planning report D&P/2404b/01

4 February 2015

40–46 Weston Street, London Bridge
in the London Borough of Southwark

planning application no. 14/AP/4640

<table>
<thead>
<tr>
<th>Strategic planning application stage 1 referral</th>
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<th>The proposal</th>
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<td>Demolition of Capital House and erection of a 21 and 31 storey building (including 1 basement level) to a maximum height of 108.788m to provide 119 residential units (C3), retail/cafe uses (flexible A1 and A3 use) at ground floor, 261 cycle parking spaces, 2 disabled car parking spaces, associated refuse and recycling and an area of public realm.</td>
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<th>The applicant</th>
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<td>The applicant is Bilford Limited and the architects are SPPARC Architecture.</td>
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<th>Strategic issues</th>
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<td>The key strategic issues in this case are the principle of providing a residential led scheme, housing, affordable housing, strategic views, World Heritage Sites and heritage, urban design and tall buildings, climate change and transportation.</td>
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<th>Recommendation</th>
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<td>That Southwark Council be advised that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 64 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.</td>
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<th>Context</th>
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<td>1. On 6 January 2015 the Mayor of London received documents from Southwark Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town &amp; Country Planning (Mayor of London) Order 2008 the Mayor has until 16 February 2015 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.</td>
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| 2. The application is referable under Categories 1A and 1C of the Schedule to the Order 2008: |
1A: “Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.”

1C: “Development which comprises or includes the erection of a building or one or more of the following descriptions...more than 30 metres high and outside the City of London.

3 Once Southwark Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The site measures 0.0912 hectares and occupies a rectangular site opposite London Bridge Station. It is within the London Bridge and Bankside Opportunity Area, as identified in the London Plan and the Central Activities Zone (CAZ). It is bound to the north by St Thomas Street, to the west by Weston Street and to the south by Melior Street. There is a mix of medium and high-rise buildings in the area, of particular reference is the 34 – storey Guys Hospital tower and ‘The Shard’.

6 St Thomas Street is part of the Transport for London (TfL) road network. The site has a public transport accessibility level (PTAL) of 6 on a scale of 1 to 6 where 6 is the most accessible. London Bridge mainline rail and underground station, served by the Jubilee and Northern lines, is located within 100 metres of the site. The nearest bus stop, adjacent to the development, is served by two bus services. London Bridge station is also served by a number of bus services.

7 The site comprises Capital House, a 1960s 10 storey building with a total floorspace of 4,079 sq.m and a small area of public space. The building is occupied by King’s College London and its educational support offices which provide assistance in conjunction with the main educational activities which take place across the different campuses belonging to the university.

Details of the proposal

8 The application is a resubmission of a previous scheme (see below) for a 21 and 31 storey building. The building would remain as previously approved, but the use would change from student housing as originally proposed to market residential units. The scheme would provide 119 residential units at floor 1 and above and retail/cafe uses at ground floor.

Case history

9 A previous application for a scheme for student housing (in the same building form) was seen by the Mayor at stage 1 on 4 November 2010 (PDU/2404a/01). Southwark Council resolved to grant planning permission and the stage 2 was received 8 December 2010. On 15 December 2010 the Mayor determined that he was content to allow Southwark Council to determine the case itself, subject to any direction that the Secretary of State may take (PDU/2404a/02).

10 On 14 December 2010 Southwark Council received a direction from the Secretary of State, which prevented the Council from issuing a planning decision until the Secretary of State had decided whether or not to call in the application. On 9 February 2011 the Secretary of State confirmed he did not wish to call in the application.
Following this, the application was taken back to Southwark’s planning committee (following publication of the Inspector’s report on its Core Strategy) and on 23 March 2011 the Council advised the Mayor that it was minded to grant planning permission (PDU/2404a/03). On 30 March 2011 the Mayor determined that he was content to allow Southwark Council to determine the case itself, subject to any additional action by the Secretary of State.

