Strategic planning application stage 1 referral (new powers)

The proposal
Demolition of existing train shed, train shed wall and 64-84 Tooley Street for the redevelopment of London Bridge station to provide a new street level concourse, realignment of the tracks, new retail and leisure space, vehicle and cycle parking space and new public realm with associated highway works.

The applicant
The applicant is Network Rail and the architect is Grimshaws.

Strategic issues
The application raises a number of strategic issues including the loss of heritage assets, reduction in leisure, cultural and office floor space, urban design and access, climate change and transport.

Recommendation
That Southwark Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 122 of this report; but that the possible remedies set out in paragraph 124 of this report could address these deficiencies.

Context
1 On 14 July 2011, 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 & Country Planning (Mayor of London) Order 2008 the Mayor has until 24 August 2011 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.

2 The application is referable under Category 1B.1b), 2C.1d) and 3E1.a) b) i) of the Schedule to the Order 2008:
Category 1B

1. Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings—

(b) in Central London (other than the City of London) and with a total floorspace of more than 20,000 square metres.

Category 2C

1. Development to provide— (d) a railway station or a tram station.

Category 3E

1. Development —
   (a) which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated; and

   (b) comprises or includes the provision of more than 2,500 square metres of floorspace for a use falling within any of the following classes in the Use Classes Order—

      (i) class A1 (retail),

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 environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 has been taken into account in the consideration of this case.

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

Site description

6 The application site comprises the existing London Bridge station and railway arches which face onto Tooley Street (north), and St Thomas’ Street (south). A range of land uses occupy the existing arches within the red line boundary (see figure 5) including the London Dungeons, Southwark Playhouse, Britain at War Museum, retail, restaurant, leisure and sports facilities and fast food outlets. Hence its falls within a Strategic Cultural Area as defined in the London Plan. It also falls within the London Bridge Opportunity Area and within the Central Activities Zone. The station tracks are elevated above the arches, which comprise the viaduct that separates St Thomas’s Street from Tooley Street. These two roads are linked by three key routes, these being, Joiner Street (part pedestrian route only with limited vehicle access) which provides the link and entrance to London Underground services (London Bridge Underground station with access to Jubilee and Northern Line services) and London Bridge bus station (at upper level). The other two routes are Western Street and Stainer Street, both one-way vehicular routes.

7 Fourteen bus services and six night bus services either terminate at the adjoining London Bridge bus station or pass the site heading to onward destinations. London Bridge Bus Station is currently being redeveloped as part of the 25 London Bridge Place office scheme. The new bus station is due be completed in spring 2012, prior to the Olympics, and will provide an enhanced
facility with a greater bus and taxi capacity which will also serve the station as part of an enhanced interchange at London Bridge.

8 The site falls partly within the Tooley Street South Conservation Area and includes the grade II listed train shed and grade II listed Shipwright Arms pub and other important buildings, including the former South Eastern Railway Offices, which is identified in the Tooley Street Conservation Area Character Appraisal, and forms part of a wider group of buildings that are noted within the sub area. The railway arches along St Thomas’ Street and Crucifix Lane have recently been awarded listed building status (grade II). A recent application to list the South Eastern Railway Offices building (64-84 Tooley Street) has been unsuccessful.

9 Beyond the red line site area is a mix of land uses including offices and Guy’s Hospital to the southeast, retail and restaurant uses towards Borough High Street and office and retail as part of the More London Estate which fronts the River Thames to the north. The scale of development is mixed with significant structures, such as the Shard and Guy’s Hospital tower immediately adjacent to the site.

10 St Thomas Street, Tooley Street and Bermondsey Street all form part of the A200 Transport for London Road Network. Weston Street and Stainer Street are also part of the Transport for London Road Network. Joiner Street, running north from St Thomas Street is partly pedestrianised and forms part of the station complex. The A3 Borough High Street, also part of the Transport for London Road Network is located to the west of the site.

11 Given the site’s proximity to London Bridge Bus, National Rail and Underground Stations, the site has the highest degree of public transport accessibility and scores 6(b) on a scale of 1-6 (where 6 is the most accessible location).

**Details of the proposal**

12 The application proposes the demolition of the existing listed train shed, listed train shed wall and 64-84 Tooley Street for the redevelopment of London Bridge station.

13 In summary the application will provide:

- A new concourse at street level.
- Reconfiguration of the track layout to provide nine through-platforms and six terminating platforms (see figure 1 and 2)
- Western Arcade (route that links the current London Underground Station to over ground terminating platforms) will be extended in length and width to link into the new street level concourse providing new retail space.
- The new Shard concourse will be retained, but reduced in size due to the viaduct realignment to accommodate the new through tracks.
- The bus station will be maintained as per the recently approved scheme and access to both will be via escalators directly from the new concourse.
- Western Street and Stainer Street will be closed, however there will be controlled pedestrian routes through the new concourse (similar to the current arrangements at Joiner Street).
- There will be a new station entrance on Tooley Street opposite More London.
- There will be a new station entrance on St Thomas’ Street opposite Capital House and Guy’s Hospital buildings.
- The existing grade II listed train shed and its two side walls will be demolished.
- 64-84 Tooley Street will be demolished.
A new public realm scheme will be provided for Tooley Street and Bermondsey Street which will provide a new setting for the Shipwright Arms (grade II listed pub).

New pedestrian crossings on Tooley Street and St Thomas’ Street.

A key factor in the composition of the planning application is the emerging construction works approved as part of the Network Rail (Thameslink 2000) Order 2006 (Statutory Instrument 2006 No. 3117) which was made on 22 November 2006 and came into force on 13 December 2006.

It provides for the construction of railway and other works for the purposes of increasing the operating capacity of Network Rail's railways serving St. Pancras, Farringdon, Blackfriars and London Bridge Station and improving facilities. The Order also provides for the lengthening of platforms and related works at other stations to enable the existing Thameslink network to be upgraded and extended.

