard Wing Guys Hospital Great Maze Pond
Unit 15 52 Bermondsey Street London
Unit 21 52 Bermondsey Street London
Ground Floor 103 Bermondsey Street London
First Floor 40 Bermondsey Street London
Second Floor 40 Bermondsey Street London
103 Bermondsey Street London SE1 3XB
Basement And Ground Floor 63 Bermondsey Street London
Second Floor 59-63 Bermondsey Street London
Second And Third Floor 61 Bermondsey Street London
Meeting Room 1 Fourth Floor 39-45 Bermondsey Street London
Ground Floor Room 4 77 Weston Street London
First Floor 16 Crucifix Lane London
Ground Floor Room 1 77 Weston Street London
Second Floor 16 Crucifix Lane London
First Floor 122 Tooley Street London
Ground Floor 40 Bermondsey Street London
Ground Floor 16 Crucifix Lane London
73B Maltings Place London SE1 3LJ
Flat 1 Artbrand House 7 Leathermarket Street
Room 301 West Wing Nurses Home Guys Hospital Great Maze Pond
Room 318 Guys Hospital Great Maze Pond
Flat 4 West Wing Nurses Home Guys Hospital Great Maze Pond
Room 306 West Wing Nurses Home Guys Hospital Great Maze Pond
Room 206 West Wing Nurses Home Guys Hospital Great Maze Pond
Second Floor 2 Leathermarket Street London

Flat 3 Counting House Guys Hospital Great Maze Pond
Ground Floor 2 Leathermarket Street London
First Floor 2 Leathermarket Street London
52 Weston Street London SE1 3QJ
Arch 873 41 Barnham Street London
79 Guinness Court Snowsfields London
76 Guinness Court Snowsfields London
77 Guinness Court Snowsfields London
80 Guinness Court Snowsfields London
83 Guinness Court Snowsfields London
84 Guinness Court Snowsfields London
81 Guinness Court Snowsfields London
82 Guinness Court Snowsfields London
94 Guinness Court Snowsfields London
126 Guinness Court Snowsfields London
127 Guinness Court Snowsfields London
124 Guinness Court Snowsfields London
125 Guinness Court Snowsfields London
128 Guinness Court Snowsfields London
131 Guinness Court Snowsfields London
45 Whites Grounds Estate Whites Grounds London
42 Whites Grounds Estate Whites Grounds London
130 Guinness Court Snowsfields London
97 Guinness Court Snowsfields London
98 Guinness Court Snowsfields London
95 Guinness Court Snowsfields London
96 Guinness Court Snowsfields London
99 Guinness Court Snowsfields London
122 Guinness Court Snowsfields London
123 Guinness Court Snowsfields London
120 Guinness Court Snowsfields London
121 Guinness Court Snowsfields London
12 Bridgewalk Heights 80 Weston Street London
12A Bridgewalk Heights 80 Weston Street London
10 Bridgewalk Heights 80 Weston Street London
11 Bridgewalk Heights 80 Weston Street London
13A Bridgewalk Heights 80 Weston Street London
17 Bridgewalk Heights 80 Weston Street London
18 Bridgewalk Heights 80 Weston Street London
Arch 874 And Arch 875 41 Barnham Street London
Flat 1 54 Weston Street London
Flat 4 54 Weston Street London
Ground Floor 47 Bermondsey Street London
Flat 2 54 Weston Street London
Flat 3 54 Weston Street London
Flat 1 More Copper House 14-16 Magdalen Street
Flat 13 More Copper House 14-16 Magdalen Street
Flat 14 More Copper House 14-16 Magdalen Street
Flat 11 More Copper House 14-16 Magdalen Street
Flat 12 More Copper House 14-16 Magdalen Street
Student Accommodation Wolfson House 49 Weston Street
Unit 11 52 Bermondsey Street London
Swimming Pool Wolfson House 49 Weston Street
Medical School Southwark Wing Guys Hospital Great Maze Pond
Flat 4 More Copper House 14-16 Magdalen Street
Flat 5 More Copper House 14-16 Magdalen Street
Flat 2 More Copper House 14-16 Magdalen Street
Flat 3 More Copper House 14-16 Magdalen Street
Flat 6 More Copper House 14-16 Magdalen Street
Flat 9 More Copper House 14-16 Magdalen Street
Flat 10 More Copper House 14-16 Magdalen Street
Flat 7 More Copper House 14-16 Magdalen Street
Flat 8 More Copper House 14-16 Magdalen Street
Flat 13 Artbrand House 7 Leathermarket Street
Flat 14 Artbrand House 7 Leathermarket Street
Apartment 28 36 Snowsfields London
Apartment 25 36 Snowsfields London
Flat 12 Artbrand House 7 Leathermarket Street
Unit A Artbrand House 7 Leathermarket Street
Railway Arches 895 And 896 Holyrood Street London
Kamen House 22 Magdalen Street London
Unit B Artbrand House 7 Leathermarket Street
Unit 1 8 Tyers Gate London

Flat 4 Artbrand House 7 Leathermarket Street
Flat 5 Artbrand House 7 Leathermarket Street
Flat 2 Artbrand House 7 Leathermarket Street
Flat 3 Artbrand House 7 Leathermarket Street
Flat 6 Artbrand House 7 Leathermarket Street
Flat 9 Artbrand House 7 Leathermarket Street
Flat 10 Artbrand House 7 Leathermarket Street
Flat 7 Artbrand House 7 Leathermarket Street
Flat 8 Artbrand House 7 Leathermarket Street
15 Bridgewalk Heights 80 Weston Street London
16 Bridgewalk Heights 80 Weston Street London
1 Bridgewalk Heights 80 Weston Street London
2 Bridgewalk Heights 80 Weston Street London
Flat 7 2 Tyers Gate London
3 Bridgewalk Heights 80 Weston Street London
8 Bridgewalk Heights 80 Weston Street London
9 Bridgewalk Heights 80 Weston Street London
5 Bridgewalk Heights 80 Weston Street London
7 Bridgewalk Heights 80 Weston Street London
19 Bridgewalk Heights 80 Weston Street London
31 Bridgewalk Heights 80 Weston Street London
32 Bridgewalk Heights 80 Weston Street London
29 Bridgewalk Heights 80 Weston Street London
30 Bridgewalk Heights 80 Weston Street London
33 Bridgewalk Heights 80 Weston Street London
106 Weston Street London SE1 3QB
33A Bridgewalk Heights 80 Weston Street London
35 Bridgewalk Heights 80 Weston Street London
22 Bridgewalk Heights 80 Weston Street London
23 Bridgewalk Heights 80 Weston Street London
20 Bridgewalk Heights 80 Weston Street London
21 Bridgewalk Heights 80 Weston Street London
23A Bridgewalk Heights 80 Weston Street London
27 Bridgewalk Heights 80 Weston Street London
28 Bridgewalk Heights 80 Weston Street London
25 Bridgewalk Heights 80 Weston Street London
26 Bridgewalk Heights 80 Weston Street London
Flat 6 2 Tyers Gate London
Flat 3 79 Bermondsey Street London
4 Leathermarket Street London SE1 3HN
8-9 Snowsfields London SE1 3SU
2-2A Morocco Street London SE1 3HB
1 Leathermarket Court London SE1 3HS
2 Leathermarket Court London SE1 3HS
Kamen House 23 Magdalen Street London
Flat 3B 16 Crucifix Lane London
Flat 4A 16 Crucifix Lane London
Flat 3A 16 Crucifix Lane London
Flat 4B 16 Crucifix Lane London
73C Maltings Place London SE1 3LJ
Ground Floor 122 Tooley Street London
Flat 2 1 Shand Street London
Flat 3 1 Shand Street London
Flat 1 1 Shand Street London
Flat 4 1 Shand Street London
33 Bermondsey Street London SE1 2EG
58 Bermondsey Street London SE1 3UD
Flat 5 1 Shand Street London
160 Tooley Street London SE1 2QH
3 Raquel Court 147 Snowsfields London
4 Raquel Court 147 Snowsfields London
1 Raquel Court 147 Snowsfields London
2 Raquel Court 147 Snowsfields London
6 Raquel Court 147 Snowsfields London
9 Raquel Court 147 Snowsfields London
10 Raquel Court 147 Snowsfields London
7 Raquel Court 147 Snowsfields London
8 Raquel Court 147 Snowsfields London
Flat 5 7 Tyers Gate London
Flat 6 7 Tyers Gate London
12 Whites Grounds Estate Whites Grounds London
22 Whites Grounds Estate Whites Grounds London

2 Whites Grounds Estate Whites Grounds London
11 Raquel Court 147 Snowsfields London
76 Bermondsey Street London SE1 3UD
First Floor 4-8 Whites Grounds London
Second Floor 4-8 Whites Grounds London
Ground Floor Right 3-5 Hardwidge Street London
Ground Floor Left 3-5 Hardwidge Street London
5 Raquel Court 147 Snowsfields London
Fashion And Textile Museum 83 Bermondsey Street London
Fourth Floor 9 Holyrood Street London
Ground Floor 4-8 Whites Grounds London
Flat 4 7 Tyers Gate London
First Floor 9 Holyrood Street London
Ground Floor 9 Holyrood Street London
Second Floor 7 Holyrood Street SE1 2EL
Basement 9 Holyrood Street London
Beckett House 60-68 St Thomas Street London
62-66 Bermondsey Street London SE1 3UD
Vintage Yard 59-63 Bermondsey Street London
104 Bermondsey Street London SE1 3UB
74 Bermondsey Street London SE1 3UD
Margret House 111 Snowsfields London
61 St Thomas Street London SE1 3QX
1-7 Snowsfields London SE1 3SU
3 Leathermarket Court London SE1 3HS
Neighbourhood Housing Office 26 Leathermarket Street London
75-79 St Thomas Street London SE1 3QX
3 Tyers Gate London SE1 3HX
Flat 1 2 Tyers Gate London
Flat 4 2 Tyers Gate London
Flat 5 2 Tyers Gate London
Flat 2 2 Tyers Gate London
Flat 3 2 Tyers Gate London
6 Leathermarket Court London SE1 3HS
7 Leathermarket Court London SE1 3HS
4 Leathermarket Court London SE1 3HS
5 Leathermarket Court London SE1 3HS
8 Leathermarket Court London SE1 3HS
11 Leathermarket Court London SE1 3HS
4 Black Swan Yard London SE1 3XW
9 Leathermarket Court London SE1 3HS
10 Leathermarket Court London SE1 3HS
Flat 4 40 Snowsfields London
Flat 4 42 Snowsfields London
Flat 3 40 Snowsfields London
Flat 3 42 Snowsfields London
Flat 5 40 Snowsfields London
Flat 7 40 Snowsfields London
Flat 8 40 Snowsfields London
Flat 5 42 Snowsfields London
Flat 6 40 Snowsfields London
Second Floor 9 Holyrood Street London
Third Floor 22 Shand Street London
Third Floor 9 Holyrood Street London
Bermondsey Village Hall Kirby Grove London
Flat 2 Globe House 2A Crucifix Lane
Part Basement And Part Ground Floor 46-50 Bermondsey Street London
Ground Floor 82-86 Bermondsey Street London
First Floor 1-7 Fenning Street London
Basement 7 Holyrood Street London
Ground Floor 7 Holyrood Street SE1 2EL
Ground Floor 1-7 Fenning Street London
Unit 7 Railway Arches 881 882 882W Holyrood Street
Flat 19 70 Weston Street London
14 Melior Street London SE1 3QP
90 Bermondsey Street London SE1 3UB
14 Whites Grounds Estate Whites Grounds London
13 Snowsfields London SE1 3SU
19 Snowsfields London SE1 3SU
Flat 9 1 Leathermarket Street London
Flat 6 38 Snowsfields London
Flat 7 38 Snowsfields London
Flat 4 38 Snowsfields London
Flat 5 38 Snowsfields London
Flat 8 38 Snowsfields London
14A The Grain Store 70 Weston Street London
Railway Arch 22 Bermondsey Street London
Third Floor Flat 75 Weston Street London
6 Bridgewalk Heights 80 Weston Street London
First Floor Flat 109 Bermondsey Street London
First Floor Flat 96 Bermondsey Street London
First Floor Flat The Glasshouse 3 Melior Place
Flat 1 Globe House 2A Crucifix Lane
Flat 1 38 Snowsfields London
Flat 2 38 Snowsfields London
Flat 3 38 Snowsfields London
Flat 12 64 Weston Street London
Flat 2 8 Tyers Gate London
11 Tyers Estate Bermondsey Street London
Flat 7 Kamen House 17-21 Magdalen Street
Flat 8 Kamen House 17-21 Magdalen Street
Flat 5 Kamen House 17-21 Magdalen Street

Flat 6 Kamen House 17-21 Magdalen Street
Flat 9 Kamen House 17-21 Magdalen Street
Flat 12 Kamen House 17-21 Magdalen Street
Flat 13 Kamen House 17-21 Magdalen Street
Flat 10 Kamen House 17-21 Magdalen Street
Flat 11 Kamen House 17-21 Magdalen Street
Basement And Ground Floor 59 Bermondsey Street London
Flat 3 Kamen House 17-21 Magdalen Street
Flat 4 Kamen House 17-21 Magdalen Street
Flat 1 Kamen House 17-21 Magdalen Street
Flat 2 Kamen House 17-21 Magdalen Street
Flat 14 Kamen House 17-21 Magdalen Street
Flat 26 Kamen House 17-21 Magdalen Street
Flat 27 Kamen House 17-21 Magdalen Street
Flat 24 Kamen House 17-21 Magdalen Street
Flat 25 Kamen House 17-21 Magdalen Street
Flat 28 Kamen House 17-21 Magdalen Street
Flat 29 Kamen House 17-21 Magdalen Street
Flat 30 Kamen House 17-21 Magdalen Street
Flat 17 Kamen House 17-21 Magdalen Street
Flat 18 Kamen House 17-21 Magdalen Street
Flat 15 Kamen House 17-21 Magdalen Street
Flat 16 Kamen House 17-21 Magdalen Street
Flat 19 Kamen House 17-21 Magdalen Street
Flat 22 Kamen House 17-21 Magdalen Street
Flat 23 Kamen House 17-21 Magdalen Street
Flat 20 Kamen House 17-21 Magdalen Street
Flat 21 Kamen House 17-21 Magdalen Street
First Floor 59-63 Bermondsey Street London
Laxmi The Tanneries 55 Bermondsey Street
Shakti The Tanneries 55 Bermondsey Street
Ground Floor Natraj The Tannery Bermondsey Street
Part Fifth Floor 39-45 Bermondsey Street London
The Hide Bar 39-45 Bermondsey Street London
Fifth Floor Part 39-45 Bermondsey Street London
Fourth Floor Part 39-45 Bermondsey Street London
Basement And Ground Floor Shiva The Tannery Bermondsey Street
First Floor And Second Floor Shiva The Tannery Bermondsey Street
10 Crucifix Lane London
6 Sister Mabels Way London SE15 6UL
79 Bermondsey Street London SE1 3XF
81A Lytham Street London SE17 2NN
5 Glengall Terrace London SE15 6NW
405 Arum House 46 Rodney Road London
St Saviours Wharf 25 Mill Street London
103 Leathermarket Court London SE13HT
93 Iliffe St London SE17 3LL
Flat 78 St Saviours Wharf 8 Shad Thames London
18 Trinity Street Flat 1 London
18 Gervase Street London SE15 2RS
Flat 8 36 Snowsfields London
Flat 4 The Morocco Store Leathermarket Street London
47 Burwash House Weston Street London
28 Sutherland Square London SE17 3EQ
210 Merrow Street London SE17 2NX
10 Chapter Road London SE17 3ET
8 Exon Street London SE17 2JW
97 Coleman Road London SE5 7TF
8 Poole Road Egremont Wallasey
20 Scrutton Close London SW12 0AW
7 St Anthonys Close London E1W1LT
Flat 30 Florin Court 70 Tanner Street London
Magdalen House 148 Tooley Street London
3 The Tabard Centre Prioress St London
Unit 52.11, Woolyard 52 Bermondsey Street London
Flat 602, Block A 27 Green Walk London
First Floor 145 Bermondsey Street London
49 Rye Lane London SE155ET
Flat 13 1A St Rule Street London
12 Pope St London SE1 3PR
44 - 48 Old Brompton Road, LONDON SW7 3DY London SW7 3DY
Flat 4, 37 Tanner Street London SE1 3LF

4 Staunton House Tatum Street London
59 Pages Walk London SE1 4HD
Basement And Ground Floor Rear 134 Tooley Street London
Part Ground Floor Front 134 Tooley Street London
Third Floor Rear 134 Tooley Street London
Part Third Floor West 136-148 Tooley Street London
Part Fourth Floor And Fifth Floor 136-148 Tooley Street London
Basement 136-148 Tooley Street London
Part Third Floor East 136-148 Tooley Street London
Ground Floor 60 Weston Street London
1 Leathermarket Street London SE1 3HN
The Glasshouse 3 Melior Place London
Unit 1 The Grain Stores 70 Weston Street
Unit 2 The Grain Stores 70 Weston Street
First Floor 60 Weston Street London
Second Floor 60 Weston Street London
Units 3 And 4 The Grain Stores 70 Weston Street
The Greenwood Theatre 55 Weston Street London
Ground Floor 2 Whites Grounds London
Basement 77 Weston Street London
Second Floor 77 Weston Street London
90 Whites Grounds Estate Whites Grounds London
34 Whites Grounds Estate Whites Grounds London
35 Whites Grounds Estate Whites Grounds London
32 Whites Grounds Estate Whites Grounds London
33 Whites Grounds Estate Whites Grounds London
36 Whites Grounds Estate Whites Grounds London
39 Whites Grounds Estate Whites Grounds London
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37 Whites Grounds Estate Whites Grounds London
38 Whites Grounds Estate Whites Grounds London
25 Whites Grounds Estate Whites Grounds London
26 Whites Grounds Estate Whites Grounds London
23 Whites Grounds Estate Whites Grounds London
24 Whites Grounds Estate Whites Grounds London
27 Whites Grounds Estate Whites Grounds London
Unit 11 56 Bermondsey Street London
Unit 11 54 Bermondsey Street London
Unit 21 54 Bermondsey Street London
Unit 21 56 Bermondsey Street London
Medical School Tower Wing Guys Hospital Great Maze Pond
Rooms 1 Second Floor 3-5 Hardwidge Street London
Unit 13 52 Bermondsey Street London
Unit 14 52 Bermondsey Street London
Unit 23 52 Bermondsey Street London
Unit 33 52 Bermondsey Street London
Unit 1 54 Bermondsey Street London
Unit 24 52 Bermondsey Street London
Unit 25 52 Bermondsey Street London
Second Floor Natraj The Tannery Bermondsey Street
Counting House Guys Hospital Great Maze Pond
First Floor Natraj The Tannery Bermondsey Street
Flat 3 Globe House 2A Crucifix Lane
Part Ground And First Floor 75 Weston Street London
Room 309 West Wing Nurses Home Guys Hospital Great Maze Pond
Friends Of Guys Hospital Shop Guys Hospital Courtyard St Thomas Street
Room 205 West Wing Nurses Home Guys Hospital Great Maze Pond
29 Weston Street London SE1 3RR
Living Accommodation Horseshoe 26 Melior Street
Flat 2 Counting House Guys Hospital Great Maze Pond
First Floor Bramah House 65-71 Bermondsey Street
Living Accommodation 98 Bermondsey Street London
Flat 1 123 Snowsfields London
Apartment 17 36 Snowsfields London
Apartment 18 36 Snowsfields London
Apartment 15 36 Snowsfields London
Apartment 16 36 Snowsfields London
Apartment 19 36 Snowsfields London
30 Whites Grounds Estate Whites Grounds London
31 Whites Grounds Estate Whites Grounds London
28 Whites Grounds Estate Whites Grounds London