**Strategic planning issues and relevant policies and guidance**

The relevant issues and corresponding policies are as follows:

- Mix of uses
  - London Plan
- Housing
  - London Plan; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG
- Strategic views
  - London Plan, London View Management Framework SPG
- World Heritage Sites and Heritage
- Urban design and tall buildings
  - London Plan; Shaping Neighbourhoods: Character and Context, London Plan; Accessible London: achieving an inclusive environment SPG
- Inclusive design
  - London Plan; Accessible London: achieving an inclusive environment SPG
- Sustainable development
  - London Plan; Mayor’s; Mayor’s Climate Change Mitigation and Energy Strategy;
- Transport
  - London Plan;

For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2011 Southwark Core Strategy, the ‘saved’ policies in the 2007 Southwark Unitary Development and the 2011 London Plan (with alterations).

The following are also relevant material considerations:

- The draft 2010 Southwark Bankside, Borough and London Bridge SPD
- The draft Further Alterations to the London Plan (intention to publish version 2014)
- Draft New Southwark Plan

**Uses**

**Office**

As outlined in the history section above, the Mayor considered an application for a proposal to redevelop the site with a building in the same form as that proposed here on the same site in November 2011. While this scheme was for student housing, it also proposed the loss of office space and was found to be acceptable. The rationale for supporting the redevelopment of the site remains largely the same as the previous scheme and is set out below.
The site is located within the London Bridge, Borough and Bankside Opportunity Area where the ability for intensification is noted. The key objectives for the area include developing its strength as a strategic office location as well as providing housing, leisure and cultural uses. The site is also specifically identified in Southwark’s 2010 draft Bankside, Borough and London Bridge SPD as a site which should reprovide the existing office space, and also look to enhance it. While this designation is noted, the Council has also confirmed it is its intention to revisit the SPD in collaboration with GLA which may well update the specific site allocations.

The proposal seeks to remove all office space which currently exists on the site. London Plan Policy 4.2 states that the Mayor will support the management and redevelopment of office provision to improve London’s competitiveness and to address the wider objectives of the London Plan. It also states that the policy should be implemented to meet the distinct needs of the local market. The site is also within the Central Activities Zone (CAZ). Policy 2.10 and 4.3 aim to ensure there is adequate capacity to meet future strategic office demand as well as ensuring developments enhance the distinct offer of the CAZ based on a rich mix of local as well as strategic uses, and supports a tailored approach to the unique circumstances of the CAZ.

The applicant has outlined their justification for the loss of this office space which are summarised below:

- The building is not suitable for modern office occupation and there is limited possibility for modernisation to bring it up to quality office standards.
- The current occupiers have alternative accommodation options (meaning no job losses would result from the loss of this office floorspace).
- There is a substantial amount of office floorspace coming forward in the area which can cater for the current office demand in Southwark. Some key recent developments and consents include; ‘The Shard’, New London Bridge House, More London, Ten Blackfriars Road, Canada Water Phase 3, Wedge House 30-40 Blackfriars Road and 15-23 Southwark Street.

This proposal follows the approval and implementation of a scheme which also proposed a removal of office space on the site. The arguments put forward by the applicant in relation to the strength of office stock in the area were accepted in this previous scheme, and there has been no material change in site circumstances or planning policy to justify coming to a different conclusion in this case.

Housing

The key consideration in this case is the provision of private sale accommodation in replacement of the student accommodation in the previous scheme. London Plan Policy 3.3 provides explicit support for the provision of housing within London. The provision of 119 units would help to achieve Southwark’s Further Alterations to the London Plan Housing target of providing 27,362 homes within the plan period and is welcomed.

Retail

A small element of retail floorspace is proposed in the scheme which would provide active frontage at ground floor. This is welcome and provides the opportunity for local needs shopping in line with London Plan Policy 4.8.
Housing

22 The housing would be laid out as follows:

<table>
<thead>
<tr>
<th>Unit Size</th>
<th>Number of units</th>
<th>%</th>
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<tbody>
<tr>
<td>Studio</td>
<td>6</td>
<td>5</td>
</tr>
<tr>
<td>1 bedroom</td>
<td>40</td>
<td>34</td>
</tr>
<tr>
<td>2 bedroom</td>
<td>50</td>
<td>42</td>
</tr>
<tr>
<td>3 bedroom</td>
<td>23</td>
<td>20</td>
</tr>
<tr>
<td>Total</td>
<td>119</td>
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Affordable housing

23 Strategic priority is afforded to maximising affordable housing in London Plan Policy 3.12 which states that affordable housing contributions should represent the maximum reasonable amount, to be provided on site and based on a detailed and robust financial viability appraisal.

