Cancer Treatment Centre, Guy’s Hospital
in the London Borough of Southwark
planning application no.12/AP/2062

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<th>Strategic planning application stage 1 referral (new powers)</th>
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<th>The proposal</th>
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<td>The proposal is to demolish the existing (Newcomen Centre and Bloomfield Clinic) buildings on the 0.275-hectare application site within the premises of Guy’s Hospital; and erect a single, 71-metre high building to provide 29,312 sq.m. of accommodation for a cancer treatment centre and private patient unit.</td>
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<th>The applicant</th>
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<td>The applicant is Guy’s &amp; St Thomas’ NHS Foundation Trust and the architects are Rogers, Stirk, Harbour &amp; Partners.</td>
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<th>Strategic issues</th>
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<td>The proposal is for an infill redevelopment to streamline the provision of health services within the existing Guy’s Hospital complex. The policy issues relevant to the proposal are health provision, education, employment, urban design &amp; architectural quality, the impact of the proposal on the setting of a World Heritage Site; transportation, sustainability and the contributions that all these would make towards regeneration of the London Bridge, Borough and Bankside Opportunity Area.</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 it does not comply with the London Plan, for the reasons set out in paragraph 97 of this report; but that the potential remedies set out in paragraph 99 of the report could address those deficiencies.</td>
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Context

1. On 30 July 2012, 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 5 September 2012 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 Categories 1B and 1C of the Schedule to the Order 2008:

1B- “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.”

1C- “Development which comprises or includes the erection of a building of the
following description—(c) the building is more than 30 metres high and is outside the City of
London.”

3 Once Southwark Council has made a resolution 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 triangular-shaped application site is situated in the extreme south-east corner of Guy’s
and St Thomas’ Hospital premises, which lie to the immediate south of the A200 St Thomas Street.
The latter forms part of the Transport for London Road Network (TLRN).

6 With frontages onto Snowsfields and Great Maze Pond, the site is also within 300 metres of
the landmark ‘Shard’ tower building and London Bridge Station, which provides access to the
Northern and Jubilee London Underground lines and National Rail services. The site is also served
by an extensive bus network, with 15 routes available within 400m of the site. As such it has been
demonstrated that the application site records a good public transport accessibility level (PTAL) of
6b on a scale of 1-6, where 6 is the highest.

7 The surrounding area comprises a mixture of retail, office, commercial, civic and residential
land uses.

Details of the proposal

8 The proposal is to demolish the existing Newcomen Centre and Bloomfield Clinic
buildings on the corner of Great Maze Pond and Snowfields, and erect a single, 14-storey plus
basement building (71-metres high) on the 0.275-hectare site they occupied. Facilities presently
accommodated within the Newcomen Centre and Bloomfield Clinic would be relocated to other
parts of the hospital before the proposed works commence, as would the staff transfer bus stop
from which a shuttle service runs between Guy’s and St Thomas’ hospitals. There would be no
loss of existing health facilities or services at the hospital as a result of these proposals.

9 The new building is required to enhance the delivery and efficiency of health care
services. It would provide 29,312 sq.m. of accommodation for a cancer treatment centre and
private patient unit. The building would provide radiotherapy and chemotherapy services; a
‘one-stop’ out-patient facility for minor procedures; a medical research facility for King’s College
London; a welcome zone, with reception, ancillary cafe and retail facilities; balconies for staff,
patient and visitor access; a plant room and a green roof.
10 A basement link to the rest of the Guy’s Hospital complex would be provided to aid servicing, deliveries and facilities management.

11 The external works would include public realm enhancements with soft and hard landscaping, tree planting, the provision of five ‘Blue Badge’ parking spaces (comprising three on Great Maze Pond and two within the car parking area at the Tower Wing), cycle parking, road alignment and an increase in pedestrian areas.

