

Bermondsey Spa Site C5, Grange Walk

in the London Borough of Southwark

planning application no. 10-AP-3010

Strategic planning application stage 1 referral (new powers)

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

The proposal

Full planning permission for demolition of existing buildings and erection of four buildings ranging in height from four to seven storeys to contain 205 residential units, together with flexible commercial floor space, new roads, parking and associated landscaping.

The applicant

The applicant is **Notting Hill Housing Trust** and the architect is **PCKO**.

Strategic issues

The principle of the **redevelopment** of this key site within the Bermondsey Spa Action Area is supported. The replacement of the existing level of affordable housing units is welcomed, as is the introduction of intermediate housing. Further clarification in relation to the **affordable housing level** and **housing mix** are required before it can be agreed that the scheme is compliant with the London Plan.

The design is appropriate to its context, subject to clarification in relation to the public realm. Further work is also required in relation to **play space, inclusive design, transport** and **climate change** before the scheme can be considered to be acceptable with respect to London Plan policy.

Recommendation

That Southwark Council be advised that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 96 of this report; but that the possible remedies set out in paragraph 98 of this report could address these deficiencies.

Context

1 On 4 November 2010 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 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 1A of the Schedule to the Order 2008:

3 *"Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*

4 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.

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 site, known as Bermondsey Spa - Site C, is bounded by is bounded by Grange Walk to north, Neckinger to the east and Spa Road to the south. The site is located approximately 800 metres south of Tower Bridge.

7 The site is currently occupied by two 1950's housing blocks fronting Grange Walk, with the remainder of the site containing a variety of commercial buildings. Southwark Council occupy part of the site fronting Spa Road as a one-stop shop for its community services.

8 A set of Portland stone piers and cast iron railings are located at the southern boundary of the site on the Spa Road frontage, which are Grade II listed. Two Grade II listed buildings flank the site to the west and east of the Spa Road frontage.

9 The nearest Transport for London Road Network (TLRN) is the A200 Jamaica Road, which is 300 metres to the north-east of the site and the A100 Tower Bridge Road, which is 300 metres to the west of the site. The nearest Strategic Road Network (SRN) is the A200 Lower Road 900 metres to the east of the site. Bermondsey London Underground station, served by the Jubilee Line, is located 600 metres and approximately an 8 minutes walk to the west of the site. There are no rail services within a reasonable walking distance of the site. There are four bus stops within 400 metres and a five minute walk of the site, providing routes to Victoria, Canada Water, Shoreditch, Peckham and Soho.

10 The site has a public transport accessibility level (PTAL) of 3 on a scale of 1 to 6, where 6 is most accessible. This represents a 'moderate' level of accessibility to public transport.

Details of the proposal

11 Full planning permission is sought for re-development of the site and erection of a residential-led development in four blocks of buildings of between four and seven storeys.

12 A total of 205 flats are proposed, comprising nine studios, 51 one-beds, 107 two-beds, 26 three-beds and 12 four-bed units. A total of 68 would be allocated as affordable housing, equating to 35% based on habitable rooms.

13 A total of 796 sq.m. of flexible Class A (retail), Class B1 (office) or Class D1 (community) floor space is proposed.

14 The scheme includes car parking for 39 cars on Woodmill Lane, East Lane, Park Way and Mews Court, four of the new roads being created within the scheme.



Figure 1: Layout/masterplan (source: submitted Design and Access Statement)

Case history

15 A pre-application meeting was held with GLA officers in August 2010, where it was advised that the principle of the proposed estate renewal and, in particular, the intensification of development to provide additional housing was supported. Full compliance with London Plan policy would, however, depend on further details of development, most notably in relation to the sizes, mix and tenure of the housing, the design and architectural quality, children’s play space, climate change mitigation and adaptation, transport and access issues.

