

GREATER LONDON AUTHORITY

Our reference: MGLA250322-7779

Date: 12 April 2022

Dear

Thank you for your request for information which the Greater London Authority (GLA) received on 16 March 2022. Your request has been considered under the Environmental Information Regulations (EIR) 2004.

You requested:

Will you be in a position to issue the redacted consultation feedback this week?

Please find attached the information we hold within the scope of your request.

Please note that some names and contact details are exempt from disclosure under Regulation 13 (Personal information) of the EIR. Information that identifies specific employees 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.

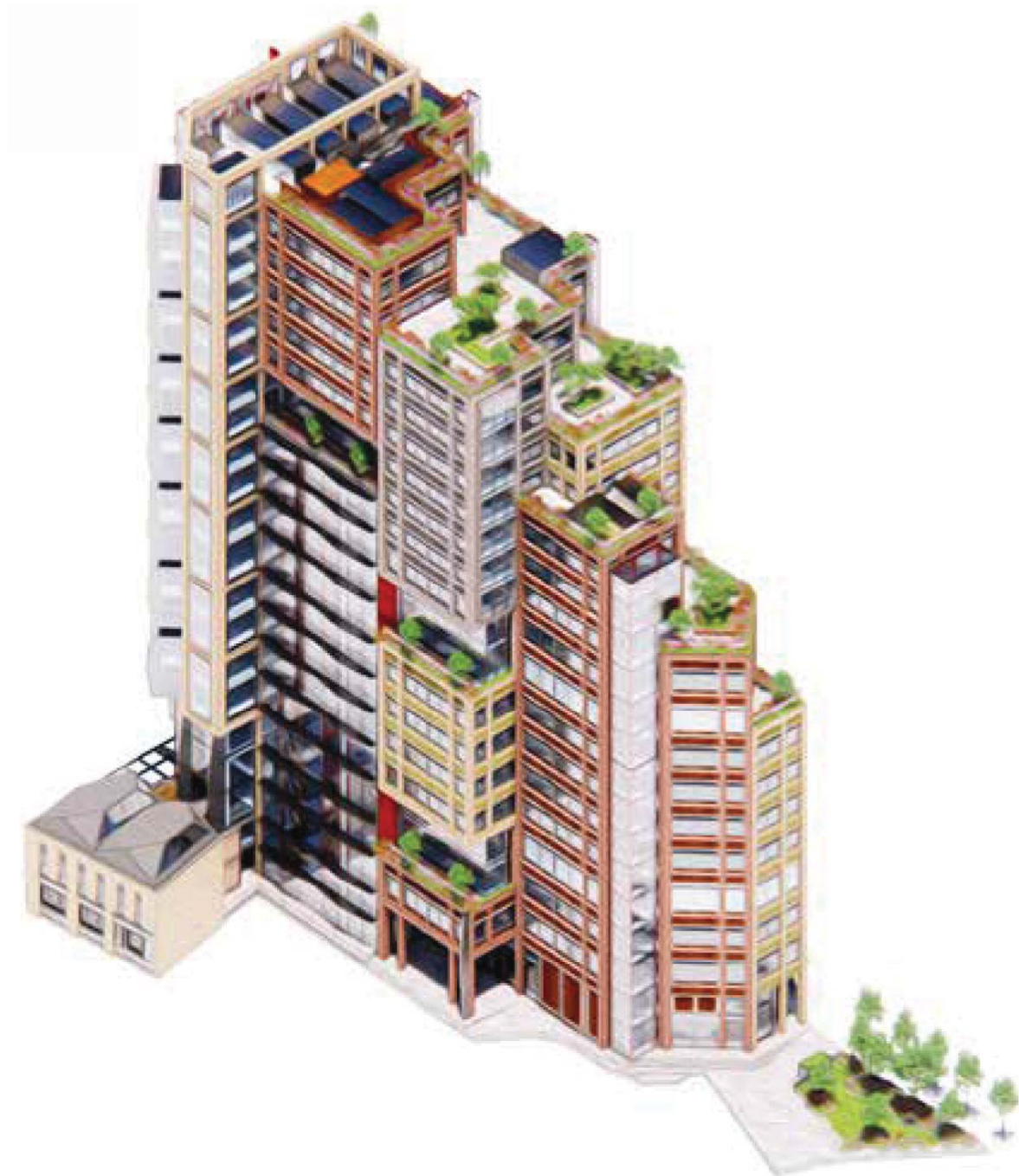
If you have any further questions relating to this matter, please contact me, quoting the reference MGLA250322-7779.

Yours sincerely

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>

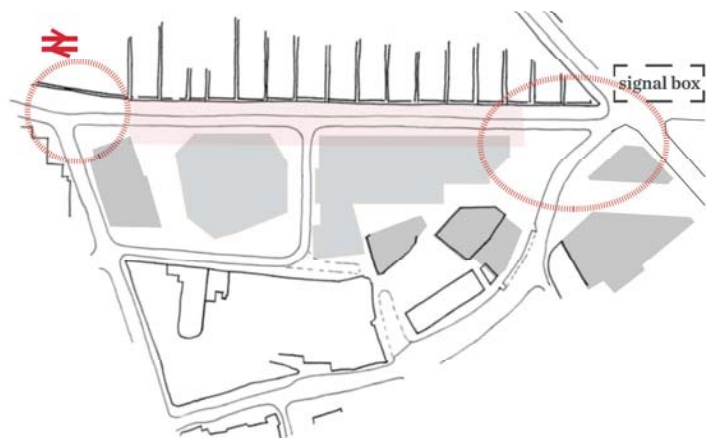


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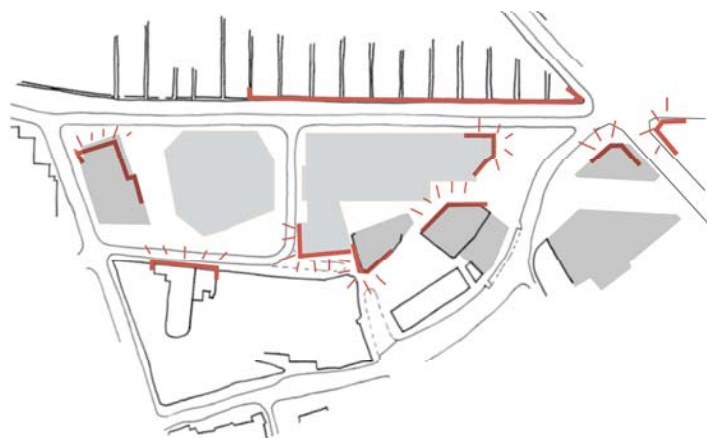
CIT RESPONSE

Response to CIT scheme - STSE framework design principles have not been followed

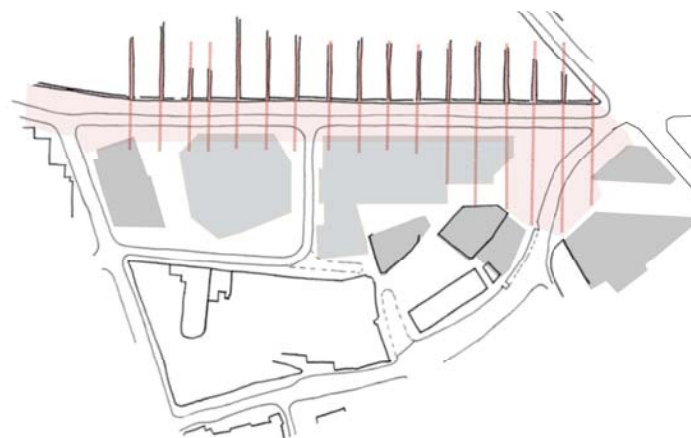
The latest CIT scheme proposal and its servicing strategy go against several of the agreed design principles of the St Thomas Street East Framework, with particular negative impact on the active frontage of the Leather Warehouse, the importance of the St Thomas St/Snowsfields junction as a destination, main pedestrian connections and green spaces .



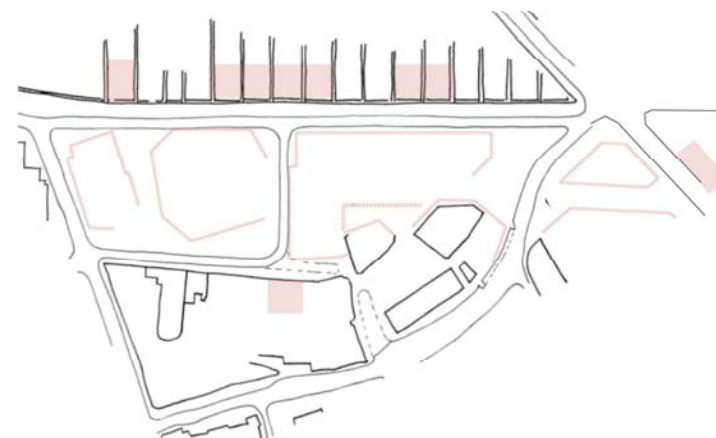
1
Anchor Destinations along St Thomas Street: London Bridge Station and 5 Way Crossing



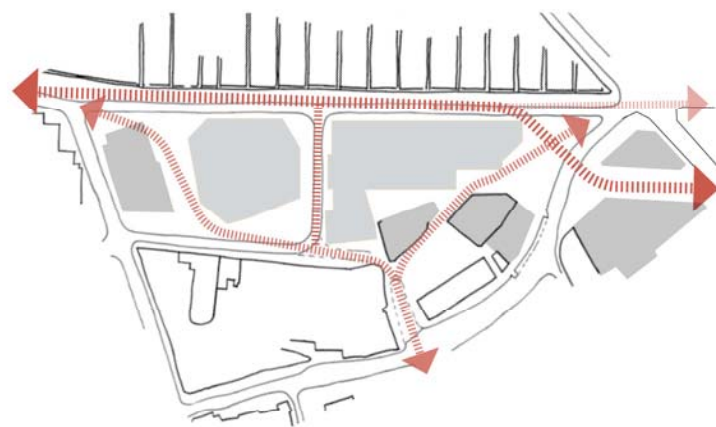
2
Anchor Buildings and Active Frontages



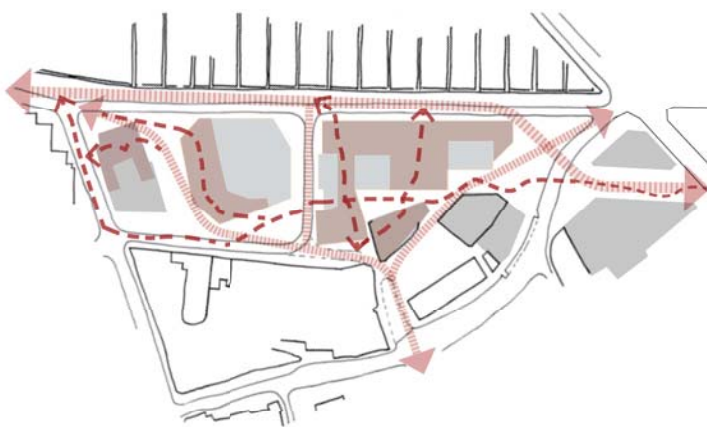
3
Railway Arches Define an Organisational Grid onto the Public Realm



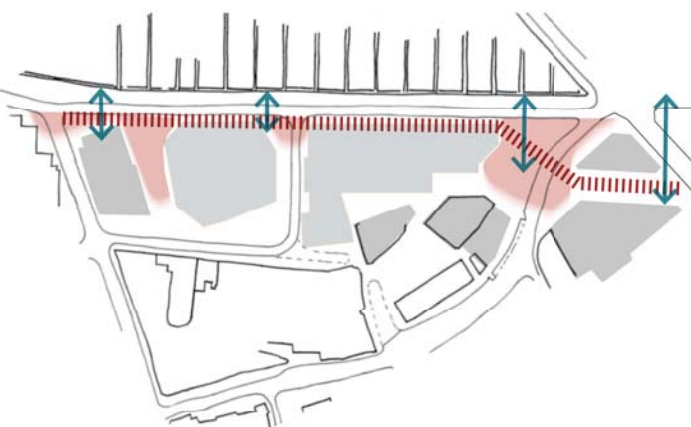
4
Streets and Open Spaces Face Active Frontages



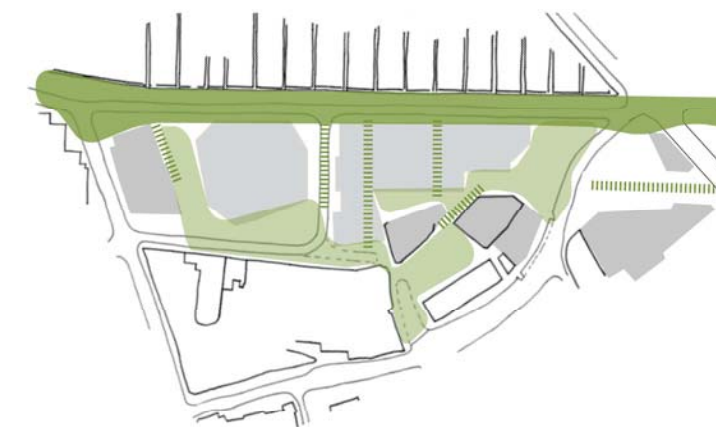
5
Main Pedestrian Connections



6
Secondary Connections Through Inns and Yards



7
Maximising St Thomas Street Width with a Covered Walkway and a New Yard



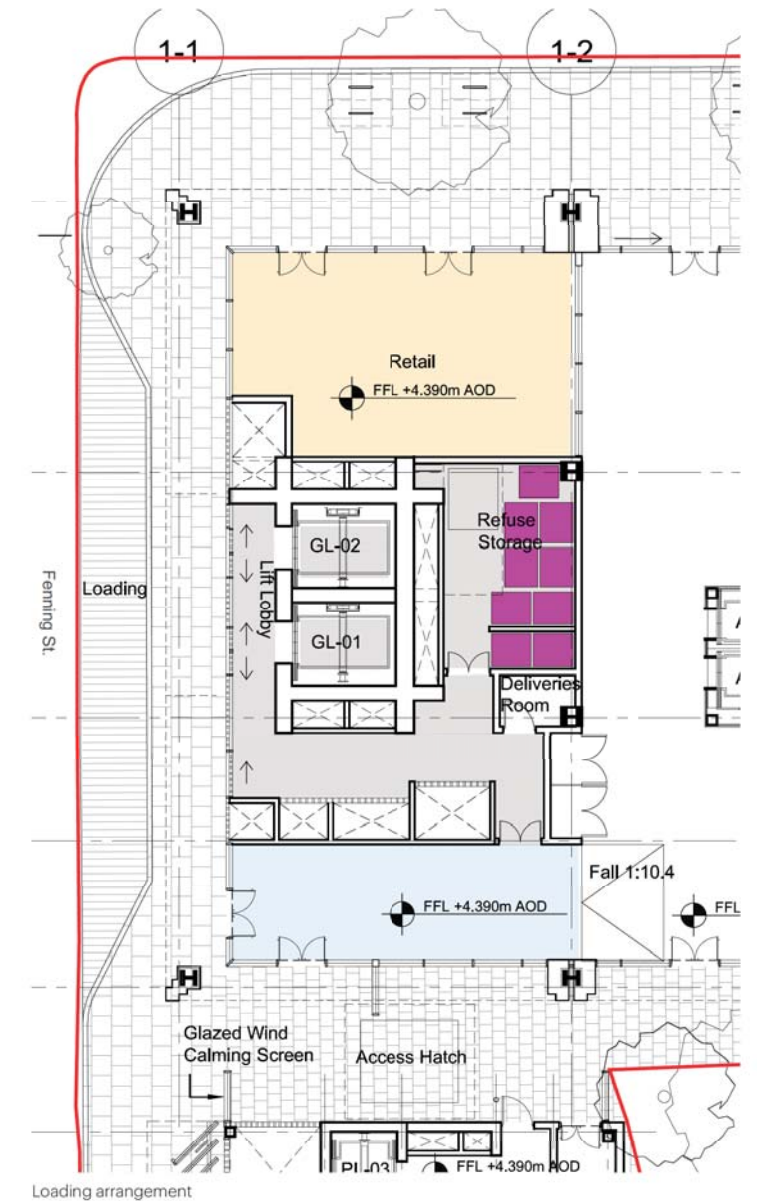
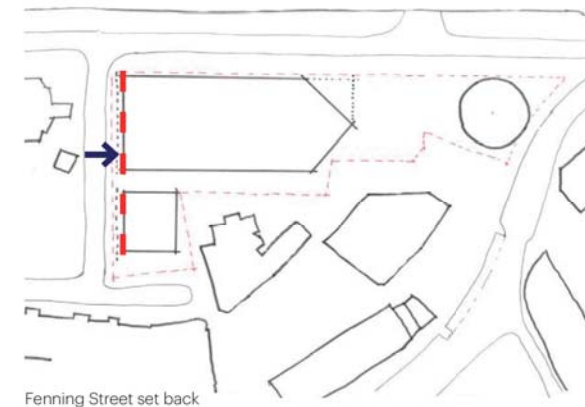
8
3 Types of Spaces: St Thomas Street, Alleys and Yards

Response to CIT scheme - Original CIT Servicing Proposal

The original servicing strategy to the CIT building utilised a loading bay on Fenning Street. This was part of the agreed STSE Framework servicing strategy:



This strategy protects the anchor destination at the Snowsfields / St Thomas Street junction (design principle 1), allowing this public space to bookend the St Thomas Street East developments. The space in front of the Leather Warehouse is kept open and free from vehicles (design principles 4 & 8).