12 In addition, measures would be taken to retain in situ a Roman Boat designated as a Scheduled Ancient Monument.

Case history

13 In May 2012, the applicant sought pre-application advice from GLA officers on a proposal to erect a 65-metre high building to provide 28,000 sq.m. of accommodation for purposes similar to the current proposal. The most evident difference between the pre-application proposal and this formal application is an increase in overall height of the building from 65 to 71 metres and an increase in floorspace from 28,000 to 29,312 square metres.

14 In response, GLA officers confirmed that the London Plan gives broad strategic planning support for the provision of a high quality health facility on a site with excellent public transport accessibility and identified potential for intensified development. Officers also agreed that the grouping of related out-patient facilities for radiotherapy, chemotherapy, clinical trials, non-clinical services and a private in-patient unit in a single bespoke building, would significantly improve efficiency in the delivery of care services to the local community and Londoners as a whole.

Strategic planning issues and relevant policies and guidance

15 The relevant issues and corresponding policies are as follows:

- Health London Plan; Health Inequalities Strategy
- Education London Plan
- Employment London Plan; Industrial Capacity SPG; draft Land for Industry and Transport SPG
- Regeneration London Plan; the Mayor’s Economic Development Strategy
- Urban design London Plan;
- Tall buildings/views London Plan, Revised View Management Framework SPG
- Historic Environment London Plan; World Heritage Sites SPG; Circular 07/09
- Access London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)
- Transport/parking London Plan; the Mayor’s Transport Strategy; Land for Transport Functions SPG, draft Land for Industry and Transport SPG
- Sustainable development London Plan; Sustainable Design and Construction SPG; Mayor’s Climate Change Adaptation Strategy; Mayor’s Climate Change Mitigation and Energy Strategy; Mayor’s Water Strategy
- Ambient noise London Plan; the Mayor’s Ambient Noise Strategy;
- Air quality London Plan; the Mayor’s Air Quality Strategy;

16 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 April 2011 Southwark Core Strategy and the July 2011 London Plan.
The following are material planning considerations:

- The draft Revised Early Minor Alteration to the London Plan
- The London Bridge, Borough and Bankside SPD (Southwark Council)

**Health facilities and the principle of development**

18. In its vision for the London Bridge Quarter, the area immediately surrounding London Bridge Station, the Southwark Core Strategy (paragraph 4.21) indicates that Guy’s and St Thomas’ Hospital will be improved to provide new housing for staff and students, and modern, world class health and education facilities.

19. From a strategic planning perspective, the application site is within the London Bridge, Borough and Bankside Opportunity Area of the London Plan, which is identified as having considerable potential for intensification, particularly at London Bridge 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.

20. More specifically, London Plan policies 3.2, 3.16 and 3.17 affirm the Mayor’s support for the provision of high quality health and social care facilities in areas of identified need, particularly in places easily accessible by public transport, cycling and walking. In particular, the Mayor commits to working in partnership with the NHS in London, the borough councils and the voluntary and community sector as appropriate to reduce health inequalities, improve the health of all Londoners and support the spatial implications of his Health Inequalities Strategy.

21. Guy’s and St Thomas’ is a major teaching hospital with a reputation for excellence in clinical research and which provides a range of important health services to London as well as the local community. The proposed state-of-the-art cancer treatment centre is part of the hospital trust’s overall plan to integrate and enhance the quality and efficiency of existing clinical services and research facilities which, for cancer, are currently dispersed between different departments at King’s College (at Denmark Hill), St Thomas’ (Westminster Bridge Road) and Guy’s (London Bridge) hospitals.

22. It is specifically envisaged that the grouping of related out-patient facilities for radiotherapy, chemotherapy, clinical trials, non-clinical services and a private in-patient unit in a single bespoke building, would significantly improve efficiency in the delivery of care services to the local community and Londoners as a whole.