Strategic planning issues and relevant policies and guidance

16 The relevant issues and corresponding policies are as follows:

- | | |
|-------------------------------|---|
| • Regeneration | <i>London Plan;</i> |
| • Employment | <i>London Plan; PPS4; Industrial Capacity SPG</i> |
| • Retail/town centre uses | <i>London Plan; PPG13, PPS4</i> |
| • Housing | <i>London Plan; PPS3; Housing SPG; Providing for Children and Young People’s Play and Informal Recreation SPG, Housing Strategy; Interim Housing SPG; Housing SPG EiP draft</i> |
| • Affordable housing | <i>London Plan; PPS3; Housing SPG, Housing Strategy; Interim Housing SPG; Housing SPG EiP draft</i> |
| • Density | <i>London Plan; PPS3; Housing SPG; Interim Housing SPG; Housing SPG EiP draft</i> |
| • Tall buildings/views | <i>London Plan; RPG3A, View Management Framework SPG, draft Revised View Management Framework SPG</i> |
| • Urban design | <i>London Plan; PPS1</i> |
| • Children’s play space | <i>London Plan; Providing for Children and Young People’s Play and Informal Recreation SPG</i> |
| • Inclusive design and access | <i>London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)</i> |

- Climate change *London Plan; PPS1, PPS3; PPG13; PPS22; the Mayor's Energy Strategy; Sustainable Design and Construction SPG*
- Transport/ parking *London Plan; the Mayor's Transport Strategy; PPG13*

17 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 Southwark Unitary Development Plan (2007) and the London Plan (consolidated with alterations since 2004).

18 The Mayor's consultation draft replacement London Plan (October 2009) and the Southwark Core Strategy Preferred Options document are also material considerations

Principle of development - regeneration

19 London Plan policy 3A.29 'supporting neighbourhood plans' states "*The Mayor will encourage communities and neighbourhood-based organisations to prepare planning frameworks or neighbourhood plans based upon identifying local economic, social, physical and environmental needs and opportunities to strengthen local Neighbourhood Renewal Strategies*". The Mayor encourages boroughs to adopt locally prepared frameworks or plans including those prepared by housing association-led estate regeneration schemes, Development Trusts and Urban Regeneration Companies as supplementary planning documents.

20 The site forms part of the largest site within the Bermondsey Spa Regeneration/Action Area, as identified within the Southwark UDP. Known as Bermondsey Spa Site C, it is the subject of a masterplan which was approved by Southwark Council as a development brief for the area. This promotes the creation of a mixed-use district, including residential office and community uses, and the application site represents approximately a third of its area.

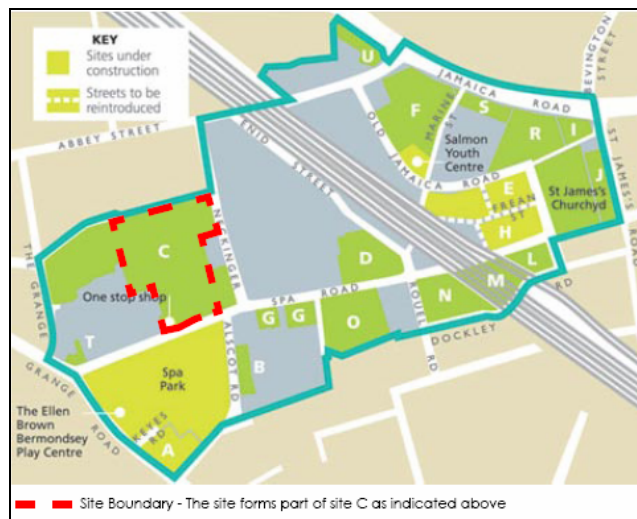


Figure 2: Site within masterplan area (source: submitted Design and Access Statement)

21 The aspirations of Southwark Council in undertaking this regeneration scheme are in accordance with policy 3A.29. Subject to the detailed policy matters set out in this report, the principle of estate renewal is supported.

Housing

22 London Plan policy 3A.1 seeks to increase London's supply of housing and sets a London-wide target of 30,500 additional homes per year between 2007/8 and 2016/17. Table 3A.1 sets borough housing targets, of which Southwark's is 1,630 additional homes per year between

2007/8 and 2016/17. The draft replacement London Plan sets a target of 2,005 additional homes between 2011 and 2021. Policy 3A.3 of the London Plan (and policy 3.2 of the draft replacement London Plan) seek to ensure that development proposals achieve the maximum intensity of use taking into account local context, the design principles of the London Plan and public transport capacity.

23 The approach employed by the GLA when assessing estate renewal is to take into account the regeneration benefits to the local community, the proportion of affordable housing in the surrounding area, and the amount of affordable housing being, or planned to be, provided elsewhere in the borough.

24 Policy 3A.15 of the London Plan provides guidance to boroughs preparing DPDs regarding the loss of housing including affordable housing. It states that DPDs should prevent the loss of housing, including affordable housing, without its planned replacements at existing or higher densities. This is reiterated in policy 3.15 of the draft replacement London Plan, which goes on to state that at least equivalent floorspace should be provided in housing redevelopments.