29 Whites Grounds Estate Whites Grounds London
41 Whites Grounds Estate Whites Grounds London
53 Whites Grounds Estate Whites Grounds London
54 Whites Grounds Estate Whites Grounds London
51 Whites Grounds Estate Whites Grounds London
52 Whites Grounds Estate Whites Grounds London
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56 Whites Grounds Estate Whites Grounds London
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44 Whites Grounds Estate Whites Grounds London
43 Whites Grounds Estate Whites Grounds London
46 Whites Grounds Estate Whites Grounds London
49 Whites Grounds Estate Whites Grounds London
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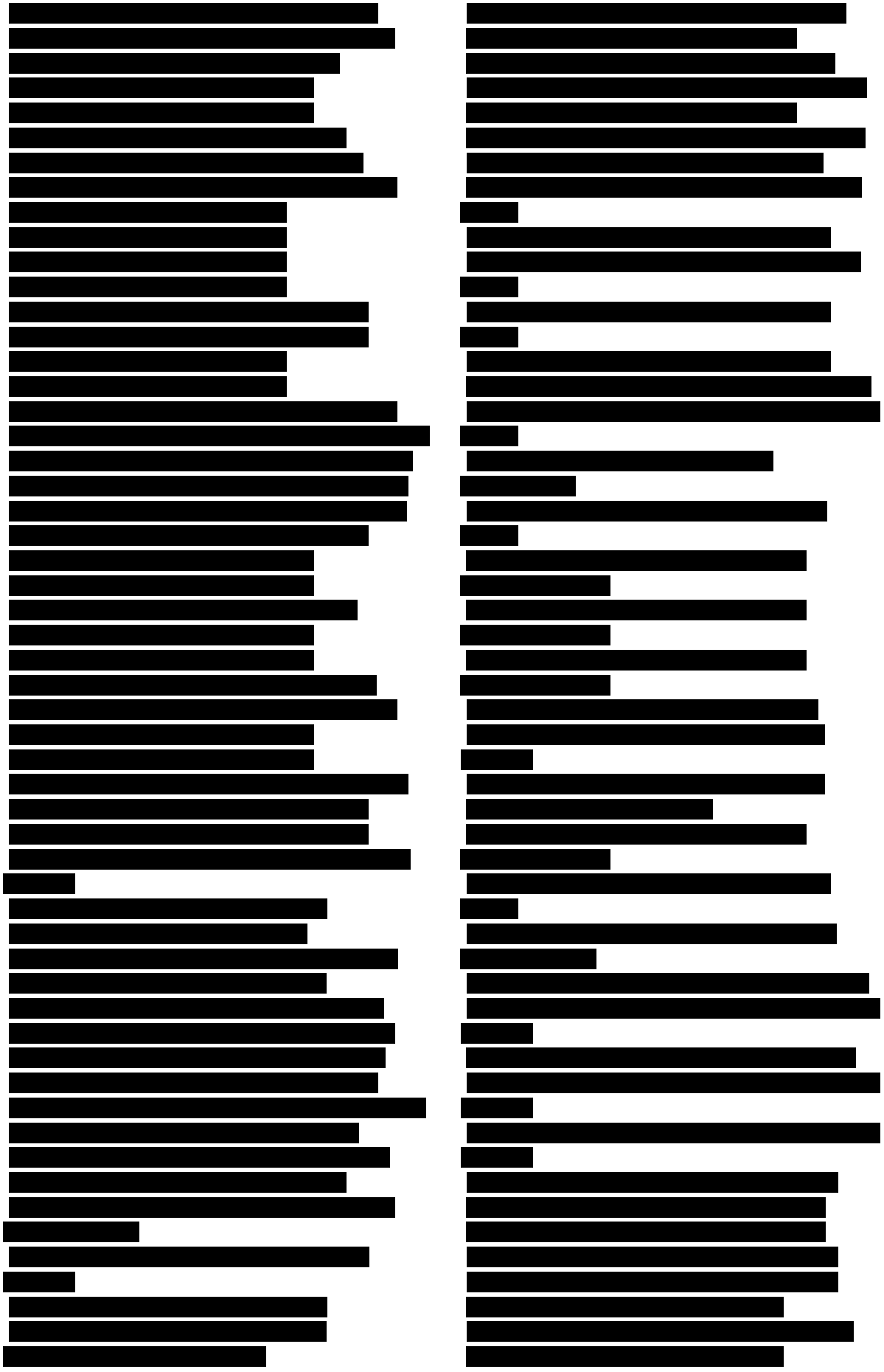
47 Whites Grounds Estate Whites Grounds London
48 Whites Grounds Estate Whites Grounds London
9 Whites Grounds Estate Whites Grounds London
110 Whites Grounds Estate Whites Grounds London
111 Whites Grounds Estate Whites Grounds London
108 Whites Grounds Estate Whites Grounds London
109 Whites Grounds Estate Whites Grounds London
112 Whites Grounds Estate Whites Grounds London
115 Whites Grounds Estate Whites Grounds London
92 Whites Grounds Estate Whites Grounds London
113 Whites Grounds Estate Whites Grounds London
114 Whites Grounds Estate Whites Grounds London
101 Whites Grounds Estate Whites Grounds London
102 Whites Grounds Estate Whites Grounds London
91 Whites Grounds Estate Whites Grounds London
100 Whites Grounds Estate Whites Grounds London
Apartment 22 36 Snowsfields London
Apartment 23 36 Snowsfields London
Apartment 20 36 Snowsfields London
Apartment 21 36 Snowsfields London
Apartment 8 36 Snowsfields London
Apartment 9 36 Snowsfields London
Apartment 6 36 Snowsfields London
Apartment 7 36 Snowsfields London
Apartment 10 36 Snowsfields London
Apartment 13 36 Snowsfields London
Apartment 14 36 Snowsfields London
Apartment 11 36 Snowsfields London
Apartment 12 36 Snowsfields London
Apartment 24 36 Snowsfields London
Apartment 4 8 Melior Street London
Apartment 5 8 Melior Street London
Apartment 2 8 Melior Street London
Apartment 3 8 Melior Street London
Apartment 6 8 Melior Street London
Apartment 9 8 Melior Street London
Apartment 10 8 Melior Street London
Apartment 7 8 Melior Street London
Apartment 8 8 Melior Street London
Apartment 27 36 Snowsfields London
Apartment 26 36 Snowsfields London
Apartment 29 36 Snowsfields London
Unit 1 8 Melior Street London
Apartment 30 36 Snowsfields London
Apartment 31 36 Snowsfields London
Apartment 5 36 Snowsfields London
Flat 4 83 Weston Street London
Flat 5 83 Weston Street London
Flat 2 83 Weston Street London
Flat 3 83 Weston Street London
Flat 3 85 Weston Street London
87 Weston Street London SE1 3RS
Flat 1 85 Weston Street London
Flat 2 85 Weston Street London
Flat 4 123 Snowsfields London
Flat 5 123 Snowsfields London
Flat 2 123 Snowsfields London
Flat 3 123 Snowsfields London
Snowsfield Yard 6-16 Melior Street London
103 Whites Grounds Estate Whites Grounds London

[redacted]



[redacted]

Re-consultation:

APPENDIX 2

Consultation responses received

Internal services

Flood Risk Management & Urban Drainage
Ecology
Archaeology
Design and Conservation Team [Formal]
Urban Forester
Flood Risk Management & Urban Drainage
Archaeology
Design and Conservation Team [Formal]
Highways Development and Management
Urban Forester
Design and Conservation Team [Formal]
Archaeology
Ecology
Environmental Protection
Highways Development and Management
Transport Policy
Urban Forester

Statutory and non-statutory organisations

Metropolitan Police Service (Designing O
Natural England - London & South East Re

London Underground
Thames Water

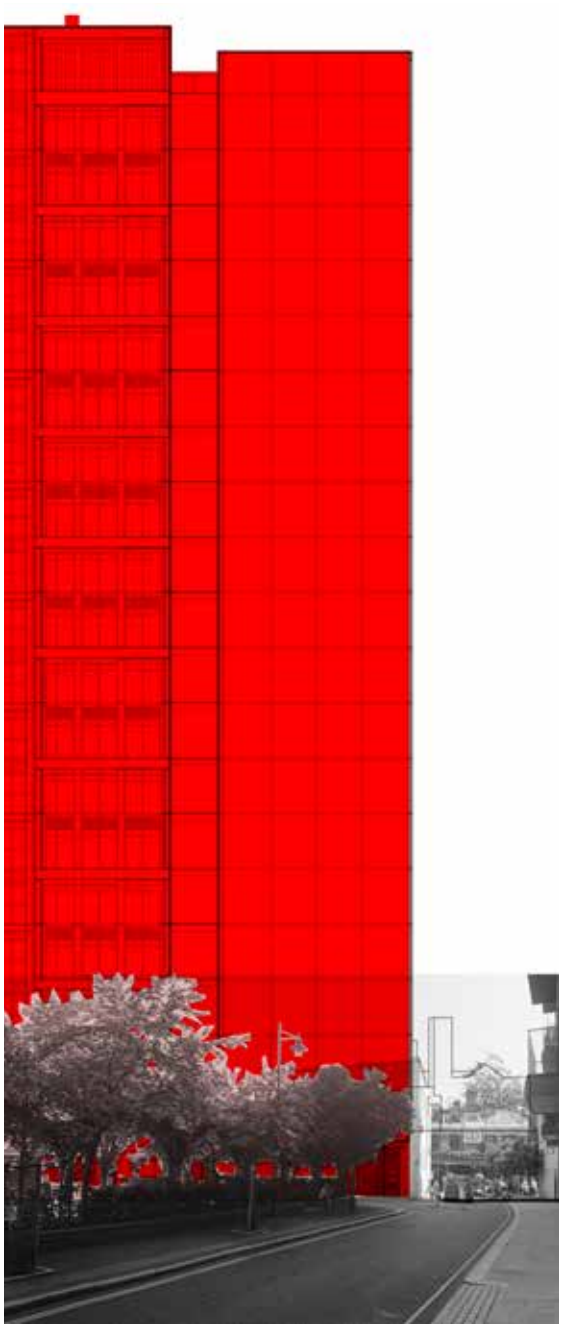
Natural England - London & South East Re
Natural England - London & South East Re
Natural England - London & South East Re
Metropolitan Police Service (Designing O
London Fire & Emergency Planning Authori
Great London Authority

Metropolitan Police Service (Designing O

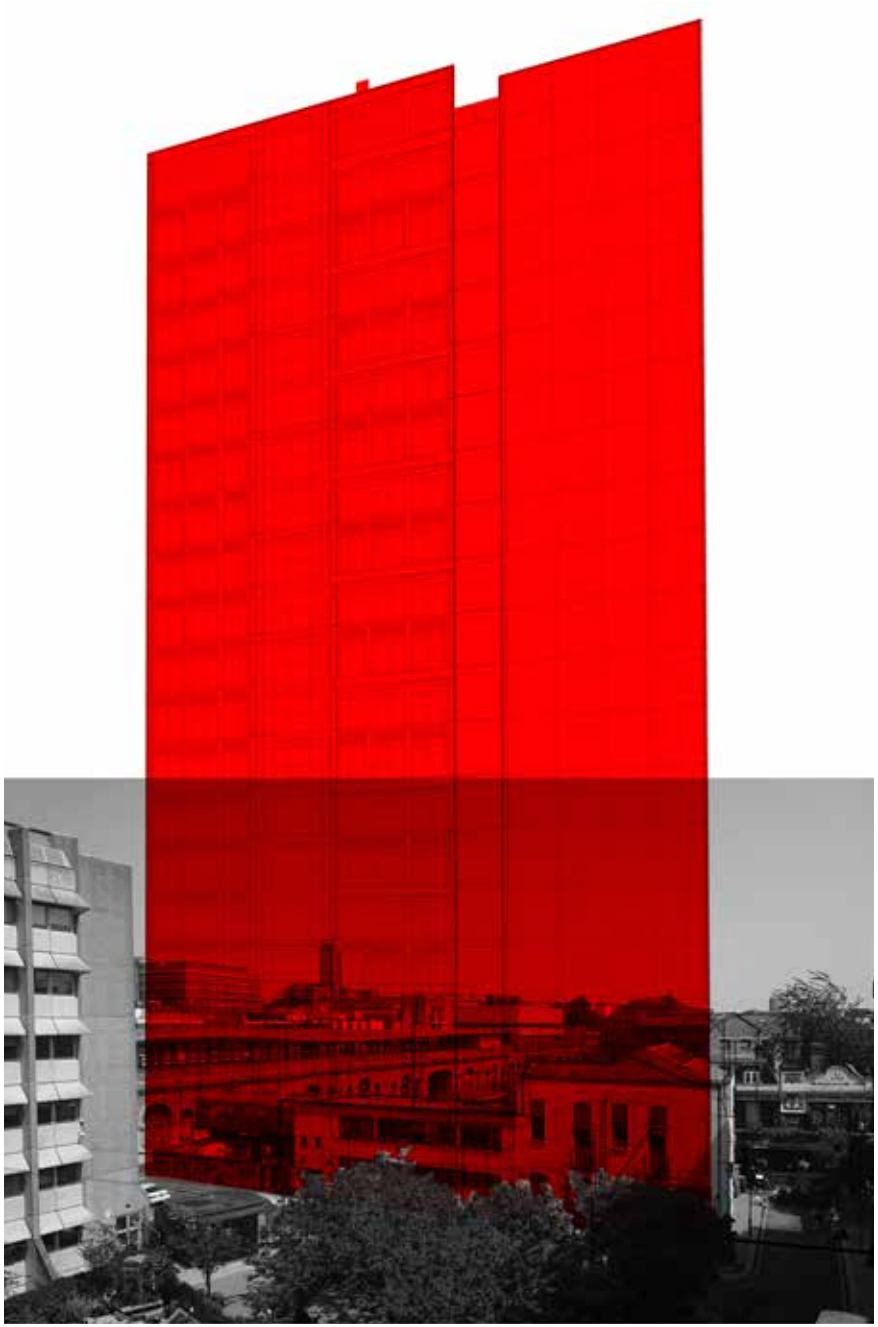
Neighbour and local groups consulted:

15 Snowsfields London SE1 3SU
Flat 3 79 Bermondsey Street London
79 Bermondsey Street London SE1 3XF
Flat 8 36 Snowsfields London
12 Pope St London SE1 3PR
Flat 4, 37 Tanner Street London SE1 3LF
Apartment 50, Taper Building, 175 Long Lane London
Apartment 50 Taper Building 175 Long Lane London
145 Bermondsey St London SE1 3UW
4B Tyers Gate London SE1 3HX

1 Melior Place London SE1 3SZ
Flat 7, 5 Plantain Place London SE1 1YN
25 Whites Grounds Estate Whites Grounds London
1 Goodwin Close London SE16 3TR
10 Sycamore Court Royal Oak Yard London
1 Black Swan Yard London SE1 3XW
Sunnyside Chorleywood Road Rickmansworth
Flat 9 28 Leathermarket St London
14 Janeway Street London London
14 Woodmill Street London SE16 3GG
Flat 3 Globe House 2A Crucifix lane London
55 bermondsey street London SE1 3XG
51 Whites grounds London
15 Snowsfields London Bridge London
19 ayrsome road Ayrsome Road N160rh
14 Woodmill Street London SE16 3GG
12 Grange Walk Bermondsey London
25/249 Bermondsey St London Se1 3uq
6 Crucifix Lane Bermondsey London
Unit 13 London SE1 3LZ
State Farm Avenue Orpington BR6 7TN
55 Bermondsey Street London SE1 3XN
7 Hestia House City Walk London
2a Crucifix Lane London SE1 3JW
10 crucifix lane London Se13jw
Flat 5 40 Snowsfields London
Unit 5 7 Tyers Gate London
Flat 1 4B Tyers Gate London
unit 6 139 bermondsey st london
Flat 42 12 Bermondsey Square London
Flat 2 4B Tyers Gate London
14 king Edward mews Bermondsey Se16 4qh
12 Elm Court Royal Oak Yard London
134 Jerningham Road New Cross Gate London
148A Totteridge Lane London N20 8JJ
The Tanneries 55 Bermondsey St LONDON
7 Tyers Estate Bermondsey Street London
197 Long Lane Flat 34 LONDON
44 lansdowne roar London N10 2AU
3 Melior Place The Glasshouse London
36 Snowsfields London SE13SU
Flat 7, 5 Plantain Place London SE1 1YN
62e Trinity Church Square London SE14HT
3a Uplands Road London N8 9NN
57 Bermondsey Street London SE1 3XJ
1001 Antonine Heights London Se13df
Unit 5, 7 Tyers Gate London SE1 3HX
6 Lincoln Road London E7 8QW
16 Snowfields London SE1 3SU
Apt 21 36 Snowsfields London
1 Leathermarket Street London SE1 3HN
17 Blue Lion Place London SE14PU
Flat 4 The Morocco Store 1 Leathermarket Street London
15 Snowsfields London Bridge London
55 Bermondsey Street London SE1 3XH
Flat 2, Gemini House 180-182 Bermondsey Street London
183 Highbury Hill LONDON N5 1TB
Flat 3 4 Archie St London
6 Lincoln road London E7 8QW
Flat 4, Herbert Morrison house 1 Browning Street London
93A Endwell Road London se42nf
8a Crofton Road London SE5 8NB
93a Endwell Road London se42nf
311B Lordship Lane East Dulwich London



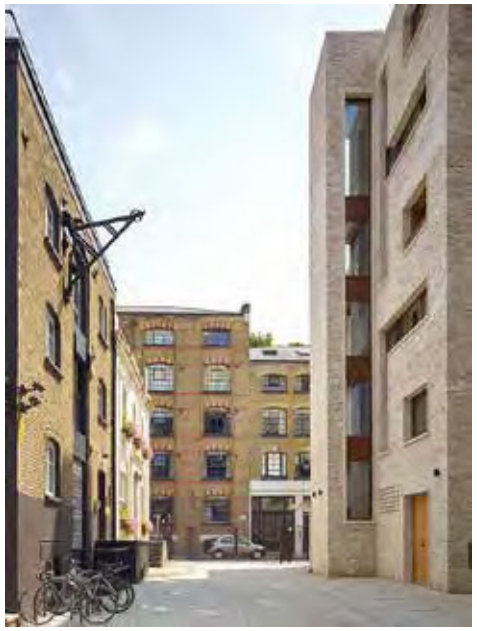
Elevation scaled over photo of Melior St.



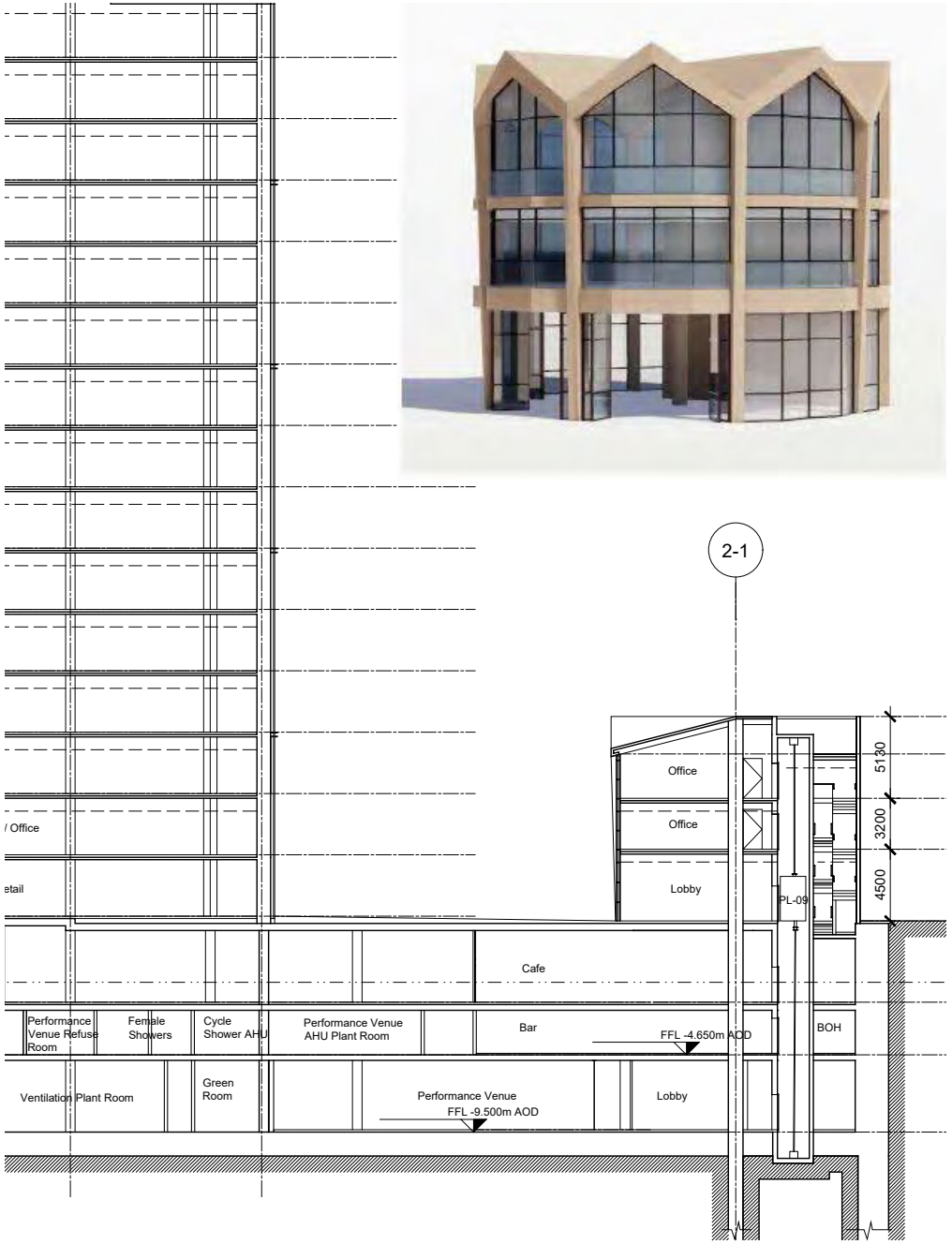
Elevation scaled over photo of Melior St and Fenning Street