24 The application does not include reference to a quantum of affordable housing proposed, noting that it would be determined by scheme viability. A viability assessment has been submitted to the Council for independent review. The results of the independent review should be shared with GLA officers as soon as this is available.

25 The applicant also confirms that any affordable housing officer will be delivered off site. London Plan Policy 3.12 states that in exceptional cases where it can be demonstrated robustly that it is not appropriate to provide affordable housing onsite in terms of the other policies in the plan, it may be provided off-site. A cash in lieu contribution should only be accepted where this would have demonstrable benefits in furthering the affordable housing and other policies in the plan, and should be ring-fenced and, if appropriate, pooled to secure additional affordable housing either on identified sites elsewhere or as part of an agreed programme for provision of affordable housing within a transparent process by the Council.

26 The applicant has sought to justify the off-site affordable housing offer on the basis of the following points:

- While a core could be incorporated into the building for registered provider management purposes, it would significantly impact on the design and net area of the proposal which would have a significant harmful impact on the viability of the scheme, fundamentally reducing the amount of affordable housing that could be provided.

- The location form and design of the proposed scheme would result in high end residential accommodation and an associated high service charge, in the region of £7 per sq.ft. This has a direct impact on the affordability of the accommodation for residents, and in the case of Affordable Rent will mean a registered provider would be unlikely to be able to afford a developer return for the units. The effect of this on the viability of the scheme would mean a significantly reduced number of on-site units.

- Providing affordable units off site would result in a greater additionality of units.
- The value of the units make the provision of intermediate homes completely unaffordable, in terms of HCA Guidance and London Plan income thresholds.

27 GLA officers agree with these conclusions and accept that the scheme would not be suitable for on-site affordable housing and that a greater quantum of affordable units could be achieved off site. However, officers require confirmation of an identified donor site and details of the provision of units (number and mix) and deliverability of a scheme which provides the affordable offer. This should be the maximum reasonable amount the scheme can deliver as outlined above. Cash in lieu contribution should only be considered if it is demonstrated that there are no off-site options available.

28 London Plan Policy 3.11 establishes a strategic affordable tenure mix of 60% social or affordable rent and 40% intermediate housing. The tenure mix of any affordable housing proposal should be confirmed in order to assess the scheme against Policy 3.11.

Housing choice

29 London Plan Policy 3.8 together with the Mayor’s Housing SPG seeks to promote housing choice and seek a balanced mix of unit sizes, with a particular focus on family homes. The submission confirms that a range of unit sizes, including family sized units, would be provided. The applicant should ensure the affordable housing offer is provided in a mix which meets the identified local need in accordance with Policy 3.8.

Children’s play space

30 London Plan Policy 3.6 outlines the requirements of play space and recreational facilities. Based on the residential mix and the methodology within the Mayor’s Shaping Neighbourhoods: Play and Informal Recreation SPG, the total minimum child yield for the development would be 13. This equates to a total minimum space requirement of 131 sq.m. The submitted drawings indicate an area of children’s play space within a communal area at the third floor which measures 45 sq.m. The scheme should be reviewed in line with Policy 3.6 and the play SPG to ensure the proposal would provide sufficient space for the anticipated child yield in the scheme.

Residential density

31 Policy 3.4 of the London Plan states that housing output should be optimised taking into account, amongst other things, the design principles of the London Plan and the content of the Housing SPG. The site has a PTAL level of 6 and is central in character. On this basis the London Plan Density matrix (Table 3.2 in support of London Plan Policy 3.4) suggests a residential density of between 650-1100 habitable rooms per hectare would be suitable on this site. The density on this site is likely to be significantly above the identified range, however this is a direct result of the small site the building occupies. The building would have exceptional residential quality (see below) and would not demonstrate the characteristics of overdevelopment, and in this case a high density development is acceptable.