25 Paragraph 3.75 of the London Plan notes that *“where redevelopment of affordable housing is proposed, it should not be permitted unless it is replaced by better quality accommodation, providing at least an equivalent floorspace.”* Section 20 of the Housing SPG provides further guidance on this matter, stating that estate regeneration schemes should be undertaken on the basis of no net loss of housing or net loss of affordable housing. Paragraph 20.2 of the Housing SPG notes that *“Replacement of social rented units by intermediate provision may be acceptable where this can be justified by a requirement to achieve a wider range of types of provision in a neighbourhood”*.

26 The site is currently occupied by two 1950’s housing blocks (Larnaca House and George Tingle House) and comprises the following mix of units:

Bedrooms	Studio	1	2	3	Total
Affordable	9	10	14	12	45
Other leasehold	1	2	6	0	9
Total units	10	12	20	12	54
Total habitable rooms (approximate)	10	24	60	48	142

Table 1: Existing housing mix

27 The proposed scheme is made up of the following:

Unit Type	Unit Tenure			Total by Unit Type	Total by Unit Type (%)	Housing SPG
	Market	Affordable				
		Intermediate	Social			
Studios	9	0	0	9	4%	1%
1-bed	29	14	8	51	25%	31%
2-bed	78	8	21	107	52%	38%
3-bed	15	2	9	26	13%	
4-bed	6	0	6	12	6%	
5-bed	0	0	0	0	0	30%
Total by Tenure	137	24	44	205	100%	100%
Total by Hab Rooms	453	69	174	696		
Tenure (% unit)	67%	12%	21%			
Tenure (% hab rooms)	65%	10%	25%			

Tenure split (by unit)		35%	65%			
------------------------	--	-----	-----	--	--	--

Table 2: Proposed housing mix

28 The provision of residential accommodation on the site is supported by London Plan policy 3A.1 and policy 3.3 of the draft replacement London Plan, which seek to increase London's supply of housing.

Re-provision of affordable housing/tenure split

29 As noted in table 1 above, there were previously 54 homes on the site, which were largely made up of social rented, with some leasehold flats. The scheme proposes 205 residential flats, of which 68 units would comprise affordable housing with a 65:35 split between social rented and shared ownership.

30 The proposal entails an increase in affordable housing units compared to existing, with a total of 101 additional habitable rooms. The replacement of affordable housing with better quality accommodation of higher density is in accordance with London Plan policies.

31 The introduction of shared ownership units to the scheme is acceptable and in accordance with London Plan policies, which enables the introduction of mixed tenure in estate renewal schemes, so as to provide mixed and balanced communities. The tenure split falls between current London Plan targets and those set out in the draft replacement London Plan. It would be useful to understand to what extent the determined tenure split reflects local needs, also noting that there is the possibility of the tenure being altered further if grant funding is not secured.

Viability

32 London Plan Policy 3A.10 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. In doing so, each council should have regard to its own overall target for the amount of affordable housing provision. Policy 3A.9 states that such targets should be based on an assessment of regional and local housing need and a realistic assessment of supply, and should take account of the London Plan strategic target that 35% of housing should be social and 15% intermediate provision, and of the promotion of mixed and balanced communities. In addition, Policy 3A.10 encourages councils to have regard to the need to encourage rather than restrain residential development, and to the individual circumstances of the site. Targets should be applied flexibly, taking account of individual site costs, the availability of public subsidy and other scheme requirements. The corresponding policies are set out in Chapter 3 of the draft replacement London Plan. Southwark Council in its adopted Unitary Development Plan sets an overall affordable housing borough target of 50% and within urban density zones, a target of 35%.

33 Policy 3A.10 of the London Plan is supported by paragraph 3.52, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. The 'Three Dragons' development control toolkit is recommended for this purpose. The results of a toolkit appraisal might need to be independently verified. This is reinforced under policy 3.13 of the draft replacement London Plan.

34 In relation to estate renewal schemes, where private housing is needed to support replacement of affordable housing provision, the net gain in total provision need not achieve the usual proportion of affordable housing, where this is necessary to cross subsidise redevelopment. Where this is the case, the applicant is expected to demonstrate that the maximum reasonable amount of affordable housing is being provided by way of an open book appraisal.