View on Snowsfields / Melior Place

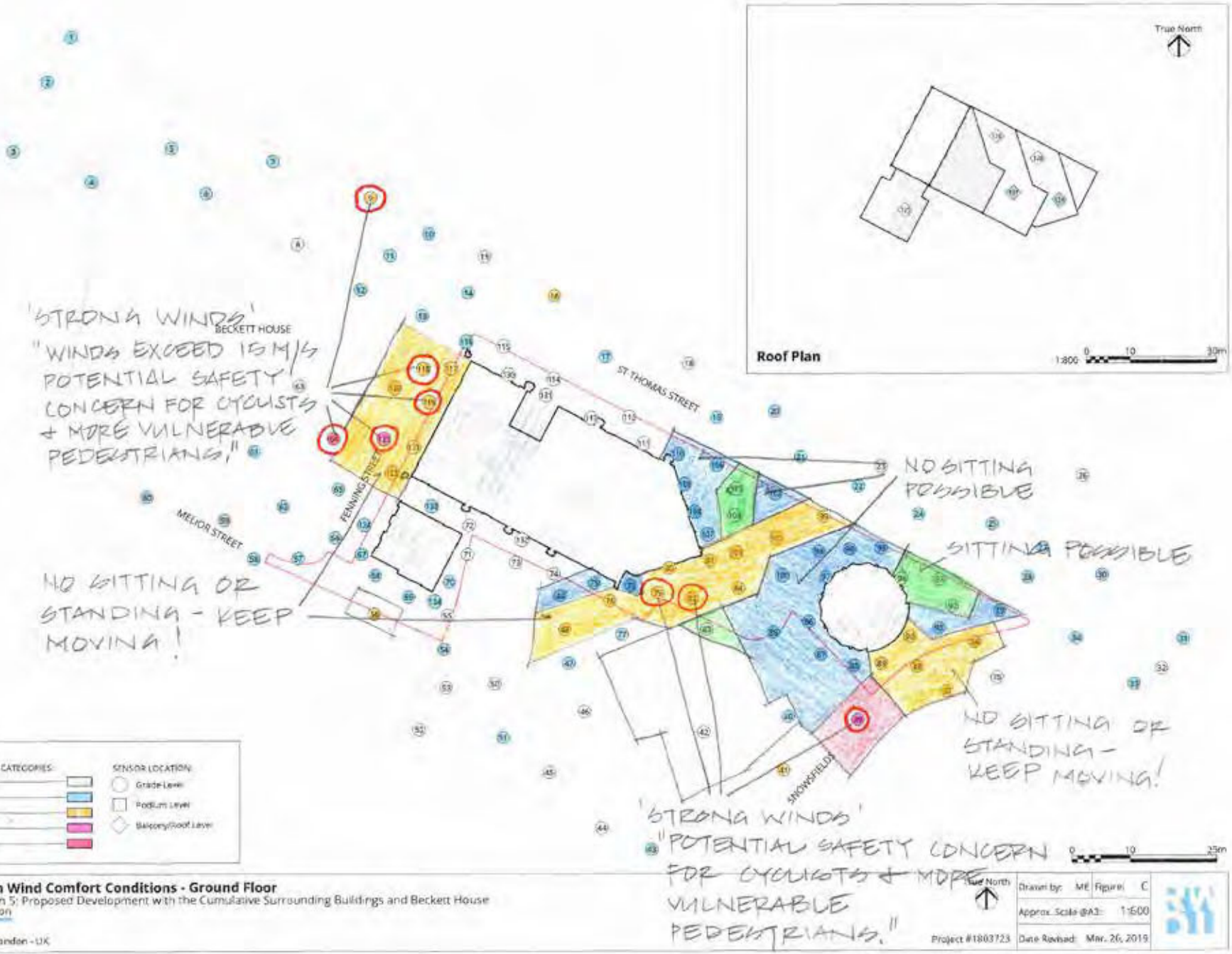
VINEGAR YARD MASTERPLAN IN CONTEXT



Ambitious contextual architecture and green public space



Basmement performance venue with lobby and offices above at street level


'STRONG WINDS'
"WINDS EXCEED 15M/S POTENTIAL SAFETY CONCERN FOR CYCLISTS & MORE VULNERABLE PEDESTRIANS."
BECKETT HOUSE
ST THOMAS STREET
FENNING STREET
MELIOR STREET
NO SITTING OR STANDING - KEEP MOVING!
NO SITTING POSSIBLE
SITTING POSSIBLE
NO SITTING OR STANDING - KEEP MOVING!
SNOWFIELDS
'STRONG WINDS'
"POTENTIAL SAFETY CONCERN FOR CYCLISTS & MORE VULNERABLE PEDESTRIANS."
True North
Roof Plan
1:800
0
10
30m
LEGEND:
LDDC COMFORT CATEGORIES:
Sitting
Standing
Strolling
Walking
Uncomfortable
SENSOR LOCATION:
Grade Level
Podium Level
Balcony/Roof Level
0
10
25m
True North
Pedestrian Wind Comfort Conditions - Ground Floor
Configuration 5: Proposed Development with the Cumulative Surrounding Buildings and Beckett House
Windiest Season
Vinegar Yard, London - UK
Drawn by: ME
Figure: C
Approx. Scale @A3: 1:600
Project #1803723
Date Revised: Mar. 26, 2019

Views from Snowsfields / Kirby Grove to Melior Place

Elevation scaled over photo of St Thomas Street

19/AP/0404 Cumulative Elevation from East

ORIGINAL HYDRAULIC HOIST
2012 vs 2019

2012

Fig. 48: View of hydraulic hoist on 1st floor

Fig. 49: View of hydraulic hoist on 3rd floor

6.12 The only internal feature is the hydraulic jack used to move the chains over the pulley wheel on the external wall-mounted crane, hoisting goods in and out of the hatch ranks. This only works that by the original C19 openings – the post WWII crane is powered by an electric motor in the SE corner of the 3rd floor.

2019

Figure 32. HOIST TYPE 1 – Modern hydraulic hoist machinery & timber casing to second floor lost.

Figure 33. HOIST TYPE 1 – Modern hydraulic hoist machinery & timber casing to third floor lost.

THIRD FLOOR
2012 vs 2019

2012

Fig. 46: View looking E on 3rd floor, C20 electric hoist motor on right

Fig. 47: View looking W on 3rd floor

No sign of damage to floor boards. Line of buckets seen to collect roof leak

Figure 24. Third floor, modern construction (1950s) (Ettwein Bridges Architects, 2018).

Figure 29. Third floor (Ettwein Bridges Architects, 2018).

2019

Figure 27. Third floor (Ettwein Bridges Architects, 2018).

Overflowing line of buckets damage floor boards

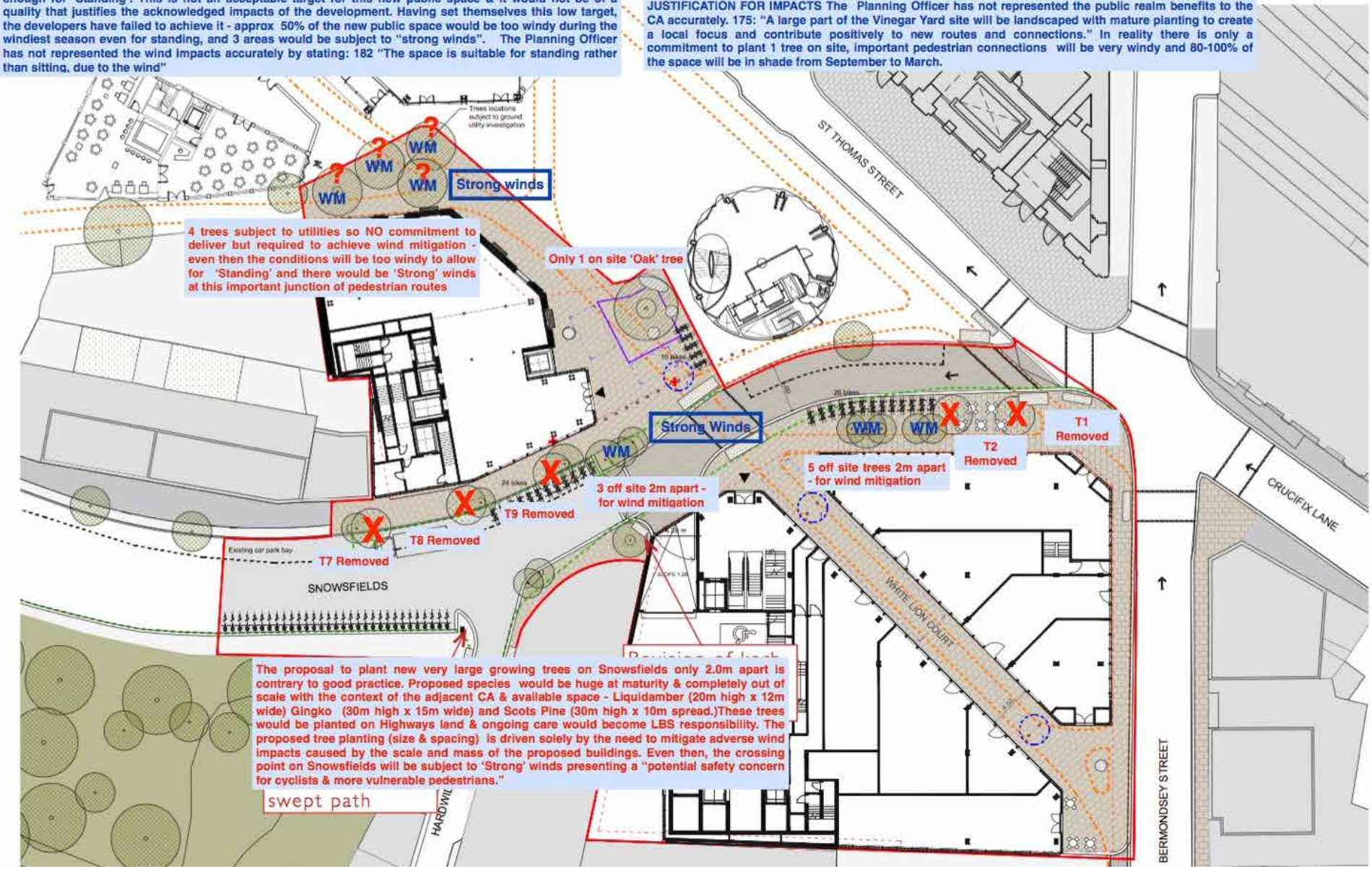
PUBLIC REALM PROPOSAL

TREES The Planning officer has not understood the content of the tree proposals. Planning report 181: "It includes the retention of a number of trees, including the large oak tree in Vinegar Yard, which will become a focal point for the forecourt area and for the view along the new passageway. It provides 5 replacement trees and 14 additional street trees, including onto St Thomas Street, where they will help soften the streetscape." Much of this is misleading or factually incorrect.

WIND The applicants have set themselves a very low target for wind in the public space - conditions good enough for 'Standing'. This is not an acceptable target for this new public space & it would not be of a quality that justifies the acknowledged impacts of the development. Having set themselves this low target, the developers have failed to achieve it - approx 50% of the new public space would be too windy during the windiest season even for standing, and 3 areas would be subject to "strong winds". The Planning Officer has not represented the wind impacts accurately by stating: 182 "The space is suitable for standing rather than sitting, due to the wind"

SHADING The Planning officer has not represented the shading correctly. Planning report 182: "The daylighting within the forecourt/plaza area is not unreasonable, with the area shown to be sunlit over the lunchtime period (12-3pm) during Spring and Autumn." The drawings show that this space would be in shade. The only area receiving sunlight at this time would be a small area to the south east of the warehouse. See dwg.MAR 1/04 which shows daylight at 1pm & 2pm, the time frame in the Officer's report. This time is the best case for the scheme. At all other times 80-100% of the public realm would be in shade.

JUSTIFICATION FOR IMPACTS The Planning Officer has not represented the public realm benefits to the CA accurately. 175: "A large part of the Vinegar Yard site will be landscaped with mature planting to create a local focus and contribute positively to new routes and connections." In reality there is only a commitment to plant 1 tree on site, important pedestrian connections will be very windy and 80-100% of the space will be in shade from September to March.



Overshadowing 21st March at 2pm

View on Crucifix Lane / Bermondsey Street

Model images from ‘roundtable meeting’ 20/02/2019

Views from Tanner Street Park

RECOMMENDATION

This document shows the case officer's recommended decision for the application referred to below. This document is not a decision notice for this application.

Applicant	St Thomas Bermondsey Limited	**Reg. Number**	18/AP/4171
Application Type	Major application		
Recommendation	Major – REFUSE.	**Case Number**	82-1

Draft of Decision Notice

Planning Permission was REFUSED for the following development:

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 provide a total of 30,292 sqm (GIA) of commercial floorspace comprising of 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. The application is accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. A hard copy of the application documents is available for inspection by prior appointment at Southwark Council's offices, 160 Tooley Street, SE1 2QH (Monday to Friday 9am to 5pm) and is viewable online at the LBS Planning Portal: https://planning.southwark.gov.uk/online-applications/applicationDetails. Printed and electronic copies of the Environmental Statement and Non-Technical Summary are available to purchase from Trium Environmental Consulting LLP: 68 - 85 Tabernacle St, Old Street, London EC2A 4BD. For further information and prices, please contact Trium at hello@triumenv.co.uk or by calling 0203 887 7118. Re-consultation is being undertaken based on updated Environmental Impact Assessment information and design amendments to the scheme including: updated landscape design; drainage strategy and flood protection; relocated loading bay; increased planting on terraces; updated energy strategy; revision to building maintenance equipment; change to materiality of main building to brick with elements of pre cast concrete.

Land Bounded By St Thomas Street Fenning Street Vinegar Yard And Snowfields Including Nos. 1-7 Fenning Street And No. 9 Fenning Street SE1 3QR

In accordance with application received on 24 December 2018

and Applicant's Drawing Nos.:

Existing Plans
Existing
A-025 P01
A-026 P00
A-031 P01
A-032 900
A-035 P00

Proposed Plans
Site
A-010 P00
A-011 P00
A-012 REV C

Plans
A-097 P00

A-098 P02
A-099 P02
A-100 P02
A-100M P02
A-101 P01
A-102A P01
A-107 P01
A-111 P01
A-114 P01
A-116 P01
A-118 P01
A-125 P02

Elevations and Sections
A-200 P02
A-201 P01
A-210 P01
A-211 P01
A-212 P01
A-213 P01
A-214 P00
A-250 P02
A-251 P02
A-252 P02
A-253 P02

Detail
A-350 P01
A-351 P01
A-352 P01
A-353 P01
A-354 P01
A-355 P01

Other Documents
Archaeological Report
Basement Impact Assessment
Design and Access Statement (including revisions and addendum)
Environmental Statement Volumes I, II and III
Environmental Statement Non Technical Summary
Environmental Statement Technical Appendices
Environmental Statement Addendum and Further Cumulative Assessment
Energy Strategy (and updated)
Flood Risk Assessment and SUDS
Planning Statement
Operational Management Plan
Statement of Community Involvement
Structural Sketchbook
Transport Statement (including Draft Service Management Plan and Draft Travel Plan)
Ventilation Strategy

Reason for refusal:

1) 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.

ORIGINAL HYDRAULIC HOIST
2012 vs 2019

2012

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2019

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Overflowing line of buckets damage floor boards

GROUND FLOOR
2008 vs 2018

2008

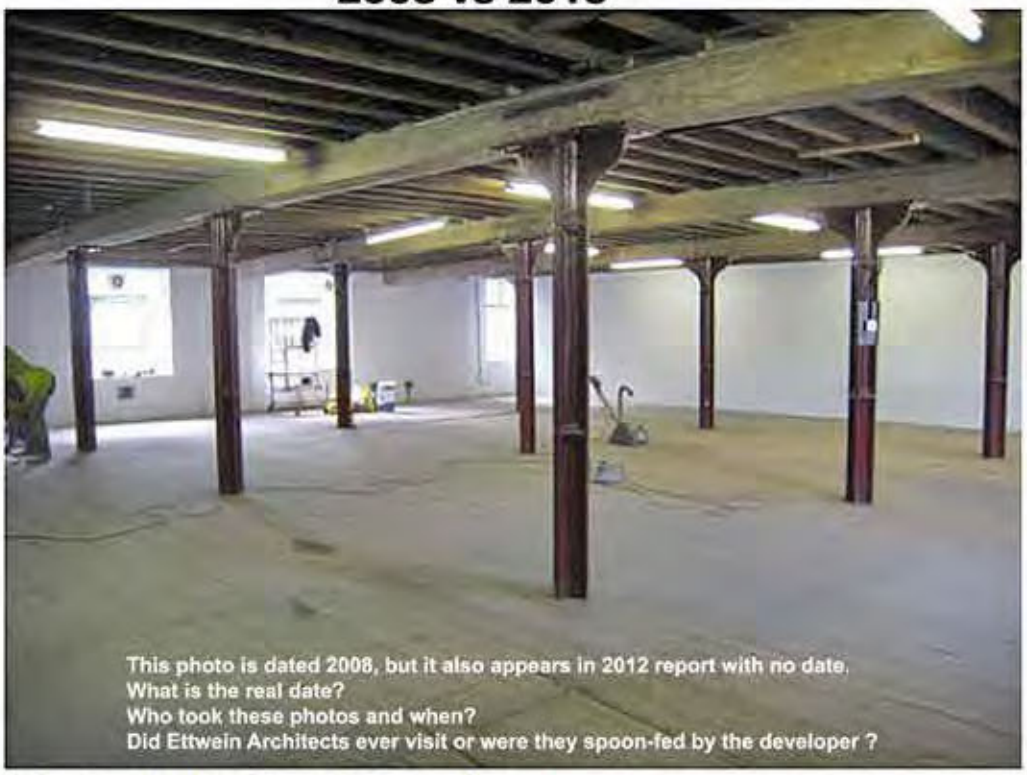


Fig. 43: View looking SW on ground floor

2018

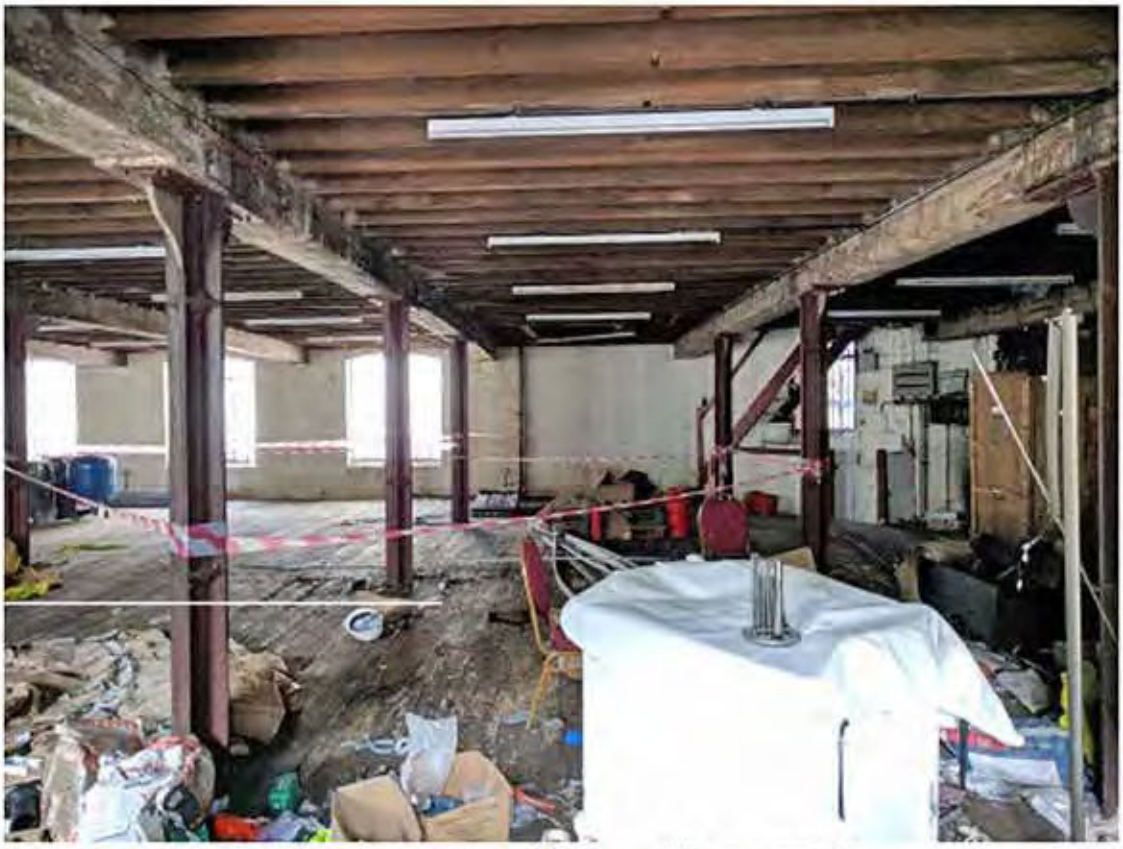


Figure 15. Ground floor (Ettwein Bridges Architects, 2018)

Ground floor reduced to a dump.
Damage to original floor boards and beams (damp / rot) in 2018 compared to prestine floor boards seen in 2008 or 2012 (date unclear)

BASEMENT
2008 vs 2019

2008

Figure 12. Basement (Ettwein Bridges Architects, 2008)

2019

Fig. 42: View looking NW in the basement

Misrepresentation - Same photo of 2008 used in 2019

BASEMENT COLUMNS
2012 vs 2019

2012

Fig. 39: View looking N at column on grid line B5 in the basement

Fig. 41: Detail view of the head of a typical 3rd floor steel column supporting the roof trusses and valley gutter

2019

Figure 25. STAIR TYPE 1 – Original from basement to ground.

Figure 2 Figure 13. COLUMN TYPE 2 – 1940s rolled steel column to Third floor, supporting steel trussed.