To realise the some of the potential benefits of the Thameslink programme in terms of platform capacity and increasing the number of train paths in the peak hours, the realignment of tracks at London Bridge Station is proposed which will provide a reduction in terminating platforms and an increase in through platforms as described below:

Figure 1 existing track arrangement
The existing station concourse and layout cannot operate with the track alterations and therefore a new concourse arrangement is required as described in figures 3-7. The intention is for the new station concourse and structure to provide a substantially bigger and more comprehensive street level concourse with station ancillary space, retail and leisure uses which seek to integrate into the existing transport interchange comprising the bus station, London Underground Station and the new Shard concourse. The existing and proposed land uses are set out below and in figure 5:

<table>
<thead>
<tr>
<th>Table 1 land uses</th>
<th>Existing (sq.m.)</th>
<th>Proposed (sq.m.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Station concourse</td>
<td>2,288</td>
<td>17,511</td>
</tr>
<tr>
<td>Station ancillary</td>
<td>4,004</td>
<td>12,583</td>
</tr>
<tr>
<td>Station operational car park</td>
<td>2,280</td>
<td>2,100</td>
</tr>
<tr>
<td>Station loading bay</td>
<td>1,600</td>
<td>1,556</td>
</tr>
<tr>
<td>‘A’ use classes</td>
<td>6,666</td>
<td>7,389</td>
</tr>
<tr>
<td>Office B1</td>
<td>1,860</td>
<td>-</td>
</tr>
<tr>
<td>Private and public car parks</td>
<td>3,573</td>
<td>-</td>
</tr>
<tr>
<td>Leisure D1, D2 and sui generis</td>
<td>14,441</td>
<td>1,907</td>
</tr>
<tr>
<td>Total</td>
<td>36,712</td>
<td>43,046</td>
</tr>
</tbody>
</table>
Figure 3 existing ground floor level (street level) arrangement showing network of arches (source: Design and Access Statement Grimshaws)
Figure 4 existing platforms levels with linked walkway (source: drawing N4200-WSP-DRG-AR-500004 Rev P01)
Figure 5 existing land uses at ground floor level within the application boundary (source drawing N231-NRT-DRG-CN-000001 Rev PO1)
Figure 6 proposed new street level concourse (source: Design and Access Statement Grimshaws)
Figure 7 proposed platform arrangement and terminating concourse with link to new Shard concourse (source: drawing N420-WSP-DRG-AR-500203 Rev P01)
Case history

18 A planning application was submitted in 2000 for the 'Alteration and partial redevelopment of railway station including new public concourse linking Tooley Street and St. Thomas Street. Alterations to bus station & stops, additional retail units and new office building' (local authority reference 00/AP/0333). Southwark Planning Committee resolved to approve this application on 13 December 2000. The section 106 agreement was not signed until 30 September 2003, at which point the decision was issued. This application was submitted prior to the commencement of the Mayor's planning powers.

19 Applications for listed building consent (demolition of the grade II listed terminus train shed to accommodate the revised operational requirements of Thameslink) and conservation area consent (demolition of viaduct wall between Weston St and Stainer St, 64-84 Tooley St and footbridge) were considered, and approved, at the same time.

20 In April 2008 an application (reference 08/AP/0832) was made under section 73 of the Planning Act 1990, to vary the conditions of the previous permission granted in 2003. The aim of the section 73 application was to extend the life of the masterplan permission and to allow its implementation in phases. This involved minor changes to the wording of 8 of the 18 conditions. The changed wording enables a phased approach to the discharge of these conditions.

21 Permission was granted on the 5 September 2008 and the time limit for implementation of the existing masterplan permission was extended to the 30 September 2008. The application was not referable to the Mayor.

22 The masterplan permission, as varied by the section 73 permission has since been implemented and is therefore still extant. Since there is no equivalent power to section 73 for listed building and conservation area consent, these were submitted as separate new planning applications. An application for listed building consent, which proposed the 'Demolition of the train-shed above platforms 9-16 and the wall between platforms 8 and 9.' (reference 08/AP/0846) was submitted in April 2008. It was granted under delegated powers on 26 November 2008. This permission will expire on 26 November 2011.

23 An application for Conservation Area Consent for the 'Demolition of railway viaduct wall between Weston Street and Stainer Street, partial demolition of 64-84 Tooley Street and demolition of footbridge over Tooley Street.' (reference: 08/AP/0848) was submitted to Southwark Council in April 2008. It was granted under delegated powers on 11 July 2008. This consent expired on 11 July 2011.

24 Pre-application advice was issued by the GLA on 3 May 2011, which related to design and energy matters. The strategic issues raised included the principle of development, in particular the loss of heritage assets, layout and access. Separate discussion has been held directly with Transport for London on transport matters. Other matters regarding quantum and mix of land uses were not discussed.

Strategic planning issues and relevant policies and guidance

25 The relevant issues and corresponding policies are as follows:

- Economic development  London Plan; the Mayor’s Economic Development Strategy
- World city role  London Plan
- Urban design  London Plan; PPS1
- Mix of uses  London Plan
Regeneration  London Plan; the Mayor’s Economic Development Strategy
Transport  London Plan; the Mayor’s Transport Strategy; PPG13
Crossrail  London Plan Alteration; Crossrail SPG
Parking  London Plan; the Mayor’s Transport Strategy; PPG13
Retail/town centre uses  London Plan; PPG13, PPS4
Access  London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)
Equal opportunities  London Plan; Planning for Equality and Diversity in Meeting the spatial needs of London’s diverse communities SPG; Diversity and Equality in Planning: A good practice guide (ODPM)
Culture  London Plan; the Mayor’s Culture Strategy
Education  London Plan; Ministerial statement July 2010
Sustainable development  London Plan; PPS1, PPS1 supplement; PPS3; PPG13; PPS22; draft PPS Planning for a Low Carbon Future in a Changing Climate; the Mayor’s Energy Strategy; Mayor’s draft Climate Change Mitigation and Adaptation Strategies; Mayor’s draft Water Strategy; Sustainable Design and Construction SPG
Tourism/leisure  London Plan; Good Practice Guide on Planning for Tourism (DCLG)
Historic Environment  London Plan; PPS5

26 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 2007 Southwark Plan (as saved), Southwark Core Strategy (2011) and the London Plan (2011). The draft Bankside, Borough and London Bridge SPD is also a material consideration.

Principle of development

27 The application site falls within the Central Activities Zone (CAZ) and within the London Bridge, Borough and Bankside Opportunity Area as identified in the London Plan (Map 2.3, Map 2.4 and Annex one, Table A1.1 ref 18). It is also identified in Map 4.2 as a Strategic Cultural Area and in Table A2.1 as CAZ Frontage with medium growth potential where there are moderate levels of demand for retail, leisure and office and with physical and public transport capacity to accommodate it (paragraph A2.6 b).

28 Annex one of the London Plan sets out the strategic policy direction for the opportunity area. Here it provides an indicative employment capacity of 25,000 jobs and a minimum target of 1,900 homes. The Plan specifically states that “This Area has considerable potential for intensification, particularly at London Bridge station and its environs, complemented by improvements to public transport and interchange facilities, better pedestrian integration with the surrounding area and greater use of river passenger transport. There is scope to develop the strengths of the Area for strategic office provision as well as housing, especially in the hinterland between Blackfriars and London bridges. Mixed leisure and culture related development should enhance its distinct offer as part of the South Bank Strategic Cultural Area, and partners should work to develop and accommodate synergies with the existing centre of medical excellence. Account should be taken of the Tower of London World Heritage site and proposals for open space networks and transport and community infrastructure should be co-ordinated with those in the Waterloo and Elephant and Castle Opportunity Area and across borough boundaries.”