Urban design and tall buildings

32 The form of the building has not altered since the previous scheme where the architectural appearance of the building was found to be of the highest order and in accordance with London Plan design policies. The site’s location within the CAZ and in the centre of a ‘cluster’ of tall buildings makes its suitable for a tall building in line with London Plan Policy 7.7.
In relation to the design changes in this scheme, the proposed layout would provide active uses along key elevations. The small retail units proposed would provide activation at ground floor as well as convenience retail for further occupiers and surrounding residents. The new central courtyard provides a piece of public realm and the position of the building, set in from the existing highway also creates generous circulation area at street level, in line with the aims of Policy 7.5.

The key alteration in this proposal is the use. GLA officers require confirmation that the proposal would meet the standards outlined in the Mayors Housing SPG. It is noted that core ratios have been kept to a minimum and the unit sizes are above the Mayors minimum unit sizes. The applicant should confirm the finished floor to ceiling heights that the units would achieve to confirm an acceptable level of residential amenity.

The provision of winter gardens for each residential unit is welcomed as is the frequency of internal communal areas. Subject to the details of child play space being confirmed, as outlined above, this proposal would meet the aims of Policy 7.1 which supports schemes which promote a local community interaction.

**Strategic views**

London Plan Policies 7.11 and 7.12 establish the London View Management Framework (LVMF), which seeks to designate, protect and manage 27 views of London and some of its major landmarks and the LVMF SPG seeks to provide a method to understand and protect the characteristics of these views. In accordance with Policy 7.12 new development is expected to make a positive contribution to the characteristics and composition of the designated views. The application documentation includes a Townscape and Visual Impact Assessment (TVIA) which provides accurate visitations from all relevant points set out in the LVMF SPG, together with assessments on the potential impact on the viewer’s ability to recognise and appreciate the strategically important landmarks(s).

The proposal would be visible in the backdrop assessment area of the Protected Vista from Parliament Hill and Kenwood (2A.1 and 3A.1) towards St. Paul’s Cathedral. It also falls into the River Prospect view of Southwark Cathedral from Southwark Bridge, downstream pavement (12B.1). It is also visible in the North Bastion, Tower Bridge (10A.1). The previous case concluded the impact on these views was not significant. The submitted TVIA includes the same assessment as that outlined in the previously approved case. As the building form and design has not changed, and there is no material change in policy in this regard since the previous scheme was approved the proposal would preserve the conservation interests and strategic views affected.

**World Heritage Site and heritage**

Policy 7.10 states that development within the setting of World Heritage Sites should conserve, promote, make sustainable use of and enhance their authenticity, integrity and significance. It also states that any development should not comprise the viewer’s ability to appreciate the assets Outstanding Universal Value.
The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should ‘have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which is possesses’ and that this should be given significant or special weight in the balance of making planning decisions. The NPPF identifies that the extent and importance of the significance of the heritage asset is integral to assessing the potential impact, and therefore the acceptability. Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to less than substantial harm, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. These aims are transposed in London Plan Policy 7.8 which requires the identification, conservation, restoration and re-use of heritage assets.

The proposal would be visible from the Tower of London World Heritage Site at Tower Green and White Tower. The assessment of this was carried out as part of the previous application which concluded that the impact would be slight, and that the proposal would be no longer visible on the approach to the Queen’s House meaning the setting of the World Heritage Site is preserved. Since the permission was granted, the judgement on Barnwell Manor wind farm has been handed down which highlights the requirement to give considerable weight to preserving the setting of all listed buildings when assessing the balance of any proposal involving listed buildings.