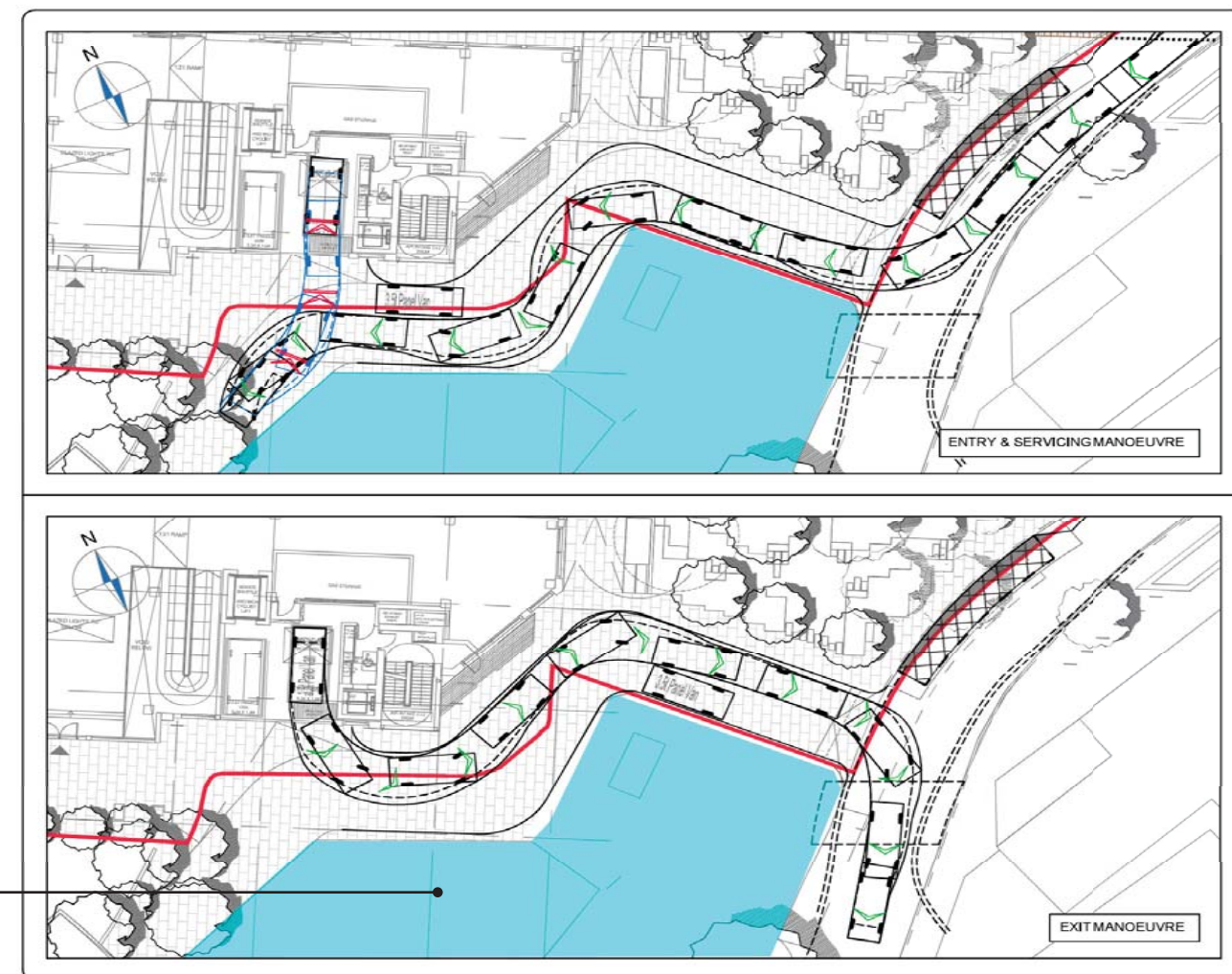
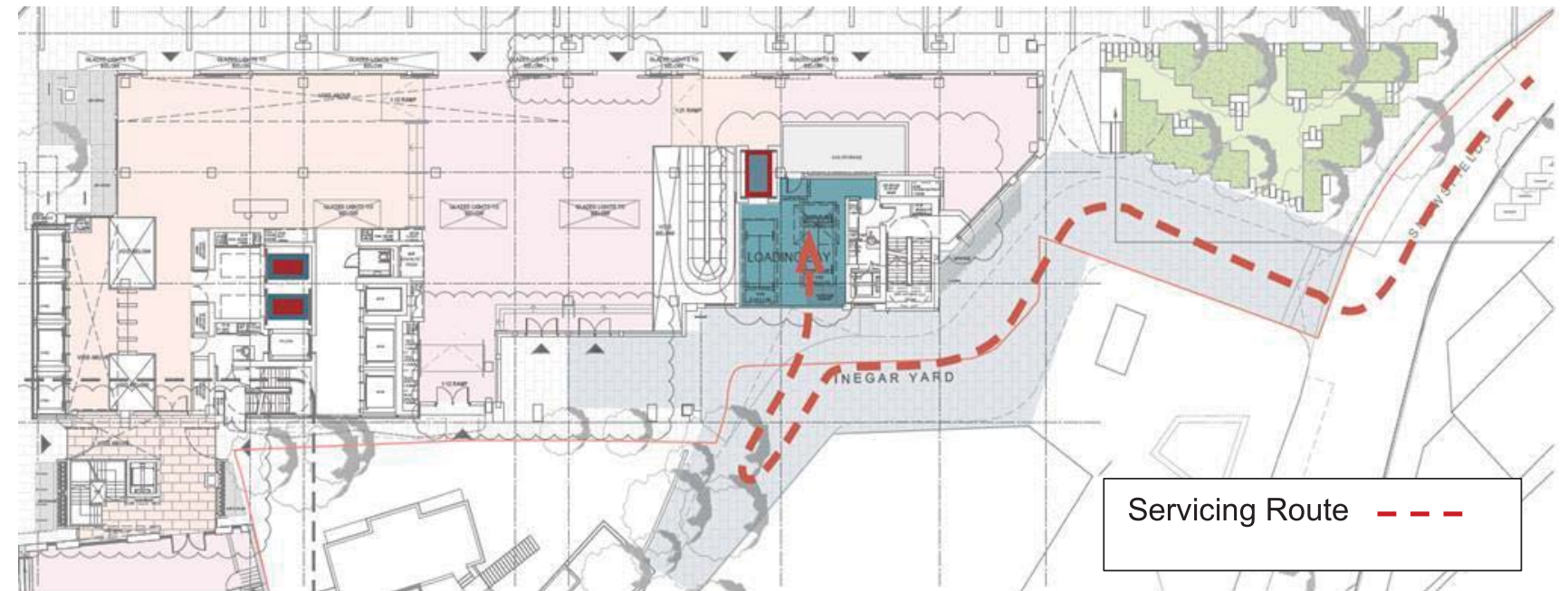


Response to CIT scheme - Impact of Revised Servicing Strategy on Leather Warehouse

The revised servicing strategy to the rear of the CIT building, entering and exiting from Snowfields negatively impacts design principles 1, 2, 4, 5, 6, 7 and 8. This is mainly because the vehicles will cut through the public realm, dividing a potential new urban square into 2 much smaller areas.

In transport terms we have concerns regarding the proposed operational strategy:

- The Vinegar Yard proposals would generate additional vehicular activity (up to 75 servicing trips / day) in an area that is seeking to support design led active travel initiatives, including connections to the Council's proposed Bermondsey Street scheme.
- The realignment of Vinegar Yard would increase traffic flow along Snowfields to the detriment of the public realm. We understand would be an additional 50 vehicles per day. As Snowfields is a one way street, all the Vinegar Yard deliveries would enter from the east and leave to the west, thereby passing the Bermondsey Yard site.
- The proposed access route from Snowfields would significantly affect public realm proposals at Snowfields/ St Thomas Street.
- The proposed access road to the loading bay and associated realignment of Vinegar Yard would cross in front of the Leather Warehouse; this would negatively affect future occupiers of the building.
- The Caneparo Transport Report for the CIT scheme includes swept path analysis for 3.5T vans only. Whilst delivery consolidation is being proposed for the scheme, we expect deliveries to also be made by larger vehicles (8m – 10m vehicles). Swept path analysis for this scenario has not been provided



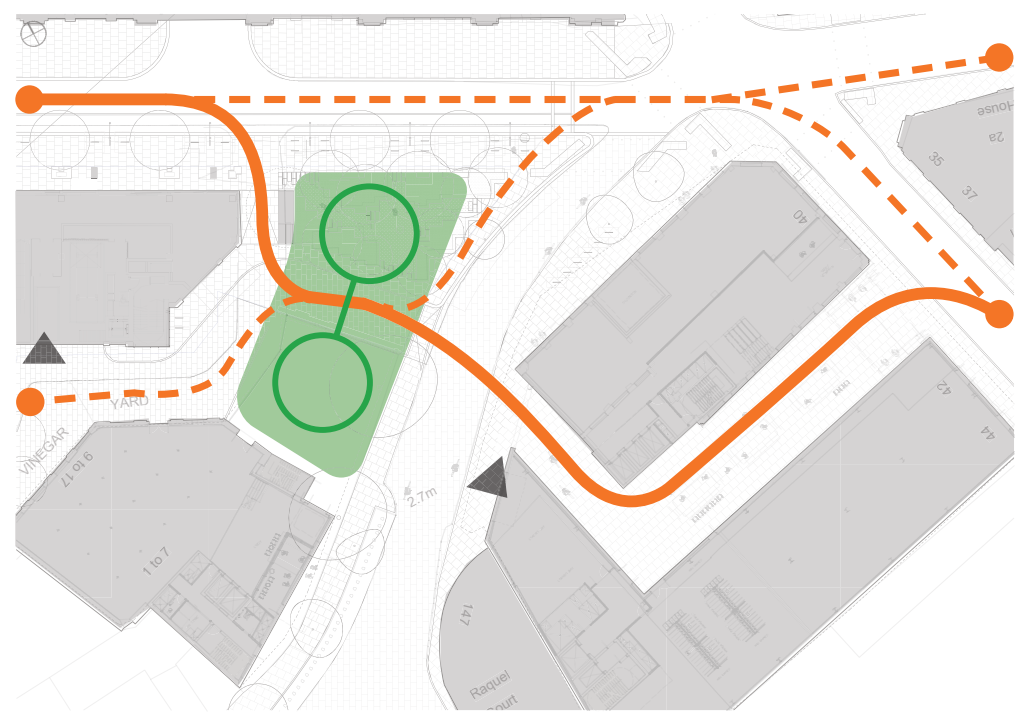
Leather Warehouse site

Response to CIT scheme - Impact of revised design on Public Realm

Routing all deliveries in front of the Leather Warehouse, coming and going, is losing the potential for a truly pedestrianised piece of public realm at a spatially complex junction (anchor destination in design principle 1).

BYLP aspiration is to create, along side and working with the CIT public realm, a new public space providing relief from the tall buildings lining St Thomas Street and facilitating main and secondary pedestrian connections (design principles 5 & 6).

The primary aim of the St. Thomas Street East Design Framework is to create a coherent and connected series of public spaces at either end of this stretch of St. Thomas Street. The proposed servicing route from Snowfields segregates the proposed public space from Vinegar Yard's public realm, whereas these two public spaces should form a coherent and connected space for the community.



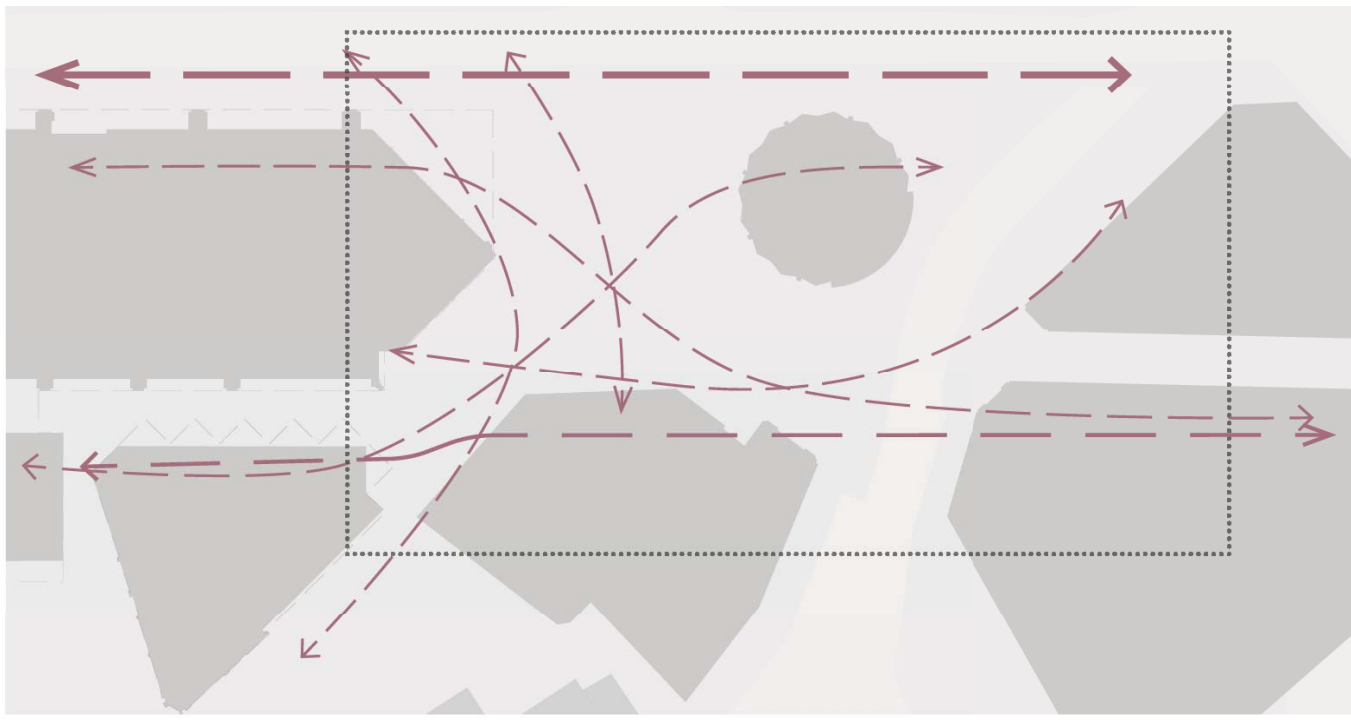
a design 'bridge' linking St. Thomas Street East Framework with Bermondsey High Street

The Public Realm design for the Bermondsey Yards proposal includes a new yard, re-instating the historic White Lion Court. In order for this to be a success, the anchor destination of the public realm between CIT and the Leather Warehouse at the junction of Snowfields and St Thomas Street needs to encourage pedestrian flow.

The CIT scheme obstructs pedestrian flow in the following ways:

- Creating a narrow pinch point due to the large cycle store structure located in the landscaping.
- Landscaping design is not permeable - it will force people to walk around it and not through it.
- Vehicular access to the loading bay on Vinegar Yards will significantly impact the ability to stitch the two areas of public realm together and will discourage pedestrian flow.

The original CIT proposals respected and facilitated pedestrian flow and would align with BYLP public realm aspirations:

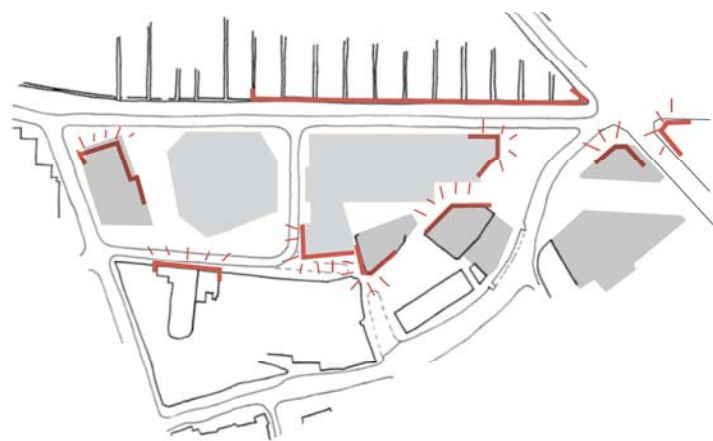


1. Respect direct and meandering desire lines

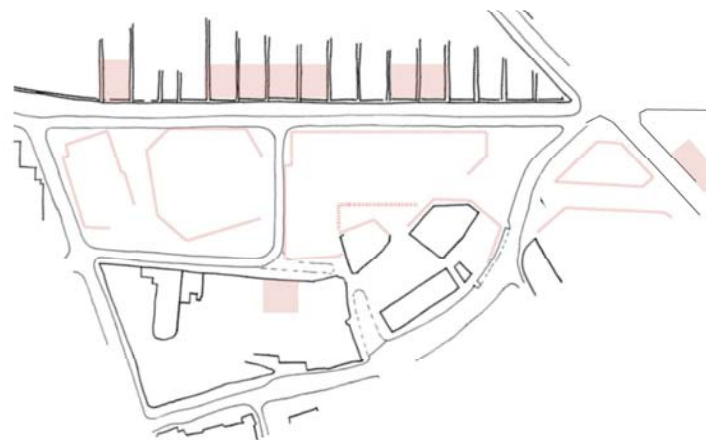
Response to CIT scheme - Anchor Buildings & Active Frontages

The STSE Framework identifies anchor buildings within the framework area and key active frontages. It also identifies open spaces that face active frontages.