23. The proposal involves the provision of a high quality health facility on a site with excellent public transport accessibility and identified potential for intensified development. In addition, a phased redevelopment of the hospital site provides an opportunity to integrate the site with its wider surrounding by improving the links, permeability, variety of uses and general activity within the locality. The hospital trust is encouraged to engage with the Council and the GLA on a comprehensive masterplan for the development of the hospital site as a whole. The Council is currently revisiting the London Bridge, Borough and Bankside SPD and therefore, the opportunity to incorporate the masterplan principles in that document could be considered.

24. As indicated by the foregoing policies of the London Plan, the application proposal falls within the category of developments that the Mayor is, in principle, firmly committed to support.

**Educational benefits**
In relation to its status as a globally renowned teaching hospital and the proposal of a medical research facility, paragraph 72 of the National Planning Policy Framework seeks a proactive, positive and collaborative approach to meeting educational requirements, and encourages development that will broaden educational choice.

London Plan Policy 3.18 supports those aims and promotes the provision of education facilities to meet the demands of London’s growing and changing population. Part C of the policy states that development proposals which enhance education and skills provision will be supported, including new build, expansion of existing facilities or change of use to educational purposes; whilst proposals that result in the net loss of education facilities would be resisted, unless it can be demonstrated that there is no ongoing or future demand.

Paragraph 3.107 acknowledges that higher education in London offers an unparalleled choice of undergraduate and postgraduate courses, continuing professional development, and infrastructure to support business growth; it is also a major employer that attracts major international companies able to benefit from the universities’ research reputation, such as in pharmaceuticals and life sciences. It also recognises that universities play a vital role in ensuring that Londoners have the higher order skills necessary to succeed in a changing economy and for the capital to remain globally competitive.

The inclusion of a state-of-the-art medical research would deliver added benefits to the scheme and is fully supported in strategic planning terms, as indicated by the policies cited in the preceding paragraphs.

**Employment and regeneration opportunities**

Whilst job creation is not a primary objective of the development, there are currently 44 full-time equivalent jobs in the Newcomen Centre and an additional 30 staff in the adjacent Bloomfield Centre.

The proposed treatment centre will be staffed on a three shift pattern, securing or attracting a total of 850 staff from Guy’s Hospital and St Thomas’ Hospital; thereby significantly increasing the employment density on the application site. Of the latter, approximately 330 of those jobs would be new to the Guy’s Hospital campus.

Cumulatively, the proposal represents a welcome contribution towards the ongoing regeneration of the locality; which includes the significant employment to be generated by ‘The Shard’, ‘The Place’ and the redevelopment of London Bridge bus and rail interchange station to meet the increased demand for public transportation. In these respects, it is supported in strategic planning terms and would help fulfil the policy objectives of the London Bridge, Borough and Bankside Opportunity Area as described in the London Plan, and the ‘London Bridge Quarter’ to which reference is made in the Southwark Core Strategy DPD.

**Urban design**

Good design is central to all objectives of the London Plan, in particular the objective to create a city of diverse, strong, secure and accessible neighbourhoods to which Londoners feel attached whatever their origin, background, age or status. Policies contained within chapter seven specifically look to promote development that reinforces or enhances the character, legibility, permeability and accessibility of neighbourhoods. It sets out a series of overarching principles and specific design policies related to site layout, scale, height and massing, internal layout and visual impact as ways of achieving this.
The proposed development has been previously commented on at pre-application stage. This set out that it was generally well designed, re-enforcing the existing street pattern, improving the public realm network in the area and creating a distinctive building, all of which are welcomed.

Layout

Of particular relevance to this proposal are London Plan Policy 7.1, that sets out the requirement for developments to reinforce or enhance the permeability and legibility of neighbourhoods, so that communities can easily access community infrastructure, commercial services and public transport; and London Plan Policy 7.3 that sets out a series of overarching principles to ensure that the design of a development should look to reduce the opportunities for criminal behaviour by maximising activity throughout the day and night, clearly articulating public and private spaces, enabling passive surveillance over public spaces and promoting a sense of ownership and respect.