29 Southwark Council’s Core Strategy 2011 sets the vision for London Bridge at paragraph 4.20-4.25 with a focus on significant improvements to public transport with the redevelopment of
the station. The Council also consulted on the draft Bankside, Borough and London Bridge SPD in February 2010, and again in December 2010 on the same document. It is, however, the Council’s intention to revisit the SPD in collaboration with various stakeholders, including the GLA, TfL and local residents. Therefore, the planning policy framework for this area and its form (SPD/OAPF/other policy document) may change. Currently the document makes numerous references to London Bridge Station. The emerging local site specific policy within the SPD is set out in section 5.1 and identifies the primary objective to achieve a well functioning station and transport interchange. Other land uses that fit include provision of retail and retention of ‘D’ class uses and office space. The document recognises that there may be some loss of historic fabric, but that the built form must be of ‘exceptional architectural quality’ (paragraph 5.1 – Built Form).

Thameslink

30 The policy framework recognises the regeneration potential of the London Bridge area given it will form part of a major catalyst of regeneration and improvement that is already underway being led by the construction of the Shard. The other major construction work that is directly linked to the proposals is the Thameslink Programme. Table 6.1 of the London Plan identifies an indicative list of transport schemes, which includes the Thameslink Programme. Regeneration of the station will help to facilitate the overall objectives of the Thameslink Programme which is consistent with London Plan Policy 6.1 Strategic Approach, 6.2 Providing Transport Capacity and Safeguarding Land for Transport and 6.4 Enhancing London’s Transport Connectivity. The principle of track alignment (see figure 1 and 2) to accommodate the Thameslink is therefore supported. The associated impacts do, however, need to be taken into the balance of considerations, in particular regarding the loss of heritage and cultural assets. These matters are considered below and in further detail in the design and heritage section of this report.

Cultural and leisure uses

31 As set out above the site is identified as a Strategic Cultural Area in Map 4.2 of the London Plan. London Plan policy 4.5Af ‘London’s Visitor Infrastructure’, sets out that “the Mayor will, and boroughs and stakeholders should: promote, enhance and protect the special characteristics of major clusters of visitor attractions including those identified in Strategic Cultural Areas in Map 4.2.” London Plan policy 4.6A ‘Support for and enhancement of arts, culture, sport and entertainment provision’, sets out that “the Mayor will, and boroughs and other stakeholders should, support the continued success of London’s diverse range of arts, cultural, professional sporting and entertainment enterprises and the cultural, social and economic benefits that they offer to its residents, workers and visitors”. Paragraph 4.33 of the Plan also sets out that “London’s internationally renowned historic environment, natural landscape and cultural institutions, including museums, galleries and theatres, are a defining part of the capital’s heritage as well as major visitor attractions. Strategic cultural areas (Map 4.2 and Policy 4.5Af) identify, protect and seek to enhance significant clusters of these institutions and their settings including ..., the South Bank/ Bankside/ London Bridge, ...”.

32 Figure 5, above, sets out a diverse mix of cultural and leisure uses within the existing application boundary including the London Dungeons, Southwark Playhouse, Britain at War Museum, retail, restaurant, leisure and sports facilities (in particular the existing five-a-side football pitches). The unique environment of the railway arches has been adapted to fit a range of uses which contribute significantly to the Strategic Cultural Area. The planning statement submitted as part of the planning application sets out very limited information regarding the strategy for relocation or re-provision of these uses and suggests that re-provision should be considered against the wider policy benefits. The applicant states that “It is appreciated that there is a loss of leisure floorspace however there is a very large new station concourse, an increase from 2,288 sqm to 17,511 sqm and this will deliver very considerable policy benefits. As stated at the
beginning of section 4, applications have to be determined in accordance with the Development Plan as a whole and not with each relevant policy. This requires a judgement to be made as to which are the dominant policies in the plan. In this instance it is considered that the dominant policies are those which identify the need for a new station and its regeneration benefits.”

33 Whilst it is accepted that the new station will provide significant benefits and facilitate the delivery of the Thameslink Programme objectives, this should not negate the need to fully consider other policy requirements. It is recognised that there is a substantially larger new concourse and therefore the net space remaining for other uses will be reduced, however, the strategy to protect and increase ‘A’ class uses whereas significantly decrease ‘D’ class uses suggests a disproportionate approach has been adopted in this instance and without sufficient justification or consideration as presented in the planning submission at present.

34 It is understood that there are ongoing discussions with tenants, and therefore the applicant should set out clearly a strategy for the promotion, enhancement and protection of these existing ‘D’ class uses. In particular the applicant should clearly define the requirements of the “station ancillary space” (see figure 6) and set out how local organisations have been engaged as part of a comprehensive relocation strategy either within the new site layout or the extent to which other opportunities have been considered for relocation outside the application boundary but within the catchment of the Strategic Cultural Area. At present the significant reduction in the diverse range of uses has not been justified and is inconsistent with London Plan policy 4.5Af.

Office provision in the CAZ

35 Policy 2.10 Central Activities Zone – strategic priorities seeks “in appropriate parts of the CAZ... ensure that development of office provision is not strategically constrained and that provision is made for a range of occupiers especially the strategically important financial and business services”. Policy 2.11 Strategic functions also seeks to ensure that development complements and supports the cluster of other strategically important specialised CAZ uses.

36 The proposals result in the loss of 1,860 sq.m. office space. As set out above, CAZ is prioritised for this type of land use and the London Plan promotes the area for strategic office supply. Whilst the London Plan does not directly protect existing office uses nonetheless transfer or loss to other land uses must be carefully considered. The policy consideration in this instance is the extent to which the loss of office undermines the strategic office function of the CAZ both locally and in terms of the implications to wider CAZ functions through the defined clusters as set out in the London Plan, in particular the London Bridge, Borough and Bankside Opportunity Area, and the extent to which an increase on this site in this location is viable.

37 The More London Estate, the Shard and 25 London Bridge Place have and will provide a significant increase in high quality office provision. The loss in this context is unlikely to be detrimental to the CAZ functions given the scale of loss is not strategically significant and where the loss is on a site which is already constrained for space and would facilitate the wider Thameslink Programme objectives described above.

Urban design and access

38 Good design is central to the objectives of the London Plan and is specifically promoted by the policies contained within Chapter 7, which encompass both general design principles and specific design issues.
London Plan policies 7.8 and 7.9 set out the strategic approach to the protection and enhancement of London’s rich built heritage. Policy 7.8C specifically states that “Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate”. In this particular case, one of the principal consideration in determining the acceptability of the proposal in design terms is its bearing on the historic assets in the vicinity and specifically whether or not it would preserve or enhance the character and appearance of the conservation area, preserve the setting of listed buildings and protect the ability to appreciate the outstanding universal values of the Tower of London World Heritage Site.