35 The proposed development would comprise 35% affordable housing (based on habitable rooms) which is in accordance with Southwark Council's affordable housing targets, however in order to comply with the London Plan, it is necessary to demonstrate that the scheme delivers the maximum reasonable amount of affordable housing, noting that the scheme proposes only 23 additional affordable housing units over the existing level (equating to 14%). This is also in light of the fact that the applicant states that the precise details of the affordable housing offer will be the subject of further discussions with the Council, and that flexibility is needed so that a lower level of affordable housing can be provided if necessary.

36 At the time of writing, the Council had not confirmed its intention with respect to scrutiny of the applicant's affordable housing offer, or whether further section 106 financial obligations would be required (which may impact upon the level of affordable housing). At this stage, it is also unknown as to whether the scheme would attract grant funding from the HCA. Given that there remains uncertainty over the availability of grant funding, and that the level of funding would impact upon the amount of affordable housing that could be provided, further discussion with the Council will be required in order to understand what the fall back position would be if grant funding is not secured. No financial viability has been submitted with the application, and at this point in time, it is not possible to establish if the scheme does deliver the maximum reasonable amount of affordable housing, keeping in mind that the applicant is a housing association. Furthermore, it is most likely that review mechanisms secured within a section 106 agreement may be required as part of any planning permission, and further discussion in this respect will be necessary before the scheme is compliant with London Plan affordable housing policies.

Mix of units

37 London Plan Policy 3A.5 encourages a full range of housing choice. This is supported by the London Plan Housing Supplementary Planning Guidance, which seeks to secure family accommodation within residential schemes, particularly within the social rented sector, and sets strategic guidance for councils in assessing their local needs. Policy 3.12 of the draft replacement London Plan states that within affordable housing provision, priority should be accorded to family housing. Recent guidance is also set out in the London Plan Interim Housing Supplementary Planning Guidance (April 2010) and draft replacement London Plan policy 3.8, which seeks to widen housing choice. Also relevant is policy 1.1C of the London Housing Strategy, which sets a target for 42% of social rented homes to have three or more bedrooms.

38 The scheme contains a broad mix of unit types ranging from studios and one-bed, two-person through to four-bed, seven-person accommodation, although the largest number of units proposed are two-bed, three person flats. Officers recognise that the scheme includes four-bed plus family housing, which do not exist in the current buildings, and this is welcomed. However, only 10% of social rented units are four-bed units or larger (the Housing SPG sets a target of 42%) and there is a small reduction in three-bed plus compared to the existing buildings on the site. Before the scheme can be considered to comply with the London Plan and Housing SPG, further information should be provided on how the housing mix was arrived at, and to establish to what extent the determined mix reflects local needs, Notting Hill Housing Trust's own housing needs and the Council's housing requirements.

Residential quality

39 The Mayor has recently published his draft interim Housing Design Guide and Housing SPG EiP draft. Aspects of these, notably the minimum space standards for dwellings, are also reflected in the draft replacement London Plan.

40 The applicant confirms that all accommodation has been designed to meet the Mayor's Housing Design Guide, and details of the floor plans for each of the unit types have been provided, which shows that all units exceed the minimum unit areas set out in the guidance. The proposal provides a good level of balcony and private outdoor space for each flat, and most units are provided with more space than the minimum threshold. Many of the proposed dwellings would provide dual-aspect accommodation, and units are for the most part, regular-shaped and there would be no solely north-facing units. Storage space is provided for all units. The frequent cores will add to community cohesiveness and assist in building street activity. The provision of two lifts in the core where there will be upper-floor wheelchair-adapted/ adaptable housing is also welcomed.

41 Whilst the Mayor is not generally supportive of studio flats within flatted schemes, it is recognised that there is some limited demand for such dwellings. The incorporation of nine studios represents a small overall proportion of the total number of dwellings. These studio units would be offered for market tenure, and are likely to represent the most affordable option for homebuyers within the overall scheme.

42 The applicant's daylight and sunlight assessment note that some single-aspect courtyard-facing flats would have low levels of daylight. Although the number of affected flats is small, this was raised as a concern at pre-application stage. While the report finds that the level of light that the flats would receive are within industry standards, they will still have reduced amenity compared with the generally high standard of accommodation that would be provided elsewhere within the development. Nonetheless, the applicant has indicated that these flats would generally be offered for market sale, and as such, future residents would generally be able to choose whether this accommodation is suitable.