The scheme takes up the majority of the triangular site with a development that re-enforces the existing street pattern and creates a corner building at the junction of Great Maze Ponds and Snowfields. As set out previously, this approach is strongly supported as it strengthens the legibility of the area and helps re-establish Great Maze Ponds as an important route through the area. The public realm improvements on the southern end of this street and to Snowfields are also strongly supported.

The layout of the ground floor of the building is organised so that all the more private and back of house uses are located adjacent to the neighbouring site allowing all the street facing aspects to be occupied by more public uses such as the proposed café, entrance and lobby which is strongly supported.

At pre-application stage, concern was raised regarding the location of the lifts and the way the proposed retail units on the southern edge of the building seem to turn their back to the street undermining the opportunity to create quality frontage along Snowfields. The applicant has set out that the lift shafts will be glazed ensuring a good visual connection between those inside and outside the building which is welcomed. However, further information is required as to how the designers will ensure that the whole of this elevation will be active on the ground floor. Consideration needs to be given to ensuring the retail unit along this edge can also be accessed from the street.

Scale, height, massing and bulk

The scale, height and massing of a development will have an impact on the legibility, character and adaptability of its surrounding urban area. London Plan Policy 7.4B sets out the requirement for buildings to provide a contemporary architectural response to the site, whilst having regard to the pattern and grain of development in the wider area and being human in scale. London Plan Policy 7.6B sets out the requirement for development to be of a proportion, composition, scale and orientation that enhances activates and appropriately encloses the public realm. London Plan Policy 7.7 sets out additional design requirements for tall and large-scale buildings, which are defined as buildings that are significantly taller than their surroundings and/or have a significant impact on the skyline. The policy includes requirements for buildings to emphasize points of civic or visual significance and have ground floor activities that provide a positive relationship to surrounding streets and to incorporate the highest standards of architecture.

In another context this building would be relatively tall, but within the context of the Guy's campus, and of the main tower and of the lower range buildings of the Borough wing and Hunts House its impact on the London skyline will be relatively limited, particularly given its close proximity to both these buildings and to the Shard and New London Bridge House redevelopment. The building would appear in most city views as a lower element in the well established cluster of
tall buildings at London Bridge, an area identified by Southwark as being suitable for taller buildings. A good amount of thought and care have gone into the design and it should make a very high quality addition to the area. The applicant’s commitment to delivering the highest standards of architecture within a hospital redevelopment scheme is to be commended.

40 Nonetheless the applicant should provide additional information in respect of strategic views and the WHS as set out below, before the scheme is referred back to the Mayor.

Strategic views and the World Heritage Site

41 London Plan Policy 7.10 ‘World Heritage Sites’ states: “Development should not cause adverse impacts on World Heritage Sites or their settings (including any buffer zone). In particular, it should not compromise a viewer’s ability to appreciate its Outstanding Universal Value, integrity, authenticity or significance.” The Mayor’s London World Heritage Sites – Guidance of Settings SPG (2012) sets out a framework for undertaking this assessment and set out guidance on a number of elements of settings, which may contribute to the significance of the World Heritage Site.

42 The scheme’s 14 storeys create a building of approximately 70m in height. However, an assessment of the impact the development will have on protected views and vistas is required. Whilst an assessment has been provided for LVMF 3A.1 from the Kenwood viewing gazebo towards St. Pauls, assessments are also required from view 10A.1 from Tower Bridge and 2A.1/2A.2 from Parliament Hill. These should be provided before the scheme is referred back to the Mayor.

43 In terms of the World Heritage Site, the applicant should set out what the likely impact of the scheme would be on the outstanding universal value (OUV) of the World Heritage Site, with reference to the World Heritage Site SPG.