Misrepresentation - Same photos of 2012 used in 2019

19/AP/0404 & 18/AP/0404

POINTS OF DISCUSSION

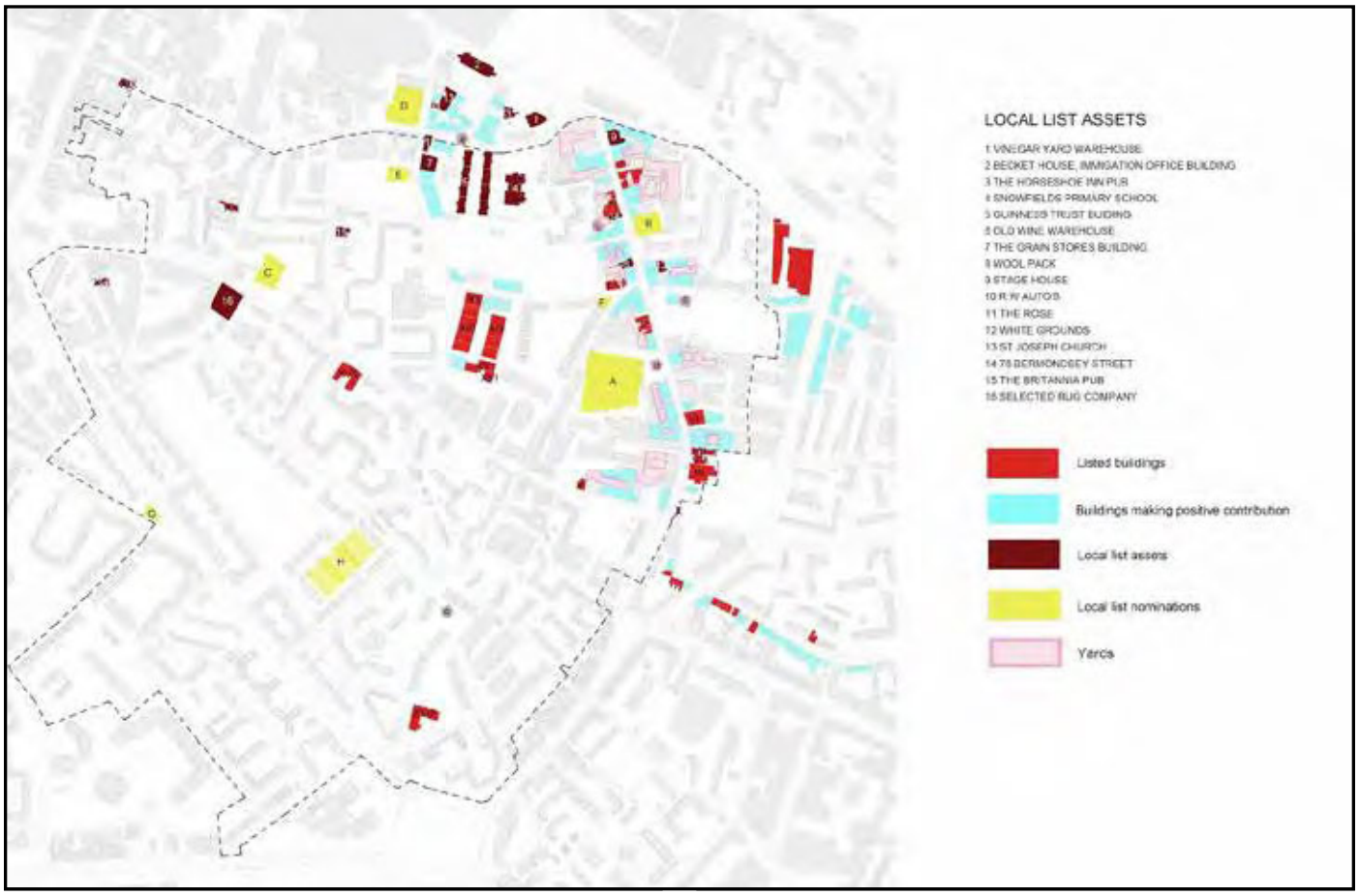
1. Policy Overview

2. Demolition vs Restoration

3. Contrast in Scale

5. Environmental Impacts

6. Consultation



Introductory image of OBNF Local List

1. Policy and Evidence Overview

NPPF
127 (c) , 127(d), 128, 129, 130, 131
189, 190, 191, 192, 193, 194, 196, 197

Planning (Listed Buildings and Conservation Areas) Act 1990
Section 72

BRE Report
'Site layout planning for daylight & sunlight: a guide to good practice'

NLP
2017 5.10 Urban Greening in relation to London's response to Climate Change
2017 7.7 Location and Design of Tall & large buildings.
2018 D1 A2 D1 A12 D1 3.1.1 D1. 3.1.2 D2 3.2.2 D2 3.2.3 GG1 Para 1.2.7 GG2 C GG2 D HC1C 7.1.7
2019 Policy E3 Affordable workspace

Core Strategy 2011
SP12

UDP
E.4.3

Bermondsey Street Conservation Area Appraisal
Various: As clearly referenced in objections from Historic England, SAVE and the VIctorian Society

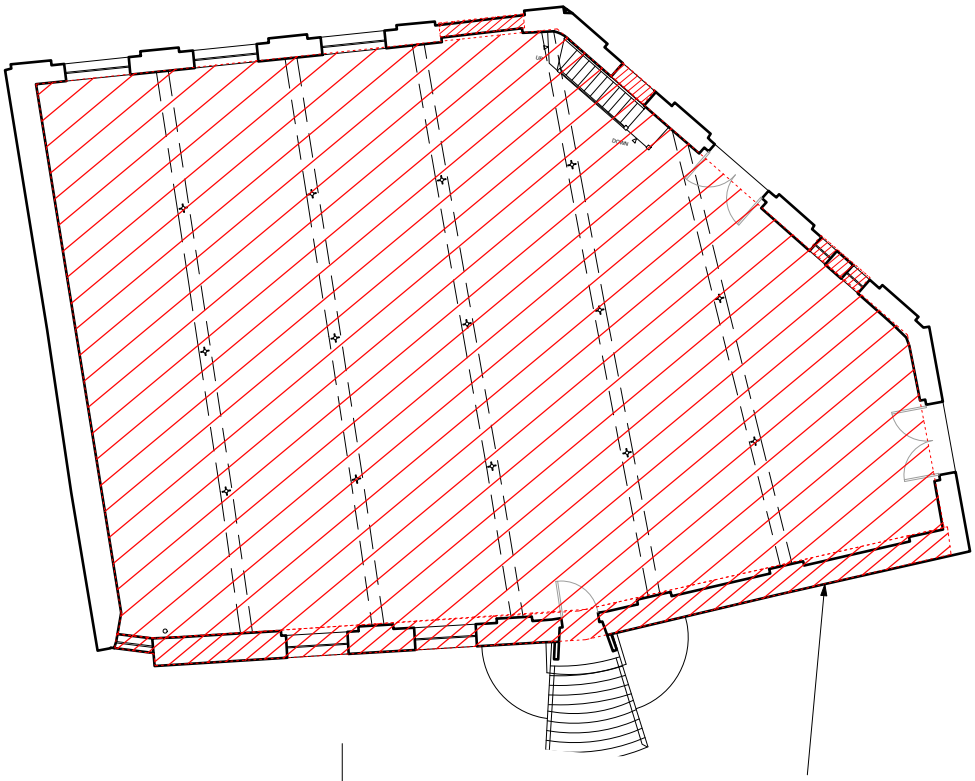
NSP
NSP (2017- 2020) Tall buildingsPolicies
NSP (2017- 2020) Site Allocations and Area VIsions
NSP 2019 SP2, P11, P12, P70
NSP 2020 SP2, SP4, P12, P13 Design quality, P19, P20, P27, P30 Affordable Workspace

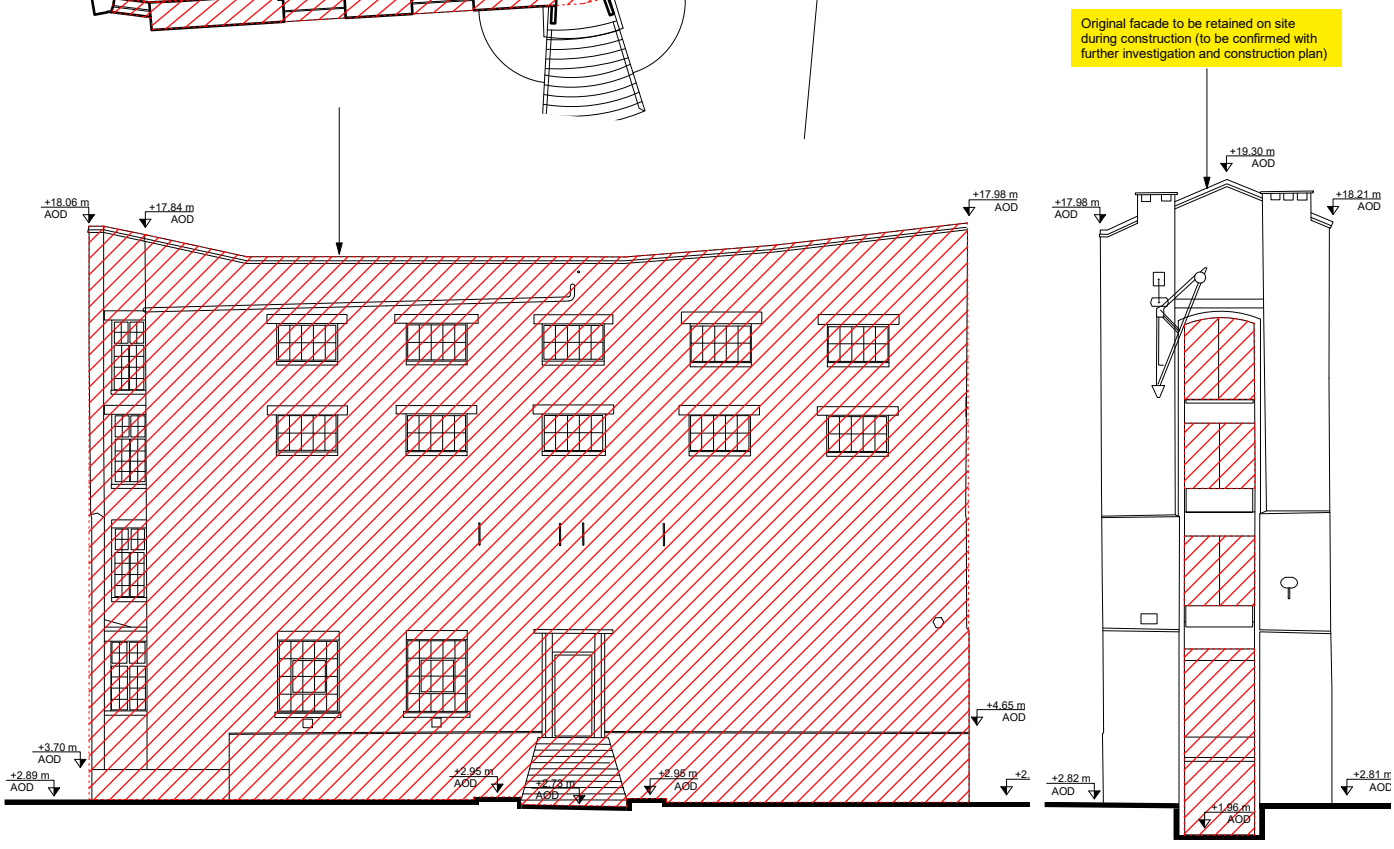
Social & economic benchmark of the residential areas most affected by the St Thomas St developments
By Social Life September 2019

OBNF collected comments and surveys
2017-Present

2. Demolition vs Restoration

Photographs of the Vinegar Yard Warehouse

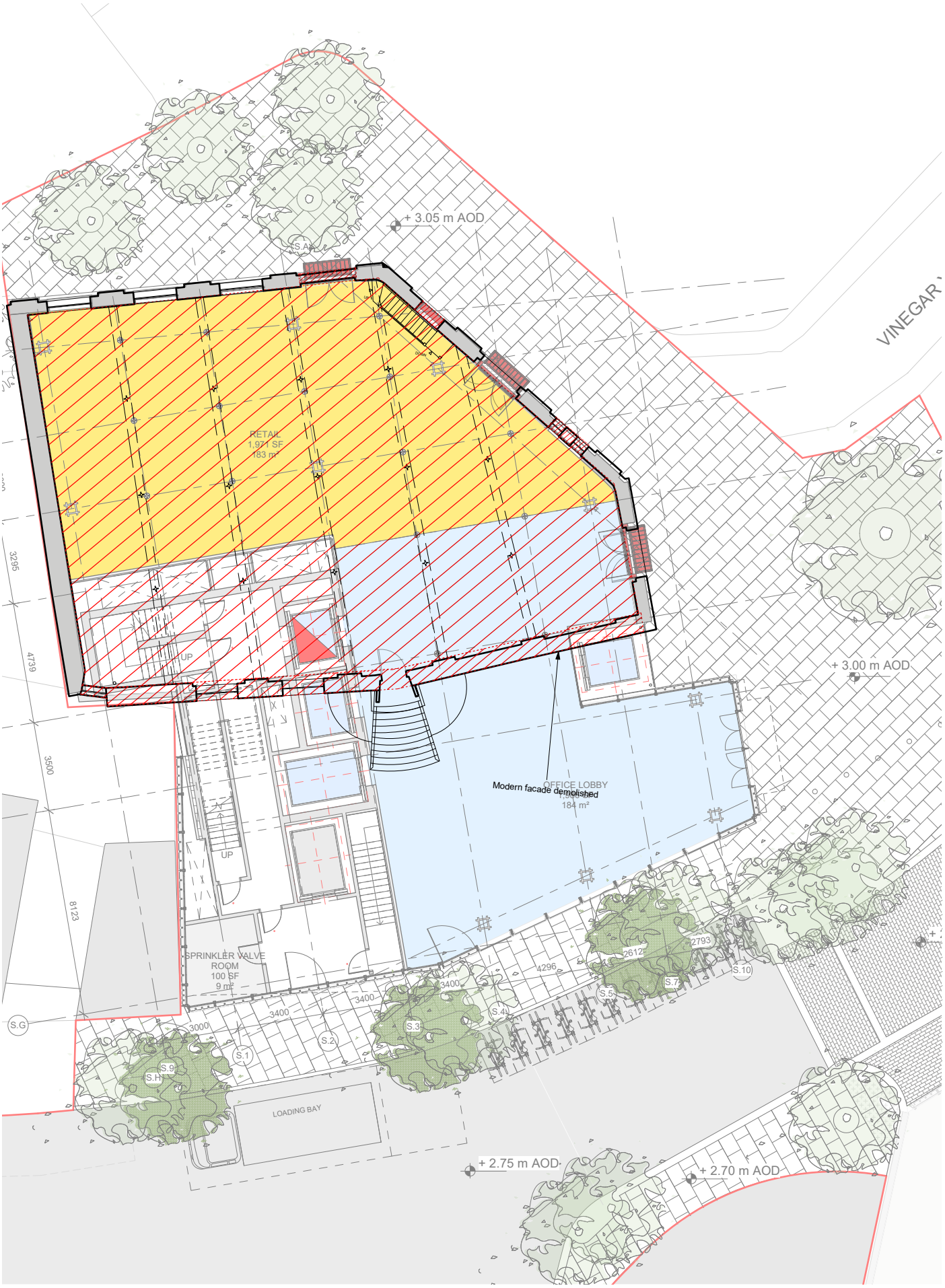




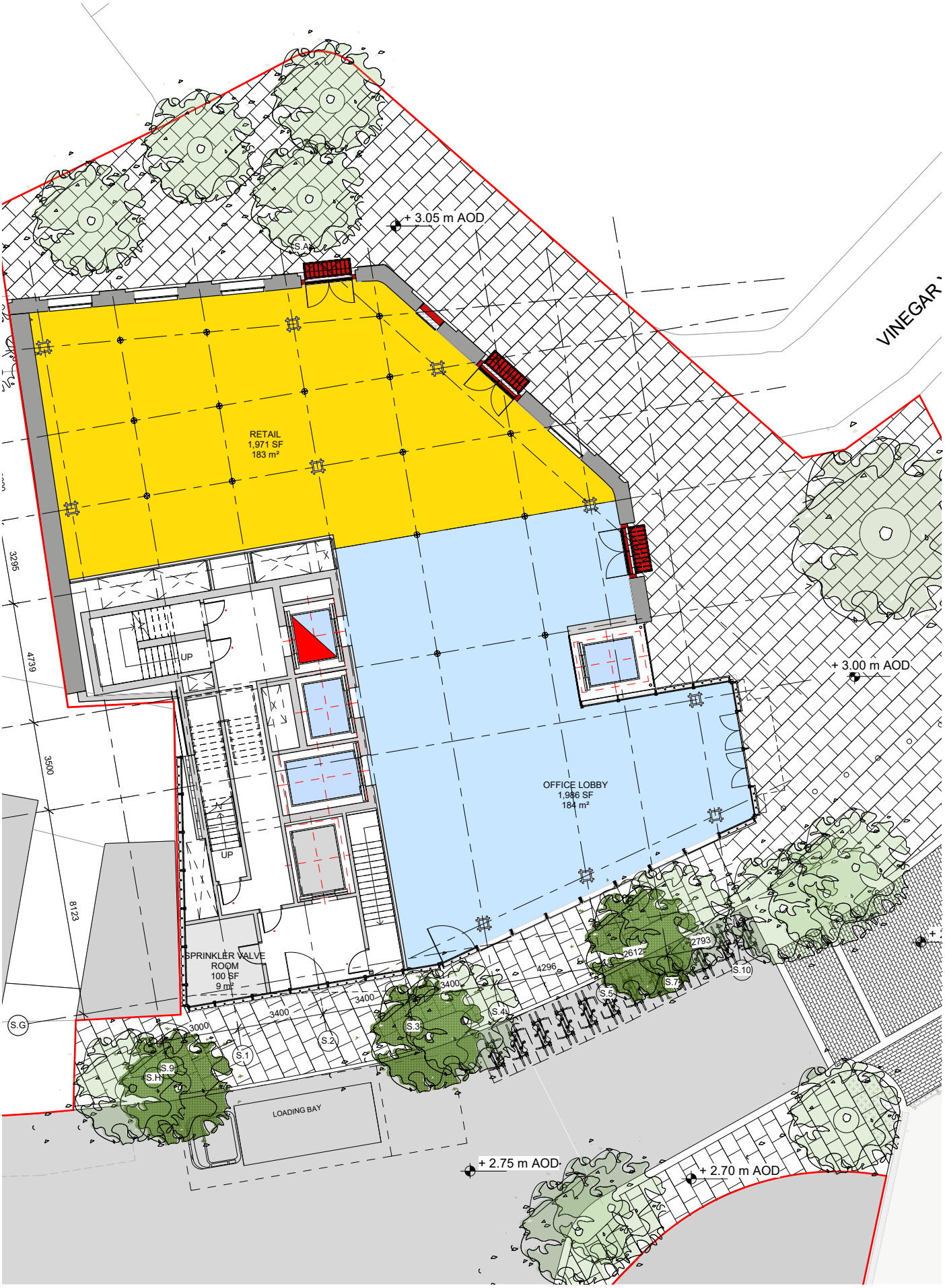
Elevation A

Elevation B

Demolition drawings (yellow highlight added)

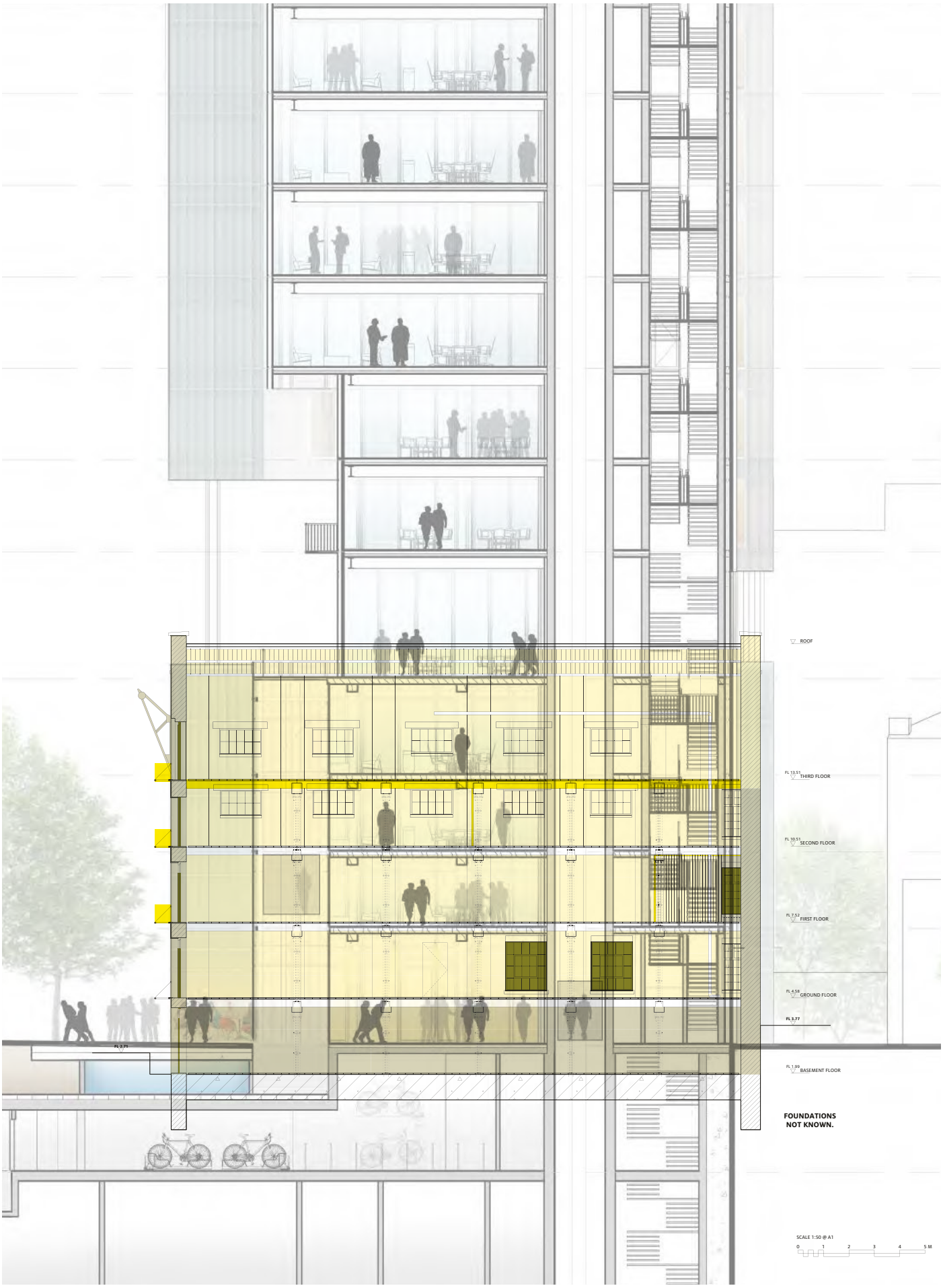


Demolition drawings overlaid with proposed ground floor plan



Proposed ground floor plan

As-existing section of the Vinegar Yard Warehouse



As-existing section of the Vinegar Yard Warehouse overlaid with proposed section

Proposed section

Inspection Scope

The inspection was carried out on 16th November 2018 by three Arup structural engineers, including a specialist in historic buildings. The weather was overcast but dry.

Externally, the building was examined from ground level only. No access was possible to the north and northeast elevations which are currently within an adjacent Network Rail site, but these were partially viewed at an angle from a distance. The roof could not be seen from the ground.

Internally, the building was examined only from the walkways installed by JFH in October 2018. It was not possible to get close to many of the structural elements due to the condition of the building. The basement was not accessible at all as at the time of the JFH works the stairway was broken and deemed not feasible to repair for access. It was not possible to see the roof structure in detail due to access limitations at 3rd level. The especially poor condition of the structure here would mean that more remediation work would be needed to make it safe to use access equipment to carry out a detailed inspection.

2. Observations

It is not known what has caused these cracks but it is possible that their causes might be linked, as they could be caused by movement in the same direction occurring on opposite sides of the building. It is possible that they are due to expansion of the structure inside the building (due to moisture) or of the brickwork (thermal movement). Previous surveys have also observed these cracks, but it is not known whether they have become worse as no monitoring has been in place. The photos with the 2009 WSP report show “telltales” installed to monitor crack movement but by the time of the 2014 Wentworth House Partnership report they have fallen off, likely due to weathering.