43 On balance, the applicant's commitment towards meeting London Plan, Southwark and its own housing standards is welcomed, and subject to details being secured by way of condition, the scheme is in accordance with the London Plan.

Density

44 Policy 3A.3 of the London Plan aims to maximise the potential of a site taking account of local context, London Plan design principles and public transport capacity. Table 3A.2 of the London Plan provides a framework for assessing density based on habitable rooms and dwellings per hectare. The consultation draft replacement London Plan policy 3.4 and Table 3.2 moves away from 'maximise' to 'optimise' taking into account all those matters in existing policy but with greater emphasis on local context and the design principles set out in Chapter 7 of the draft plan.

45 Paragraph 20.3 of the Housing SPG notes *that "to achieve 100% replacement of demolished social rented units, development at significantly increased density may be necessary to generate sufficient value from market development to support replacement of affordable housing provision or to achieve a mixed and balanced community objective."*

46 The density of the proposal is approximately 700 habitable rooms per hectare (hr/ha). This figure reflects the mixed-use nature of the scheme and removes the non-residential floor space from the calculation. Although the density is above the range suggested by the London Plan density matrix (300 - 600 hr/ha for this urban setting with a PTAL of 3), the surrounding context supports a scheme of this form. The well-considered approach to development would result in a suitable design that would mostly provide good internal and external environments for future residents.

Tall buildings/views

47 London Plan policies 4B.8 and 4B.9, which relate to the specific design issues associated with tall and large-scale buildings, are of particular relevance to the proposed scheme. These policies set out specific 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 and are larger than the threshold sizes set for the referral of planning applications to the Mayor.

48 Although the proposed scheme is unlikely to achieve a height that will cause significant concern, the site is within the identified background area of the Parliament Hill-St Paul's Cathedral view corridor, as identified within the adopted London View Management Framework (LVMF). Several other defined corridors pass close to the site. The applicant has provided a statement within the planning report noting that the strategic views have been considered within the design process, but the heights of the proposed buildings preclude any detrimental impact on the views. Specifically, the highest part of the proposed development is 23 metres AOD, and the LVMF consultation height within the affected background area of the viewing corridor is 52.1m AOD. This assessment is acceptable.

Urban design

49 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B which address both general design principles and specific design issues. London Plan Policy 4B.1 sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage, views, and the Blue Ribbon Network. The draft replacement London Plan reinforces these principles, with new development required to have regard to its context, and reinforce or enhance the character, legibility and permeability of the neighbourhood (policy 7.1).

Principles and layout

50 The proposed development principles are sound and are supported. The proposal seeks to increase permeability through this large urban block, and provide opportunity for future development to continue these routes. The proposed east-west and north-south routes proposed by this development will be of particular value for access between the Larnaca Works development and the regenerated Spa Road shopping parade, and for residents to the north and Spa Park.

51 The majority of the public realm would be open to the public at all times, although 'Arts Lane', alongside block C, would have after-hours access restrictions. The form of the surrounding architecture, with the oversailing balconies, is likely to make this area feel more private than the shared surface streets throughout the rest of the site. While there is no objection to this control, the provision of an unconditional north-south link would be useful and the Council is encouraged to explore the provision of this link at the earliest opportunity.

52 The proposed commercial spaces are intended to afford maximum flexibility in terms of their future uses and internal arrangements, but a long-term vacancy of the units would lead to unattractive conditions for residents, including a lack of passive surveillance within Arts Lane and Park Way. The applicant is requested to provide information as to whether a market study has been undertaken, and other supporting information to provide an assurance that the spaces are both marketable and desirable.

53 The route hierarchy is suitable for a site of this scale, and the application's landscape statement provides detailed information on the future character of each of the streets and spaces within both the public and private realms. Hard and soft landscaping, the arrangement of parking and the relationships between the spaces and buildings will assist legibility and help residents, including visitors, in navigating their way around the site.

Building form and appearance

54 The massing of the proposal is suitable and works well with the scale of the buildings. Both are relevant to the surrounding context, specifically the emerging context of the regeneration area around Spa Road. The heights of the buildings would also be appropriate and the 'cascading' effect sought by the architects is useful in providing defined, appropriately scaled edges to the site, and the public realm within the site.