The Leather Warehouse is identified as an anchor building, with a key active frontage which also faces onto open space in design principles 2 & 4.

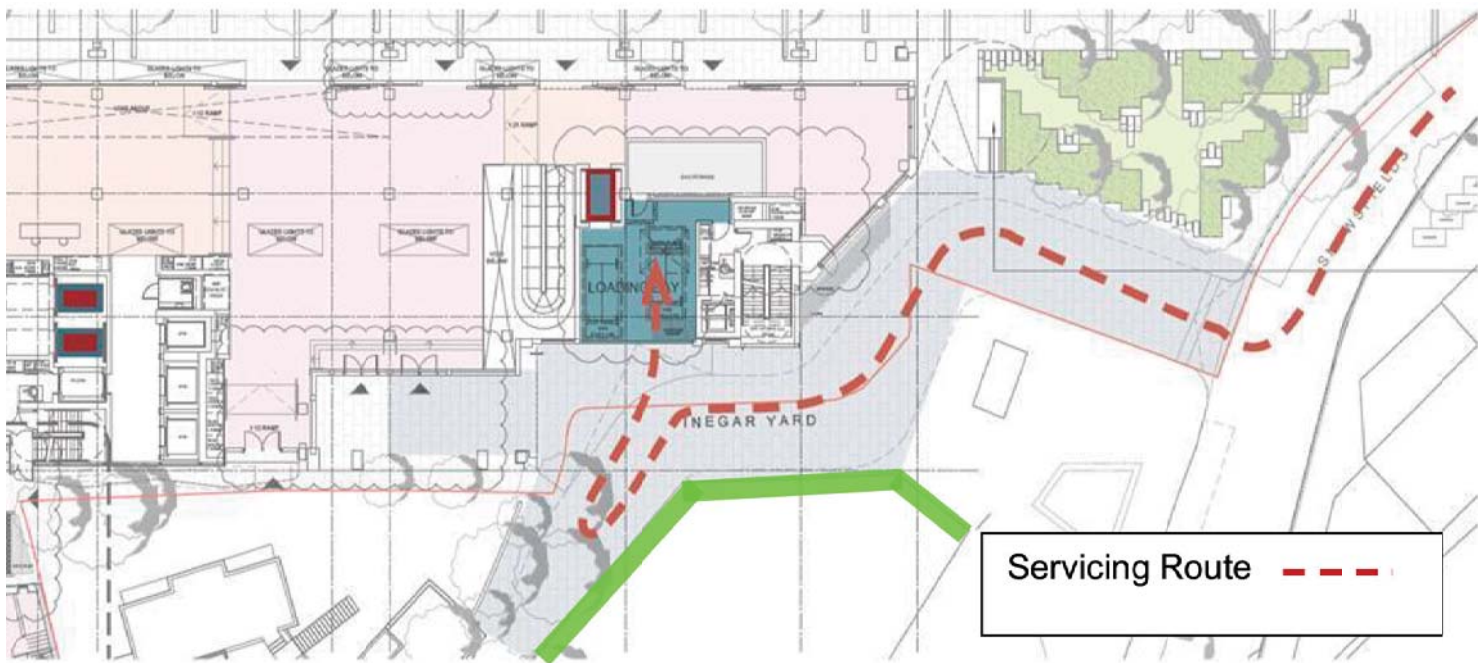


Anchor Buildings and Active Frontages



Streets and Open Spaces Face Active Frontages

The CIT proposal to locate a servicing loading bay on Vinegar Yards, accessed from Snowfields will negatively impact active frontage (shown in green) of the Leather Warehouse.



The previous CIT proposal celebrated this Leather Warehouse frontage:



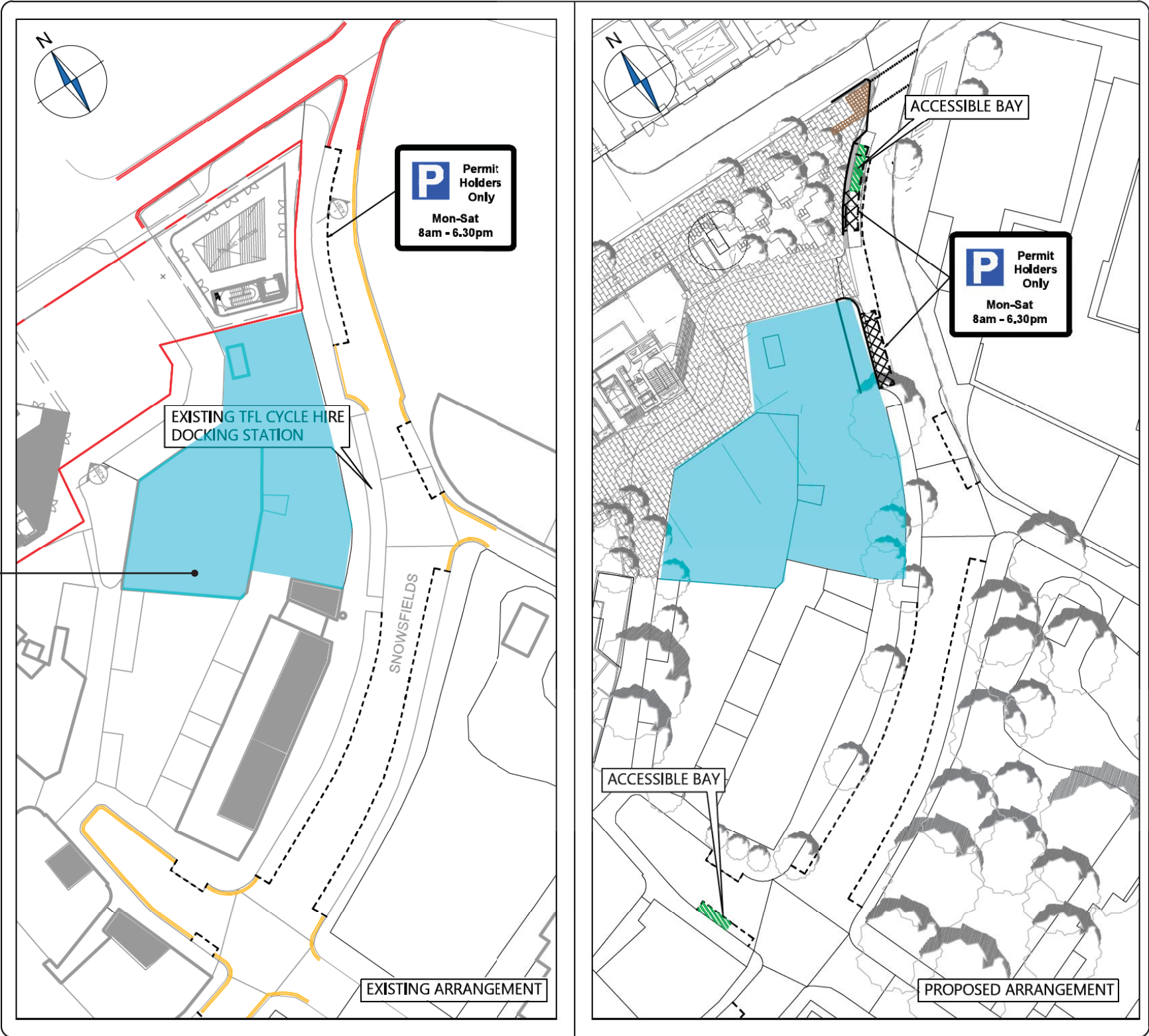
Artist impression of new square looking towards the Leather Warehouse

Response to CIT scheme - Impact on Parking

It is noted that two possible parking spaces are proposed to the south of the proposed access route; these spaces are proposed to be relocated as part of the new access route. These two parking spaces would impede access to the Leather Warehouse building and contradict the current/ submitted proposals for our scheme.

The proposed parking spaces on Snowfields also form a barrier between the proposed pedestrian flow across the masterplan and interrupts the movement of pedestrians.

Leather Warehouse site



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From: [REDACTED]@southwark.gov.uk>
Sent: 22 February 2022 10:15
To: Vinegar Yard
Subject: Archaeology comments from Southwark Council

Categories: Red Category

CHAPTER 12 of ES is ARCHAEOLOGY

The site lies at an exceptionally interesting location within the North Southwark and Roman Road (APA). Saved Policy 3.19 of the Southwark Plan (2007) requires that applications for development in APZs should be accompanied by an archaeological desk-based assessment (DBA) and an evaluation report. An Archaeological Desk-Based Assessment (DBA) was prepared in September 2018 and is presented within ES Volume 3: Appendix – Archaeology and subsequently revised for the new application. This chapter of the ES contains a summary of the baseline conditions, an assessment of the proposed scheme's impact on archaeology and potential mitigation measures. 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 Summary Report of the Archaeological Evaluation can be found at the end of the ES Chapter 12 – Annex A. The DBA and the pre-determination evaluation showed that archaeological deposits survive on the application site. There is now sufficient information to establish that the development is not likely to cause such harm as to justify refusal of planning permission provided that the following conditions are applied to any consent:

Archaeological Evaluation

Before any work hereby authorised begins, the applicant shall secure the implementation of a programme of archaeological evaluation works in accordance with a written scheme of investigation shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In order that the applicants supply the necessary archaeological information to ensure suitable mitigation measures and/or foundation design proposals be presented in accordance with Chapter 12, paragraph 141 of the National Planning Policy Framework, policy 12 of the Core Strategy 2011 and saved policy 3.19 of the Southwark Plan 2007

Archaeological Mitigation

Before any work hereby authorised begins, excluding demolition to ground slab level only, the applicant shall submit a written scheme of investigation for a programme of archaeological recording, which shall be approved in writing by the Local Planning Authority and implemented and shall not be carried out other than in accordance with any such approval given.

Reason: In order that the details of the programme of archaeological excavation and recording works are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with Chapter 12, paragraph 141 of the National Planning Policy Framework, policy 12 of the Core Strategy 2011 and saved policy 3.19 of the Southwark Plan 2007

Archaeological Reporting

Within six months of the completion of archaeological site works, an assessment report detailing the proposals for post-excavation works, publication of the site and preparation of the archive shall be submitted to and approved in writing by the Local Planning Authority and that the works detailed in this assessment report shall not be carried out otherwise than in accordance with any such approval given.

Reason: In order that the archaeological interests of the site are secured with regard to the details of the post-excavation works, publication and archiving to ensure the preservation of archaeological remains by record in accordance with Chapter 12, paragraph 141 of the National Planning Policy Framework, policy 12 of the Core Strategy 2011 and saved policy 3.19 of the Southwark Plan 2007

Archaeological Basement and Foundation Design

Before any work hereby authorised begins, excluding demolition, a detailed scheme showing the complete scope and arrangement of the basement and foundation design and all ground works shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any such approval given.

Reason: In order that details of the foundations, ground works and all below ground impacts of the proposed development are detailed and accord with the programme of archaeological mitigation works to ensure the preservation of archaeological remains by record and in situ in accordance with Chapter 12, paragraph 141 of the National Planning Policy Framework, policy 12 of the Core Strategy 2011 and saved policy 3.19 of the Southwark Plan 2007

The Design and Conservation team MUST be consulted about the value and significance of the buildings that currently stand on the site and a condition should be added for Historic Building Recording to Historic England Level 3 standard:

Archaeological Building Recording

Before any work, including all demolition work, hereby authorised begins, the applicant or successors in title shall secured the implementation of a programme of archaeological building recording in accordance with a written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In order that the archaeological operations are undertaken to a suitable standard as to the details of the programme of works for the archaeological building recording in accordance with PPS5, Strategic Policy 12 - Design and Conservation of The Core Strategy 2011 and Saved Policy 3.19 Archaeology of the Southwark Plan 2007.

Please note that this advice relates solely to archaeological matters and the Design and Conservation team must be consulted for advice concerning the historic buildings that survive on the site.

[REDACTED]
[REDACTED] | Design and Conservation | Planning Division
Chief Executive's Department | London Borough of Southwark
160 Tooley Street | London SE1P 5LX

T: please email for a call | E: [REDACTED] [@southwark.gov.uk](mailto:[REDACTED]@southwark.gov.uk)

BERMONDSEY YARDS

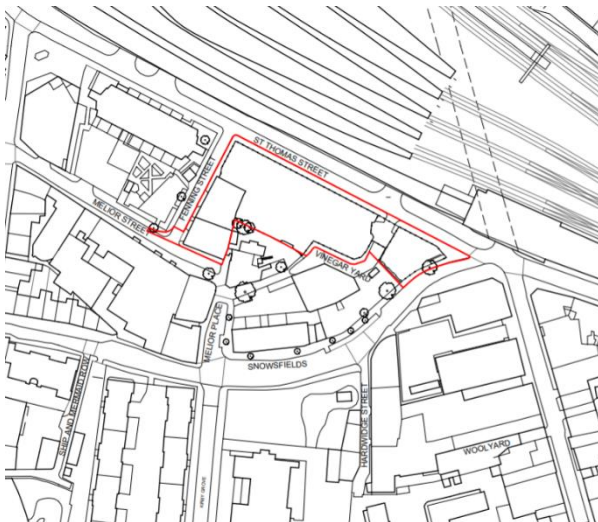
21 December 2021

Planning,
City Hall,
More London Riverside,
London,
SE1 2AA

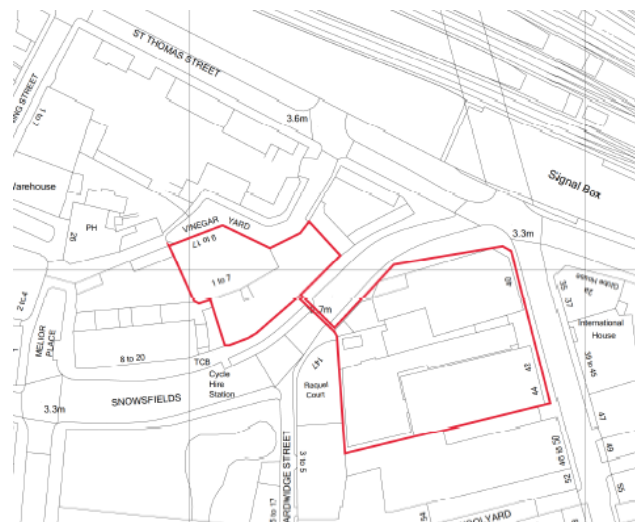
Dear Sir/Madam,

Thank you for giving us the opportunity to comment on planning application 2020/6665 (henceforth 'The Vinegar Yard Proposal') submitted at Land Bounded By St Thomas Street, Fenning Street, Vinegar Yard And Snowsfields, Including No.S 1-7 Fenning Street And No.9 Fenning Street, SE1 3QR by the CIT Group.

We write on behalf of the Bermondsey Yards Limited Partnership, the new owner of the sites at 42-44 Bermondsey Street, 40 Bermondsey Street, and the Leather Warehouse at Vinegar Yards (referred to as the 'Bermondsey Yards Site') which lie immediately adjacent to the Proposal subject site, as shown in the site boundary below.



Site boundary – Vinegar Yard scheme (NTS)



Site boundary – Bermondsey Yards scheme (NTS)

Introduction

Aviva Investors acquired the Bermondsey Yards site from Sellar in 2020 and with Sellar have formed the Bermondsey Yards Partnership Limited (BYPL) where Aviva is acting as asset manager and Sellar as development manager.

BYPL is currently engaging with the London Borough of Southwark (LBS), the Greater London Authority (GLA) and the local community to submit amendments to a live application on the site for the following development:

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 (LBS Ref: 19/AP/0404)

This application was presented to the Southwark Planning Committee in June 2020 with a recommendation to approve by officers at the Council. However, the planning committee resolved to defer the application so that amendments could be considered that address concerns regarding materiality to the proposals on Bermondsey Street, the height of the extension to the Leather Warehouse, and the alignment of pedestrian route through the site.

Discussions around a series of amendments to this application remain on-going with the LBS, the GLA and local stakeholders. The ambition is to formally submit these amendments to the Council for consideration in the New Year.

As part of their ownership of this site, BYPL also forms part of the overall St Thomas Street East Framework (STSEF). This framework was envisaged to provide coordination for the bringing forward of comprehensive re-development across the sites for the four landowners. Since acquiring the site BYPL has been to a number of coordination meetings with the other landowners. However, this consultation represents the first time we have seen a comprehensive version of the amendments to the Vinegar Yard proposal. We therefore submit this letter to you setting out our observations to the proposals.

Context

We are fully supportive of the view that development (under the right circumstances) can and should be used to improve our city's built environment and deliver the good growth in jobs that Londoners require, a theme that is carried through both National and London-wide planning policies.

However, good growth relies on all sites coming forward in a manner that optimises the potential of well-located brownfield land through a design-led approach, which is what the STSEF seeks to achieve. In our view, proposals that deliver sub-optimal solutions for public realm, pedestrian movement and deliveries and servicing are not good growth and in the worst circumstances, have the potential to prejudice wider delivery, contrary to the ambition of National, regional and local planning frameworks.