The Mayor’s SPG on London World Heritage Sites – Guidance on Setting was adopted in March 2012. This provides a framework for assessing the impact of change on World Heritage Site’s Outstanding Value, authenticity and integrity and the contribution its setting makes to its Outstanding Universal Value. It highlights the need to frame the assessment of impact on World Heritage Sites in relation to the importance and value of the setting, which includes physical alterations and changes to the user experience of setting. The assessment of the effect on the setting of the Tower of London World Heritage site should be updated to take account of the advice in the London World Heritage Sites SPG and shared with officers prior to any decision being made on the case.

Since the previous stage 1 report was published, the railway viaduct arches at the southern frontage of London Bridge station have been listed. The proposal would provide a far better relationship with these listed arches than the current building on site and would therefore enhance their setting. All other designated buildings have been considered through the previous application.

The site is not within a conservation area, but is adjacent to one and would affect its setting and views from the conservation areas. The views analysis indicates the scale of the impact from a number of conservation area viewpoints. Owing to the form of the building, the steeply sloping roof slopes are positioned away from the conservation area. In line with the conclusion of the previous scheme, in those parts where the glimpse of the building is present, this would still preserve the special character of the conservation area.

Inclusive design

In line with London Plan Policy 7.2 states that all new developments should achieved the highest standards and accessible and inclusive design. The planning statement confirms that 10% of all units will be provided as wheelchair units. The applicant should confirm that all units are Lifetime Homes compliant and the design and access statement should be updated to include sample layouts of the accessible units and how the units will meet the Lifetime Homes criteria.
45 The applicant should also confirm the details of the public realm in relation to accessibility, particularly in relation to the provision of level access across the site and the new public realm proposal. Details of how the two Blue Badge spaces will be assigned to occupiers of wheelchair units should also be provided.

**Sustainable development**

46 London Plan Policy 5.2 outlines that development proposals should make the fullest contribution to minimising carbon dioxide emissions in line with the energy hierarchy. The applicant has followed the energy hierarchy in their energy assessment. However, the energy savings have not been based on Part L 2013. The energy work should be reviewed and updated in line with Part L 2013 prior to any decision on the case.

47 In relation to the lean stage, the proposal would reduce emissions through passive design features. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include energy efficient lighting, mechanical ventilation with heat recovery and triple glazing as part of a curtain wall system. Further information is required on the passive measures proposed to reduce the demand for active cooling. Dynamic thermal modelling using the guidance provided in CIBSE TM49 should be provided to demonstrate that overheating can be avoided without the use of active cooling.

48 The regulated CO2 savings from energy efficiency alone should be determined relative to the Target Emissions Rate (TER) or a Part L 2013 Building Regulations compliant development. The applicant should model additional energy efficiency measures and aim for the development to improve on Part L through energy efficiency measures alone. TER and DER modelling sheets should be provided showing the assumptions used and any constraints to meeting this energy efficiency requirement should be clearly explained.

49 In relation to the ‘clean’ stage, the applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the site. However, the development would incorporate infrastructure that would allow for future connection should a district network become available, which is welcome. The applicant is proposing to install a site heat network linking the dwellings and non-domestic building spaces and the application is supported by a plan for the network and the single energy centre.

50 The proposal includes the provision of a 150kWth gas fired CHP unit with accompanying thermal storage as the lead heat source for the network which would result in a reduction in regulated CO2 emissions of 90 tonnes per annum. The CHP is sized to provide domestic hot water load, as well as a proportion of the space heating. Details of the CHP electricity sales strategy and the operation and maintenance arrangements should be provided to demonstrate its long term viability.

51 In relation to the ‘green’ stage of the hierarchy, the applicant proposes the installation of 100 sq.m of PV on the south façade of the tower which would equate to a reduction in regulated CO2 emissions for 6.6 tonnes per annum though this stage of the hierarchy.

52 While the applicant has followed the energy hierarchy, compliance with Policy 5.2 cannot be confirmed until the work has been updated to reflect Part L 2013.
Transportation

53 St Thomas Street to the north of the site is part of the Transport for London Road Network (TRLN) and has an excellent public transport accessibility level (PTAL) of 6 (where 1 is low and 6 is high).