55 Material choices appear to be appropriate and would differentiate between the blocks containing houses and those containing flats, within the same overall pattern. The dominant material would be light grey brick and there is a slight concern that its liberal use in blocks D and E would lead to monotony. The applicant should give further consideration to the choice of materials and treatment of elevations, in order to address these concerns. The Council should seek to ensure that any approval is subject to suitably worded conditions requiring the submission of materials that achieve a high quality design is achieved.

56 The Spa Road frontage would have a special treatment, where the relationship with the flanking listed buildings is important. The dimensions and patterns within the elevation mirror those of the adjacent buildings and provide an appropriately modern and attractive response to the adjacent neo-classical proportions.

Landscaping

57 The landscaping plan submitted as part of the application demonstrates that there would be a high-quality public realm that gives importance to pedestrian access. Car parking provision is minimal and on-street parking is limited, although this is welcomed, as it would contribute to activity within these areas. There would be limited opportunities for parking outside marked bays. Planting will be the prime means of division between private defensible, semi-private and public space, with metal railings backed by hedge planting at street interfaces.

58 The proposed courtyards have been allocated as play space areas. The applicant should confirm the access arrangements to each courtyard – i.e. whether all residents would have access to play space, or whether courtyard access would be restricted to those residents of the relevant surrounding block.

59 While the provision of new trees around the site is welcomed, the applicant may also wish to consider, in conjunction with the Council, provision for the planting of new street trees. The addition of new street trees is a Mayoral aim for both new and existing development.

Historic environment

60 The proposals for the site's Spa Road frontage, between two Grade-II listed buildings, are welcomed. The setback of new development, deferring to the listed buildings, is the correct approach and will enable the proportions of the historic buildings to be appreciated from Spa Park. The simple but interesting facade, and the slightly lower height of the proposed building, when compared with the listed buildings, ensures that it is complementary with the existing listed building facades. Although the listed buildings are in separate ownership and have not been

integrated into the proposal, the proposed boundary treatment between the old and the new would not be detrimental to the setting of the existing buildings.

Children's play space

61 Policy 3D.13 of the London Plan sets out that "the Mayor will and the boroughs should ensure developments that include housing make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs". This is reinforced under policy 3.6 of the draft replacement London Plan. Using the methodology within the Mayor's supplementary planning guidance 'Providing for Children and Young People's Play and Informal Recreation' it is anticipated that there will be approximately 84 children within the development. The guidance sets a benchmark of 10 sq.m. of useable child playspace to be provided per child, with under-5 child playspace provided on-site. As such the development should make provision for 840 sq.m. of playspace, of which approximately 330 sq.m. should be provided on-site for under 5 year olds.

62 The design and access statement includes a play strategy, which assesses the child yield of the development and identifies existing local play provision in accordance with the Mayor's SPG. The scheme includes communal landscaped spaces and courtyards between the buildings which will contain informal play and seating into the public realm, and a total of 330 sq.m. of toddler play areas would be provided within the four courtyard of the development. The plans also indicate shared surface spaces for informal recreation for older children.

63 The play strategy is well considered and shows the applicant's commitment to ensuring that the communal space is designed as a playable and exciting landscape, with examples provided of how this might be achieved. In accepting this approach, it will be important to ensure that a high quality, creative and useable landscape is provided within these courtyard spaces, noting that only annotated plans have been provided and dimensions of the allocated play space have not been provided on the ground floor plan. As such, full details of the landscaping of this space, including a minimum requirement of children's play space will need to be secured by way of condition of any planning permission. As noted above, confirmation as to the accessibility of these spaces to residents should be provided.

64 The close proximity to Spa Gardens Park is such that it would provide a useful amenity space for residents of the scheme. Confirmation from the Council should be provided as to whether the park is adequate to cater for the needs of existing and future residents, including active play equipment for children of all age ranges and abilities, and whether there is a requirement for any financial contributions towards its improvement.

Access and inclusive design

65 London Plan policy 4B.5 and the corresponding draft replacement London Plan policy 7.2 seek to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum), and this and all developments should seek to better minimum access requirements. Policy 3A.5 requires that 10% of new housing is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users. Design and access statements should explain the design thinking behind the application and demonstrate how the principles of inclusive design, including the specific access needs of people with disabilities, have been integrated into the proposed development and how inclusion will be maintained and managed.