We are therefore writing to you to provide comments with regard to the above proposed development following full consideration of the submission documents and drawings, in the context of both adopted and emerging policy and guidance at regional and local level, the emerging proposals for Bermondsey Yards and the wider aspirations for the delivery of the STSEF, a relevant material consideration to the proposals.

We therefore consider that the Vinegar Yard Proposal in its current form runs contrary to a number of policy aspirations and the wider masterplan vision for reasons set out under the following heads:

- Relevant planning policy framework
- Servicing
- Public realm and pedestrian movement
- Traffic and trip generation
- Environmental considerations

As outlined in Section 4 of the NPPF, the planning system encourages Councils and landowners to work together and it is in this spirit that we would hope to be able to work with the Applicant and the GLA in order to coordinate proposals across both sites. We therefore ask that the GLA considers the contents of this letter in the ongoing assessment of the Vinegar Yard proposals and that revisions are sought accordingly.

Relevant planning policy framework

The following planning policy documents will be considered in the remainder of this letter:

Current Local Plan

- London Plan (2021)

- Southwark Core Strategy (2011)
- Southwark Saved Policies (2007)

The following documents are also considered material planning considerations in addition to the above:

- National Planning Policy Framework (NPPF) (2021)
- National Planning Practice Guidance (NPPG) (2019)
- St Thomas Street East Framework (2019)

Emerging Development Plan

The New Southwark Plan (NSP) is at the final stage of the adoption process. The Inspectors' report has been published following the Examination in Public and final adoption is programmed for February 2022. The NSP is therefore considered to carry significant weight relative to the Core Strategy and Saved Policies. We therefore have considered the Vinegar Yard proposals in the context of the NSP.

The following section identifies the relevant planning policies and objectives from the key Development Plan policies and other material considerations, against which the proposals for Vinegar Yard should be assessed.

London Plan (2021)

London Plan GG1 '**Building strong and inclusive communities**' states that development must ensure that streets and public spaces are consistently planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging, which encourage community buy-in, and where communities can develop and thrive.

London Plan D3 '**Optimising site capacity through design-led approach**' states that all development must make the best use of land by following a design-led approach. It specifically encourages convenient and inclusive pedestrian routes delivery and servicing strategies that minimise negative impacts on the environment, public realm and vulnerable road users.

London Plan D8 '**Public Realm**' states that desire lines for people walking and cycling should be a particular focus, including the placement of street crossings, which should be regular, convenient and accessible. Public realm should be well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. It also highlights that public realm should be provided with appropriate wind and microclimate conditions in order to encourage people to spend time in a place.

London Plan D9 '**Tall Buildings**' states buildings must not compromise the comfort and enjoyment of spaces around a building from wind, daylight and sunlight penetration.

London Plan T7 '**Deliveries, servicing, and construction**' highlights that development proposals should facilitate **safe**, clean, and efficient deliveries and servicing.

New Southwark Plan

The **Bermondsey Area Vision** seeks to improve existing and create new cycle and walking routes, in addition to creating a new public realm corridor adjacent to historic railway arches, with lively accessible spaces for creativity.

Southwark Policy P13 '**Design of Places**' seeks to ensure that development provides a high quality public realm that encourages walking and cycling and is safe, legible, and attractive, and eases the movement of pedestrians, cyclists, pushchairs, wheelchairs and mobility scooters and vehicular traffic.

Southwark Policy P14 '**Design Quality**' seeks development to provide adequate servicing within the footprint of the building and site for each land use. It also seeks development to create a positive pedestrian experience

Southwark Policy P50 '**Highways Impacts**' refers to highways impacts and states that development must ensure safe and efficient delivery and servicing that minimizes the number of motor vehicle journeys.

Southwark Policy P51 '**Walking**' states that development must provide routes and public realm that enable access through development sites and adjoining areas.

Site Allocation NSP51: St Thomas Street, Fenning Street, Melior Street and Snowsfields which seeks to increase permeability through the site through two north south routes connecting Melior Place with St Thomas Street.

St Thomas Street East Framework

The STSEF was developed in order to bring a coordinated and coherent approach to the delivery of a series of sites owned by four major landowners within St Thomas Street. This includes the Proposal Site, the Bermondsey Yards Site, Beckett House and Capital House. It was prepared by KPF on behalf of the STSE Landowners Board and can be downloaded [here](#).

The framework was drafted following an extensive consultation process with both Southwark and the local community. Since adoption in 2019 it has formed part of Southwark's planning guidance, and in the recent consideration of Raquel Court (LPA Ref 20/AP/0744, PINS Ref APP/A5840/W/20/3261317) by the Inspector, the STSEF was considered a material planning consideration. At paragraph 13 of his report, the Inspector Rory MacLeod BA (Hons) MRTPI notes:

"The Sellar sites [Bermondsey Yards] are within a larger tract of land forming the St Thomas Street East Masterplan, a shared vision of a group of developers for the regeneration of sites to the south of London Bridge Station. Whilst the Masterplan has no formal planning status, it would appear to have been developed following consultations with the local community and the Council. It is a material consideration."

The STSEF sets out a number of urban design principles summarised in more detail with accompanying diagrams in the enclosed document by JRA Architects. The principles are:

1. **St Thomas Street East E-W "Bookends"** at the junctions with Weston Street and Snowsfields/Bermondsey Street
2. **Pedestrian Connectivity and Hierarchy** that improves pedestrian connectivity and permeability including an east-west connection across Vinegar Yard immediately north of the Leather Warehouse
3. **Enhanced Setting of Heritage Buildings** including the Leather Warehouse and its north facing elevation
4. **New Strategic Elevations** that create focal points and provide visual amenity
5. **Active Frontages** maximised to provide permeability and add to the livability of surrounding streets and public realm
6. **Spatial Character** which identifies a yard environment between the CIT site and the Leather Warehouse
7. **Responding to the Low Line** by providing building elevations and trees that follow the Low Line arches grid
8. **Service Consolidation Points** to minimise the impacts of vehicle movements on St Thomas Street and Snowsfields including a servicing point for the CIT site at Fenning Street
9. **Integration of Placemarks** that include historical references including the Roman water inlet on Vinegar Yard

Further, section 4 on '**Cumulative Impact**' states that the landowners are willing to liaise amongst each other with regards to a holistic approach for consolidated deliveries.

Section 6 on '**Landscape Proposals**' seeks to celebrate St Thomas Street East as a walking destination; reducing traffic flow, pedestrian focus, slower paced environment. It proposes a new pedestrian route from Snowsfields through to the rear of Vinegar Yard.

Having undertaken a review of the latest proposals for Vinegar Yard, we are concerned that these depart from the agreed principles in the STSEF and also prejudice the scheme we are seeking to revise and bring forward in alignment with feedback we have received from the borough and the local community.

Servicing

The STSEF seeks to manage the impacts of servicing across the wider framework area by identifying a servicing point to the immediate west of the CIT site at Fenning Street. The original Vinegar Yard proposal utilised a loading bay on Fenning Street. However, the revised proposals now seek to locate the servicing point to the rear of the CIT building entering and existing from Snowsfields which we consider is at odds with the agreed STSEF design principles 1, 2, 4, 5, 6, 7 and 8. The proposed servicing strategy gives rise to related impacts on public realm, pedestrian connectivity and vehicle movements. These are discussed below.

Public realm and pedestrian movement

The STSEF seeks to create a coherent and connected series of public spaces at the end of St Thomas Street at its junction with Snowsfields, which relies on the delivery of both the Vinegar Yard and the Bermondsey Yards sites. This ambition is reflected in the Bermondsey Street Area Vision and NSP Site Allocation 51 which both seek to improve the existing condition and create new cycle and walking routes, in addition to creating a new public realm corridor, in particular increasing permeability through two north-south routes connecting Melior Place with St Thomas Street.

The realignment of Vinegar Yard would not only result in an increase in traffic flow along Snowsfields, but this would be at the detriment of a high quality public realm as the route serves what has the potential to be a new pedestrianised public space in the immediate setting of the Leather Warehouse, in accordance with regional and local policy objectives. This space should form a coherent and connected space for the community which prioritises pedestrian movement and comfort, however the reliance of this space for servicing will result in a dominance by vehicular traffic.

Our emerging proposals for Bermondsey Yards seek to reinstate a new publicly accessible yard along the historic alignment. In order to successfully deliver pedestrian connections along this desire line identified in the STSEF (p66), an area of public realm between CIT and the Leather Warehouse needs to form an anchor in order to encourage pedestrian flow.

We note that the previous proposals for Vinegar Yard would have respected and facilitated pedestrian flow. However, the current proposals for Vinegar Yard will obstruct pedestrian flow in the following ways:

- Creating a narrow pinch point due to the large cycle store structure located in the landscaping.
- The landscaping design is not permeable - it will force people to walk around it and not through it.
- Vehicular access to the loading bay on Vinegar Yards will significantly impact the ability to stitch the two areas of public realm together and will discourage pedestrian flow.

In addition, we note that two parking spaces proposed on Snowsfields. It is considered the location of these spaces would form a barrier between the proposed pedestrian flow across the masterplan and interrupts the movement of pedestrians which the STSEF seeks to achieve.

This is considered to run contrary to the STSEF in addition to policies D3 and D8 of the London Plan, and P13, P14 and P51 of the NSP which seek to ensure the delivery of well-designed public realm that eases movement for pedestrians and increases permeability through development sites and adjoining areas.

Traffic and trip generation

The proposed realignment of Vinegar Yard to accommodate a servicing entrance to the loading bay to the rear of the building gives rise to a number of concerns in terms of traffic and trip generation:

- The Vinegar Yard proposals would generate additional vehicular activity in an area that is seeking to support design led active travel initiatives, including connections to the Council's proposed Bermondsey Street scheme.

- The realignment of Vinegar Yard would increase traffic flow along Snowfields to the detriment of the public realm. The information submitted suggests that there would be an additional 50 vehicles per day. As Snowfields is a one way street, all the Vinegar Yard deliveries would enter from the east and leave to the west, thereby passing in close proximity to the Bermondsey Yards site. The result of this will be to sever the public realm into two disparate elements. With traffic flow all around, these potentially connected and vibrant public places will become traffic islands.
- The proposed access route from Snowfields would significantly affect public realm proposals at Snowfields/St Thomas Street.
- The proposed access road to the loading bay and associated realignment of Vinegar Yard would cross in front of the Leather Warehouse; this would negatively affect future occupiers of the building.
- The Canapero Transport Report includes swept path analysis for 3.5T vans only. Whilst delivery consolidation is being proposed for the scheme, we would reasonably expect deliveries to also be made by larger vehicles (8m – 10m vehicles). Swept path analysis for this scenario has not been provided.

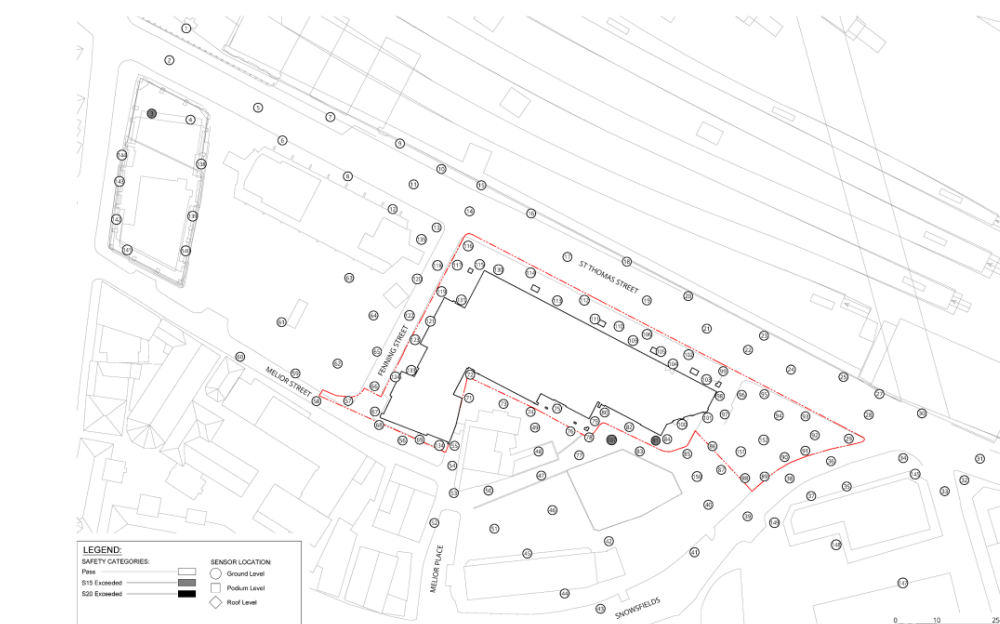
It is also unclear how the servicing would be controlled to manage public safety in terms of pedestrians on the public realm. It is therefore considered that the Vinegar Yard proposals fail to meet the requirements of the STSEF, London Plan policies GG1, D3, T7 and NSP policy P50 to ensure safe and efficient delivery and servicing that minimises the number of motor vehicle journeys.

It is therefore considered the proposed parking spaces do not accord with London Plan D8, NSP Policy P14, P50 and P51 and the NSP51 Site Allocation.

Environmental considerations

The STSEF seeks to create key pedestrian links between Snowfields, Vinegar Yard, and St Thomas Street. Two public realm spaces are also proposed on the junction of Snowfields and St Thomas Street. It has been observed from the wind and microclimate analysis set out in Volume 1 Chapter 10 of the Environmental Statement that the Vinegar Yard proposal would create exceedances of safety conditions between the development and the Leather Warehouse along Vinegar Yard. This is illustrated in the diagram below. Where there ought to be an ambition for pedestrian friendly environment in this part of the site, this is undermined by both the proposed servicing strategy and the proposed massing which gives rise to these microclimatic effects.

While the Environmental Statement refers to mitigation in the form of a canopy, it is not clear whether this forms part of the application proposal or not. EIA regulations require that mitigation needs to be committed to by the developer in order to be relied upon, it is not clear that the application is compliant in this regard. Notwithstanding, we have concerns about the impact of a canopy on the quality of the public realm in terms of overshadowing and the loss of a visual connection between the two sites.



Extract from Wind and Microclimate chapter of the ES showing Vinegar Yard proposal wind safety conditions (with existing buildings on the Bermondsey Yards site)

In addition, we note that Vol 1 Chapter 11 of the Environmental Statement notes a permanent solar glare effect and given that this can be a safety issue, we are surprised that no mitigation for this is proposed.

The micro-climatic effects as reported in the Environmental Statement are therefore considered to cause a negative impact on both the public realm and future development potential of a neighbouring site, not in accordance with London Plan policy D8, D9, NSP Policy P14, P17, and P56 which seek to ensure that tall buildings do not compromise the comfort and enjoyment of spaces around a building and the provision of high quality public realm with appropriate microclimatic conditions in order to ensure appropriate wind and microclimatic conditions in order to encourage people to spend time in a place

Summary

For the reasons set out above, it is our view that the current proposals fail to deliver against the set of agreed urban design principles in STSEF which if followed will meet the requirements in the London Plan and NSP for high quality design, pedestrian friendly public realm and safe and efficient servicing in this part of London Bridge and Bermondsey.

Southwark's planning committee's direction to the applicant to retain the Fenning St Warehouse appears to have been implemented through the uncritical adoption of a sequence of design changes, all of which are detrimental. By increasing the height of the building and shifting it eastwards, the previous piazza – which offered an open, public setting for the Leather Warehouse - has been lost; the mass and bulk of the building has been brought into an overbearing and oppressive relationship with the Warehouse; and the relocation of the service bay to the south-east corner of the site will alter an area of intended pedestrian amenity into a clumsy circulatory system for delivery and service vehicles.

All of these changes undermine not only our emerging proposals to restore the Leather Warehouse in a manner befitting its heritage asset status but are directly in conflict with the objectives of the STSEF. Most specifically, they run counter to Urban Design Principle 3 (Enhancing the urban setting) and also depart from Principle 6 (Public realm), Principle 2 (Pedestrian connectivity) and Principle 8 (Servicing).

We request that the GLA considers the matters raised within this letter and ensures that they are addressed as part of the determination of the planning application to ensure that other sites within the St Thomas Street Framework area can be brought forward in accordance with the STSEF, London Plan and the New Southwark Plan.

Bermondsey Yards Limited Partnership would welcome the opportunity to work with, and alongside the CIT group to successfully bring forward both sites in a way that is coherent, connected, and delivers the best planning outcomes for the wider area.

Yours sincerely,

Bermondsey Yards Limited Partnership

CC
































██████████ – LB Southwark
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██████████ – LB Southwark
██████████ – LB Southwark






















[REDACTED]

From: KSLPlanning <KSLPLANNING@environment-agency.gov.uk>
Sent: 23 November 2021 09:19
To: [REDACTED]@southwark.gov.uk
Cc: Vinegar Yard; greater.london.authority@notifications.service.gov.uk
Subject: RE: Notification on revised documents for planning application for Land bounded by St Thomas Street, Fenning Street, Vinegar Yard and Snowfields

Dear [REDACTED]
I hope you are doing well.
I am unable to locate any new documents/revisions for application 18/AP/4171 on the planning portal from 18 December 2020 onwards. See images below.
Please let me know if there's an issue with the planning portal.
Best wishes.

You can select up to 25 documents to download at one time and at a time.