Inclusive design and access

44 The London Plan (policy 7.2) requires all new development to meet the highest standards of accessibility and inclusion (not just the minimum required under the Building Regulations); and to ensure from the outset that the design process takes all potential users of the proposed places and spaces into consideration, including disabled and deaf people, older people, children and young people. This, together with the Supplementary Planning Guidance- ‘Accessible London achieving an inclusive environment’, underpins the principles of inclusive design and aims to achieve an accessible and inclusive environment across London. In addition, these policies require all referable planning applications to be accompanied by a design and access statement, following engagement with relevant user groups, to demonstrate how the principles of inclusive design and accessibility have been integrated into the proposed development, whether relevant best practice standards such as British Standard BS8300:2009 have been complied with, and how inclusion would be maintained and managed.

45 The application is supported by a fairly comprehensive access statement. Given the existing and future high levels of public transport accessibility, with the bus and rail interchange station within a five-minute walking distance, the access statement places greater emphasis on pedestrian movement rather than vehicular access.

46 The hospital campus has a current capacity for 61 cars, distributed between two car parks. The provision comprises 41 spaces in St Thomas Street car park, including two Blue Badge holder spaces; and 20 spaces in Tower Car Park situated west of the main hospital entrance from Great Maze Pond. Three additional on-street Blue Badge parking spaces are proposed on Great Maze Pond and a further two at the main entrance to the hospital, as part of this development.
The applicant should nonetheless confirm that the wheelchair and buggy storage area to be provided adjacent to the ground floor cafe would also be large and secure enough to accommodate and recharge mobility scooters if necessary.

Pedestrian approaches within the site are generally level and well lit. Routes would be defined by the use of low kerbs from the vehicle drop-off points, with no part of the development having a gradient steeper than 1:20. Within the curtilage of the cancer treatment centre, seating would be provided at 50 metre intervals to allow users to rest whilst moving from one area to another.

The main circulation routes would be adequately wide (1800mm) to allow two wheelchairs users to pass each other in opposite directions; appropriately finished in anti-reflective and slip-resistant surfaces, or equipped with handrails where required.

Similarly, appropriate-sized passenger, goods and patient lifts would be installed to facilitate vertical circulation within the 14-storey building. The lift and stair cores would be located in each corner of the building. The access statement aims to ensure that fully accessible toilets are distributed throughout the building such that travel distance between each would not exceed 40 metres, although this is evidently not achievable in all instances.

A means of escape strategy would be developed for disabled users and staff in conjunction with fire engineering consultants. The building would be zoned to facilitate horizontal evacuation, with refuge points located at each landing level and evacuation lifts provided at the rear of the building. The strategy would include the use of combined visual and audible alerts to deaf, hard of hearing and partially sighted users and members of staff. The latter would have a personal emergency escape plan designed for each individual.

A separate, general evacuation strategy would be developed for visitors to the facility and appropriate escape management measures put in place to ensure that there are no hindrances to a quick and safe evacuation of the building at all times, especially in the event of an emergency.

**Transport For London’s comments**

**Highway impact**

TfL notes the number of hospital staff is expected to increase from 74 to 850 full time equivalent employees on the application site. 330 of these employees would be entirely new to the hospital, with the remaining staff transferred from elsewhere on the campus. The development is expected to treat on average 650 patients a day and also accommodate approximately 830 visitors/carers per day. However, due to the shift patterns described within the transport assessment (TA), a maximum of 560 staff would be on site any one time. Similarly, there will be a maximum of 290 in and out patients and associated visitors at any one time.

These numbers are not insignificant and the Council should be aware that there is existing traffic congestion on the surrounding strategic highway network, including the Transport for London Road Network (TLRN) routes of Borough High Street, St Thomas Street, Tooley Street and A100 Tower Bridge Road. However, the results of the recent travel surveys included within the TA show that only 2.5% of staff at Guy’s Hospital, and approximately 12% of patients and visitors, currently drive or share a car to the campus. Given the low mode share to private car, the distribution of trips throughout the day (most of which are unlikely to coincide with standard commuter peak periods), the overall reduction in vehicle trips due to the consolidation of the cancer treatment facilities, and excellent public transport links available from this location, TfL is satisfied that these additional trips can be accommodated by the TLRN and public transport network.
The proposal includes public realm improvements in the vicinity including: a reduction in the size of the existing on-site roundabout at the southern end of Great Maze Pond in order to accommodate the pick-up/drop-off facility; wider pedestrian footways and landscaped areas on Great Maze Pond; the provision of benches and cycle parking and footway widening on Snowfields road to the south of the site. TfL supports these proposals, with are in line with London Plan policy 6.7.