54 The proposed cycle parking is in line with the London Plan Policy 6.9 FALP targets. The previous application provided for a cycle docking station. Cycling remains a key priority of the Mayor and the provision of an on-site 24 space docking station is requested in addition to a S106 contribution of £100,000 to secure its delivery (£200,000 if the docking station is located off site). Further details of this should be discussed with TfL as soon as possible.

55 The car free nature of the scheme, save for two Blue Badge spaces, is welcomed. At least one of the Blue Badge spaces should be fitted with an electric vehicle charging point, in line with Policy 6.13. This should be secured through condition.

56 To support the car free development, enhancement of the pedestrian environment in the vicinity of the site should be secured by legal agreement. This should be via a section 278 agreement for the areas immediately adjoining the building and a contribution of £50,000 towards enhancement of the St Thomas Street footway which together with Network Rail and other developer funded works to this street will ensure a consistent treatment.

57 A Travel Plan submission and review should be secured through the S106. This should include the impact on the pedestrian environment and a future PERS audit once the London Bridge re-development is complete. A delivery and servicing management plan, construction management plan and construction logistics plan should be secured through condition and developed in communication with TfL, Network Rail and Southwark Council.

Community Infrastructure Levy

58 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3. The Mayoral CIL formally came into effect on 1 April 2012, and it will be paid on commencement of most new development in Greater London that was granted planning permission on or after that date. The Mayor’s CIL will contribute towards the funding of Crossrail.

59 The Mayor has arranged boroughs into three charging bands. The rate for Southwark is £35/sq.m. The required CIL should be confirmed by the applicant and council once the components of the development or phase thereof have themselves been finalised. See the 2010 regulations: http://www.legislation.gov.uk/ukdsi/2010/9780111492390/contents as amended by the 2011 regulations: http://www.legislation.gov.uk/uksi/2011/987/made

60 London borough councils are also able to introduce CIL charges which are payable in addition to the Mayor’s CIL. Southwark is in the process of adopting its own charging schedule. See the council’s website for more details.

Local planning authority’s position

61 The local planning authority’s position is not yet known.
Legal considerations

62 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor’s statement and comments.

Financial considerations

63 There are no financial considerations at this stage.

Conclusion

64 London Plan policies on land use principles, housing and affordable housing, strategic views, World Heritage Sites and heritage, urban design and tall buildings, housing quality, inclusive access, climate change and transport are relevant to this application. In general, the application is acceptable in strategic terms, but fails to comply with all London Plan Policy. Further discussion is needed on the following points prior to referring the application back to the Mayor:

- **Housing:** Further information is required pending the outcome of the independent assessment of the applicant’s viability appraisal regarding the maximum reasonable amount of affordable housing and the identification of an off-site affordable housing provision in line with London Plan Policy 3.12. Further information is also required of the tenure mix proposed, density and the details of identified children’s play space.

- **Urban design:** The applicant should provide confirmation of the finished floor to ceiling height that is able to be achieved in the tower.

- **World Heritage Site:** The effect of the proposal on the setting of the Tower of London World Heritage site should be updated to take account of the Mayor’s ‘London’s World Heritage Sites – Guidance on Setting’ SPG.

- **Inclusive access:** The applicant should confirm the details of the public realm in relation to accessibility, particularly in relation to the provision of level access across the site and confirm that all units would meet Lifetime Homes criteria. Indicative layouts of accessible units and how units would meet Lifetime Homes targets should be provided in the design and access statement.

- **Climate change:** The energy savings achieved should be reported against Part L 2013 to confirm savings in line with Policy 5.2. Dynamic thermal modelling demonstrating risk of overheating should be provided as well as details of how Part L will be met through energy efficiency alone. Details of management of the CHP should also be provided to officers.
Transportation: A S278 agreement and a contribution of £50,000 towards enhancement of the St Thomas Street footway, Network Rail and Southwark. Details of drop offs need to be considered and included in the scheme. A cycle hire docking station should be provided on the site and alongside a S106 contribution of £100,000 to secure its delivery (£200,000 if this is off site). The submission and monitoring of an updated Travel Plan should be secured in the S106 and a delivery and servicing plan, construction management plan and construction logistics plan should be secured through condition.