	Date Published ▾	Document Type ▾	Measure	Drawing Number ▾
<input type="checkbox"/>	03 Sep 2020	Document		
<input type="checkbox"/>	23 Jul 2020	Support Comment		
<input type="checkbox"/>	23 Jul 2020	Support Comment		
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<input type="checkbox"/>	26 Jun 2020	Objection Comment		
<input type="checkbox"/>	09 Jun 2020	Document		
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<input type="checkbox"/>	09 Jun 2020	Transport assessment		
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<input type="checkbox"/>	09 Jun 2020	Drawing		A-100
<input type="checkbox"/>	09 Jun 2020	Drawing		A-099

Planning Advisor, Kent and South London Team

Environment Agency | 2 Marsham Street, Westminster, London, SW1P 4DF

kslplanning@environment-agency.gov.uk

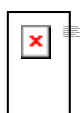
Please accept my thanks for your email in advance - each UK adult sending one less 'thank you' email a day would save more than 16,400 tonnes of carbon a year.

From: Greater London Authority [mailto:greater.london.authority@notifications.service.gov.uk]

Sent: 18 November 2021 11:54

To: KSLPlanning <KSLPLANNING@environment-agency.gov.uk>

Subject: Notification on revised documents for planning application for Land bounded by St Thomas Street, Fenning Street, Vinegar Yard and Snowfields



From: [REDACTED]@environment-agency.gov.uk>
Sent: 31 January 2022 15:34
To: Vinegar Yard
Cc: planning.applications@southwark.gov.uk
Subject: RE: Notification on revised documents and drawings for planning application at Land bounded by St Thomas Street, Fenning Street, Vinegar Yard and Snowfields
Attachments: SL119247 04 (MH) 1-7 Fenning Street.pdf; SL119247 03 (MH) Land Bounded by St Thomas.pdf

Dear Team

Thank you for consulting us on the above application.

I have attached our formal response, as well as our previous response.

Please let me know if you have any questions.

Best wishes.

[REDACTED]
Planning Advisor, Kent and South London Team Environment Agency | 2 Marsham Street, Westminster, London, SW1P 4DF kslplanning@environment-agency.gov.uk

Please accept my thanks for your email in advance - each UK adult sending one less 'thank you' email a day would save more than 16,400 tonnes of carbon a year.

From: Greater London Authority <greater.london.authority@notifications.service.gov.uk>

Sent: 20 January 2022 15:11

To: KSLPlanning <KSLPLANNING@environment-agency.gov.uk>

Subject: Notification on revised documents and drawings for planning application at Land bounded by St Thomas Street, Fenning Street, Vinegar Yard and Snowfields



Dear Sir/Madam

Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("EIA Regulations") and the Town and Country Planning (Development Management Procedure) England Order 2015 (DMPO).

Please note that this is a re-notification following the previous notification on this application which took place in November/December 2021. It came to the Mayor's attention that some hard copy letters may have been returned to the sender by Royal Mail. We are undertaking this further round of consultation

██████████
London Borough of Southwark
Development Control
PO Box 64529
LONDON
SE1P 5LX

Our ref: SL/2019/119247/03-L01
Your ref: 18/AP/4171
Date: 09 December 2021

Dear ██████████

Amended plans. Redevelopment of the site to include the demolition of the existing buildings and the erection of a 5 to 19 storey building (plus ground and mezzanine) with a maximum height of 86.675M (AOD) and a 2 storey pavilion building (plus ground) with a maximum height of 16.680M (AOD) with 3 basement levels across the site providing a total of 30,292 SQM (GIA) of commercial floorspace comprising of use classes B1, A1, A2, A3, A4, 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.

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

Thank you for consulting us on this application.

We have reviewed the submitted information and respond as follows:

Environment Agency position:

We consider that planning permission should only be granted to the proposed development as submitted if **the following planning conditions are imposed** (See section 1).

Groundwater and contaminated land

The site is located adjacent to a railway, a high-risk contaminative use. Construction works may mobilize contaminants, which would pose a risk of polluting the underlying secondary aquifer. We therefore request the following conditions on any planning permission granted for the development (see section 1).

Flood risk

The site is in Flood Zone 3 and is located within an area benefitting from flood defences. Whilst the site is protected by the River Thames tidal flood defences up to a 1 in 1000 (0.1%) chance in any year, our most recent flood modelling (December 2017) shows that the site is at risk if there were to be a breach in the defences.

The submitted Flood Risk Assessment (FRA) by akt II (dated 02 November 2021; ref.4188 Vinegar Yard) provides an accurate assessment of the tidal and fluvial flood risks associated with the proposed development.

According to 'General Arrangement Plan Level 00 – D1 Medical Option 01' by KPF (reference 2472-PA-100 rev-00) a section of the ground floor will be used for medical/research development, a more vulnerable use (national Planning Practice Guidance: Table 2). In correspondence with the case officer, it was confirmed that this will be used for an outpatient facility. As there will be no overnight sleeping accommodation, we will not object to this more vulnerable use on the ground floor.

Please note that our review is based solely on submitted documentation and reported actions, so no responsibility can be taken for the accuracy of any such information.

The Local Planning Authority should consider the submitted FRA when deciding this application in accordance with Paragraph 167 of the National Planning Policy Framework (NPPF).

Flood resistance and resilience

We recommend that flood resistant and resilient measures are incorporated in to the design and construction of the development proposals, where practical considerations allow, using guidance contained within the Department for Communities & Local Government (DCLG) document 'Improving the flood performance of new buildings: flood resilient construction'.

Decision notice request

The Environment Agency requires decision notice details for this planning application in order to report on our effectiveness in influencing the planning process. Please email kslplanning@environment-agency.gov.uk with any decision notice details.

If you have any questions, please contact the Kent & South London Sustainable Places team at kslplanning@environment-agency.gov.uk, quoting our reference number.

Yours sincerely


Planning Advisor

Direct e-mail KSLPlanning@environment-agency.gov.uk

customer service line 03708 506 506
[gov.uk/environment-agency](https://www.gov.uk/environment-agency)

Section 1

Condition 1:

Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the Local Planning Authority:

1. A site investigation scheme and preliminary risk assessment to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
2. The results of the site investigation and detailed risk assessment referred to in (1) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
3. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (2) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express consent of the Local Planning Authority. The scheme shall be implemented as approved.

Reason: To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution in line with the National Planning Policy Framework (NPPF) (Paragraph 174). The site is located over a Secondary Aquifer and it is understood that the site may be affected by historic contamination.

Condition 2:

Prior to occupation of the development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a 'long-term monitoring and maintenance plan') for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, if appropriate, and for the reporting of this to the local planning authority. Any long-term monitoring and maintenance plan shall be implemented as approved.

Reason: To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with the National Planning Policy Framework (NPPF) (Paragraph 174).

Condition 3:

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the

Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved, verified and reported to the satisfaction of the Local Planning Authority.

Reason: To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with the National Planning Policy Framework (NPPF) (Paragraph 174).

Condition 4:

Whilst the principles and installation of sustainable drainage schemes are to be encouraged, no drainage systems for the infiltration of surface water drainage into the ground are permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Reason: To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants. This is in line with the National Planning Policy Framework (NPPF) (Paragraph 174). Infiltrating water has the potential to cause remobilization of contaminants present in shallow soil/made ground which could ultimately cause pollution of groundwater.

Condition 5:

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the development does not harm groundwater resources in line with the National Planning Policy Framework (NPPF) (Paragraph 174). The developer should be aware of the potential risks associated with the use of piling where contamination is an issue. Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters. We recommend that where soil contamination is present, a risk assessment is carried out in accordance with our guidance 'Piling into Contaminated Sites'. We will not permit piling activities on parts of a site where an unacceptable risk is posed to controlled waters.

██████████
London Borough of Southwark
Development Control
PO Box 64529
LONDON
SE1P 5LX

Our ref: SL/2019/119247/04-L01
Your ref: 18/AP/4171
Date: 31 January 2022

Dear ██████████

Amended plans. 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.

1-7 Fenning Street London SE1 3QR

Thank you for re-consulting the Environment Agency on the above planning application.

We have reviewed the submitted information and respond as follows:

Environment Agency position

We note that our previous letter (dated 09 December 2021 with reference SL/2019/119247/03-L01) and the comments contained therein are still applicable to this amended planning application. Accordingly, we request that you refer to our previous letter (attached).

Decision notice request

The Environment Agency requires decision notice details for this planning application in order to report on our effectiveness in influencing the planning process. Please email kslplanning@environment-agency.gov.uk with any decision notice details.

We hope you find our response helpful. Please contact us if you have any questions.

Yours sincerely


Planning Advisor

Direct e-mail KSLPlanning@environment-agency.gov.uk

From: [REDACTED]@environment-agency.gov.uk>
Sent: 31 January 2022 15:34
To: Vinegar Yard
Cc: planning.applications@southwark.gov.uk
Subject: RE: Notification on revised documents and drawings for planning application at Land bounded by St Thomas Street, Fenning Street, Vinegar Yard and Snowfields
Attachments: SL119247 04 (MH) 1-7 Fenning Street.pdf; SL119247 03 (MH) Land Bounded by St Thomas.pdf

Dear Team

Thank you for consulting us on the above application.

I have attached our formal response, as well as our previous response.

Please let me know if you have any questions.

Best wishes.

[REDACTED]
Planning Advisor, Kent and South London Team Environment Agency | 2 Marsham Street, Westminster, London, SW1P 4DF kslplanning@environment-agency.gov.uk

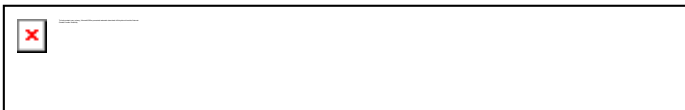
Please accept my thanks for your email in advance - each UK adult sending one less 'thank you' email a day would save more than 16,400 tonnes of carbon a year.

From: Greater London Authority <greater.london.authority@notifications.service.gov.uk>

Sent: 20 January 2022 15:11

To: KSLPlanning <KSLPLANNING@environment-agency.gov.uk>

Subject: Notification on revised documents and drawings for planning application at Land bounded by St Thomas Street, Fenning Street, Vinegar Yard and Snowfields



Dear Sir/Madam

Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("EIA Regulations") and the Town and Country Planning (Development Management Procedure) England Order 2015 (DMPO).

Please note that this is a re-notification following the previous notification on this application which took place in November/December 2021. It came to the Mayor's attention that some hard copy letters may have been returned to the sender by Royal Mail. We are undertaking this further round of consultation

From: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Sent: 06 February 2022 13:11
To: Vinegar Yard
Subject: Consultation Response - Notification on revised documents and drawings for planning application at Land bounded by St Thomas Street, Fenning Street, Vinegar Yard and Snowfields

Dear Sir or Madam

Our Ref: 381595

Your Ref: 18/AP/4171

Thank you for your consultation.

Natural England has previously commented on this proposal and made comments to the authority in our responses to Southwark Borough Council dated 10 June 2019, 25 November 2019 and 01 December 2021.

The advice provided in our previous responses applies equally to this amendment although we made no objection to the original proposal.

The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

Yours faithfully

Consultations Team
Operations Delivery, Natural England
County Hall, Spetchley Road, Worcester, WR5 2NP.
Tel: [REDACTED]

Natural England staff are primarily working remotely to provide our services and support our customers and stakeholders.



consultations@naturalengland.org.uk | www.gov.uk/natural-england

Natural England offers two chargeable services: the [Discretionary Advice Service](#), which provides pre-application and post-consent advice on planning / licensing proposals to developers and consultants; and the [Pre-submission Screening Service](#) for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development; reduce uncertainty; the risk of delay and added cost at a later stage while securing good results for the natural environment.

From: Greater London Authority <greater.london.authority@notifications.service.gov.uk>

Sent: 20 January 2022 15:11

To: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>

Subject: Notification on revised documents and drawings for planning application at Land bounded by St Thomas Street, Fenning Street, Vinegar Yard and Snowfields



Dear Sir/Madam

[REDACTED]
[REDACTED]
Greater London Authority
City Hall
More London Riverside
London
SE1 2AA

10th December 2021

F.A.O [REDACTED]

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 (References: 2019/4822 (Stage 1), 2020/6208 (Stage 2), 2020/6913 (Stage 2 update), and (Stage 3 - 2020/6665).

I write in respect of the above planning application and to set out Network Rail's support of the application submitted for full planning permission for an office-led mixed-use development on land bounded by St Thomas Street, Fenning Street, Vinegar Yard and Snowfields.

The proposed development is situated within a highly sustainable location and the proposals will ensure delivery of a high-quality development on land currently under-utilised for employment. The site also has a draft allocation within the emerging Southwark Local Plan, and the proposals are consistent with the objectives of Southwark Council. The revised uses proposed will also contribute to the emerging SC1 life science innovation district in the area.

The redevelopment of London Bridge Station was intended both to enhance transport infrastructure at this key location in London and as a catalyst for wider investment and regeneration. We see CIT's proposed development delivering on this ambition and a vital part of the regeneration of the area to the south of the station along St Thomas Street. The proposal will be compatible with the safe and efficient operation of the station and it is considered that there will be no significant impacts on the railway arising from the proposed development.

Employment floorspace

The proposals will deliver a significant amount of high quality, modern and flexible commercial floorspace. This will lead to the creation of a significant number of new full-time jobs and approximately 1,700 construction jobs. We welcome the fact that this space has been designed to support the emergence of a life science cluster in the area, which would contribute to the potential of the station investment by making a significant contribution to London and nationally.

Open space

The proposed development includes the creation of high quality public open space and associated landscaping improvements. This will help to create more of a destination and a place where people want to spend time. It will also improve pedestrian connectivity in the surrounding area, particularly the new urban park that the development creates between Snowfields and St Thomas Street.

Design & views

The appearance of the proposals reflects the existing character and context of the surrounding area. The building materials are reminiscent of the historic warehouses, which are situated in this part of London and retain an 'industrial' architectural language. They also take inspiration from the Victorian arches of London Bridge Station. The design of the new buildings is therefore considered appropriate in this location and complements the architecture of the station.

The height and massing of the proposed development will complement the existing taller buildings that are situated within Bank, Borough, and London Bridge. Changes to the scheme since 2020 have improved the building and taken it out of the conservation area, ensuring no detrimental impact. These changes include the provision of a new public garden in the place of the previously proposed pavilion building providing urban greening.

Transport

The proposed development will be car-free and office workers will be encouraged to use sustainable modes of transport to travel to work, making best use of the site's high PTAL rating and rail connections. 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 for the offices has been agreed with the local highways authority and intends to ensure the number of deliveries generated through operations at the site are reduced.

Local amenity

Network Rail operated this site as a works yard for the London Bridge station redevelopment for a number of years. We are therefore familiar with the character of the area and its local communities. Development in this location will always bring challenges. It is our view that proposals have been sensitively designed to ensure that the scheme does not negatively impact on the amenity of nearby existing residents and significant consideration has been given to both construction and operation of the site to minimise disruption, for example through the commitment to servicing consolidation.

Construction period

The application is supported by a Construction Management Plan (CMP) that 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, the proposals will optimise the development potential of an under-utilised employment site that Southwark Council has 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. We therefore support the application. If you have any questions on any of the above or require anything further, please get in contact.

Yours sincerely,



[Redacted]

Development Planning Manager | Group Property

One Eversholt Street, London, NW1 2DN

Mobile: [Redacted]

[Redacted] [Redacted] [@networkrail.co.uk](mailto:[Redacted]@networkrail.co.uk)

OLD BERMONDSEY

OBNF

NEIGHBOURHOOD FORUM

Dear [REDACTED]

We are writing to object in the strongest of terms to the new CIT proposal for Vinegar Yard (Ref: 2020/6665/S3) for the reasons below.

Height and massing overwhelms the local historic surroundings and conservation area

Visually the proposal is entirely out of scale with the neighbouring historic environment, including the listed St Thomas St arches and the Bermondsey St Conservation Area. The building will reach a height of 92m above ground (a 10m increase from the original proposal), greatly obstruct views from surrounding buildings and parks and cast St Thomas St in permanent wind and shade. This height increase is particularly galling as the building was previously denied permission by the Southwark Planning Committee due to its excessive “height, scale and massing immediately on the boundary of... the Bermondsey St Conservation Area”.¹ Furthermore, this objection was omitted from the *Design and Access Statement*, which states the sole objection was a tall structure **within** the Conservation Area.² In addition to local policies on the basis of which the application was refused, the extreme contrast in scale between proposed building and the Conservation Area goes against London Plan 2021 policies D3D(1), D3D(11), D9C(1)(a)iii, D9C(d) and HC1C.

Similarly, Cllr Kath Whittam’s warning that the historic Horseshoe Inn would be “completely swallowed up” by the tower block has not been addressed. The new proposal will certainly overshadow the Victorian pub, both figuratively and literally, a fact that has been obfuscated by no ‘Accurate Visual Representations’ (AVR) being produced to show the view from Melior St, where the pub is situated.

The community have requested this view to be made available many times (before, during and since the refusal at planning committee) because the negative affect on the CA’s character will be most apparent here from the west along Melior Street (standing approximately outside the church) where the BSCA Sub Area 3 ‘Weston Street/Snowsfields’ is characterised by the **scale**, grain and arrangement of the cluster of positive contributors namely the Fenning Street Warehouse, Horseshoe Pub and the Vinegar Yard Warehouse. The refusal to provide this view to date is in contravention of London Plan Policy D4B and also of the policies cited below in relation to community engagement

Overall, the AVRs have been created to grossly understate the full visual impact the building will have by the use of wide-angle lenses for the photographs used in the simulations, creating a false impression of the scale of the scheme. According to the *London Views*

¹ Southwark Council Planning Committee 29 June 2020 part 6, at 5 minutes 22 seconds. Available at https://www.youtube.com/watch?v=VOrl_Z62_JU&t=338shttps://www.youtube.com/watch?v=VOrl_Z62_JU&t=338s

² *Design and Access Statement*. P. 8.