**Loss of heritage**

The station is the oldest permanent terminus in London, opened in 1836 and extended significantly over time. The train shed is a later addition (1864-7) and is a grade II listed building. The key features of the existing train shed are described in the listing and include “the 12-bay roof with wrought-iron trusses central semicircular roof of crescent-truss design with vertical struts, flanked by 2 side roofs of triangular trusses... The exterior 2-storey wall to south (facing St Thomas's Street) includes bays framed by Tuscan pilasters rising to modillioned classical cornice. Ground floor has semicircular arches, mostly blind and in triplets; a skewed entrance arch with polychromatic brick voussoirs. First floor has triplets of graduated semicircular blind arches with polychromatic brick voussoirs.” These features, particularly the grand nature of the roof and the scale of the shed and shed wall in its entirety and its setting within the townscape, are fundamental elements of the building that justify its listing.

The loss of the train shed was previously considered as part of the original planning permission for a new station concourse with office space above. The masterplan permission has been implemented, however the conservation area consent for demolition of the shed expires on 26 November 2011 and the consent for demolition of 64-84 Tooley Street expired on 11 July 2011.

As set out above, 64-84 Tooley Street was recently the subject of a listing application. The application was unsuccessful. As part of the consideration of the case, English Heritage concluded that whilst the building would not be recommended for listing status “64-84 Tooley Street is a handsome local building which enhances the character of the street and the setting of the listed Shipwright’s Arms and Hay’s Wharf buildings. It has some historic significance as a surviving element of London Bridge Station, which was extensively rebuilt after the Second World War. Notwithstanding our recommendation not to list, our National Planning colleagues are separately endorsing Southwark Council’s identification of this building as one that makes a positive contribution to the character and appearance of the Tooley Street Conservation Area”.

Other historic buildings in the application boundary include the railway arches along St Thomas Street/ Crucifix Lane, which will be subject alterations as part of this application and which have recently been listed grade II. The Shipwright Arms on Tooley Street (grade II) will not be altered, however, the setting of the building will change as part of the alterations to the viaduct wall, the public realm facing Bermondsey Street and by the proposed removal of 64-84 Tooley Street.

Notwithstanding the existing planning permission and conservation area consent for the train shed, the policy test to justify the loss of the heritage assets is still required in terms of the new planning application. In such circumstances the policy objective is clearly articulated in PPS5.

(PPS5: HE9.1) “There should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be. Once lost, heritage assets cannot be replaced and their
loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional.

45 In terms of the application of the guidance, HE9.2 also provides the following:

“Where the application will lead to substantial harm to or total loss of significance local planning authorities should refuse consent unless it can be demonstrated that:

(i) the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that harm or loss; or

(ii) (a) the nature of the heritage asset prevents all reasonable uses of the site; and

(b) no viable use of the heritage asset itself can be found in the medium term that will enable its conservation; and

(c) conservation through grant-funding or some form of charitable or public ownership is not possible; and

(d) the harm to or loss of the heritage asset is outweighed by the benefits of bringing the site back into use”.

46 In terms of HE9.2, the significant public benefit from the proposed application is a key factor in the consideration of the case for the loss of the heritage assets identified. Officers have been briefed on site regarding the technical constraints in terms of retention of the existing shed and the implications to delivery of the Thameslink programme. This is also set out in the Heritage Statement (Section 7) where options are considered for retention of the train shed. The evidence suggests that retention in its current location or relocation to the through platform side of the station would not be feasible. Whilst it is recognised that there is limited opportunity to retain much of the train shed as part of a comprehensive scheme, retention of part of the train shed wall along St Thomas’s Street requires further analysis as set out later in this report (see St Thomas’s Street section below).

47 In terms of the requirements of HE9.1 and HE9.2, part of the clear and convincing justification is the quality of the design of the replacement proposal and the public benefits this would deliver. The significance in terms of public transport benefits and the technical constraints regarding retention of the shed do not justify the loss of the asset on their own. Architectural quality is also a key consideration and is a strong theme throughout the London Plan, in particular London Plan policy 7.6 ‘Architecture’.

48 It is recognised that creating a replacement structure to meet the qualities of the existing building is a significant challenge for the design team and whilst the new comprehensive approach to the concourse and station layout represents a significant improvement, the current approach to architectural form and expression still lacks in its ambition and in particular the contribution to the design emerging from the roof covering as considered further below (see roof section below).

49 In terms of the other heritage assets, the same policy assessment is also required through the loss of 64-84 Tooley Street. As identified in the Council Conservation Area Character Appraisal and through the listing application conclusions from English Heritage, whilst not a listed building, it is within the Conservation Area and is recognised as a heritage asset by the Council as forming an important group of buildings. At present the retention of this building would appear to constrain the overall masterplan ambitions to create large, uninterrupted station frontage with direct access onto Tooley Street. Whilst the design ambition to create landmark frontage along
Tooley Street is supported, the approach is not yet fully tested as part of a clear and convincing justification. Some of the arguments in the Heritage Statement (section 7) are valid in terms of the benefits removal of the building would create in terms of public realm for break out space and orientation purposes, however the case of integrating existing constraining buildings on public transport schemes has been successfully achieved for example at Kings Cross Station. Whilst London Bridge Station is significantly more constrained the options for retention of 64-84 Tooley Street as part of alternative design solutions should be provided. In this respect the onus remains on the design team to justify the loss as required by PPS5 and London Plan policy 7.8.

**Roof**

50 London Plan policy 7.6Ba) ‘Architecture’ sets out that “Buildings and structures should: a) be of the highest architectural quality”. The lifting of the canopy to reflect and signal the concourse area is a positive approach, however, it is understated and does not reflect the opportunity or the scale and grandeur of the existing shed or the take advantage of this rare opportunity to create world class design in a major rail station.

51 The roof needs to perform a number of functions. First, it should provide the practical solutions and benefits typical of terminating, and in many cases, through station platforms, in that it should fully protect the passengers from adverse weather conditions. Second, it should clearly signal the arrival point or destination of a major station. Third, it is a meeting point for many and therefore needs to be of landmark significance particularly in terms of its interaction with street level and its legibility. Fourth, it needs to provide the quality of delight to those who use and pass through the station.

52 The design philosophy which seeks to harmonise the station as a terminating and through station is supported. In terms of addressing these matters above however, fundamentally, the roof should be extended to create full roof coverage, rather than individual canopy coverings for the relevant platforms. Although the number of platforms for the terminating versus through station platform capacity are being ‘handed’ (i.e. the existing 9 terminating and 6 ‘through’ platforms become 6 terminating and 9 ‘through’), the design rationale to drop the functions of the shed (its practical function and its scale and grandeur) in favour of what is being described as a typical through station treatment (canopy coverage) is not justified and represents a basic engineering solution.

53 Whilst there are very different functions of London Bridge station, with a more intensive through station than the terminating area, this can be signalled as part of the design of a flowing roof form, such as full coverage across the concourse area, with canopy coverage extending to the east and west. There are numerous design examples where this is achieved, for example Liege Guillemins TGV railway station in Belgium.