3. Recommendations

1. Further access to within the building should be minimised. The building should be reviewed periodically by a competent engineer to monitor any further deterioration.
2. The exterior walls should be periodically checked for loose bricks and and these removed or secured. This particularly applies to the north elevation where bricks have already come loose, but if the building deteriorates further all elevations could become hazardous. Items could fall into the adjacent Network Rail site, public alleyway or car park.
3. Remove the buckets placed at 3rd , if safe to do so. These are not providing protection as they and
4. Depending on the period before refurbishment, consider improving the watertightness of the building to limit further deterioration to elements.

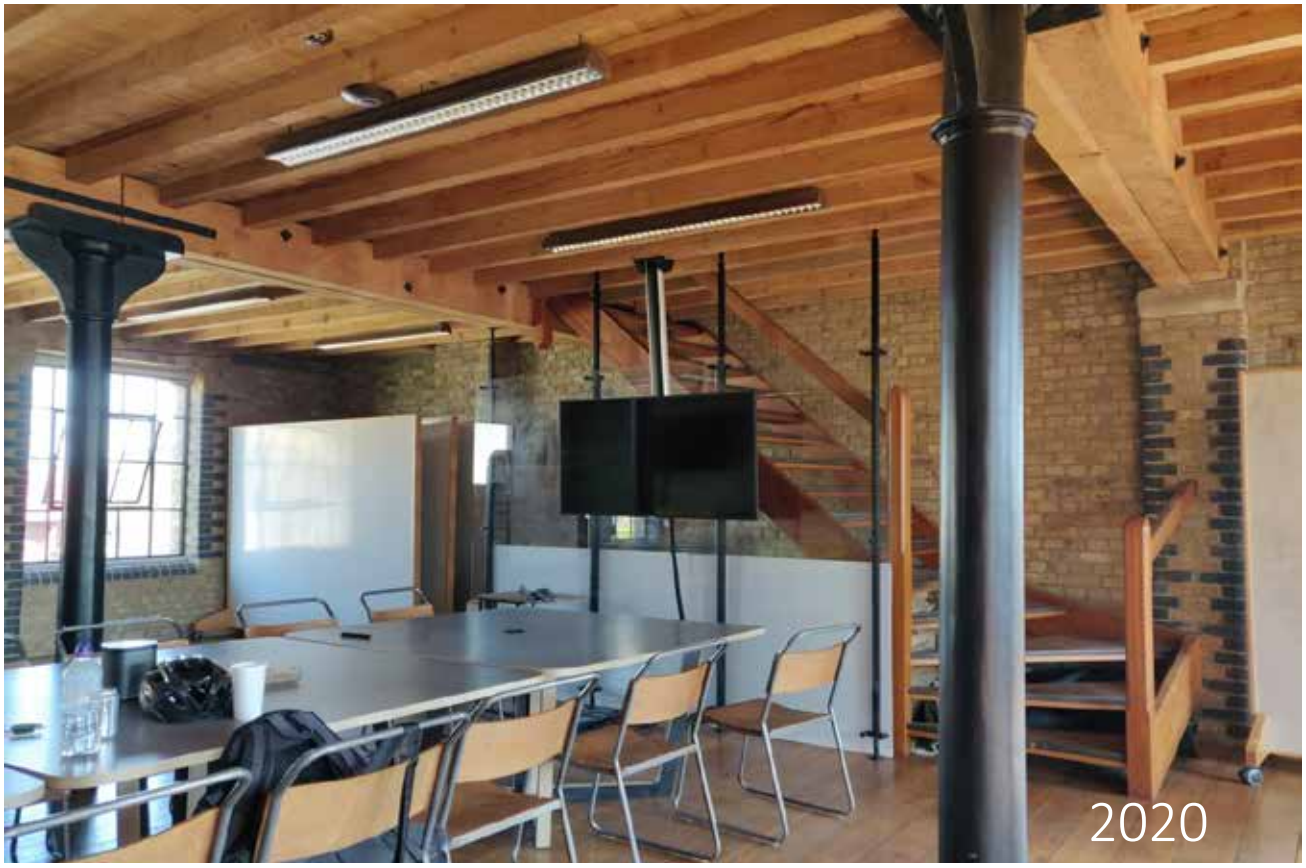
4. Conclusion

currently embedded in perimeter walls. The roof envelope has already failed which is leading to water entering the building, and the roof framing may have corroded due to the water ingress. This water ingress if not stopped will continue to cause damage to the structure. The external walls have cracks which may be due to movement which, if the movement continues, may lead to bricks or becoming loose and falling.

We recommend that action is taken to check for and secure any loose items on the outside of the building, to prevent these becoming a danger to the public. We also recommend that action is taken to make the building watertight and prevent any further deterioration.

Photographs of the restoration of the Tanneries Buildings on Bermondsey Street

Photographs of the restoration of the Tanneries Buildings on Bermondsey Street



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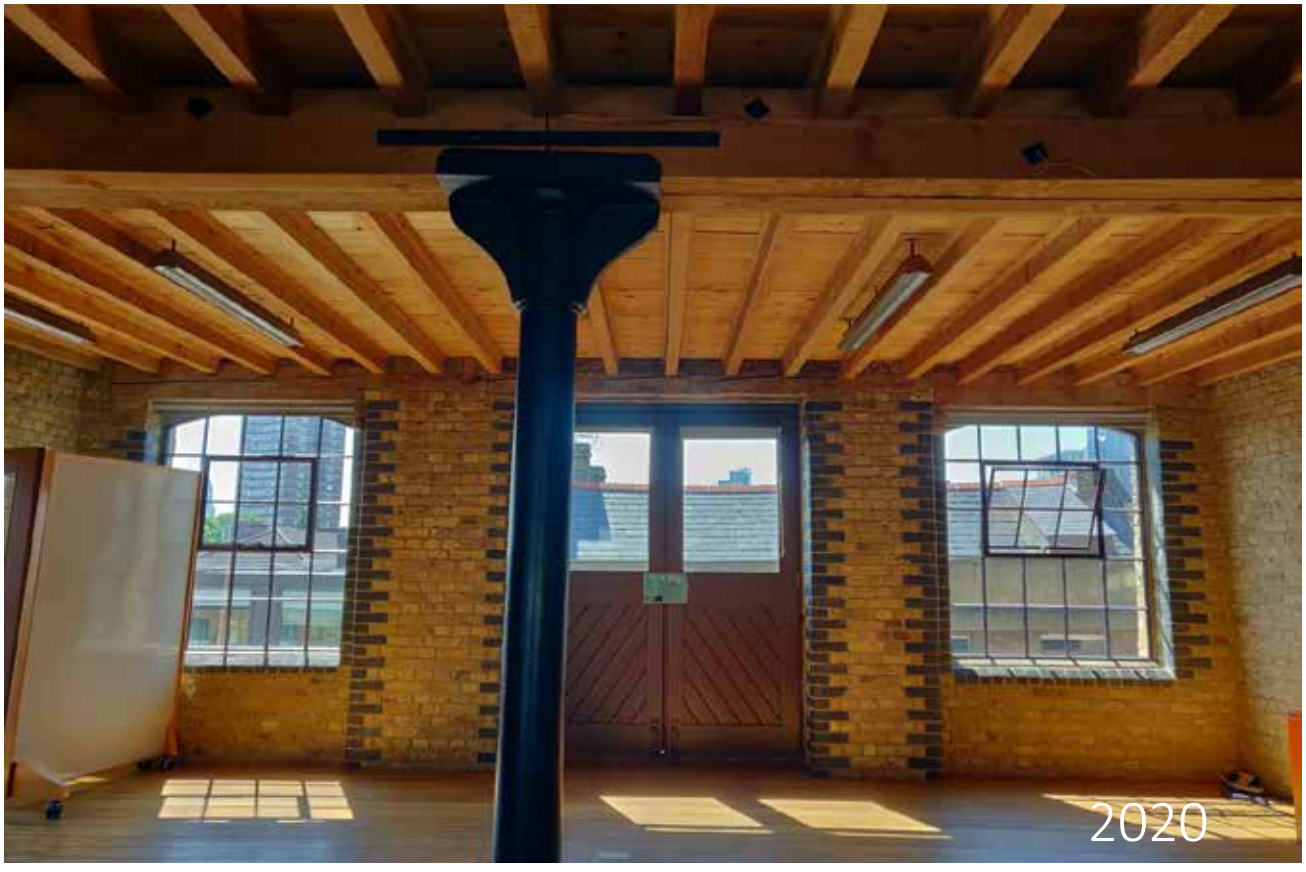

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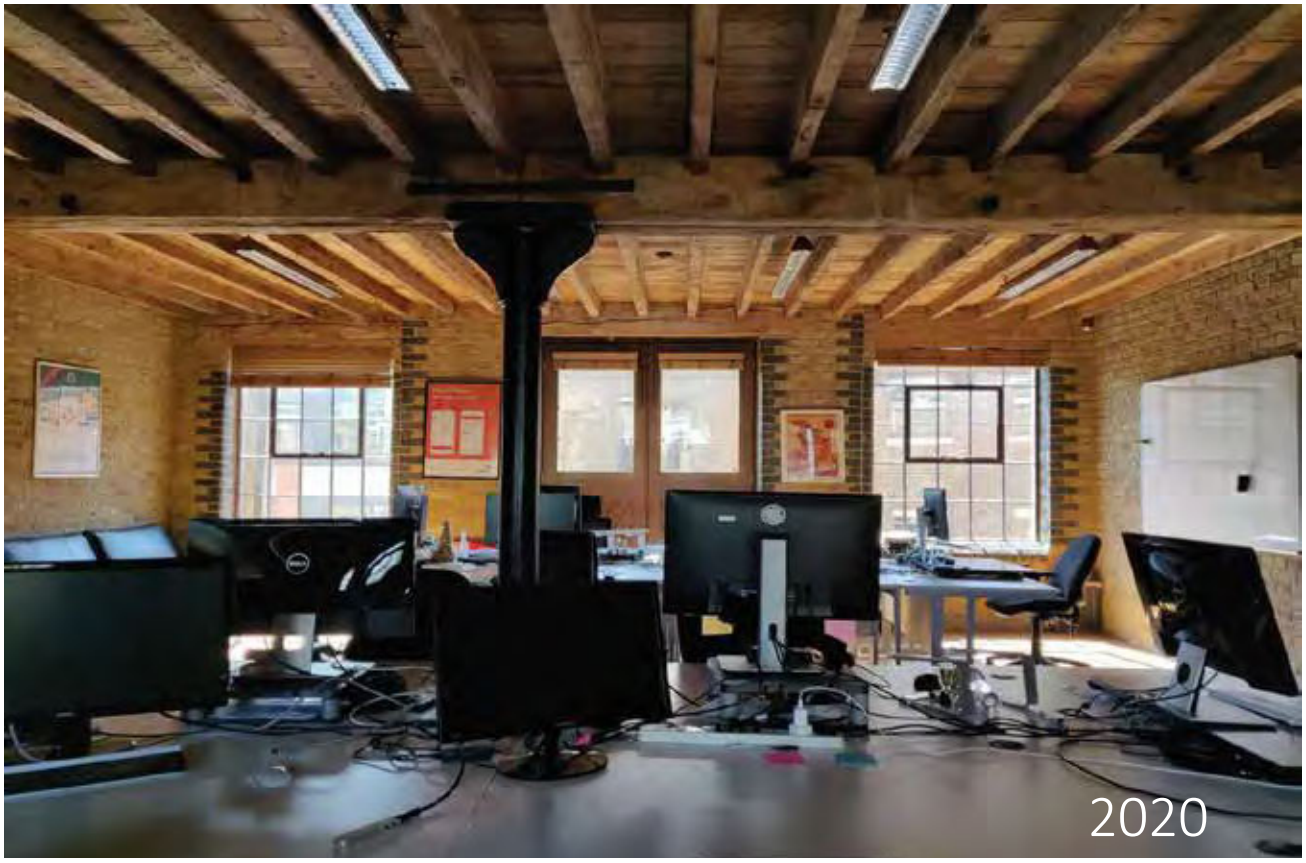

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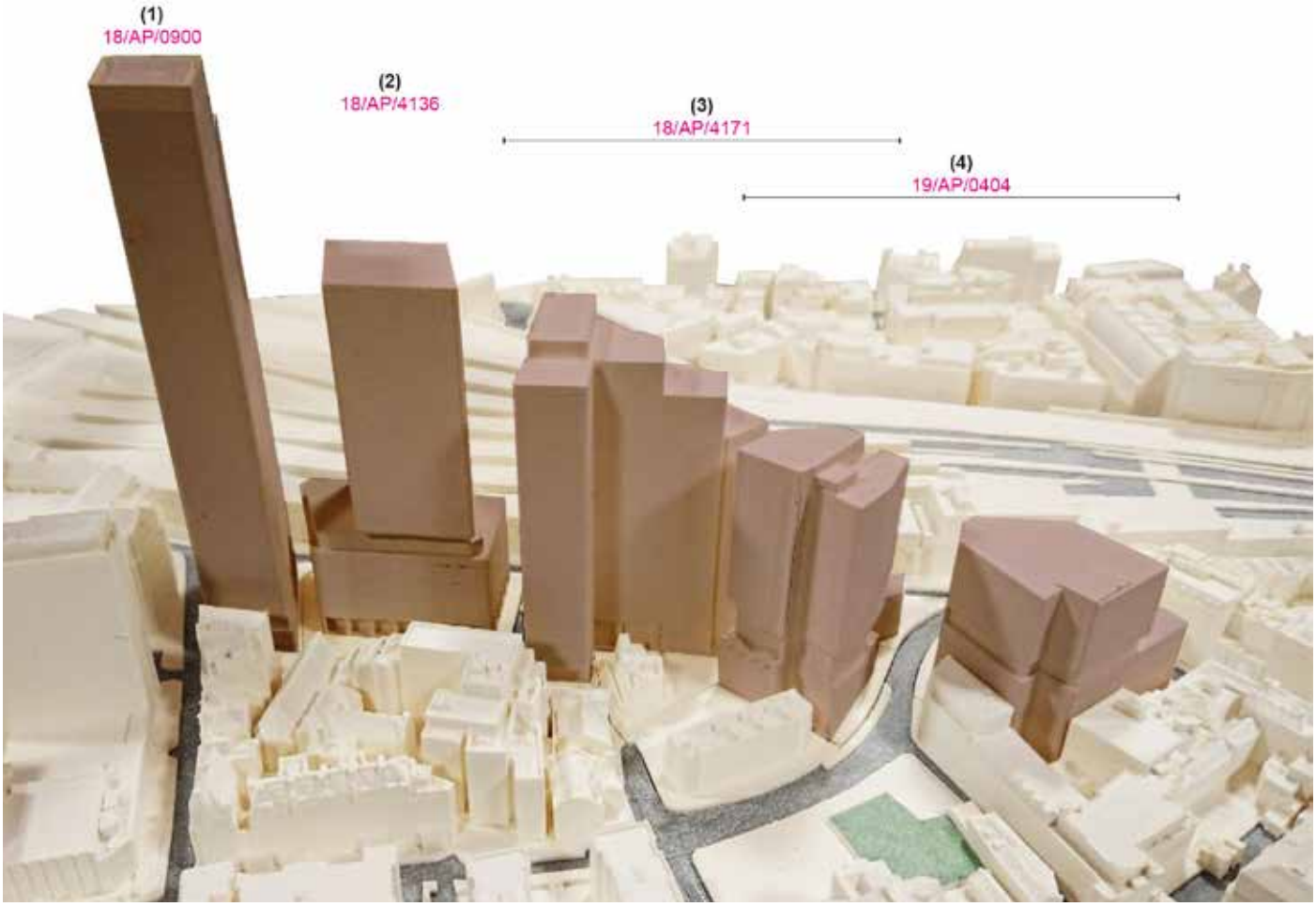
3. Contrast in Scale

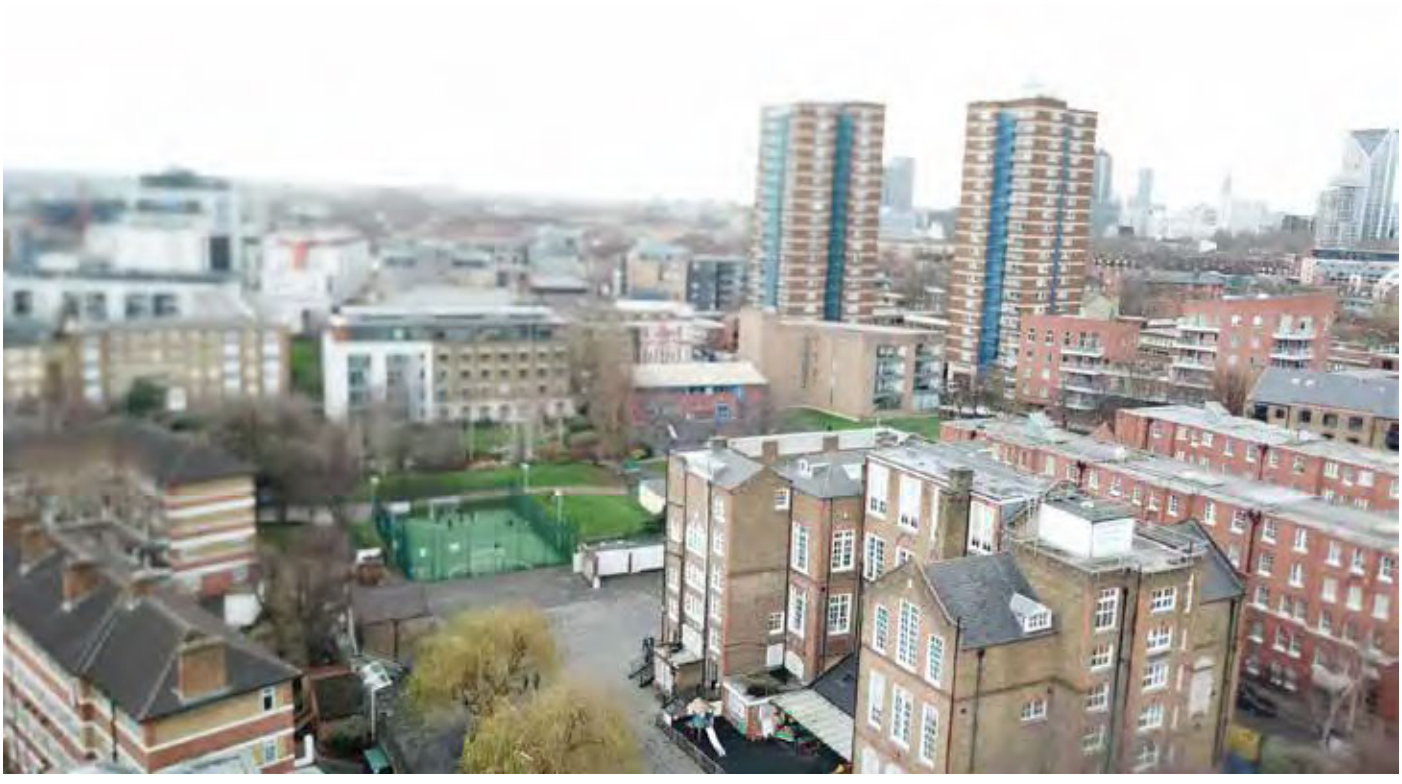


KEY

- Site 1 - 18/AP/0900 - Greystar
- Site 2 - (Forthcoming) - Edge
- Site 3 - 18/AP/4171 - CIT
- Site 4 - 19/AP/0404 - Sellar
- Conservation Area
- Listed Buildings
- Buildings Making Positive Contribution
- Neighbourhood Area
- Selected Street Views
- Selected Sky Views
- 83 Proposed Builing Heights (m)
- * Key Proposed Public Space