Management Framework AVRs should show “the location of a proposed development as accurately as possible”, which the *Environmental Statement* pointedly fails to do.³

Community engagement

As per previous representations, due to the extremity of the negative transformation being imposed on the local environment by the scheme, when considered both by itself and in the cumulative context of the proposals by developers Greystar, Edge and Sellar, early extensive and meaningful community engagement should be required. This has not been carried out, contrary to NPPF policies 126, 132 and 133 as well as London Plan policy GG1A, GG2E and D3D(11). Despite requests, there is no opportunity area framework in place which might have helped enforce the recognition of ‘the role of heritage in place-making’ in the management of this application in this unique historic context. In its place, the ‘St Thomas Street East Framework’ repeatedly failed to consult the community on the crucial issue of height. Since this issue was raised in previous representations (and following this application’s refusal) the Forum were advised by the council that significant changes would be made to the ‘framework’ through engagement with the community, however this has not taken place.

Anti-social wind tunnelling

The proposed development will create uncomfortable wind channelling on St Thomas St, Fenning St and Snowfields. Figure 10.15 of the *Environmental Statement* demonstrates that during the ‘windiest season’ (undefined) much of the surrounding area will be too windy to even walk comfortably.⁴ One of the worst affected areas is the site of the proposed ‘Vinegar Garden’ on the eastern edge of the site where, even in the summer it will be too uncomfortable to sit, and in some areas stand still.⁵ This runs entirely counter to Policy D8.J of the London Plan.⁶

Public Realm

The wind is not the only problem with the proposed public realm space. Whilst in total it is presented as an area of 1533m² the green ‘Vinegar Garden’ only makes up 12.5% of it (190m²). The majority is in fact a service yard intended to provide loading/unloading and manoeuvring space for an estimated average of 76 service vehicles per day – peaking at 82.⁷ The volume of this goods vehicle traffic and associated noise and pollution will negate any amenity value in the large majority of what is presented as public realm. It does not provide public benefits such as seating or trees. The small, windy and polluted public space provided in a development of such high density is grossly insufficient. The local community benefits are negligible, despite the very substantial damage to the historic environment and the micro-climate the community is expected to suffer.

³ *London View Management Framework*, 2021. App. C, P. 243.

⁴ *ES Volume 1, Chapter 10: Wind Microclimate – 2021*. P. 10.23.

⁵ *ES Volume 1, Chapter 10: Wind Microclimate – 2021*. P. 10.38.

⁶ *The London Plan: The Spatial Development Strategy for Greater London*, 2021. P. 135.

⁷ *Delivery & Servicing Management Plan Vinegar Yard Southwark*. P. 9.

The negative effect of the proposed service area will inevitably extend beyond the development site itself. The building's service area (misrepresented as public realm) is expected to handle typically 10 goods vehicles an hour – one every 6 minutes. This is bound to generate overflow and waiting of service vehicles in Snowfields, a small and presently quiet one-way street supposed to be a Council-designated 'pocket plaza'. The expansion of goods vehicle traffic and the inevitable waiting of heavy goods vehicles will cause congestion and pollution in Snowfields with knock-on effects in Crucifix Lane and Berrmondsey St., negatively impacting amenity of local residents and businesses. This runs directly against policy SD7 D.2 as laid out in The London Plan:

Development proposals should support efficient delivery and servicing in town centres including the provision of collection points for business deliveries in a way that minimises negative impacts on the environment, public realm, the safety of all road users, and the amenity of neighbouring residents⁸

The proposed servicing of this large scheme is wholly inappropriate for the area, not just anti-social but dangerous. It needs to be reconsidered.

Overcrowding

The proposed building will also significantly increase foot traffic. It is estimated to produce a new office and student population of 8,000 people. The existing pavement is already inadequate for current flows, with barriers having been placed at western St Thomas St to expand the pavement into the road. The increased foot traffic caused by the new development will strain the capacity of already busy pavements. A problem which will be amplified by the proposed narrowing of the footpath at the east end of St Thomas Street to only 2m, short of the minimum width of 2.4m presented in the *Southwark Streetscape Design Manual*.⁹ The addition of trees and cycle stands on the pavement at St Thomas Street will also compound this overcrowding. The proposed width between the stands and building is only 1.6m.¹⁰ Again, this falls short of *Southwark Streetscape Design Manual's* minimum recommended width of 2m.¹¹ This miserliness with the public footpath is starkly unjustifiable in the context of such a profit-driven, high-rise, high-density scheme.

Urban greening

While the development's Urban Greening Factor (UGF) of 0.31 scrapes past the London Plan's recommended target score of 0.3, this figure is misleading. The trees to be planted on St Thomas Street will be 3.5 m from the building's face. In this position the trees will never be able to grow the amount of foliage to contribute to what is presented in the UGF calculator due to the lack of sunlight. Evidence of this can be seen in the trees alongside Guys Hospital on St Thomas St, which produce no meaningful canopy.¹² The other trees are

⁸ *The London Plan: The Spatial Development Strategy for Greater London*, 2021. P.89.

⁹ *Southwark Streetscape Design Manual, SSDM, DS 208*. P. 3.

¹⁰ *St Thomas Street Landscape + Public Realm Strategy*. P. 24.

¹¹ *Southwark Streetscape Design Manual*. P. 40.

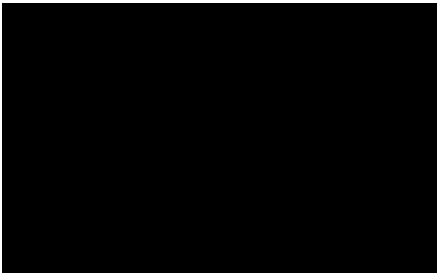
¹² Appendix A Picture 1 – 2.

positioned solely to mitigate wind impact, in similarly confined spaces. They are also situated off site so there is no certainty they can be delivered.

Conclusion

This scheme is greedy in the extreme, providing very little by way of local community benefits in exchange for all the detriment to the local historic environment, overcrowding and adverse micro-climate impacts it imposes upon it. It should be rejected as the Southwark Council themselves rejected it.

Yours Sincerely



Coordinator, OBNF

Appendix A

PHOTO 1



PHOTO 2



From: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>
Sent: 24 January 2022 10:25
To: Vinegar Yard
Subject: RE: Notification on revised documents and drawings for planning application at Land bounded by St Thomas Street, Fenning Street, Vinegar Yard and Snowfields

18/AP/4171 | 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

Thank you for your consultation.

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application as submitted.

This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards

Infrastructure Protection

Email: SMBLocationEnquiries@tfl.gov.uk

TfL Engineering | 5 Endeavour Square, Stratford, London E20 1JN



Find out more about Infrastructure Protection - <https://youtu.be/0hGoJMTBOEg>

From: Greater London Authority <greater.london.authority@notifications.service.gov.uk>

Sent: 20 January 2022 15:11

To: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>

Subject: Notification on revised documents and drawings for planning application at Land bounded by St Thomas Street, Fenning Street, Vinegar Yard and Snowfields



[REDACTED]

From: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>
Sent: 25 November 2021 14:40
To: Vinegar Yard
Subject: RE: Notification on revised documents for planning application for Land bounded by St Thomas Street, Fenning Street, Vinegar Yard and Snowfields

18/AP/4171 | 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

Thank you for your consultation.

I can confirm that London Underground Infrastructure Protection has no comment to make on this planning application.

This site is adjacent to Network Rail assets. Please contact them directly to query what affect, if any, the proposals will have on their railway.

This response is made as TfL Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards

[REDACTED]
Infrastructure Protection

Email: SMBLocationEnquiries@tfl.gov.uk

TfL Engineering | 5 Endeavour Square, Stratford, London E20 1JN



Find out more about Infrastructure Protection - <https://youtu.be/0hGoJMTBOEg>

From: Greater London Authority <greater.london.authority@notifications.service.gov.uk>

Sent: 18 November 2021 11:54

To: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>

Subject: Notification on revised documents for planning application for Land bounded by St Thomas Street, Fenning Street, Vinegar Yard and Snowfields



Vinegar Yard Public Hearing
The Planning Team
Greater London Authority

Planning Division
Chief Executive's Department
Direct Line [REDACTED]
[REDACTED]
[REDACTED]
Our ref 18/AP/4171

By email only:
[REDACTED]@london.gov.uk

27.01.2022

Dear [REDACTED]

Vinegar Yard Public Hearing

This letter sets out the response from London Borough of Southwark with regards to the GLA Consultation received on 23rd November 2021 in respect of the call-in under Article 7 of the Town and Country Planning (Mayor of London) Order 2008 and the powers conferred by Section 2A of the Town and Country Planning Act 1990 (as amended) for the proposed redevelopment of Land bounded by St Thomas Street, Fenning Street, Vinegar Yard and Snowfields.

The relevant application is 18/AP/4171 submitted to the London Borough of Southwark on 15 April 2019 by CIT Group ('the Applicant') 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. 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 was considered by Southwark Planning Committee on 29th June 2020. The committee resolved to refuse planning permission for the following reason:

The proposal's excessive height, scale and massing would have an adverse impact on the character and setting of the Bermondsey Street Conservation Area. This is because it would adversely impact on the Horseshoe Inn and result in the loss of existing heritage assets in Fenning Street, thereby contravening Policies 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.

On 24 August 2020, the Deputy Mayor for Planning, Regeneration & Skills, acting under delegated authority issued a direction to the London Borough of Southwark that the Mayor will act as the Local Planning Authority for the purposes of determining the Application.

Subsequent to the Mayors Direction, the Applicant has revised the proposal and has submitted a series of plans and documents to the GLA.

The revised description for the proposal is:

"Redevelopment of the site to include the demolition of existing buildings, retention, refurbishment and use of the warehouse as a retail and community space and the erection of a ground, mezzanine

and 18 storey building (with plant at roof) and 3 basement levels, comprising new office space, a flexible medical and research and development space, flexible retail at ground floor and affordable workspace, alongside cycle parking, servicing, refuse and plant areas, soft and hard landscaping, highway improvements and all other associated works”

The application documents confirm that the proposed development seeks to provide, on the lower floors of the main building, either medical floorspace to be used as an outpatient facility or research & development floorspace (Use Classes D1 or B1(b)). It is proposed that levels one to ten of the main building will first be offered to Guys and St Thomas' for use as either D1 medical space (Option 1) or B1(b) research & development (Option 2). The remainder of the upper floors, levels 11 to 18, will comprise a B1(a) office use under Option 1 or Option 2. This configuration of the building in either Option 1 or 2 reflects Guys and St Thomas's Adaptable Estates Strategy, where buildings are able to accommodate a range of possible functions both physically and by virtue of permitted uses in the long term. The Adaptable Estates Strategy requires buildings to be constructed with generous floor to ceiling heights and space for plant. This results in a larger building than that required for standard office/employment uses.

In the event that Guys and St Thomas' do not wish to occupy levels one to ten of the proposed building, it is proposed that the lower floors will default to a B1(b) research and development use and will be made available to R&D occupiers which may include occupiers whose work could support the SC1 Life Science & Innovation District cluster. The acceptability of this approach is discussed in detail below.

London Borough of Southwark have reviewed the application material as a statutory consultee and would request that the content of this letter is taken into account in the decision making process.

The content of this report focusses upon the following key issues that arise from the revisions to the scheme following Southwark's resolution to refuse planning permission. Namely:

- Land use, on the basis that by virtue of the medical use now proposed as Option 1 the proposed land use would be contrary to Southwark Plan (2022) Site Allocation 54;
- The implications on affordable workspace;
- The impact of the amendments on heritage assets;
- The impact of the amendments on public realm;
- The lack of transparency around the community use provision;
- Transport, as the current application proposes a significant change to the servicing arrangements and
- The requirement to negotiate and secure appropriate planning obligations to mitigate the impact of the development.

Amendments

The revised description of development has been set out above. As a consequence of how the scheme has evolved since it was formally considered by the Southwark Planning Committee, the following key changes are proposed:

- Change of use from predominantly office development to allow for the potential for a mixed use building to be occupied by Guys/St Thomas Hospital Trust as a Medical Outpatient Building (12,634 sq.m) with associated office floorspace (8,207 sqm) or for Medical Research and Development (12,956 sqm) with associated office floorspace (8,207 sqm);
- Overall increase in floorspace of circa 200 sqm GIA (previously proposed 30,292 sqm GIA and now proposed 30,503 sqm GIA)

- Increased provision of onsite affordable workspace from 1,200 sq.m. to 3,067 sq.m (basement and mezzanine level)
- Retention of the existing Fenning Street warehouse to accommodate retail and community space
- Removal of the music venue and subsequent reconfiguration of the proposed building layouts and public realm, providing 190 sq.m. of public garden space
- Revising the overall height of the building from 86.7m AOD to 97.14m AOD, to facilitate the increased floor to ceiling heights required to accommodate medical use or medical research and development use
- Reduced basement footprint. Basement level 1 to be used for affordable workspace, Basement levels 2 and 3 used for plant/equipment for medical use
- Introduction of an internal loading bay and provision of offsite disabled parking spaces

New Southwark Plan/Southwark Plan 2022

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 New Southwark Plan (NSP) is now at an advanced stage. The New Southwark Plan was submitted to the Secretary of State in January 2020. The Examination in Public (EiP) for the NSP took place between February and April 2021. The Inspectors wrote a post hearings letter on 28 May 2021 and under Section 20(7)(c) of the Planning and Compulsory Purchase Act (2004) the Council asked the Inspectors to recommend Main Modifications to ensure the Plan is sound. The Council consulted on the Main Modifications as recommended by the Inspectors from 6 August 2021 to 24 September 2021. The Inspectors have published their final report and the Plan can proceed to adoption.

The NSP, now known as the Southwark Plan 2022, will be considered for adoption by Council Assembly on 23rd February 2022 (following consideration by Cabinet in December 2021). Once adopted, it will replace the saved policies of the 2007 Southwark Plan, the 2011 Core Strategy, the Aylesbury Area Action Plan 2010, the Peckham and Nunhead Area Action Plan 2014 and the Canada Water Area Action Plan 2015. On the assumption that adoption takes place prior to the Hearing, the Southwark Plan 2022 should be accorded full weight in the determination of this application.

The application site forms part of Southwark Plan 2022 Site Allocation 54 - Land between St Thomas Street, Fenning Street, Melior Place, and Snowsfields.

Land Use

Southwark Plan Site Allocation 54 states:

Redevelopment of the site must:

- Provide at least the amount of employment floorspace (E(g), B class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater; and
- Provide a new north-south green link from Melior Place to St Thomas Street; and

- Enhance St Thomas Street by providing high quality public realm and active frontages including retail, community, medical or healthcare or leisure uses (as defined in the glossary) at ground floor; and
- Provide new open space of at least 15% of the site area - 605m²

Redevelopment of the site should:

- Provide new homes (C3)

Proposed Use – Medical or Research and Development

As set out above the proposal includes two options for the use of the building.

Option 1: Medical (Use Class D1) Scenario

	Community/Event Space D1/D2	Commercial (A1/A2/A3/A4)	Medical Use D1	Office B1(a)	Affordable Workspace	Plant	Total Sq.m
Main Building		408	12,634	8,207	3,067	5,827	30,143
Warehouse	180	180					360
Total	180	588	12,634	8,207	3,067	5,827	30,503

Option 2: Research & Development (Use Class B1(b)) Scenario

	Community/Event Space D1/D2	Commercial (A1/A2/A3/A4)	Research & Development B1(b)	Office B1(a)	Affordable Workspace	Plant	Total Sq.m
Main Building		438	12,964	8,207	3,067	5,467	30,143
Warehouse	180	180					360
Total	180	618	12,964	8,207	3,067	5,467	30,503

As the above tables demonstrate, the overall floorspace proposed for Options 1 and 2 is the same at 30,503 sq.m GIA. This represents an increase of 1,123 sqm GEA and 211 sqm GIA above the scheme considered by Southwark Planning Committee. It is understood that this is due to the requirement for more generous floor to floor heights and additional plant space to serve the medical use. A research and development use by Guys and St Thomas would result in a reduction in plant by 360 sq.m. This reduction in plant would be incorporated into the research and development floorspace.

Option 2 has been designed for research and development purposes (Use Class B1 (b)) but retains the large floor to floor heights in order to meet the specific adaptability requirements of Guys and St Thomas Trust. Whereas an alternative R&D occupier would not necessarily generate the same structural requirements in terms of plant area/floor to floor heights so could potentially occupy a similar amount of floorspace within a smaller structure. This is significant in terms of assessing the implications of the proposal as designed for a specific operator. For the reasons set out below the Council contend that the specific design requirements for Guys and St Thomas gives rise to the need for adequate controls to be secured in respect of preventing the implementation of the development until an appropriate occupier has been secured (discussed further below).

In order to comply with the site allocation, redevelopment of this site should provide 50% employment floorspace (since this quantum is greater than replacement of the existing floorspace).