54 The current canopy approach to the roof does not yet have a strong design rationale. The design team has explored some of the options to create the feeling of full coverage through the linking fins above the tracks and by extending the canopy to cantilever further out beyond the platform edge. These ideas do not fully embrace the potential for a striking and exciting roof form that would help to justify the significant loss of heritage assets.

55 The design team should continue to explore the linking of the current canopy above the concourse area to create a fully covered roof above this part of the platform area. This should articulate and express the direct relationship between the street level concourse area and the viaduct level platforms, one which provides shelter and light to both the viaduct level and concourse level and creates an interesting form that can deliver design quality to provide the clear and convincing justification for the loss of heritage assets.
Views

56 London Plan policies 7.11 and 7.12 and Draft London View Management Framework (July 2011) describes the approach to the management of strategically important views. The Environmental Statement considers the heritage and views impacts at a local level. Whilst the proposals are unlikely to significantly impact on River Thames prospect views or other strategic views the design team should provide views as part of the heritage and townscape analysis including any analysis on the impact on the outstanding universal value of the Tower of London, and its setting in views from the north and from the inner court yard.

Tooley Street

57 As set out above, the loss of 64-84 Tooley Street needs to be part of the clear and convincing justification for the loss of heritage assets. This building is a handsome piece of railway architecture and makes a positive contribution to the Tooley Street Conservation Area. It is an attractive part of the street scene and has a direct relationship to the history of the area. The design rational for a colonnade approach is understood, but the proportions of the openings are not. Given the facade is significant in scale and will create a draw it is very disappointing that there is no direct access into the centre of the concourse from Tooley street. Such an option would seem essential given the need to utilise public realm as breakout space for pedestrians and to animate the space by creating a meeting point for users and visitors of the station and the wider area.

58 The current entrance and exit points are set at the east and west ends of this space, which in the case of the western entrance/exit, will be particularly congested when turning the corner onto Tooley Street. This matter is directly linked to the location of the ticket barriers. A solution needs to be considered to maximise the use of the available space to accommodate the flow of pedestrians in the areas where there is greatest capacity. This relationship with the street will ultimately impact on the appearance of the elevation. Whilst this needs to be more fully explored, the modern approach to the Tooley Street elevation is broadly acceptable. The relationship of the elevation to the roof remains unresolved as set out in the comments regarding the roof form.

St Thomas’s Street

59 As set out above, the testing work undertaken by the design team considers the complete demolition of the listed train shed and train shed wall. The technical constraints to ‘punch’ through the train shed wall have been explained to officers on site and are set out in section 7 of the Heritage Statement. The design team has dismissed retention of the wall in isolation on the basis that it would need almost complete removal and rebuild and that the structure it was intended to support (train shed roof) is no longer present and therefore the heritage value is mostly lost. Initially, at pre-application stage, the same treatment as the current design for the Tooley Street elevation was reflected on the St Thomas’s Street elevation. It was quickly apparent that the same modern architectural approach to St Thomas’s Street is inappropriate given the views of the arches are far more prominent in the wider context and the contrast does not fit in the prevailing and dominating townscape of the arches. This is particularly important given the recent listing of the arches further along the road.

60 A reconstruction approach using new materials rather than the original form is therefore currently being proposed. The location of the wall is altered from its existing position which creates more generous pedestrian walkway along St Thomas’s Street. Whilst this could be a successful solution in townscape terms, particularly with the current modern, honest approach to the materials, the retention options of the wall in isolation are not set out in the Heritage Statement. As set out in HE9.1 of PPS5, there should be a presumption in favour of the
conservation of designated heritage assets. Figure 7.8 and 7.10 of the Heritage Statement suggests that part of the wall needs to be removed; however it is not clear why. The configuration of the new concourse should therefore be shown testing retention of the train shed wall as part of the clear and convincing justification for the loss of heritage assets.

**Access and inclusive design**

61 The aim of Policy 7.2 is that proposals aim for the highest standards of accessibility and inclusion (not just the minimum) and that the design process has from the outset considered how everyone, including disabled and Deaf people, older people, children and young people, will be able to use the places and spaces that are proposed safely, easily and with dignity.

62 The design and layout of all spaces including the landscaping and the public realm is crucial to how inclusive the development is to many people. There are a number of areas which are unclear and where there is need for improvements and alterations. The headline issues are considered below. The design team should, if not already undertaken, commission an access consultant to audit the current application. In addition the design team should identify which disabled groups have been involved in the emerging masterplan. There may be scope for the design team to present to the London Access Forum as part of the ongoing consideration of the planning application.

**Lifts**

63 The lift strategy needs to be significantly expanded. The location of the lift access up to the bus station and terminating platform concourse from street level concourse level should be centrally located. It appears that there are no passenger lifts directly from the terminating platforms to the street concourse. This appears to be located some distance from the platform level and there appears to be only a single lift which serves as the only lift for passengers between bus station/ shard concourse and street concourse. The lifts on the terminating platforms as shown on page 127 of the design and access statement are marked for staff use only. This needs to be reconsidered. In addition, given the expected pedestrian flows, the number of lifts on each ‘through’ platform should be increased to two per pair of platforms. This is essential in the event of lift breakdown and repair/maintenance. It is unclear how the new layout will affect the area at street and first floor opposite London Underground entrance on Tooley Street (i.e. the existing ticket barrier that allows passengers up to the ‘through station’ platforms). It may be suitable to provide lift access as it suggests access will be maintained through to the bus station and the pedestrian walkway.

**Escalators**

64 The escalators that serve the link between street concourse level and the terminating platforms should be increased. Currently there is an up and down staircase and only a single escalator. It is likely that most people will use the escalators rather than the stair case and these provide a much more efficient way of moving people through the station and which can still be used if they are stationary. The approach should be amended to include and up and down escalator and a single stair route.

**WC facilities**

65 The introduction of toilet facilities at street concourse level is supported, however there should be provision of WC facilities at the terminating platform level. The applicant should also
consider the provision of a changing places WC and separate unisex disabled WC. It is also important that there is provision of baby changing facilities.

Security

66 It is understood that security bollards will be required as part of the public realm. It is important that the design team consider a common language to assist pedestrians, particularly visually impaired users, when navigating around the site. Silver bollards are difficult to read. The applicant should consult with relevant disability groups regarding appropriate visual language to street furniture and signage, which should include consistent themes. This approach should be implemented across all areas including planters, landscaping, seating, key routes which should be distinguished in a consistent manner.

Platform height

67 The applicant should ensure that the platform height is level with the existing or planned rolling stock design to allow level access onto the train carriages from platform level.

Seating

68 There should be significantly more opportunities for seating, particularly within the station plan and outside in the public realm areas.