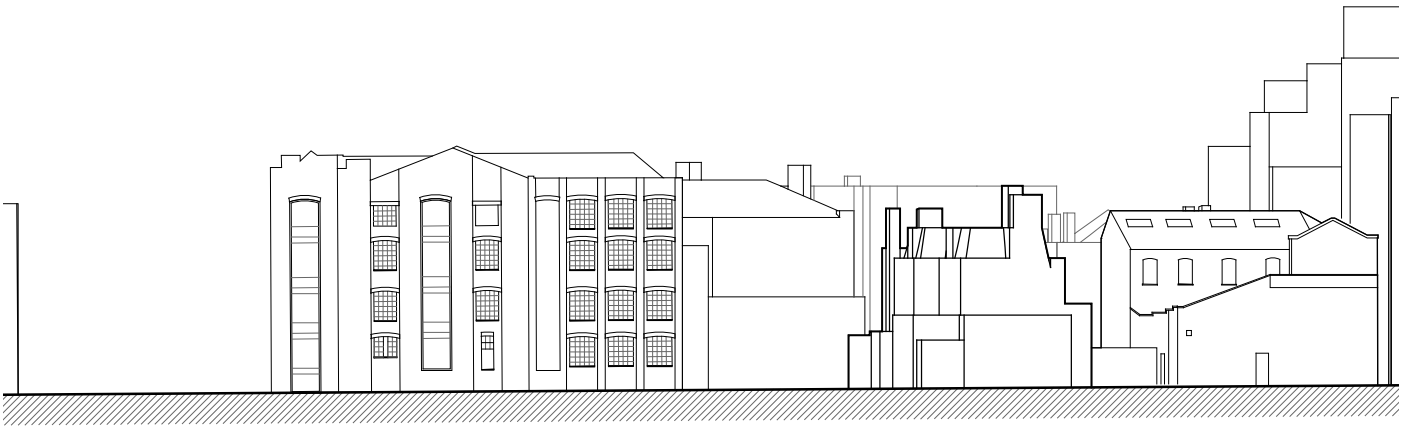
Cumulative heights and massing

Views from the proposals at 20m

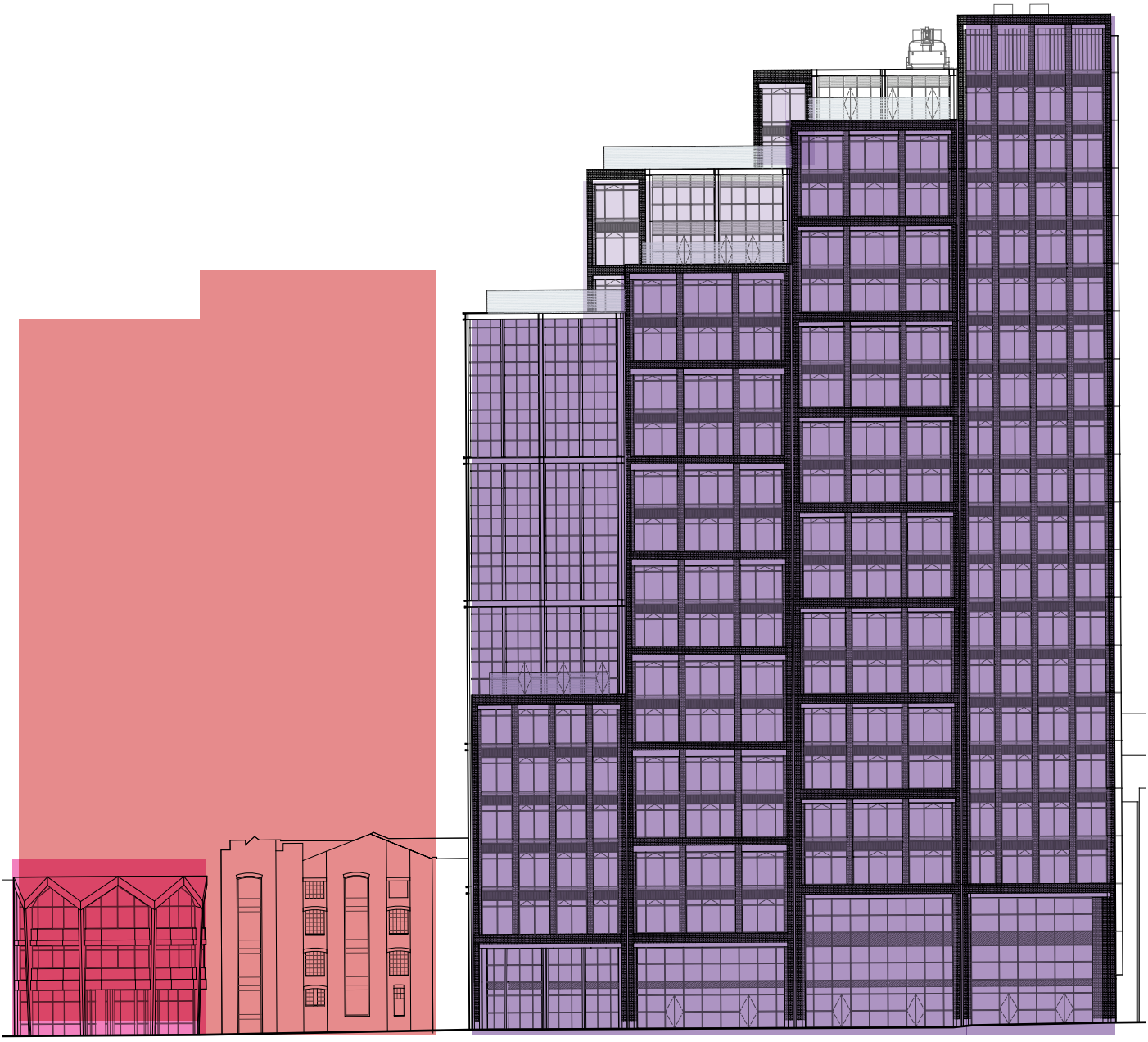


Views from the proposals at 40m

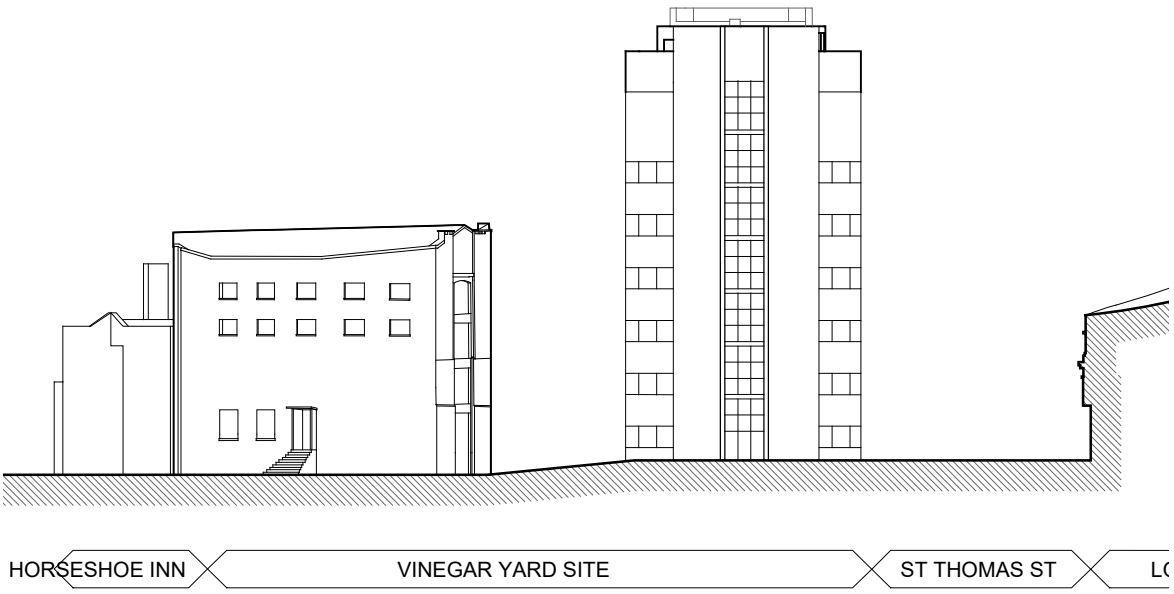
Cumulative views from 20/AP/0944



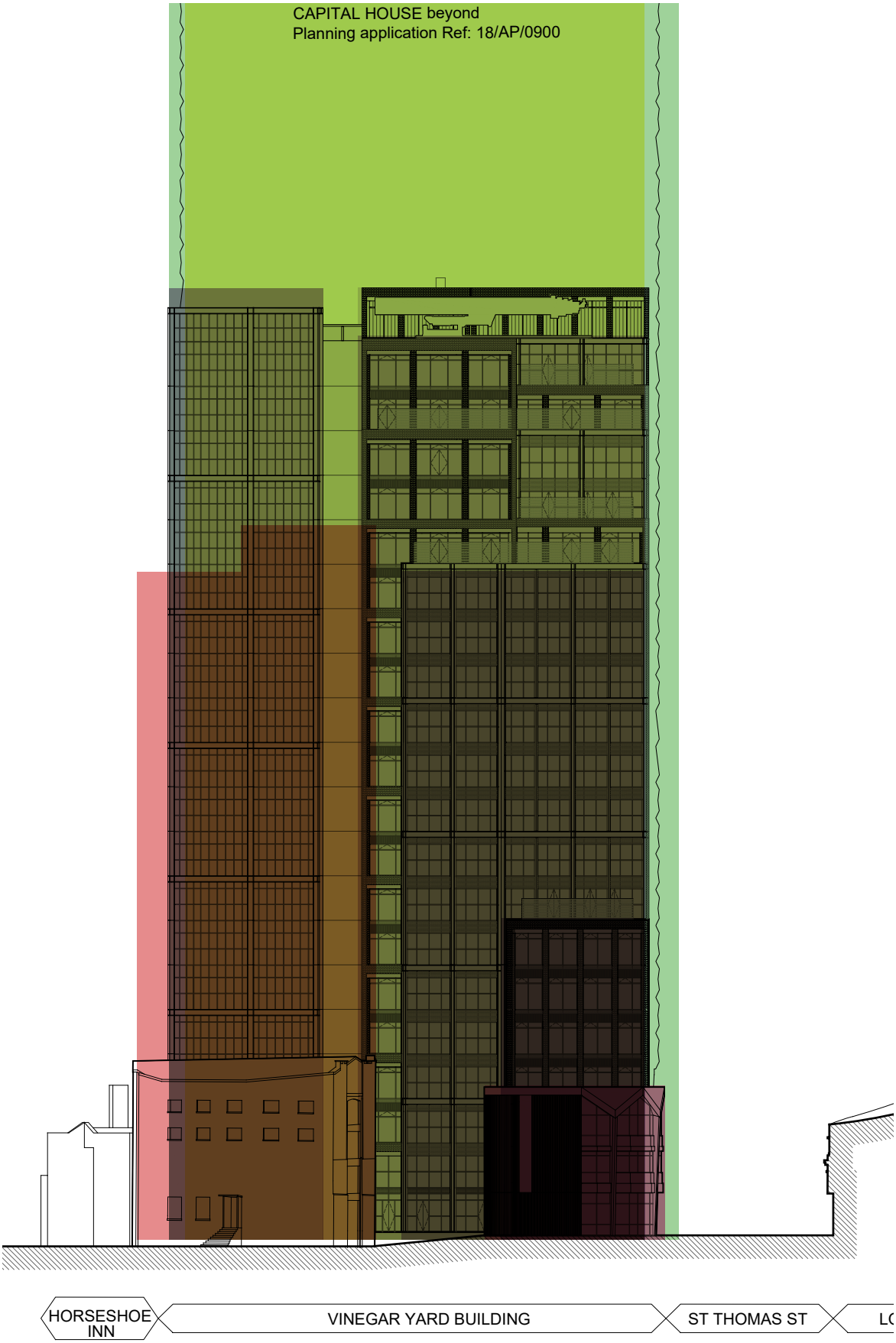
Existing Elevation from North



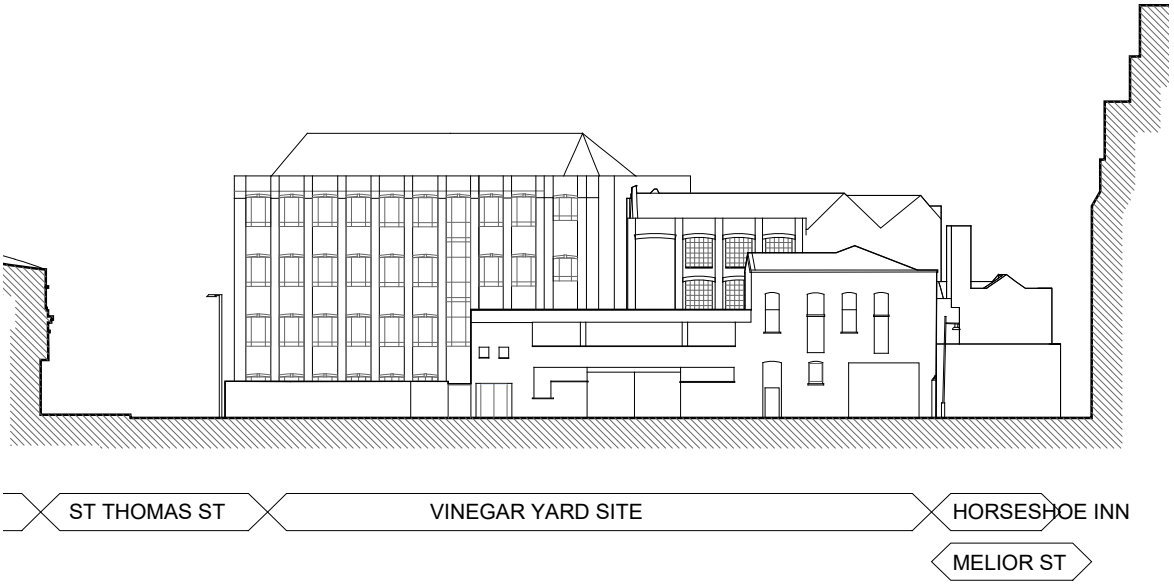
Cumulative elevation from North



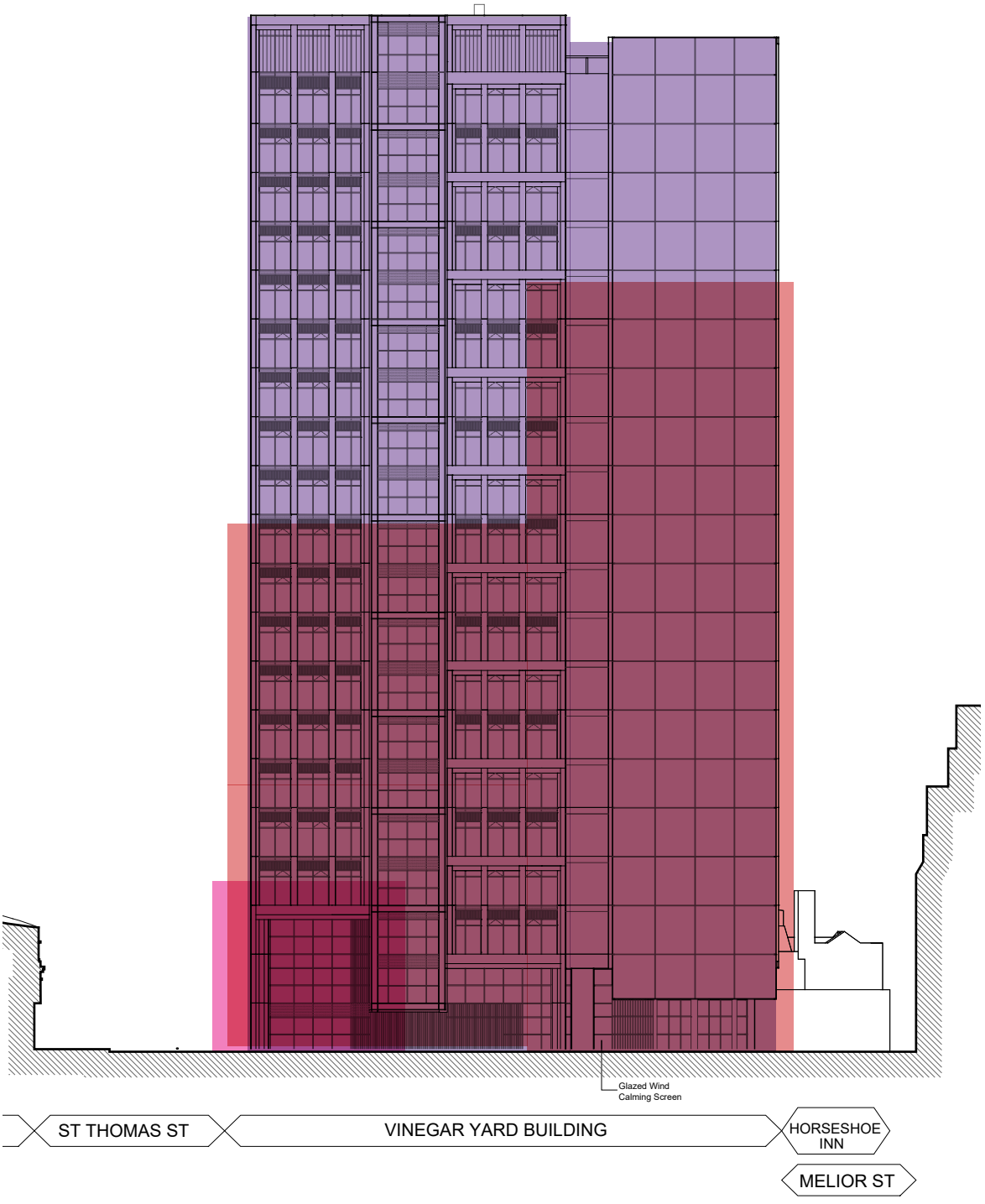
Existing elevation from East



Cumulative elevation from East



Existing elevation from West

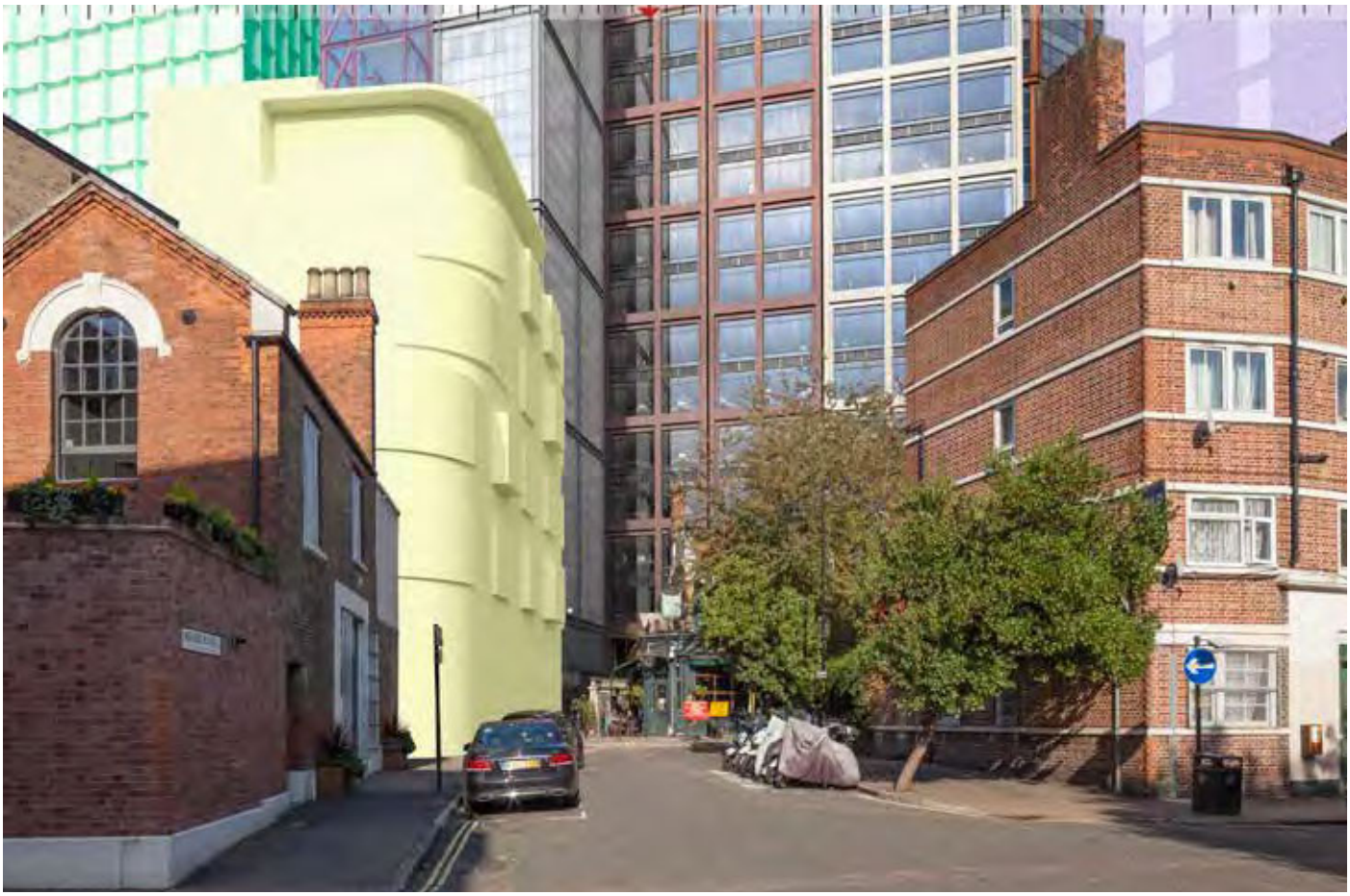


Cumulative elevation from West

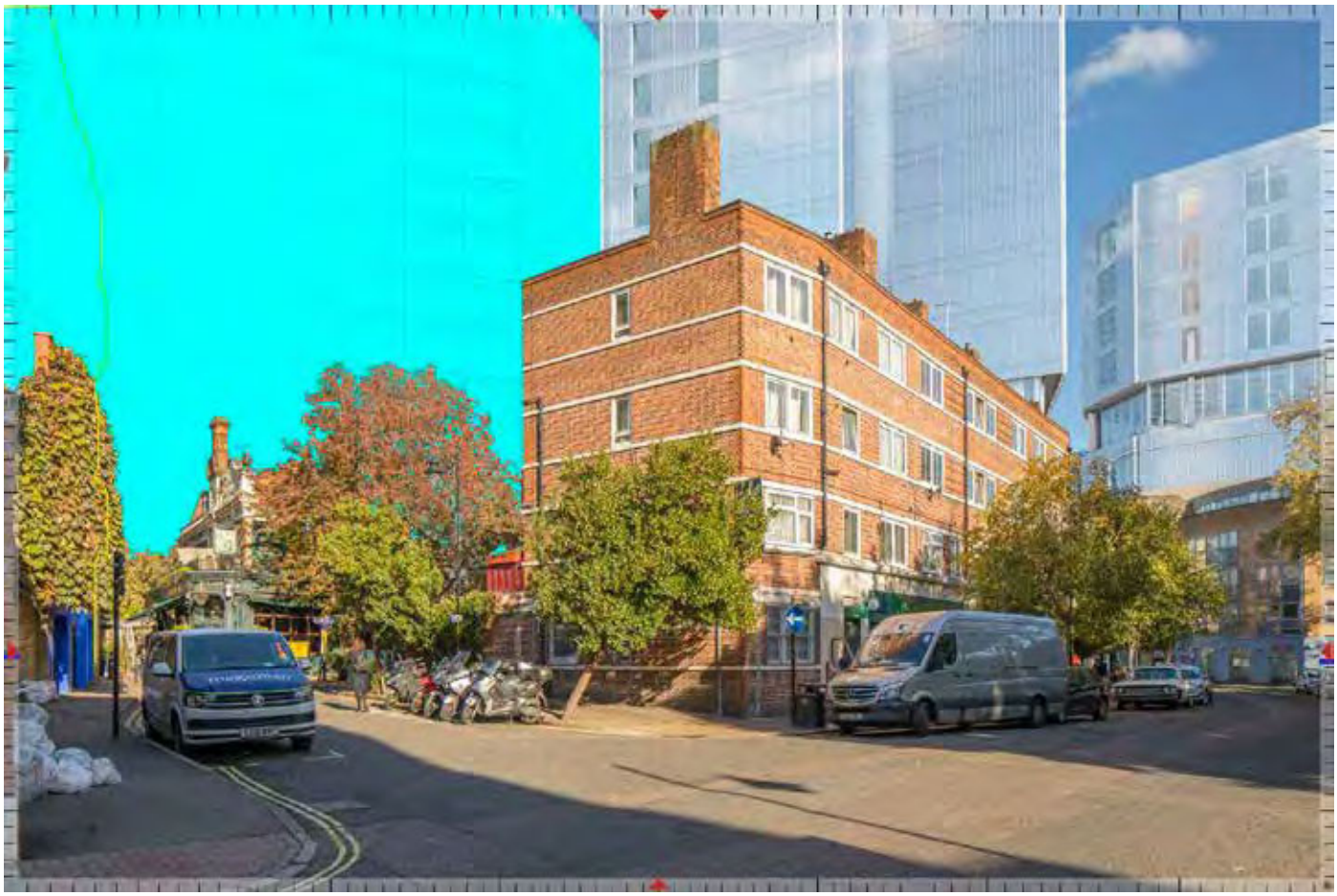
As-existing and proposed cumulatve view at Crucifix Lane / Bermondsey Street