Option 1 which would result in the lower floors of the building being used for medical purposes would fall significantly short of providing 50% employment floorspace and as such the proposal would be contrary to Site Allocation Policy 54. However, the benefits of providing a facility for medical purposes as an extension to the existing world-renowned NHS healthcare cluster at London Bridge, and the role they would play in promoting the SC1 Life Sciences cluster, a key priority for the London Boroughs of Southwark and Lambeth are recognised. The public benefit of this should be given significant weight and consequently the proposed land uses are supported

The net gain of jobs that will be created from either Options 1 or 2 (378 – 432 for Option 1 or 554 for Option 2) is also recognised as a positive aspect of the scheme although it is noted that the level of potential employment falls well short of that indicated under the original 2018 office proposal.

Option 2, which would result in floorspace which is designed to accommodate research and development occupiers, is welcomed and would comply with the site allocation requirement for 50% employment floorspace. Whilst this is welcome in land use terms as discussed above, the outcome of Option 2 being designed specifically for Guys and St Thomas to occupy is a building with more generous floor to floor heights, which has the effect of significantly increasing the height of building beyond that which may be required for an alternative occupier operating within the B1 use class. For this reason it is considered necessary for the s106 agreement to include a clause whereby an occupier must be secured for this specific medical use (including the R&D option) before the development is implemented.

The need for an adaptable/flexible building to meet potential future requirements for Guys and St Thomas is understood. However, there is no firm commitment/lease agreement from an occupier at this stage and limited information to demonstrate that a minimum amount of floorspace is required to meet a contractual obligation. The increased size of the building causes harm to the conservation area, which must be weighed against the public benefits arising from the scheme (discussed in more detail below), and the certainty that they would occur.

Taking into account the harm that will arise and the significant weight which must be given to this harm, any justification for a building of this height and scale must be founded on the demonstration of clear and positive public benefits. If the GLA are minded to grant planning permission this should be subject to robust controls being secured in the s106 legal agreement to ensure that the building is occupied as proposed. The legal obligation should be drafted to ensure that an appropriate occupier is secured before the development is implemented. The s106 obligation should go as far as preventing the permission being implemented if an appropriate occupier cannot be secured. An appropriate occupier would be Guys and St Thomas in the first instance or if such an arrangement cannot be secured, an alternative public medical operator or failing that another operator in the life sciences sector who would use the building for R and D purposes. If the building cannot be occupied for medical purposes then an alternative SC1 Life Science operator would be acceptable. However, the use of the building as a standard office use would require a fresh planning application for the reasons discussed below.

If sufficient legal obligations can be secured to ensure that the development is not implemented until the applicant has entered into a lease agreement either with Guys/St Thomas Hospital Trust, or an alternative public medical operator, or another Life Science operator the Council would acknowledge that the harm identified to the setting of the Bermondsey Street conservation area, and the individual heritage assets within it, could be balanced by public benefits of appropriate weight. In the event that such an occupier cannot be secured and the site becomes available for more general employment purposes (such as a standard office), the equivalent amount of usable floorspace could potentially be accommodated in a smaller building with less impact on the conservation area. As such, it would be appropriate for a new application to be submitted in this instance since the harm, which could have been avoided in these circumstances, would not be

properly balanced by significant public benefits.

In either Option 1 or 2 the applicant proposes that floors 11-18 of the building would be occupied as office floorspace. The amount of office floorspace would not amount to 50% of the total floorspace. Nevertheless, given the site allocation, which requires 50% of floorspace to be Class B/Class E(g) Use it is considered appropriate for the s106 legal agreement to include measures to ensure that if Option 1 is implemented the medical use (Use Class D1/E(e)) should only apply to floors 1-10 and not the whole building. Floors 11-18 (8,207sqm) should be restricted to employment use (Use Class B/E(g)).

Furthermore, the s106 agreement and/or conditions should restrict any change of use beyond those specified in Options 1 or 2 to prevent permitted changes of use between the full range of uses now permissible under Use Class E. This is necessary to protect the provision of employment floorspace in accordance with the site allocation and because this development has been tested in environmental impact terms for the purposes of the ES for a specific range of uses. Consequently, the planning authority has not had the opportunity to assess the full range of impacts that may arise from other uses such as retail, indoor sport or recreation or industrial purposes.

Finally, sufficient measures should be put in place to prevent any future change of use to residential without planning permission. Whilst the site allocation allows for residential use it is necessary to consider the appropriate quantum, sufficient standard of accommodation provided, affordable housing, and potential impact on technical matters such as highways and daylight/sunlight.

Community Use

The application proposes a community use within the Fenning Street warehouse building which is a positive benefit of the scheme. The terms should be secured in the s106 agreement, including cost, availability, management arrangements, fit out and facilities and the means of promoting its use by the community.

Ground Floor Retail

Provision of retail uses on the ground floor would be acceptable in accordance with the site allocation.

Land Use Summary

Southwark Council acknowledge the public benefits of developing this site for mixed use purposes to accommodate a significant amount of office floorspace as well as a medical facility or for medical research and development purposes as set out in Options 1 and 2 above. Whilst the benefits are recognised, in light of the Southwark Plan 2022 Site Allocation and the impact of the design amendments on designated heritage assets (discussed in more detail below) this approach could only be supported subject to sufficient controls being secured within the s106 agreement as set out above. The Council will continue to work with the applicant and GLA in respect of the detailed drafting of the s106 agreement.

Affordable Workspace

Southwark Plan 2022 Policy P31 sets out the criteria for securing affordable workspace. The policy requires that:

Developments proposing 500sqm GIA or more employment floorspace must

1. Deliver at least 10% of the proposed gross employment floorspace as affordable workspace

on site at discount market rents; and

2. Secure the affordable workspace for at least 30 years;

3. Provide affordable workspace of a type and specification that meets current local demand; and

4. Prioritise affordable workspace for existing small and independent businesses occupying the site that are at risk of displacement. Where this is not feasible, affordable workspace must be targeted for small and independent businesses from the local area with an identified need; and

5. Collaborate with the council, local businesses, business associations relevant public sector stakeholders and workspace providers to identify the businesses that will be nominated for occupying affordable workspace

The policy further states *“In exceptional circumstances affordable retail, affordable cultural uses, or public health services which provide a range of affordable access options for local residents, may be provided as an alternative to affordable workspace (employment uses). This will only be acceptable if there is a demonstrated need for the affordable use proposed and with a named occupier. If the alternative affordable use is no longer required in the future, the space should be made available for affordable workspace (employment uses) in accordance with the criteria above. The re-provision or uplift of employment floorspace must still be provided in the scheme overall”*.

It is understood that the 10% of the total floorspace (expressed as GIA) within the building will be provided as affordable workspace in both Options 1 and 2 with potential occupiers identified as Southwark Studios for the basement level space and Guys and St Thomas for the space located at ground floor mezzanine level.

The quantum of affordable workspace (3,067 sqm) is welcome and this minimum provision should be secured in the legal agreement.

The applicant has stated that 1,115 sqm of the affordable workspace (located at basement level) would be provided at 70% discount on market value for Southwark Studios which would be a significant discount and a positive benefit of the scheme. This level of discount should be secured within the legal agreement. The 70% discount should apply to the space in its entirety for all future occupiers, since there is no clear justification for limiting these terms to Southwark Studios. Future service charges should be inclusive, or capped at appropriate levels, to ensure that these additional costs do not render the space unaffordable to target organisations, and a fit-out condition should also be applied.

The remaining 1,952 sqm of affordable workspace would be provided on the ground floor mezzanine level of the building. The applicant has stated that this space would be occupied by Guys and St Thomas as discounted medical or research and development floorspace. From the information available to date it is not clear how the medical/research and development affordable workspace model would work. Southwark officers are not familiar with this approach (where a single organisation occupies space at both market and affordable rates) and have asked the applicant to share examples of where this approach is being used elsewhere. Guys and St Thomas would not meet the criteria set out in clause 2(4) of Policy P31 (ie they are not a small or independent business). The policy does allow, in exceptional circumstances, for: ‘public health services which provide a range of affordable access options for local residents may be provided as an alternative to affordable workspace’

Therefore, if the proposal is to provide the affordable space to Guys and St Thomas directly, for their own use and occupation, a clear demonstration of the benefits of this approach, and the services delivered to the public, would need to be provided, and then secured, in order to

demonstrate compliance with Policy P31. In the event that the medical facility is not delivering healthcare services to the public, as per clause 5, then other clear benefits of the approach need to be demonstrated to outweigh the key objective of the policy to provide space for small and independent businesses. It is requested that further detail is provided as part of the ongoing negotiations for the s106 agreement. The Council reserve their position on this aspect until it has been demonstrated that such a model would meet the objectives of Southwark Plan Policy 31.

If as a result of ongoing s106 negotiations the applicant can satisfy the Council that a research and development occupier can meet the objectives of Southwark Plan Policy 31 this should be secured in the legal agreement. In the event that a future medical or research and development occupier does not require the affordable workspace element, then the legal agreement must include an appropriate cascade mechanism to ensure that the affordable workspace is still secured as B1/E (g) space.

For all of the affordable workspace the s106 agreement must include heads of terms to satisfy Southwark Plan Policy 31 which would include securing the space in its entirety for a minimum period of 30 years.

Design

This application site is located partially within the Bermondsey Street Conservation Area and contains an undesignated heritage asset (The Fenning Street Warehouse) as well as affecting the setting of the Horseshoe Inn (another undesignated heritage asset). The site lies within the Background Assessment Areas of LVMF views 3A.1 and 2A.1 – Parliament Hill Summit to St Paul's Cathedral and Kenwood Viewing Gazebo to St Paul's Cathedral.

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 199). Any harm to, or loss of significance of a designated heritage asset should require clear and convincing justification (paragraph 200). Pursuant to paragraph 201, where a proposed development would lead to substantial harm or total loss of significance of a designated heritage asset, permission should be refused unless certain specified criteria are met. Paragraph 202 explains that where a development would give rise to less than substantial harm to a designated heritage asset, the harm should be weighed against the public benefits of the scheme. Paragraph 203 deals with non-designated heritage assets and explains that the effect of development on such assets should be taking into account, and a balanced judgment should be formed having regard to the scale of any harm or loss and the significance of the asset.

Working through the relevant paragraphs of the NPPF will ensure that a decision-maker has complied with its statutory duty in relation to Conservation Areas and Listed Buildings.

As set out in the land use section above the site falls within allocated Southwark Plan 2022 Site Allocation 54. In respect of tall buildings Policy 54 states "Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape. Taller buildings should be located towards the west of the site with building heights stepping down in height from west to east taking into account the

height of buildings approved at site NSP53. Taller buildings should not detract from the primacy of The Shard”.

Policy 54 further states “The Leather Warehouse, which makes a positive contribution to the area. The site is also within the setting of the important unlisted Horseshoe Pub. Redevelopment should enhance the setting of these buildings. Development proposals should retain and enhance the townscape setting provided by key heritage assets and complement local character and distinctiveness. The urban grain and street layout of the surrounding area should be retained”.

Heritage Impact

In assessing the original scheme officers recorded a two-fold impact on the Bermondsey Street Conservation Area: that derived from the demolition of the existing warehouse and its contribution to the setting of the northeast corner of the conservation area and the Horseshoe Pub in particular; and the townscape impacts of the large scale building on views within the wider conservation area, most notably within Bermondsey Street itself.

In reaching its decision to refuse planning permission (subject to the GLA call-in), the Planning Committee gave greater emphasis to the adverse impacts on the conservation area, highlighting the loss of the warehouse, but in addition to the wider townscape impacts. Southwark Council resolved to refuse planning permission on the grounds of harm to the conservation area specifically by virtue of demolition of the Fenning Street Warehouse and harm to the setting of the Horseshoe Inn.

In the revised scheme, the design approach has been to address the concerns regarding the loss of the warehouse in Fenning Street and its positive contribution to the Bermondsey Conservation Area. The revised scheme retains the early 20th Century warehouse, albeit a later side extension would be demolished. The extension is of no particular merit and is outside the conservation area: This small loss is considered acceptable.

The retention of the warehouse is welcome, maintaining the intimate, historical setting of this part of the conservation area with its positive relationship of the warehouse, Horseshoe Pub and low-rise terrace in Melior Street (south) and the notable townscape view along Melior Street from the junction with Weston Street. The outcome is that the revised development preserves the character and appearance of the conservation area at this point.

The heritage benefit derived, however, is from the proposed refurbishment of the warehouse and not its retention per se, as well as the potential planning benefit of the proposed new community use. The refurbishment of the building, including the restoration of its original fair-faced brickwork appearance is a welcome benefit, albeit distinctly modest in terms of its contribution to the wider conservation area. It is also dependent on the quality of the design details for the new shopfronts, window openings and contemporary-styled mansard roof, albeit these adaptations are sympathetic to the host building. The detailing and finishes, however, should be secured by condition.

Given that substantial works are required to retain and convert the existing building into useable space it would be appropriate to secure by way of a planning condition the submission of a RICS Building Survey prior to commencement to demonstrate in full the detailed condition of the building and necessary techniques required during construction to protect the important elements that are to be retained as part of the conversion.

The impact of the development upon the Horseshoe Pub was also raised as a concern in the original scheme. That the revised development form sets back the new tall building within the Melior Street view is welcome, albeit the development remains evident within the backdrop to the Horseshoe Pub when viewed from Snowfield along Melior Place, where the contrast in scale and

appearance remains marked. However, this adverse townscape impact was present in the previous iteration and the increased scale of the revised scheme does not add to this effect, which remains moderately adverse.

The wider revisions to the application result in a scale and form of development which is materially different to that considered by the planning committee. As such it is now necessary to reconsider the impact of the revisions to the new build elements on the character and setting of the conservation area as well as the impact on public realm.

The application proposes a substantial building which, as a 'tall building' must demonstrate exemplary design in accordance with relevant London and Southwark Plan policies. The increased scale and footprint onto St Thomas Street and Vinegar Yard affects the quality of the new public realm (discussed further below) and also has a far greater impact on the wider townscape and setting of the Bermondsey Street Conservation Area.

The revised proposal extends the massing of the building further along St Thomas Street, this will make for a considerable, continuous street frontage which at the proposed heights will feel unrelenting. It is recognised that the building steps down in height towards the eastern end of St Thomas Street, nevertheless at the scale proposed it will result in a large, bulky building which will be clearly visible in the conservation area as shown in the Townscape and Visual Impact Assessment submitted with the application. Furthermore, the extended massing runs counter to opening up Vinegar Yard and views through to its historic warehouse, which is a key feature better revealing this part of the local conservation area.

The amended architecture suited to Guys Hospital is acknowledged, with the revised floor-to-floor heights, incorporation of interstitial floors of plant and amended service cores. The outcome, however, is a significantly taller building, adding 10.4m (the equivalent of three additional standard floors) to the building. Whilst the principle of a tall building in this location has previously been supported by officers, this was balanced by the townscape fit of having a built form cascading in height down towards the local contextual scale of the area and by the sufficiently easing the impacts on the wider historic environment. The revised taller building continues to step down in height, but less effectively.

The additional scale is more evident within the conservation area within the middle distance and longer distance views of the development, such as from Kirby Grove, Leathermarket Gardens, Weston Street and St Mary's Gardens. Previously, the impacts on these views were considered minor to moderate adverse, particularly where the views were static (e.g., view #24). Whilst the increase in scale is notable, the increase in the degree of adverse impact over-and-above the previous scheme is modest or minor.

The critical issue, however, is the impact of the additional height on Bermondsey Street, which is the heart of the local conservation area and of particularly high townscape value, its sensitivity increased with its many listed buildings. The proposed building is no longer a brief incursion in the backdrop, with its rooftop momentarily glimpsed amongst the attic storeys within the street. The proposed c.10m increase in height and the building's extended southern massing results in the uppermost 3 and 4 storeys of the development being distinctly visible above the roofline within the linear view (view #15). This is not a brief incursion; the modelled views shows the development visible above the roofline when walking northwards of Tanner Street park for some 60m. It forms a notable and continuous backdrop to this highly sensitive townscape view, disrupting the strong roofline and visual coherency within the historic street. The impact will be particularly notable at dusk, with internal illumination. This is a new, additional harm caused by the revised scheme. The harm is less than substantial, but given the street's high townscape value and prominence within the conservation area, is considered important and towards a high order of less than substantial harm.

Overall, whilst the retention of the warehouse has reduced the harmful heritage impacts to an extent, the revised development gives rise to increased harm elsewhere, most notably within Bermondsey Street.

As discussed above, the benefits of such an operator as an extension to the London Bridge Health Cluster are regarded as a positive aspect of the development. However, the physical form of the building as set out in the proposal does give rise to harm to the conservation area. The Council consider the revised scheme to be considerably more harmful to the conservation area in terms of scale and prominence.

Furthermore, the adverse impacts are not considered to be mitigated by the heritage contribution of the refurbishment of the warehouse. It is therefore important that, in accordance with the NPPF, the increased extent of less than substantial harm should set against the wider planning benefits of the scheme. This would include the consideration of the proposed community use, medical use and the enhanced public realm, albeit the public realm benefits are not without design shortcomings.

This level of harm is less than substantial and therefore the application must be assessed against Paragraph 202 of the NPPF which states “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”.