Parking

69 The blue badge parking bays in the staff car park need to have transfer space both sides of each bay and at the rear of the bay (see BS 8300 for guidance on design of blue badge bays). The parking management plan should include a mechanism to ensure that the supply and demand of the blue badge bays are regularly monitored and provision reviewed to take into account changes in future demand and ensure that future disabled staff are able to occupy a blue badge bay, and that the bays are effectively enforced.

Surrounding streets

70 Connectivity to the surrounding streets and public transport network is also a key issue. An access audit of the surrounding streets showing existing and proposed pedestrian links and step free routes would be a helpful way to demonstrate that any barriers to disabled people have been removed. This should be illustrated on a plan as part of the design and access statement and landscaping strategy.

Lighting

71 The lighting design is particularly important to create safe and well and evenly light routes through and into the station, particularly for people at night using the station and surrounding area.

Climate change mitigation

72 The London Plan climate change policies as set out in chapter 5 collectively require developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures, prioritising decentralised energy supply, and incorporating renewable energy technologies on-site. The policies set out ways in which developers must address mitigation of, and adaptation to, the effects of climate change.
The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole and the proposals are considered acceptable.

Energy efficiency standards

A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Measures include passive design features in order to reduce solar and heat gains, such as shading and high performance facades. Other measures include improvement of facade performance to reduce the need for space heating and energy efficient lighting and controls. The development is estimated to achieve a reduction of 6 tonnes per annum (8%) in regulated carbon dioxide emissions compared to a 2010 Building Regulations compliant scheme.

District heating

There are no district heating networks within the vicinity of the proposed development. Centralised plant installed in either one or two energy centres will be used to supply the heating requirements of the site. The use of centralised plant removes the need for installation of plant in retailer fit-out with consequent improvements in efficiency. The heating approach put forward by the applicant is compatible with future connection to an external heat network should one become available in the future.

Combined Heat and Power

Combined heat and power to supply this development has been initially rejected on sound technical grounds.

Cooling

As explained above, attention has been put in ensuring that the need for cooling is minimised through the use of passive design measures and the use of natural ventilation where possible. In order to provide the cooling requirements of the station redevelopment high efficient electrical chillers will be used.

Renewable energy technologies

A review of the potential for the use of renewable energy on-site has been undertaken. Of all the technologies explored, the use of photovoltaic mounted at the platform canopies could, initially, have had some applicability to the site. However, a detailed shading analysis indicates that the surrounding tall buildings would shade the photovoltaic panels significantly. The rationale put forward by the applicant for not committing to the use of renewable on-site is accepted.

Summary

The estimated regulated carbon emissions of the development are 600 tonnes of carbon dioxide per year after the effect of energy efficiency measures. This equates to a reduction of 6 tonnes per year in regulated emissions compared to a 2010 Building Regulations compliant development, equivalent to an overall saving of 8%.

Although the carbon savings achieved as a result of the proposals fall short of the 25% carbon reduction target stated in the London Plan, it is acknowledged that technical constraints exist that prevent the fulfilment of this target with the use of on-site technologies.

Climate change adaptation
The London Plan promotes key adaptation principles in Chapter 5 that promote and support the most effective adaptation to climate change. These are to minimise overheating and contribution to heat island effects; minimise solar gain in summer; contribute to flood risk reductions, including apply sustainable drainage principles; minimise water used; and protect and enhance green infrastructure and urban greening. Specific policies cover overheating, urban greening, living roofs and walls and water.

A sustainability statement supports the application and demonstrates general compliance with the relevant London Plan policies on climate change adaptation.

The proposals have been designed to reduce carbon dioxide emissions beyond building regulations through energy efficiency measures alone. This includes the use of natural ventilation and techniques to minimise the risks of overheating. The design of the roof is still in discussion; however it is unlikely that green or brown roofs would be suitable in this particular instance. As part of the urban greening, however, the landscaping strategy should include a range of planting. This can be conditioned by Southwark Council.

Regarding water, the Environment Agency’s flood zone map shows that the existing site is in flood zone 3. The Environment Agency has been consulted by Southwark Council, any significant comments will be reported at the final determination stage.

**Noise and vibration**

London Plan policy 7.15 Reducing noise and enhancing soundscapes states that the Mayor will, and boroughs should reduce noise by, among other things, “minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals” and that new noise sensitive development should be separated from major sources of noise wherever practicable. The advice contained in Planning Policy Guidance note 24 (PPG24): Planning and noise is also relevant.

The noise and vibration chapter of the Environment Statement considers the temporary and permanent noise and vibration impacts from the proposed development. It concludes that whilst construction activities have the potential to cause major/moderate impacts for some of the closest receptors at various stages of the construction programme, they are not permanent, and most are considered to have the potential to be mitigated such that internal noise levels are acceptable. It also concludes that the moderate road traffic noise change on Bermondsey Street is not judged to be a significant adverse effect for receptors in this area.

GLA officers will further scrutinise the methodology in the Environmental Statement and may provide further comment in due course. This matter may therefore require further discussion before the Mayor considers the case at the final determination stage.

**Air quality**

London Plan policy 7.14 ‘Improving air quality’ sets out five objectives, a) to minimise exposure to existing poor air quality, b) promote sustainable design and construction, c) be at least ‘air quality neutral’ and not lead to further deterioration of existing poor air quality, d) ensure that where provision needs to be made to reduce emissions from a development, this is usually made on-site and e) where the development requires a detailed air quality assessment and biomass boilers are included, the assessment should forecast pollutant concentrations.

The site is located within an Air Quality Management Area (AQMA). The Environment Statement considers potential emissions during station construction, but not impacts of the end
state (i.e completed development). The applicant states that the end state has not been considered as the impacts “would not be significant or they were assessed at the time the works were consented in the original Transport and Works Act Order”.

90 The assessment notes that all the impacts would be temporary, and in the case of the maximum impacts of particulate matter, are limited to individual phases of the construction. The assessment concludes that the demolition and construction works will have the potential to create dust and it will be necessary to apply a package of mitigation measures to minimise dust impacts. The impacts need to be discussed in further detail with Southwark Council and in line with discussion on construction, servicing and delivery. GLA officers will therefore further scrutinise the methodology in the Environmental Statement and may provide further comment in due course.

**Biodiversity**

91 London Plan policy 7.19 ‘Biodiversity and access to nature’ requires development proposals to a) make positive contribution to the protection, enhancement, creation and management of biodiversity, b) priorities assisting in achieving targets in biodiversity action plans, c) not adversely affect the integrity of European sites and be resisted where they have significant adverse impacts on European or nationally designated sites or on the population or conservation status of a protected species, or a priority species or habitat identified in a UK, London or appropriate regional biodiversity action plan or borough action plan.