As-existing and proposed cumulatve view at Bermondsey Village Hall, Leathermarket Gardens

As-existing and proposed cumulatve view on Kirby Grove

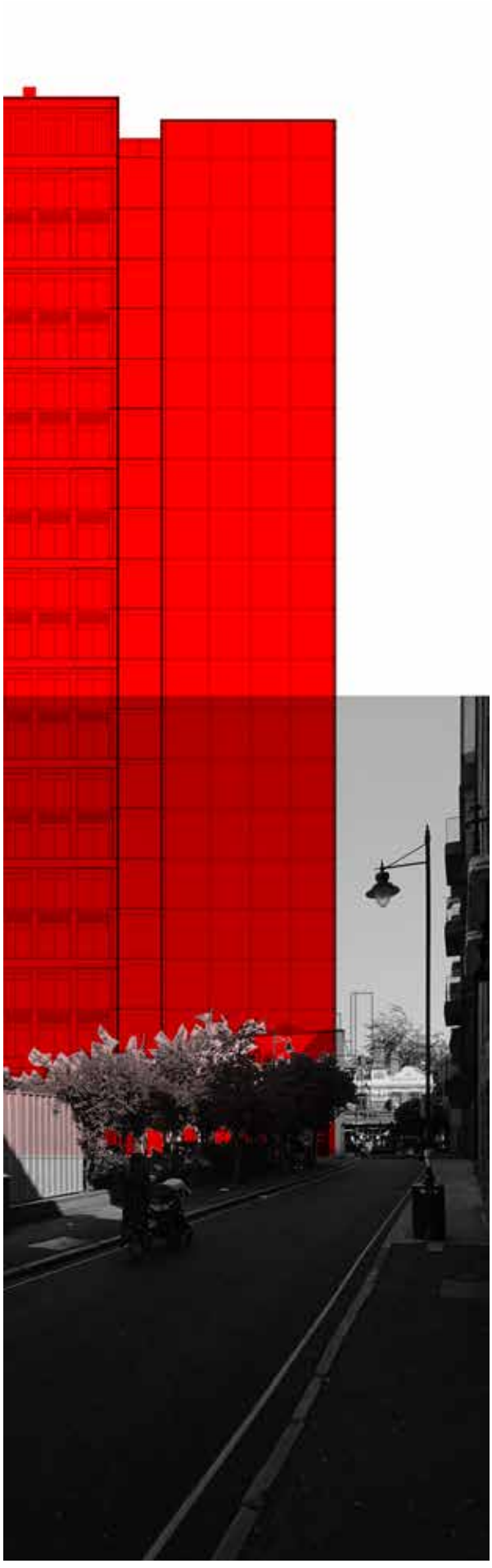


As-existing and proposed cumulatve view on Snowsfields / Melior Place



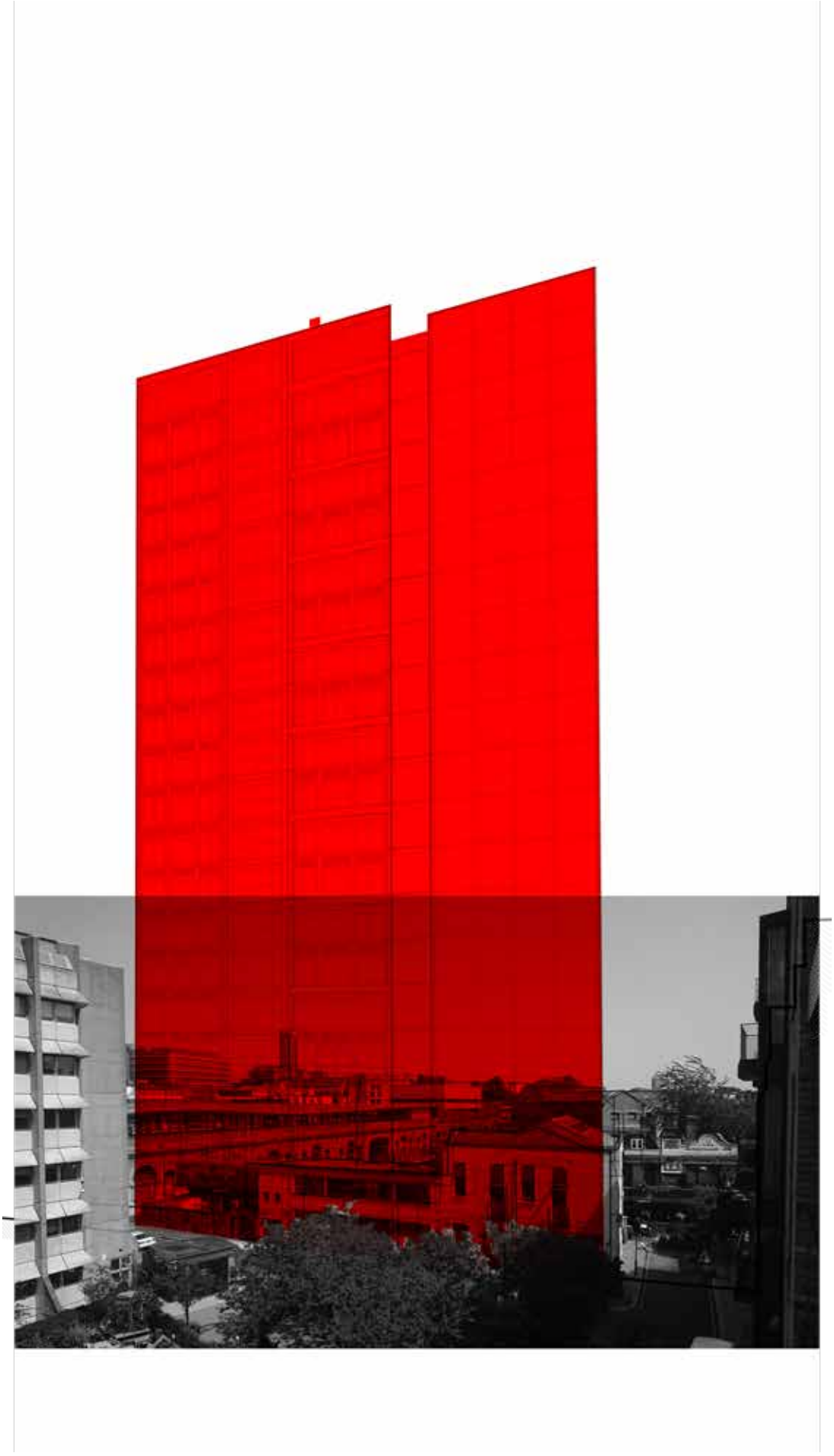
As-existing and proposed cumulatve view on Snowsfields / Melior Place

Photograph of existing condition on Melior Street



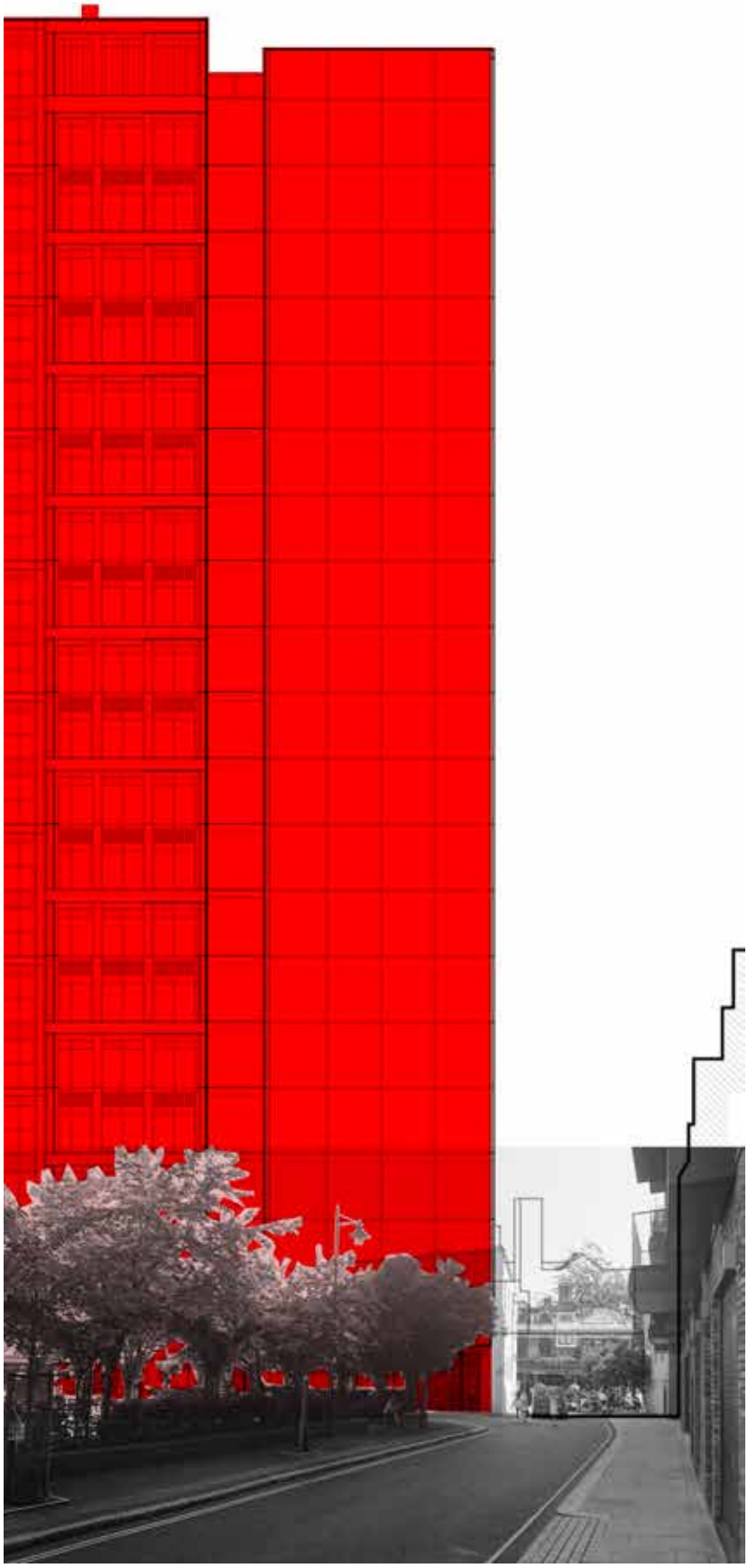
Proposed massing (highlighted over existing photograph using elevations)

Photograph of existing condition on Melior Street



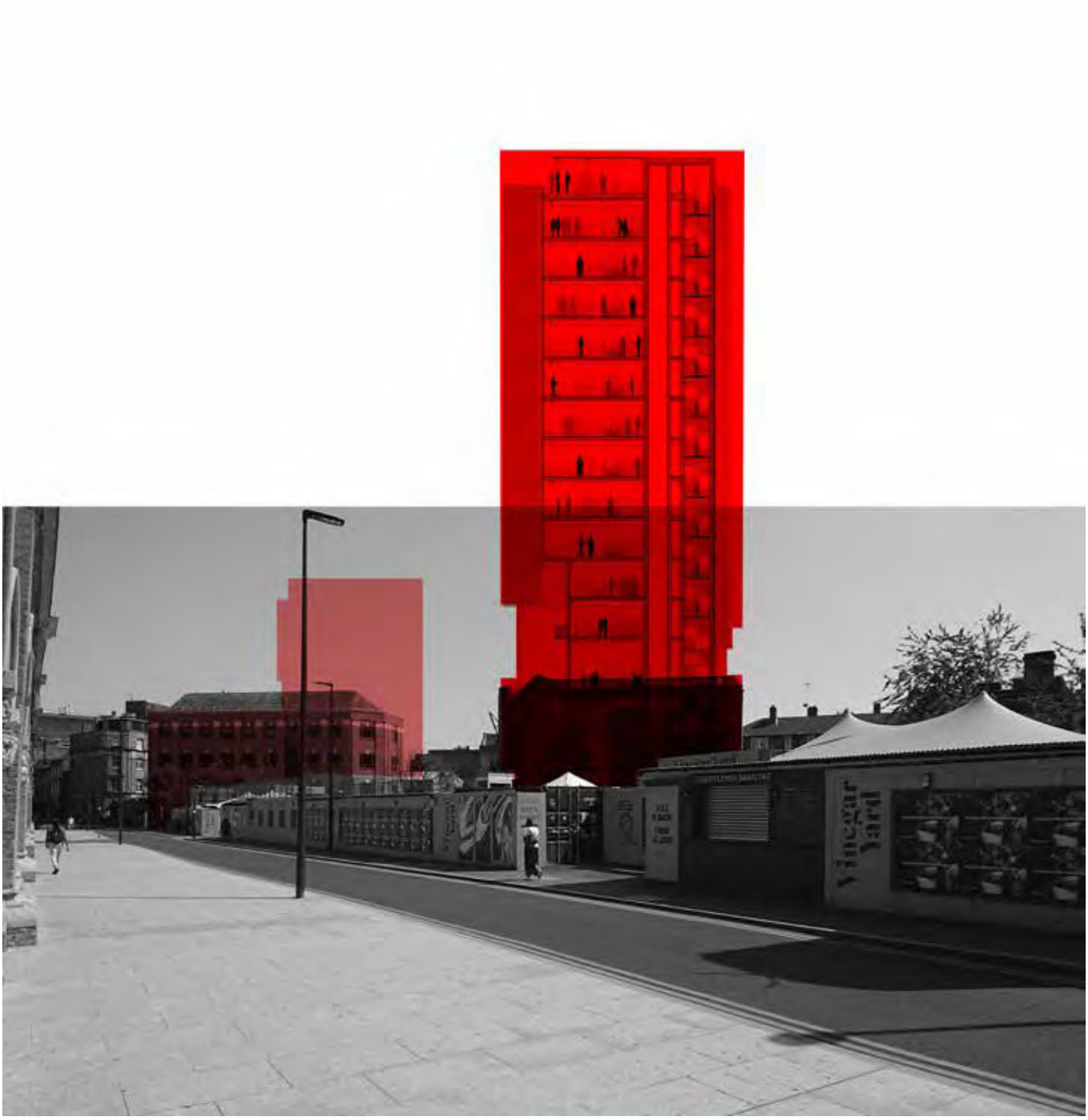
Proposed massing (highlighted over existing photograph using elevations)

Photograph of existing condition on Melior Street



Proposed massing (highlighted over existing photograph using elevations)

Photograph of existing condition on St Thomas Street



Proposed massing (highlighted over existing photograph using elevations)

	Points of discussion
1. Restoration of the warehouse	Unneccessary demolition Neglect and poor evidence Genuine restoration entirely viable Tower precludes restoration Tower gives precedent for harm Pre-commencement condition details
2. High quality public realm / space	Net reduction in green infrastructure Unnacceptable overshadowing Unnacceptable wind conditions S016 tbc e.g. wind
3. Improved pedestrian connectivity	Unnacceptable wind conditions Provision v.s. new footfall and density S016 tbc e.g. transport
4. The provision of new jobs	Jobs for local people Section 106 details (in lieu and tbc) Support for the local economy Support for sustainable future economy Affordable housing alternatve
5. New retail units	Local oriented provision Sustainable for future needs Affordable housing alternatve
6. Provision of affordable workspace	Section 106 details tbc: - Detailed design - Affordable workspace strategy

	Points of discussion
1. High quality architecture	Poor quality architecture
2. A	Negligable urban greening Urban greening factor not provided Unnacceptable overshadowing Unnacceptable wind conditions S016 tbc
3. New pedestrian linkages / improved connectivity	Unnacceptable wind conditions Provision v.s. new footfall and density S016 tbc
	Jobs for local people Support for the local economy Support for sustainable future economy Affordable workspace in lieu Affordable housing alternatve S016 tbc
5. New retail opportunities	Local oriented provision Sustainable for future needs Affordable housing alternatve
6. A new music venue	No evidence of need / evidence to contrary Management plan tbc in s106
7. Affordable workspace	In leui payment

VINEGAR YARD MASTERPLAN IN CONTEXT

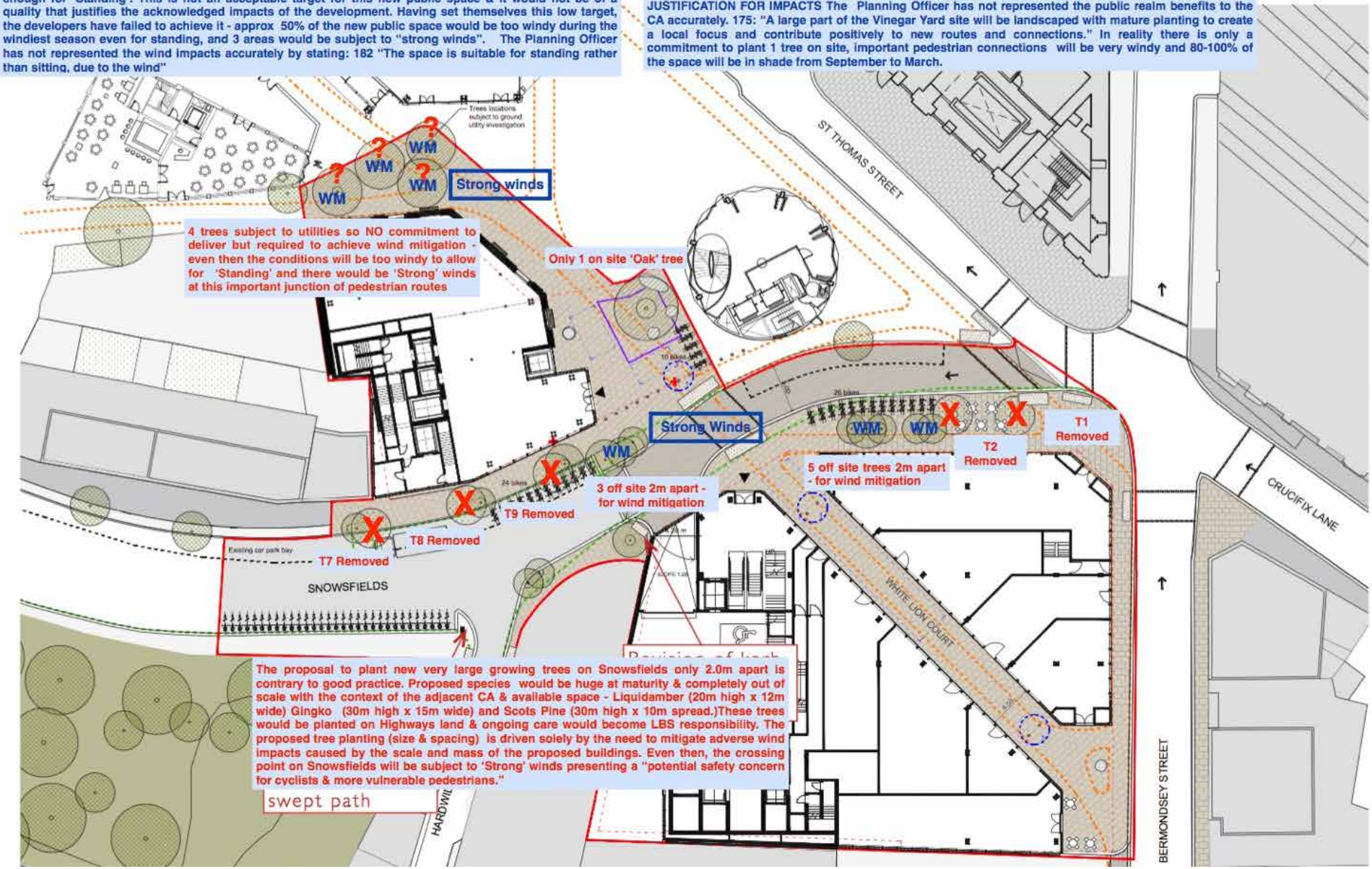
PUBLIC REALM PROPOSAL

TREES The Planning officer has not understood the content of the tree proposals. Planning report 181: "It includes the retention of a number of trees, including the large oak tree in Vinegar Yard, which will become a focal point for the forecourt area and for the view along the new passageway. It provides 5 replacement trees and 14 additional street trees, including onto St Thomas Street, where they will help soften the streetscape." Much of this is misleading or factually incorrect.