If the GLA are minded to accept that the proposed amount of development and form of the building is necessary then the harm to the conservation area must be offset through the public benefits that will arise. Such benefits should be substantial, deliverable and secured through the s106 agreement and /or conditions attached to the planning permission. The public benefits include:

- Redevelopment of an allocated site bringing regeneration benefits to the area
- Retention of the Fenning Street Warehouse and conversion to a community use
- Guys and St Thomas Hospital Trust in the first instance, or some other Life Sciences operator occupying a significant amount of the new floorspace as an extension to the existing London Bridge Health Cluster.

In weighing the harm to the conservation area against the aforementioned public benefits of the proposal to accord with the NPPF, the Council require robust measures to be put in place to ensure that this particular use/operator is secured before the development is implemented. Failure to secure a specific medical/Life Sciences operator would result in the need for a fresh planning permission. This is necessary to secure the significant public benefit that is being used to justify the less than substantial harm to the conservation area.

Lastly, looking at the revised elevational architecture, officers note that the designs have become much busier and have moved further towards corporate architecture than the previous scheme. There is a greater move to provide terraces with planting, which is welcome and will help soften the appearance and break down the scale as well as being necessary to achieve the Urban Greening Factor. The success of the elevations will be dependent upon the detailed design and execution including the use of high quality, robust materials, which should be subject to control via conditions in respect of detailed large scale, elevations, sections and bay studies, submission of material samples/full scale mock ups and detailed landscaping proposals.

Impact on Public Realm

The 2018 scheme considered by Southwark Planning Committee comprised a series of buildings separated by areas of hard landscaped public realm. The site layout was considered to be rational

and legible, reinforcing the existing streets whilst providing new pedestrian routes that would have radiated from and across the new public realm, creating through routes in a north-south and east-west direction. The routes would have linked to the other St Thomas Street development sites and to the principal thoroughfares of St Thomas Street and Bermondsey Street.

The 2018 layout presented a good scheme in terms of public realm made possible by the gaps between the buildings which facilitated a clear east-west route from Fenning Street to Snowsfield running through a series of hard landscaped spaces that were generous enough for pedestrian movement and areas to dwell with seating linked to the commercial ground floor uses. In addition the hard landscaped space between the main building fronting St Thomas Street and the music venue would have provided a generous and welcoming north-south route from Snowsfield to St Thomas Street. The presence of a loading bay on Fenning Street would have meant that the public realm would not have been compromised by servicing/delivery vehicles.

The revised proposal significantly reduces the quantum and quality of the public realm to the detriment of the scheme.

The new buildings result in more site coverage along St Thomas Street and a significant change has occurred as a result of introducing an internal servicing bay to the rear of the buildings accessed from Snowsfield. The quantum of public space has reduced and the way in which the space will be used has also changed the nature of the space. The applicant has stated that due to an offsite consolidated service strategy there will be limited impact to this space by servicing vehicles and that its primary function would still be as public realm. The Council do not accept that this space is generous enough to accommodate access to the loading bay without compromising the environment and experience for pedestrians. The incorporation of the large service bay greatly alters the nature of the route, which is now proposed as a shared vehicular/pedestrian space not envisaged by the informal masterplan or previous planning submission. The Council maintain that the inclusion of the loading bay as currently proposed will dominate the character and function of the route, with its pedestrian quality seriously eroded.

The revised layout of the scheme may well retain the proposed pedestrian route to the immediate rear of the new building, however it is no longer overtly public or strongly legible. The new link is routed through the proposed replacement side extension to the warehouse, with the public expected to pass through two sets of double doors. This is not a passageway that is fully open or a covered route, but a semi-public route through an informal foyer space.

The current design has comprised the legibility, attractiveness and ease of use. Whereas the original design would have resulted in a clear east-west desire line it is hard to envisage what benefit might now be derived from using this route as opposed to St Thomas Street. Whilst the continued paving eases matters to an extent, it is important that the space is designed as more a passageway than a foyer and that the doors are held open during the daytime and are seldom (if ever) closed for events if the public are to feel confident in regularly using the route.

In addition, the revised route is rather compromised in terms of its quality as a public space, being less than 1.5m wide in places, hard up against the perimeter wall of the Horseshoe Pub and impacted upon by the introduction of the new rear service bay and the potential conflict with vehicle servicing movements. It is important that the delivery of a safe and pleasant pedestrian route is delivered within the scheme and is not made reliant on a development scheme for the adjacent public house, which may not be forthcoming. Moreover, the scale of the current development is such that a more generous footway width should be incumbent on the host scheme. A minimum width of 2.0m and public lighting on the new building should be secured along the full route as a minimum.

Notwithstanding the above concerns with how the east-west route has been diminished it is still

considered to be important to open up future east-west connections through this site to link with adjacent schemes coming forward. If the GLA are minded to grant permission then the detailed design execution will be key to ensuring that the route is legible, attractive and comfortable to use. Detailed design conditions should be used to ensure this outcome. Furthermore the s106 agreement must include an obligation to ensure that the route is publically accessible at times to coordinate with the adjacent development sites.

As stated above, the introduction of rear servicing is a retrograde step in terms of a high quality public realm and impacts upon the place-making proposals for Vinegar Yard, which had been intended to become a fully pedestrianised/ plaza space and focal point for the new development and that of its neighbour, Vinegar Yard. Whilst limited servicing arrangements could ease matters, retaining a vehicle route nonetheless limits the opportunity for a cohesive, singular public space.

If the GLA are minded to grant permission on the basis of the plans submitted to date, sufficient controls must be secured by way of planning conditions and/or the s106 agreement to regulate and minimise the servicing requirement for the building and use of the route (requiring consolidation, controlling servicing hours and/ or vehicle sizes).

In terms of the pedestrian experience, it is important that the surfaces are appropriately designed to accommodate the shared use and marginalise any sense of vehicle priority, and that associated street furniture is kept to a minimum to prevent clutter. In particular, gating of the space to prevent vehicle use should be avoided, as this limits the flexibility of pedestrian movement. Similarly, the physical presence of the servicing bays should be minimised. The detailed design and execution should be controlled by way of landscaping conditions.

It is acknowledged that the new development provides for a new green public space, which is located on the junction with St Thomas Street/ Snowsfield. The provision of the new green open space is welcome in its contribution to the physical and visual amenity of the immediate area, and that the trees will be planted direct in the ground and not planters, will be an important factor. Its provision offsets for the most part the large plaza area of the previous proposal, albeit it does bring a different character and purpose to the space, with changes in the flexibility of use and free-flowing form of the public realm. Whilst the garden offsets the loss of the main plaza it does not offset the diminished east west route and; as the only genuine area of public realm within the site, the Council remain concerned about the overall public realm provision in relation to the quantum of development coming forward and the quality of the other spaces proposed.

It should also be noted that the proposed servicing route off Snowsfield would make for an overt vehicular route onto the site and disrupt the opportunity to co-ordinate the soft landscaping with that of the Vinegar Yard scheme to provide a single, combined landscaped public garden aligned onto Snowsfield. It is therefore suggested that the opportunity to reroute the service access off St Thomas Street, in a similar arrangement to the current Vinegar Yard but shifted westwards, closer to the new building be considered.

It has been mentioned in the submission that the applicant would like occasional events in the public realm. The Council would be cautious about this given the limited space available on site for pedestrians and vehicles and meaningful public realm. As such it should not be granted as part of this permission but should be subject to consideration as a separate application once the scheme has been built out and the servicing impacts are fully known.

Finally the quality of the public realm onto St Thomas Street is questioned where it is extensively reliant upon a new colonnade with the building oversailing and cantilevering in parts above the new footway. This brings an overbearing character to the street, which is particularly apparent where the building sits partly above the proposed new street trees, emphasising the effect. It is important that the building facade line is no further forward than the adjacent Edge and Capital House

schemes and is aligned parallel to the street with sufficient clearance to make for a comfortable 3-dimensional public realm.

Highways/Transport Policy

The introduction of an internal loading bay with consolidated servicing hub is a significant change to the scheme since it was considered by Southwark Planning Committee. The approach to servicing is understood from a technical transport perspective. There will be a requirement for a detailed delivery and servicing and management plan to be submitted once the intended use of the building is known and the Developer has confirmed whether they are building out Option 1 or 2. This should be secured in the s106 agreement.

Climate Change

Southwark Plan 2022 Policies P69 and P70 set out development plan requirements in respect of climate change. Policy P69 requires non-domestic developments greater than 500sqm to achieve BREEAM 'Excellent'. Whilst Policy P70 requires all developments to reduce operational greenhouse gas emissions and minimise both annual and peak energy demand in accordance with the London Plan energy hierarchy. Major development must be net zero-carbon. Major non-residential development must reduce carbon emissions on site by a minimum of 40% and any shortfall must be secured off site through planning obligations or as a financial contribution. Furthermore, developments must calculate whole life cycle carbon emissions and demonstrate actions taken to reduce life cycle carbon emissions.

The revised proposal has been accompanied by a detailed energy strategy, whole life carbon and circular economy statements. As the decision making body it is the responsibility of the GLA to undertake a full assessment of the documents submitted.

The documents submitted confirm that the development would achieve BREEAM 'excellent', which would meet the requirements of Policy P69 and should be secured by way of a planning condition.

For Option 1 the development would achieve 57% onsite carbon reduction and for Option 2 a 55% onsite reduction. This would be achieved through passive design features, Air Source Heat Pumps and PV Panels. The shortfall between onsite carbon reductions and net zero carbon would be met by way of a contribution to the Carbon Offset Fund. The approach to addressing climate change would meet the requirements of Policy P70. Furthermore, it is noted that the revised scheme would result in a greater onsite carbon reduction than the original scheme considered by Southwark Planning Committee which would have achieved 46% on site carbon savings.

The s106 agreement should secure compliance with the energy strategy (as relevant to Option 1 or 2 when implemented) as well as securing the minimum onsite carbon reductions, the necessary financial contribution and Be Seen Monitoring. Furthermore planning conditions should be used to secure compliance with Whole Life Carbon and Circular Economy Statements.

Conclusion

This report sets out the view of Southwark Council on the key issues arising from the amendments to the scheme. As the decision making body it is the responsibility of the GLA to fully consider and determine all impacts arising from the revised proposal before making a determination, a full assessment of all impacts would go beyond the scope and content of this letter.

Although this revised scheme is broadly comparable to the previously proposed floor area, the increased floor to floor heights and additional plant give rise to a much taller building than previously proposed. It is this increased height which causes harm to the important view from the Bermondsey

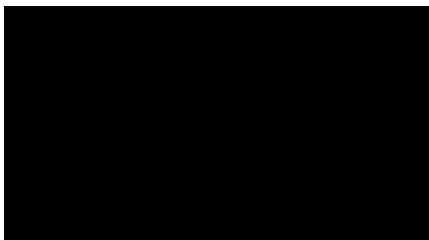
Street conservation area. This harm could have been avoided by a lower building. As it stands, the applicant argues that this harm can be off-set by the public benefits of the scheme and in particular the potential use of the development by Guys and St Thomas as part of the SC1 Life Sciences cluster. The development of the latter is a key priority for the council and these potential benefits are acknowledged and supported. However there must be sufficient certainty that these benefits will be delivered. This will require detailed and robust mechanisms secured through a s106 agreement in the event that the Mayor decides to grant planning permission.

The Council would also expect the Mayor to give full and careful consideration, and appropriate weight, to any representations made by other interested parties including local residents and amenity groups.

As part of this response the Council are not confirming a view on the acceptability or otherwise of the proposal in respect of impact on residential amenity for existing or future neighbours, or other technical matters such as contamination or flood risk.

The Council will continue to work with the GLA and applicant in the preparation of the s106 agreement which must, as a minimum, secure those obligations set out within Southwark Council's original planning committee report and the matters raised in this letter.

Yours sincerely

A large black rectangular box redacting the signature of the Head of Strategic Development.

Head of Strategic Development

Vinegar Yard 18/AP/4171
Objection February 2022

Objection to the excessive height and massing, inadequate public realm offer and impact on the Bermondsey St Conservation Area

INADEQUATE SIZE OF USABLE PUBLIC REALM AND GREEN SPACE.

The total size of the proposed public realm is 1533 sqm.

Only 190sqm of this is the proposed garden, which represents just 12.5% of the public realm. This is an inadequate provision of properly usable 'dwell' space for those visiting the development and for local community benefit.

12.5% green space is inadequate by any standards but particularly in relation to the excessive height and massing of the building, increased substantially since the previous application, and when compared with London Plan Policy G4 Open Space 'The creation of new open space, particularly green space, is essential in helping to meet the Mayor's target of making more than 50 per cent of London green.'

Nor is the proposal compliant with London Plan Policy G4 Open Space 'New provision or improved public access should be particularly encouraged in areas of deficiency in access to public open space' given that this part of the Borough is deficient in public open space per head of population.

It is not acceptable that a building which is planned for uses that support health and wellbeing would have a public realm offer that falls substantially short of delivering those benefits to the local community.

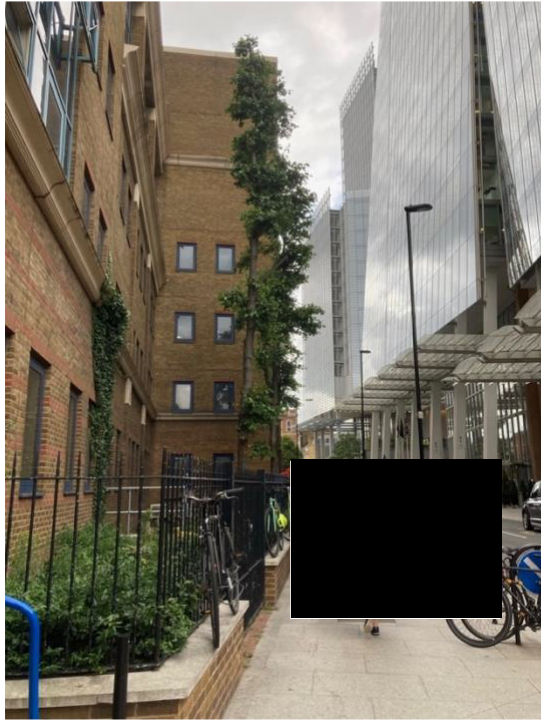
UGF – NOT ROBUSTLY ACHIEVED, AND NOT ENOUGH AT GROUND LEVEL FOR ENVIRONMENTAL AND PUBLIC BENEFIT

An UGF of only 3.01 is achieved, and some of the proposed tree planting at ground level is questionable.

The St Thomas St trees are to be planted circa 3.5m from the building face. This is far too close to deliver successful trees and meaningful, long term canopy cover. The existing trees alongside Guys Hospital on St Thomas St are planted at similar distances, also on the north side of a building so with compromised light conditions, and the poor condition of these trees provide a clear indication of what this proximity and microclimate is likely to deliver - no meaningful canopy cover and a life-long maintenance need for pruning. (See photos.)

Other trees positioned within the yard are located solely to mitigate predicted wind impacts. Some of the trees that are needed to mitigate wind impacts are proposed in locations that are outside the applicant's boundary, so there is no certainty about their delivery.

The viability of these trees and the trees proposed for St Thomas St is highly dubious, as is their inclusion within the UGF calculations .



PUBLIC REALM AS SERVICE ACCESS ROAD, NOT ATTRACTIVE GREEN SPACE FOR PEOPLE

The majority of the space will be for servicing as shown by the swept path analysis of service vehicles driving in from Snowfields through the 'public realm' to the loading bays. The ground plane required to support this movement completely sterilises what could otherwise be animated by seating, trees, planting, playable features, public art etc. All such features that would make the space inviting and contribute to green infrastructure are not provided as they would get in the way of the service vehicles entering, turning and leaving.

The application documents show that there would be **70-80 vehicle movements per day, over 6-8 hours every day** which will render the space nothing more than a service access road. This would not create a space that meets London Plan Policy D8 Public Realm '...ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain.

Or Policy D9 Tall Buildings '.. buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm.'

The proposed new office and student population generated by the proposed developments in the St Thomas St Masterplan will substantially increase the pedestrian footfall on existing pavements. This major impact is not properly addressed by the CIT proposals:

- The existing pavement on the south of St Thomas St varies from circa 2.0 - 2.3m wide and this is inadequate for current peak time pedestrian flows. The proposed 'free area' of pavement on the south side of St Thomas St uninterrupted by building columns, cycle stands and proposed trees would be a maximum of 2m wide which would be totally inadequate for future footfall generated by the proposed building.
- The east/west open route that was promised in the framework as a secondary route to St Thomas St/London Bridge will not be provided in the current proposal. A very narrow path to the retained warehouse would be just 1.15m wide, with proposed tree planting further obstructing both movement and clear line of sight. While tree planting would normally be a benefit, tree planting here would be obstructive to movement and will not thrive in the very narrow zone provided between the development and Horseshoe pub boundary. The only purpose for planting trees in this location would be to mitigate wind. The path would be alongside the loading bays and stair/lift cores facing onto this route, which would severely limit the potential for active edges and a safe, attractive route for pedestrians. Access through the warehouse building at the end will be time controlled, creating an unsafe 'dead-end' after certain times.

- The existing route to the south west will be interrupted by new planting of 5 trees – the only purpose of these trees is to mitigate dangerous wind impacts. While tree planting would normally be a benefit, in this instance the trees would obstruct movement and clear line of sight. Furthermore, the proposed tree locations are of site so there's no certainty they can be delivered.

This proposal should be rejected on the basis that it doesn't meet policy and inflicts harm on the local community.

21 February 2022