92 Surveys undertaken reveal that no significant ecological resources have been identified at London Bridge Station. No evidence of black redstart or bats was found from the survey of the station, although there is historic evidence in the vicinity. GLA officers will therefore further scrutinise the methodology in the Environmental Statement in discussion with Southwark Council and may provide further comment in due course. There is likely to be limited opportunity to include rooftop biodiversity opportunities, however, the roof design remains an area still in discussion. Other landscaping opportunities do, however, exist to improve biodiversity and should be conditioned.

**Transport for London**

**Crossrail**

93 The site is within the Central London Contributions for the purposes of the Mayor’s supplementary planning guidance, use of planning obligations in the funding of Crossrail, June 2010 and London Plan Policy 6.5 Funding of Crossrail and other strategically important infrastructure. Whilst the station development proposes additional retail floorspace, this is however offset by the reduction in office floorspace resulting from the demolition of 64-84 Tooley Street. Contrary to pre-application advice, a Crossrail charge will therefore not apply to this development as currently proposed.

**Construction, phasing and implementation**

94 The station and surrounds will be redeveloped over a six year period between 2013 and 2018. The resulting temporary road closures and highway changes will have a significant effect on operation of, and access to, the strategic transport network.
The construction period will require temporary mitigation measures to be agreed with TfL, particularly for the management of construction traffic and junction alterations on the Transport for London Road Network. A communications strategy will also need to be developed between Southwark Council, Network Rail and TfL. This strategy will advise passengers on both the construction programme, how to access the station and onward travel to the bus station, London Underground and taxis, all of which will need to be managed. The proposed closure of St Thomas Street will restrict access to the bus station. Given that these diversions may give rise to additional running costs and driver duty, TfL will expect these costs to be covered by Network Rail and secured through the section 106 agreement.

It is essential that TfL is fully engaged in scoping and approving mitigation measures the applicant proposes, as these details are not currently contained within the transport assessment. The final phase will impact on the Transport for London Road Network in respect of junction redesign, pedestrian environment, cycle super highway and cycle parking all of which could have implications for the operation of the bus and Underground stations. It is therefore essential that TfL is engaged in the subsequent approval of these details through the section 106 process.

Car parking

TfL supports the reduction in operational car parking from 75 to 53 spaces for the station. Provision should however be made for electric vehicle charging (20% with a further 20% passive provision) to accord London Plan policy 6.13 Parking.

London Underground

London Bridge station provides access to Jubilee and Northern Line services. These can be accessed from Borough High Street, St Thomas Street/Joiner Street and Tooley Street. During construction, it is likely that these accesses will be affected and will need to be addressed through the construction management process. It is therefore essential that TfL agrees with the applicant any changes to passenger flows during the construction period in order to ensure the ongoing safe operation of the Underground station is maintained. Agreement on how this is addressed will need to be set out in section 106.

The transport assessment submitted with the application demonstrates that there will be congestion at Joiner Street and the area around the London Underground ticket hall. This is a significant concern to TfL. Options have been explored with Network Rail with regard to possible mitigation measures but it seems inevitable that this issue will have to be managed by staff, local station controls and wayfinding measure which will also need to be agreed with Network Rail. Further discussions are therefore required to ensure passenger numbers and passenger congestion is managed to within acceptable levels.

Highways and modelling

TfL is still in the process of reviewing the detailed highway and pedestrian modelling and will liaise separately with the applicant to ensure that all outstanding issues are satisfactorily addressed. A final design, however, and any subsequent proposed mitigation measures cannot be determined until the modelling assumptions and outputs for pedestrians and highway impact have been agreed with TfL and there is ongoing work with Network Rail to progress this. It is noted that the applicant has suggested a traffic liaison group. Ultimately it will be for the relevant highway authority (TfL or Southwark Council), to make the final decision on the acceptability of any proposal that affect the highway network that it has responsibility for.

A number of temporary changes to the highway network are proposed and many of the proposed works will be subject to section 278 agreements between the developer, Southwark
Council and TfL. In summary, eastbound traffic movement currently using St Thomas Street will be re-directed north along Bermondsey Street and then onto Tooley Street and Duke Street Hill. Westbound traffic movement is proposed to be redirected from Southwark Street, south along Southwark Bridge Road and Marshalsea Road, east along Great Dover Street and north along Tower Bridge Road.

102 Should this application be granted planning permission, the developer and their representatives are reminded that this does not discharge the requirements under the Traffic Management Act 2004. Formal notifications and approval may be needed for both the permanent highway scheme and any temporary highway works required during the construction phase of the development.

Taxi

103 TfL supports the re-provision of the taxi rank currently located in Tooley Street to Bermondsey Street. This will ensure that a facility is available for office uses in More London but also provides access to a rank if the bus station has to be closed for any reason. Recent observations have confirmed that taxis currently over-rank at this site with vehicles pulling over and waiting in Tooley Street. As part of the ongoing discussions with Network Rail it has therefore been agreed to extend the proposed rank and provide additional taxi provision at the proposed Bermondsey Street location, which is supported.

Buses

104 General access to London Bridge bus station and buses will be affected over a number of years as a result of the development. It will be necessary for Network Rail to implement temporary works along London Bridge Street as discussed in relation to the 25 London Bridge Place station development section 106 agreement.

105 Bus route 381 and N381 will be unable to access stops on St Thomas Street during temporary closure over a number of years. Westbound buses would instead use Tooley Street, which will affect passengers wanting to access Guy’s Hospital. The applicant suggests use of Druid Street and Crucifix Lane as a solution but this is yet to be agreed between TfL and Southwark Council.

106 The applicant proposes that bus route 381 will use Tooley Street during the end phase of development. This re-routing is supported in principle but will be subject to a formal approval process with TfL. Temporary routing arrangements will also need to be agreed with TfL and any additional mileage and driver duty, where significant, will need to be funded through the section 106 agreement. Where needed, temporary stops and layover space will also need to be secured through the section 106 agreement. Further details must be worked up in discussion with TfL.

107 Any works affecting the operation of the bus station, must be agreed with TfL and Southwark Council. Should Network Rail works require a full closure of the bus station, then costs associated with Traffic Orders, Publicity, Bus Operator disruption, taxi marshalling, increased bus operational staff/customer information assistants would need to be funded by the applicant and secured in the section 106 agreement.

108 TfL will require section 106 contributions toward bus re-routing and infrastructure, including stops and lay over arrangements. It is likely that there will be future bus station closures and how buses may operate in these circumstances should also be considered.

Pedestrian and Cyclists
109 London Plan Policy 6.10 Walking, requires development proposals to provide high quality pedestrian environments and emphasises the quality of the pedestrian and street space. As discussed above, TfL will need to review the pedestrian modelling which has been undertaken so as to consider the effects on the wider strategic transport networks and routings. The transport assessment is unclear on temporary footway closures and diversions and as a result further information is required. The proposed communications strategy will be crucial to easing pedestrian and cycle movements during the construction period, adequate way finding initiatives will also need to be agreed with TfL and Southwark Council funded by the application.