Car parking

TfL notes that no additional parking is proposed for this site with the exception of 5 new blue badge spaces. The additional disabled spaces have been shown to be required in the ‘Blue Badge’ car park survey carried out by the applicant, which identified a proportion of vehicles parked ‘informally’ outside of marked bays in the main car park. In order to accommodate these spaces, the ‘Tower Car Park’ is to be reconfigured as part of the proposals to provide a total of 25 blue badge spaces. The proposed increase in formal provision for disabled people is supported by TfL and is in accordance with London Plan policy 6.13 and standards, as detailed in Table 6.2.

In line with London Plan policy 6.13, TfL requests the provision of an electric vehicle charge point within the Tower Car Park. TfL also requests consideration of provision for motorcycle parking in line with London Plan policy 6.13.

TfL notes pick-up/drop-off of visitors for the proposed centre would take place on Great Maze Pond with the provision of a new lay-by accommodating 4 vehicles. The TA states waiting times for private vehicles in this lay-by and elsewhere will be enforced by security on site. This should be secured and enforced through a condition.

Public transport

TfL notes the high existing and anticipated mode share of staff, patients and visitors to public transport, with over 70% using public transport to access the hospital campus. It is noted that most would be travelling outside peak commuter hours.

As well as the Underground and National Rail services, there is an extensive bus network serving the site. Works are currently under way to improve the bus station at London Bridge which will enhance the quality of the facility as well as increase capacity. TfL confirms all bus stops in the vicinity are/will be of good quality and accessibility. Works are also underway to enable an increase in services at the NR station and the enhance passenger facilities.

TfL is satisfied that the trips generated by the proposed development are unlikely to require an increase in the capacity of the local bus or rail network.

Walking and cycling

The site is well-connected for cyclists. In addition to the 100 cycle parking spaces currently provided on the Guys campus, 84 new cycle parking spaces are proposed, with 48 of these allocated to staff. Given that staff and visitor cycle trips would be distributed throughout the day this increase in provision is in accordance with London Plan standards as detailed in Table 6.3. TfL requests confirmation that the spaces will be located in secure and well lit locations. Shower, locker and changing facilities should also be provided for staff wishing to cycle to work. The cycle parking and associated facilities should be secured by condition.

TfL welcomes the pedestrian audit carried out by the applicant. This concluded that the pedestrian routes to and from the campus are currently well served by sufficiently wide and well maintained footways, convenient crossing facilities, and well-lit footways. These facilities will be
further enhanced by the proposed public realm improvements and those which have or will be 
made consequent upon adjoining development.

**Travel and servicing plans**

64 Tfl welcomes the submission of a travel plan, which promotes sustainable travel to and 
from the site. The travel plan should be secured, enforced, funded, monitored and reviewed as part 
of the s106 agreement.

65 The applicants have also submitted a stand alone delivery and servicing plan (DSP) which 
seeks to ensure that such activity takes place efficiently and without causing a negative impact on 
the surrounding highway network. Tfl notes the TA states that there will be no significant 
additional service vehicle movements resulting from the development. The DSP should be secured 
by condition.

**Construction logistics plans**

66 In line with London Plan policy 6.14, Tfl supports the applicant’s submission of an outline 
‘construction logistics strategy’. The CLS should be secured by condition.

**Summary**

67 Overall, Tfl has no significant objections to the principle of the proposed development. 
However, Tfl considers that further work is required by the applicant on the Travel Plan, provision 
of electric vehicle charging, and provision of shower and changing facilities for staff cycling to 
work, in order to comply with the transport policies of the London Plan.