WIND The applicants have set themselves a very low target for wind in the public space - conditions good enough for 'Standing'. This is not an acceptable target for this new public space & it would not be of a quality that justifies the acknowledged impacts of the development. Having set themselves this low target, the developers have failed to achieve it - approx 50% of the new public space would be too windy during the windiest season even for standing, and 3 areas would be subject to "strong winds". The Planning Officer has not represented the wind impacts accurately by stating: 182 "The space is suitable for standing rather than sitting, due to the wind"

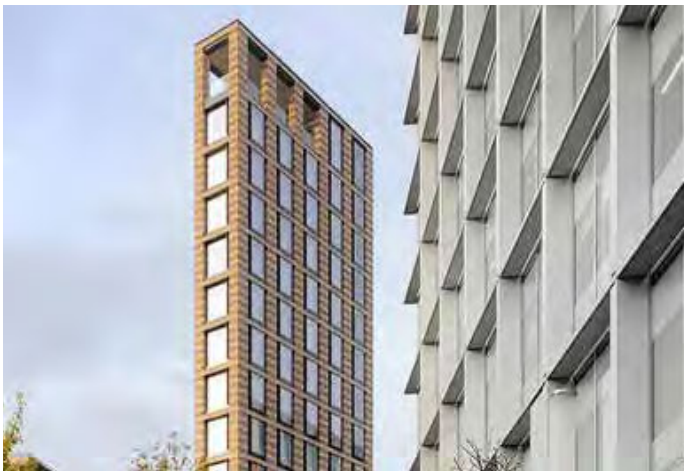
SHADING The Planning officer has not represented the shading correctly. Planning report 182: "The daylighting within the forecourt/plaza area is not unreasonable, with the area shown to be sunlit over the lunchtime period (12-3pm) during Spring and Autumn." The drawings show that this space would be in shade. The only area receiving sunlight at this time would be a small area to the south east of the warehouse. See dwg.MAR 1/04 which shows daylight at 1pm & 2pm, the time frame in the Officer's report. This time is the best case for the scheme. At all other times 80-100% of the public realm would be in shade.

JUSTIFICATION FOR IMPACTS The Planning Officer has not represented the public realm benefits to the CA accurately. 175: "A large part of the Vinegar Yard site will be landscaped with mature planting to create a local focus and contribute positively to new routes and connections." In reality there is only a commitment to plant 1 tree on site, important pedestrian connections will be very windy and 80-100% of the space will be in shade from September to March.



Ambitious green public space

Ambitious green public space



Ambitious contextual architecture

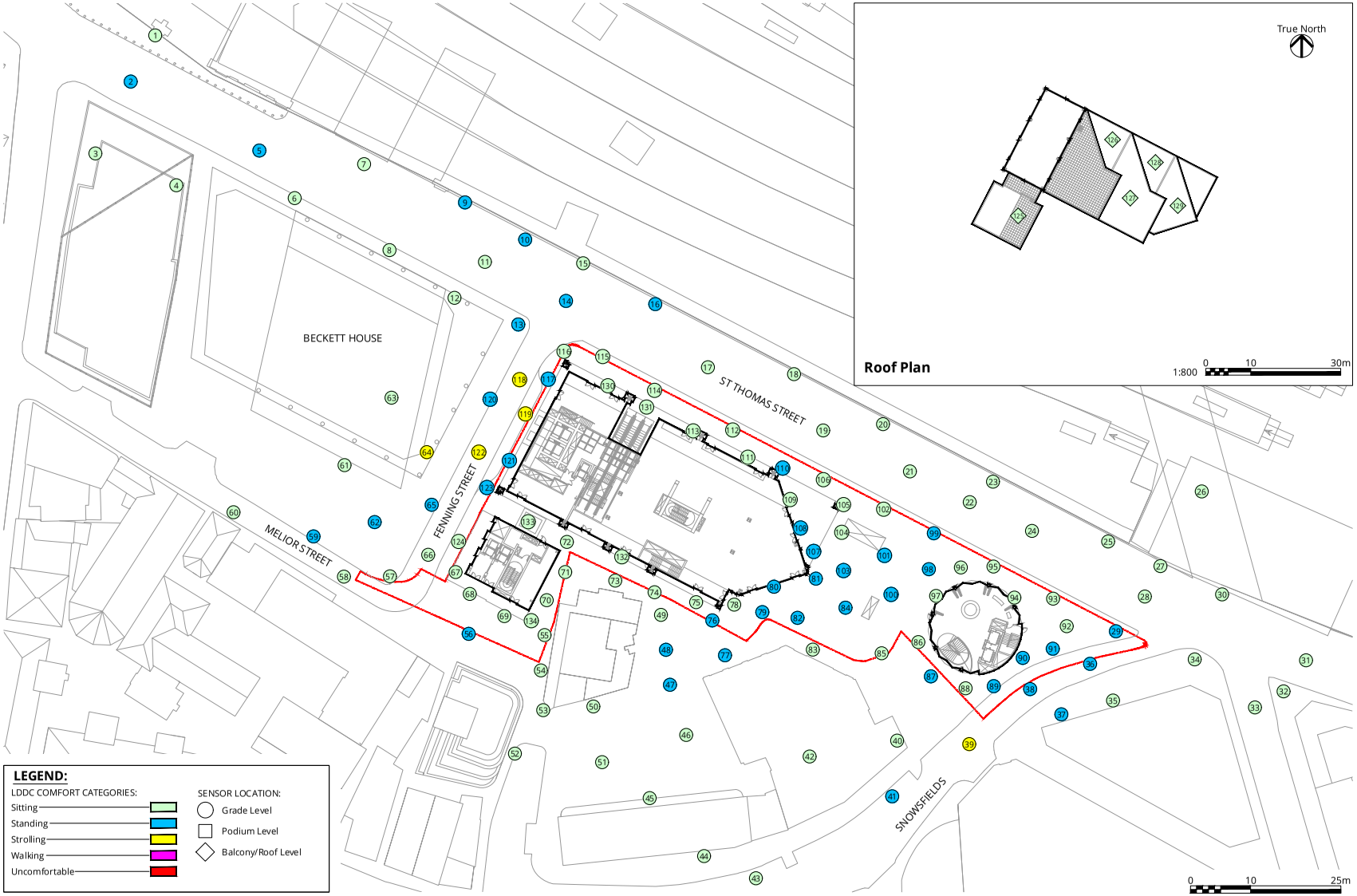
Basmement performance venue with offices above at street level

5. Environmental Impacts

Overshadowing 21st March at 1pm (top) and 2pm (bottom)

Figure 10.3 Configuration 1: Existing Site with Existing Surrounding Buildings – Ground Floor: Summer Season

Figure 10.2 Configuration 1: Existing Site with Existing Surrounding Buildings – Ground Floor: Windiest Season



Pedestrian Wind Comfort Conditions - Ground Floor
Configuration 5: Proposed Development with the Cumulative Surrounding Buildings and Beckett House
Summer Season

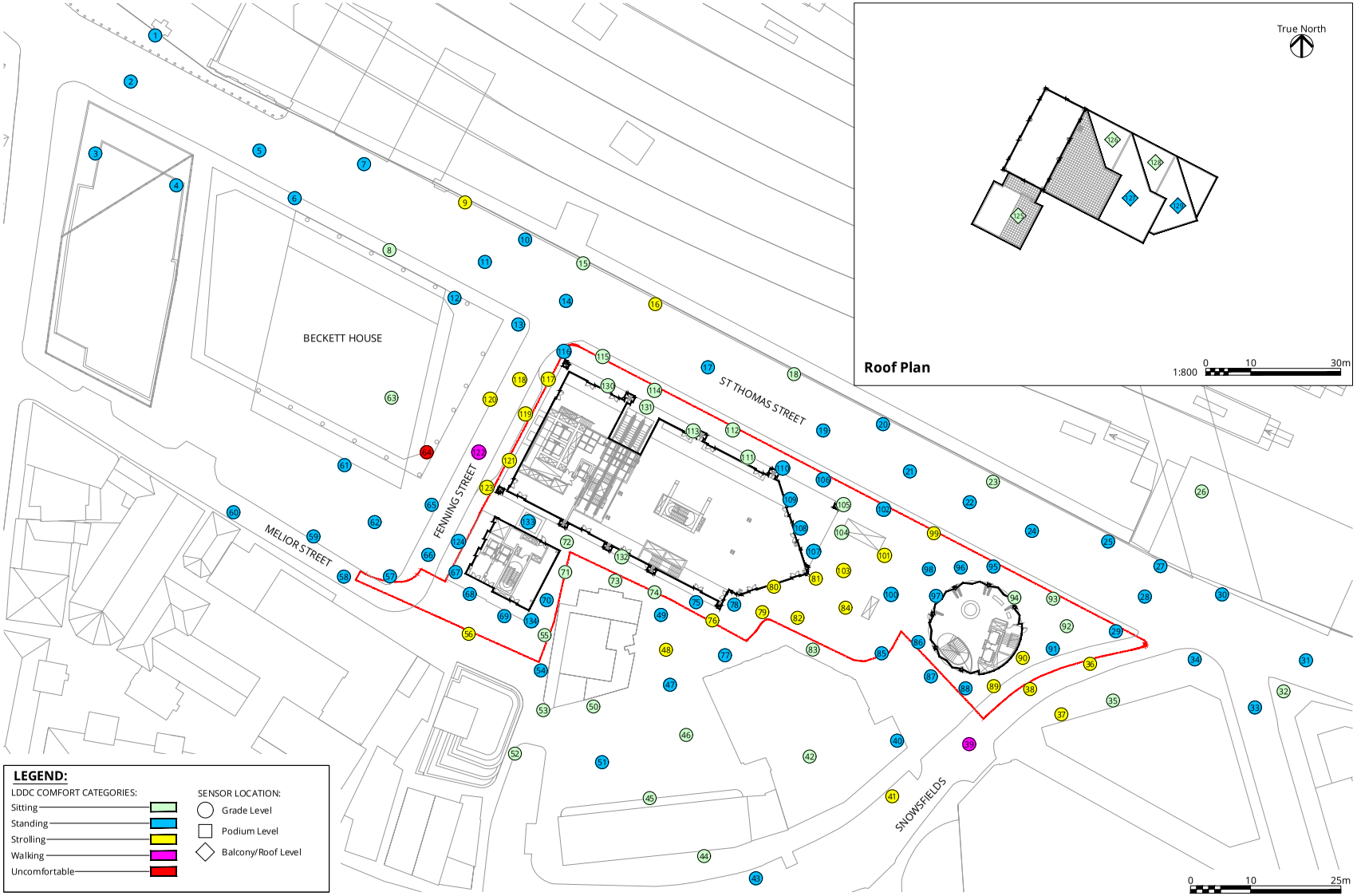
Vinegar Yard, London - UK

True North

Project #1803723

Drawn by:	ME	Figure:	D
Approx. Scale @A3:			1:600
Date Revised:	Mar. 26, 2019		

Cumulative wind in Summer



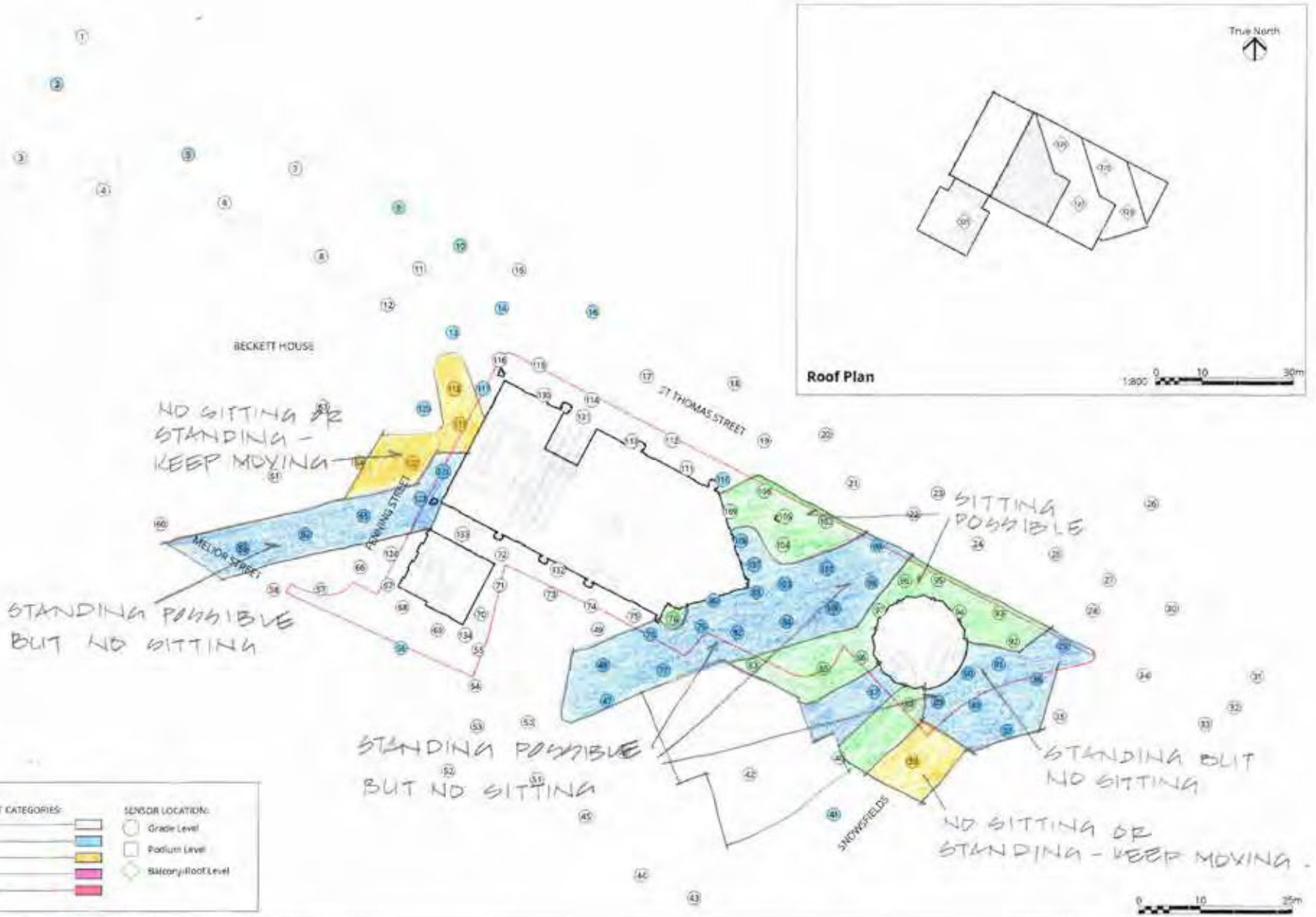
Pedestrian Wind Comfort Conditions - Ground Floor
Configuration 5: Proposed Development with the Cumulative Surrounding Buildings and Beckett House
Windiest Season

Vinegar Yard, London - UK

True North

Project #1803723

Drawn by:	ME	Figure:	C
Approx. Scale @A3:			1:600
Date Revised:	Mar. 26, 2019		



Pedestrian Wind Comfort Conditions - Ground Floor
Configuration 5: Proposed Development with the Cumulative Surrounding Buildings and Beckett House
Summer Season

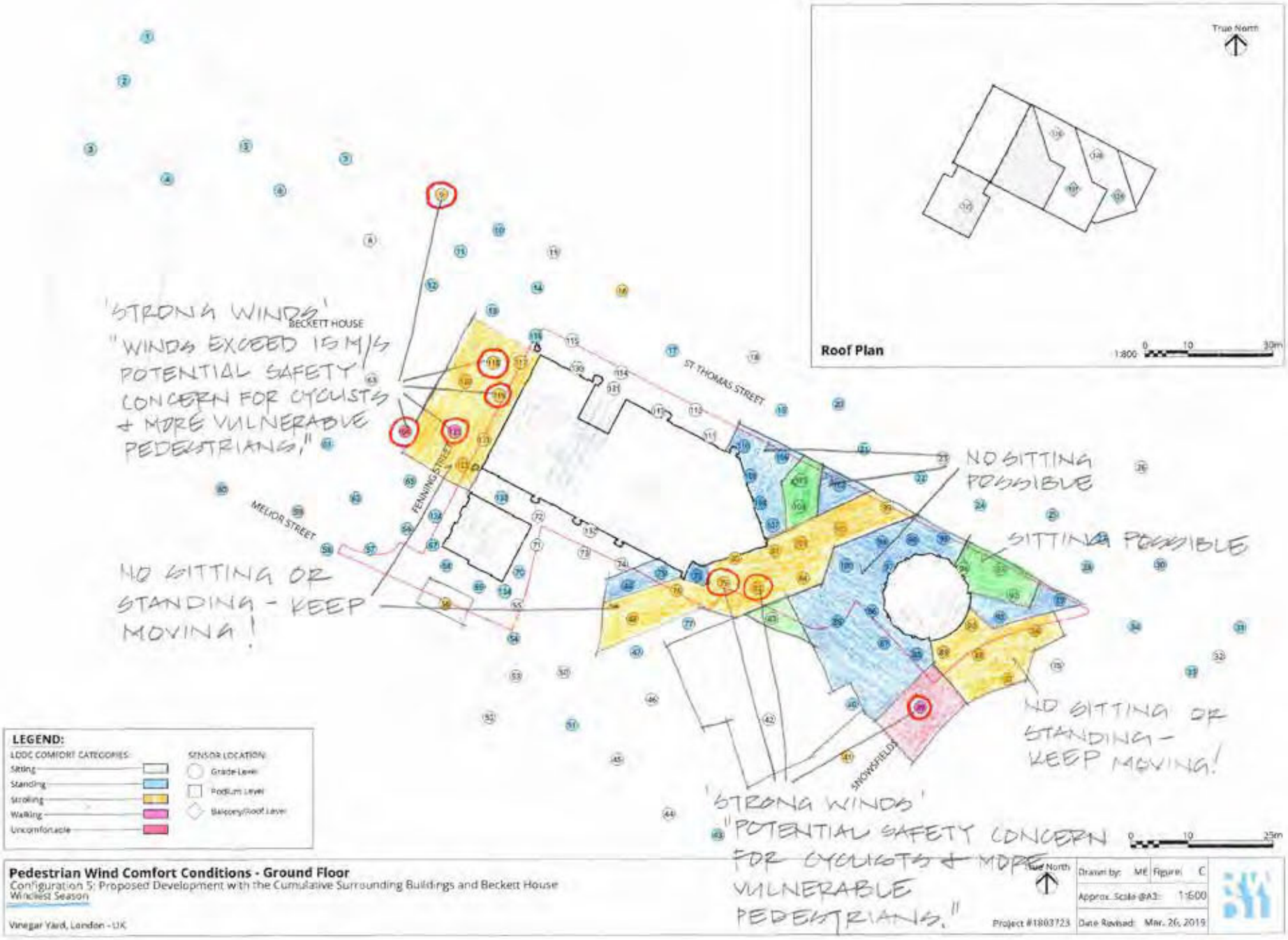
Vinegar Yard, London - UK

True North

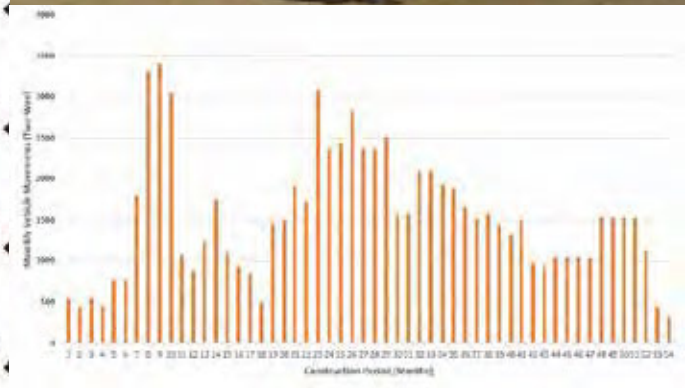
Project #1803723

Drawn by: ME Figure: D
Approx. Scale @A3: 1:600
Date Revised: Mar. 26, 2019

Cumulative wind in summer - annotated



Cumulative wind in winter - annotated



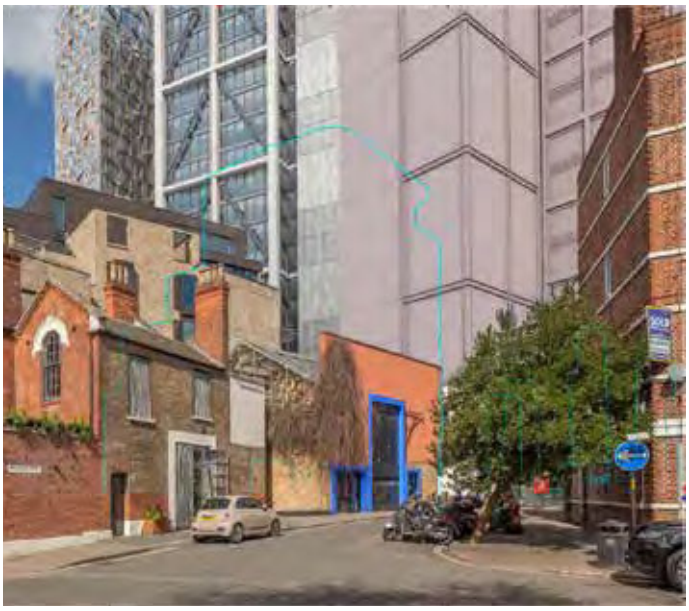
ENVIRONEMTAL / OVERDEVELOPMENT IMPACTS SUMMARY OF POINTS FOR DISCUSSION

- Wider cumulative impacts (e.g. Guys)
- Overshadowing
- Daylighting
- Light pollution
- Wind
- Construction stage disruption
- Air quality
- Congestion / road management and safety / joined up delivery plan
- Public transport saturation
- Higher Sustainability Standards required - e.g. 20/AP/0944

HGVs are expected to cross the local area av. 60xday = 1 every 8 minutes of the working day.. for 5 years.

6. Consultation

Cumulative view from 20/AP/0944



Cumulative views from 20/AP/0944

"..the joint pre-app outline masterplan planning application.. pre-app process will.. culminate in a Design Review Panel (DRP) on the masterplan, and a formal preapp letter at the end of the process.
(Cllr Johnson Situ July 2018)

CONSULTATION SUMMARY POINTS FOR DISCUSSION

- Cumulative DRP process promised on a masterplan and withdrawn without explanation
- No reference to wider guys masterplan
- Cumulative height / massing of (fully developed) schemes witheld during Framework engagement
- Misrepresentative and misleading SCI reports falsely claiming local support

Model images from 'roundtable meeting' 20th February 2019