110 London Plan policy 6.9 Cycling, outlines the requirements for developments to address cycle super highways, cycle routes and secure cycle parking. Currently, there are 107 cycle parking spaces at the station together with a further 68 cycle stands on neighbouring streets. In addition, the TfL’s On Your Bike supported facility provides a further 468 spaces for the area, although not all these spaces are occupied and not all used by users of the station. The proposed cycle parking provision (some 500 spaces) is however, still considered inadequate to cater for the likely demand and future growth.

111 Based on the Network Rail assumptions for cycle parking and, using Network Rail passenger figures, 1,000 cycle parking spaces should be provided on station opening for station users (passengers); 1,500 by 2026 and a further 100 spaces for staff and the retail and other commercial uses. All cycle parking locations will need to be agreed. It is also recommended that 500 spaces are provided during the construction phase of the station’s redevelopment. The applicant may wish to consider a cycle parking master plan for the retail/ancillary uses so that provision can be made at the time of occupancy, with conditions attached to each of the units and space for the provision for staff parking and other facilities i.e. storage, lockers, changing and showers to be included within the stations core design.

112 Cyclists will be affected by the proposed closure of Stainer Street, which is part of the London Cycle Network Route 22 Southbound. A suggested end solution is for a shared cycle and footway to be located to the west side of Bermondsey Street from running from Tooley Street/Bermondsey Street junction to St Thomas Street/Bermondsey Street junction. It is however unclear at this stage how this may be delivered particularly at the junction with Tooley Street, which will be problematic.

113 Any cycle provision location will need to be agreed with TfL where it is proposed on the Transport for London Road Network. There should also be appropriate signage to direct cyclists around the construction site to allow a continuation of Route 22. The applicant has suggested use of Borough High Street or Shand Street, the details of which will need to be agreed with TfL and Southwark Council.

Delivery and Service plans

114 London Plan Policy 6.3 ‘Assessing effects of development on transport capacity’ advises that delivery and servicing plans should be secured in line with the London Freight Plan and should be co-ordinated with travel plans. TfL recommends that the delivery and service plan follows TfL best practice guidance. This should be subject to approval by TfL if it is likely to involve vehicle movements on the Transport for London Road Network. Facilities for electric vehicle delivery vehicle charging should also be provided for in the loading bay area.

Travel Planning

115 TfL supports the applicant’s proposals to provide travel planning for staff and occupiers of the commercial units. The travel plan framework submitted with the application does not contain
any targets or proposals which are specific, measurable, attainable, relevant and timely (SMART). It should also look at the construction staff travel and introduce initiatives particularly for staff of the retail/commercial units to benefit from, prior to opening. It is recommended that the plan follows TfL Travel Planning Guidance and is ATTrrBUTE compliant. Further targets, measures and future monitoring should be secured through the section 106 agreement to be consistent with London Plan Policy 6.3C ‘Assessing affects of development on transport capacity’.

Planning Obligation and approval of details

116 Given the importance of this site as a key interchange on the public transport network and the level of agreement needed regarding detailed operation of the station, wayfinding, bus operations, effect on the Transport for London Road Network and other issues raised above, it is essential that TfL is engaged in the approval of these issues. TfL therefore requests it is party to the section 106 agreement and approval of details where it affects the transport network. TfL will also expect Network Rail to fund any legal costs in any section 106 drafting process.

Summary

117 The planning application and associated transport assessment is currently considered inadequate and, as a result, the proposed development does not comply with the London Plan transport policies.

118 Further work on the impact of construction on the Underground station, bus station, buses, pedestrians and cyclists is required including signage and wayfinding. Further work is also needed on the impact of the completed station development on public transport networks and access to them. Financial contributions will also be required towards temporary bus routings and arrangements which will need to be agreed through either the section 106 process and approval of conditions, to which TfL will need to be party to. The temporary and permanent highway works are required and will need to be secured through section 278, including the issue of licenses and consents. Additionally, a more detailed construction management plan and communications strategy will need to be agreed with TfL and Southwark Council.

Local planning authority’s position

119 The officer recommendation is unknown.

Legal considerations

120 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

121 There are no financial considerations at this stage.
Conclusion

London Plan policies on are CAZ, urban design, access, heritage, strategic views, climate change, noise, air quality, biodiversity and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Principle of development**: (non-compliant). The principle of development and the objectives to realise the full potential of the Thameslink programme is supported in broad terms, however the loss of heritage assets has not been sufficiently justified, nor has the loss of cultural and leisure space been given sufficient consideration by the applicant. The impact regarding the reduction in office space in the CAZ is broadly accepted.

- **Urban design and access**: (non-compliant): The design does not yet meet the policy test regarding the loss of heritage assets. There remains a significant lack of ambition to deliver outstanding architectural quality for this site. The access strategy is currently insufficient and is likely to fail once the station becomes fully operational.

- **Climate change mitigation**: (compliant): Subject to appropriate conditions regarding a ‘unit occupiers strategy’ for connection to the centralised plant and securing the site wide technologies and potential links to a future heat and power network.

- **Climate change adaptation**: (compliant): Broadly acceptable subject to conditions set out in this report.

- **Noise**: (non-compliant): Requires further consideration as part of ongoing discussions.

- **Air quality**: (non-compliant): Requires further consideration as part of ongoing discussions.

- **Biodiversity**: (non-compliant): Requires further consideration as part of ongoing discussions.

- **Transport**: (non-compliant): The transport assessment is currently considered inadequate and, as a result, the proposed development does not comply with the London Plan transport policies.

On balance, the application does not comply with the London Plan.

The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Principle of development**: The clear and convincing justification for the loss of the heritage assets needs to be made in further detail. This is directly linked to the options for retention of the 64-84 Tooley Street and regarding the quality of the replacement structure and the urban design comments set out in this report. The strategy for relocation of ‘D’ class uses needs to be reconsidered and progressed.

- **Urban design and access**: The design team need to reconsider a number of matters as set out in this report, including the design of the roof and the opportunity to create world class architecture. There are also a number of points regarding the layouts and access points and location and number of lifts.

- **Noise, air quality and biodiversity**: GLA officers will continue to scrutinise these policy areas in discussion with the Council and may provide further comment.

- **Transport**: Further work on the impact of construction on the Underground station, bus station, buses, pedestrians and cyclists is required including signage and wayfinding. Further work is also needed on the impact of the completed station development on public transport networks and access to them. Financial contributions will also be required.
towards temporary bus routings and arrangements, which will need to be agreed through either the section 106 process and approval of conditions, to which TfL will need to be party to. The temporary and permanent highway works are required and will need to be secured through section 278, including the issue of licenses and consents. A more detailed construction management plan and communications strategy will need to be agreed with TfL and Southwark Council.

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