**Climate change mitigation**

68 Chapter 5 of the London Plan sets out the approach to climate change and requires 
developments to make the fullest contribution to minimizing carbon dioxide emissions. The policies 
as 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 with a 
target of 20% carbon reductions from on-site renewable energy. The policies set out ways in which 
developers must address mitigation of and adaptation to the effects of climate change.

**Be Lean**

Energy efficiency standards

69 A range of passive design features and demand reduction measures are proposed to reduce 
the carbon emissions of the proposed development. Both air permeability and heat loss parameters 
will be improved beyond the minimum backstop values required by building regulations. Other 
features include heat recovery ventilation, building energy management system (BEMS) and low 
energy lighting. The demand for cooling will be minimised through external louvres and balconies.

70 Based on the information provided, the proposed development does not appear to achieve 
any carbon savings from energy efficiency alone compared to a 2010 Building Regulations 
compliant development.

71 The applicant should model additional energy efficiency measures and commit to the 
development exceeding 2010 Building Regulations compliance through energy efficiency alone.
Be Clean
District heating

72 The applicant has identified that the Guy’s and St Thomas’ district heating network is within the vicinity of the development and is proposing to connect to the network.

Combined heat and power

73 The applicant proposes to utilise the existing 3.04 MW, gas fired CHP unit to provide the lead heat source for the development. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating.

74 A reduction in regulated CO₂ emissions of 171 tonnes per annum (23%) will be achieved through this second part of the energy hierarchy.

Be Green

Renewable energy technologies

75 The applicant has investigated the feasibility of a range of renewable energy technologies but does not propose to install any renewable energy technology for the development.

Overall carbon savings

76 The estimated regulated carbon emissions of the development are 586 tonnes of CO₂ per year after the cumulative effect of energy efficiency measures and CHP has been taken into account.

77 This equates to a reduction of 157 tonnes of CO₂ per year in regulated emissions compared to a 2010 Building Regulations compliant development, equivalent to an overall saving of 21%.

78 The carbon dioxide savings fall short of the targets within Policy 5.2 of the London Plan. The applicant should consider the scope for additional measures aimed at achieving further carbon reductions.

Climate change adaptation

79 Developments are also required to be adaptable to the climate London will experience over their lifetime and should be designed for the warmer, wetter winters and hotter, drier summers and to withstand possible natural hazards (such as heatwaves, flooding and droughts) that may occur. Chapter 5 of the London Plan considers climate change adaptation, specifically policies 5.9 through to policy 5.15.

Flood risk

80 The site is some 500 metres from the River Thames and benefits from the existing tidal flood defences. It is nonetheless situated within zone 3a on the Environment Agency flood risk map, wherein there is an annual probability of 1 in 200 of tidal flooding if there is a breach of those defences. Nonetheless, the proposal is appropriate for its location and fulfils the sequential and exception tests prescribed by national policy.
Particular concern is raised by the inclusion of a single basement level as part of the development and a ground floor level which, at 3.9 metres above ordnance datum (AOD), is significantly below the tidal flood level of 4.93m (AOD) inclusive of climate change envisaged for a 1 in 200 event.

The applicant has submitted a flood risk assessment to confirm that less vulnerable uses, such as electrical plant and machinery would be accommodated at basement level, with the reception area, a cafe and day therapies accommodated at ground floor. The more vulnerable activities, such as the chemotherapy and admission wards would be located on the upper floors of the building.

The flood risk assessment also indicates that it would take three hours for flood water arising from a breach of existing defences to reach the site, giving ample warning time to activate an evacuation strategy.

Surface water run-off

A drainage strategy is also proposed to attenuate flooding from surface water. Although the basement and Scheduled Ancient Monument in the form of a Roman Boat restricts the scope for rainwater storage, feasible measures include the collection of 200 sq.m. of roof run-off for infiltration into the ground using a storm block system; the use of green roofs and rainwater harvesting for irrigation purposes. These are in line with the recommendations in policies 5.11 and 5.13 of the London Plan.

Any discharge to the existing combined sewer would be agreed with Thames Water at the detailed design stage, to ensure there is sufficient capacity to do so. As such, there would be no increase in the risk of flooding from surface water as a result of the proposed development.

Ambient noise

London Plan policy 7.15 requires development proposals to minimise the existing and potential impacts of noise on, from, in or within the vicinity of sites; and for major sources of noise to be separated from noise-sensitive developments wherever practicable.

The proposal raises concern over the potential impact on noise-sensitive hospital uses, during construction of the building and from the rumbling of train movements from the busy London Bridge Station nearby.

To address this concern, the applicant has submitted a noise assessment that identifies potential sources of noise, their impact on sensitive receptors and the measures necessary to mitigate such impacts.

Air quality

The application site is within an Air Quality Management Area which raises concern that the development and its surrounding may be subject to high levels of air pollution from dust particles during the construction phase. The strategic policy to address this issue is London Plan policy 7.14, which aims to promote sustainable design and construction, and to ensure that, at the planning application stage, air quality is taken into account along with other material considerations.

An air quality report has been submitted with the application and appropriate remediation measures are proposed to minimise the relevant impacts.

Community Infrastructure Levy
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.

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/2010/978011492390/contents](http://www.legislation.gov.uk/ukdsi/2010/978011492390/contents) as amended by the 2011 regulations: [http://www.legislation.gov.uk/uksi/2011/987/made](http://www.legislation.gov.uk/uksi/2011/987/made)

London borough councils are also able to introduce CIL charges which are payable in addition to the Mayor’s CIL. Southwark Council has yet to adopt such a scheme but draft proposals are the subject of consultation. See the council’s website for more details.

**Local planning authority’s position**

There is broad officer support for the principle of development, although the applicant has been requested a further setback of the building from the adjoining Snowfields. The application is likely to be reported to Council’s planning committee with a recommendation for approval.

**Legal considerations**

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**

There are no financial considerations at this stage.

**Conclusion**

London Plan policies on health provision, education, employment, urban design & architectural quality, transportation, sustainability and environmental are relevant to this application. In general, the application complies with some of these policies, but not with others for the following reasons:

- **Urban design**: Insufficient illustration is provided to enable a full assessment of the impact that the development would have on protected views and vistas, and on the OUV of the World Heritage Site.

- **Inclusive access**: Further clarification is required of the storage facilities available for disabled visitors and users.
• **Energy**: The carbon dioxide savings fall short of the targets within Policy 5.2 of the London Plan. The development does not appear to achieve any carbon savings from energy efficiency alone compared to a 2010 Building Regulations-compliant development.

• **Transport**: Additional details need to be provided and secured, either by condition or legal agreement to ensure full compliance with the transport policies of the London Plan.

98 Whilst the application is broadly acceptable in strategic planning terms, on balance, the application does not comply with the London Plan.

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

• **Urban design**: Additional illustrations are required to assess the potential impact of the development on protected views and vistas, especially from Tower Bridge and Parliament Hill and on the Outstanding Universal Value of the Tower of London World Heritage site.

• **Inclusive design**: The applicant should confirm that the wheelchair and buggy storage area to be provided adjacent to the ground floor cafe would also be large and secure enough to accommodate and recharge mobility scooters if necessary.

• **Energy**: The applicant should consider the scope for additional measures aimed at achieving further carbon reductions. In particular, the applicant should model additional energy efficiency measures and commit to the development exceeding 2010 Building Regulations compliance through energy efficiency alone.

• **Transport**: The applicant should provide an electric vehicle charging point in the Tower Car Park, space for motor cycle parking, and shower and changing facilities for cyclists. Southwark Council should also ensure that the submitted travel plan is secured, enforced, funded, monitored and reviewed as part of the s106 agreement.

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