66 The applicant has committed to ensuring that all of the housing is designed to exceed Lifetime Homes and Habinteg standards through generous use of space and careful layout to ensure that flats are easily adaptable. Whilst a typical floor plan is provided for the two-bed and

three-bed units, annotated floor plans for the range of wheelchair units being proposed should be provided to show how the relevant standards are achieved, including with respect to accessing balconies and bedrooms, for example.

67 The accommodation schedule indicates that sixteen of the units would meet wheelchair accessibility standards, equating to approximately 10% of habitable rooms, and would be allocated across a range of unit sizes and to both social rented and shared ownership units. Whilst some provision in the private housing would ensure genuine housing choice, there are no objections to the proposed allocation, given the number of units. A commensurate amount of blue badge parking would be provided. Two lifts are provided to the cores and adequate space is allocated within the blocks, and passing zones are accommodated in communal areas, together with level access to the entrances. The commitments that the applicant has made are welcomed, and it will be important for the Council to secure these by way of condition.

68 In terms of the external environment, priority would be given to pedestrians and cyclists on the shared surface streets, by using traffic calming measures and external treatments. The applicant has indicated how the access routes throughout the scheme have embodied the principles of inclusive design, however there is little mention of how the shared spaces and commercial units will be designed accordingly, confirmation of which should be provided, and details secured by way of condition. The Council will need to ensure that the whole scheme, including shared spaces, are fully inclusive, paying attention to the needs of visually impaired people, in order to ensure compliance with London Plan policies 3A.5 and 4B.5.

Sustainable development

69 The London Plan climate change policies as set out in chapter 4A 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. The corresponding policies within the draft replacement London Plan are set out in chapter 5.

Climate change mitigation

70 Policies 4A.2 to 4A.8 of the London Plan focus specifically on how to mitigate climate change, and the carbon dioxide emissions reduction targets that are necessary across London to achieve this. Developments are required to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions (be lean), adopting sustainable design and construction measures and prioritising decentralised energy (be clean), including renewables (be green).

Energy efficiency standards

71 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 mechanical ventilation with heat recovery and energy efficient lighting.

72 Based on the information provided, after energy efficiency measures alone the proposed development's carbon dioxide emissions are likely to broadly equate to those of a 2010 Building Regulations compliant development.

District heating

73 The applicant has investigated the potential for connecting into external district heating networks. While the external district heating infrastructure that the scheme could be connected to is not yet in place, the applicant has committed to providing the necessary interfaces to allow future connection to a district heating network should one become available.

74 A heat network is proposed for the development, fed from a central plant room of approximately 70 square metres, which is shown on the drawings. The applicant should confirm that all dwellings and building uses would be connected to the communal heat network.

Combined Heat and Power

75 The applicant is proposing the installation of a 70kWe gas fired CHP unit as the lead heat source in the central plant room. Supporting information has been provided which indicates that the CHP size has been matched to the development's heat demand. A reduction in regulated carbon dioxide emissions of 99 tonnes per annum (18%) will be achieved through this second part of the energy hierarchy. The applicant should provide further details in relation to the proposed strategy for selling CHP electricity.

Cooling

76 Passive design will be adopted to avoid the need for cooling in the residential units. Further details of the specific measures that will be adopted should be provided.

77 Where active cooling is required in the commercial units this will be provided using local cooling plant with high seasonal energy efficiency ratios.

Renewable energy technologies

78 The applicant proposes to install 115 square metres of photovoltaic panels (PV) on the roof of the development. The location of the PV panels is shown on a drawing. The use of PV panels appears to have been maximised, taking into account constraints relating to overshadowing and use of the roof space for other uses. A reduction in regulated carbon dioxide emissions of seven tonnes per annum (2%) will be achieved through this third element of the energy hierarchy.

Summary

79 The estimated regulated carbon emissions of the development are 457 tonnes of carbon dioxide per year after the cumulative effect of energy efficiency measures, CHP and renewable energy has been taken into account. In order to be satisfied as the compliance with London Plan energy policies, the applicant should provide an estimate of the overall carbon dioxide savings, expressed in tonnes of carbon dioxide per annum and percentages, relative to a 2010 Building Regulations compliant development.

Climate change adaptation

80 The London Plan promotes five principles in Policy 4A.9 to promote and support the most effective adaptation to climate change. These are to minimise overheating and contribute to heat island effects; minimise solar gain in summer; contribute to flood risk reduction, including applying sustainable drainage; minimising water use; and protect and enhance green infrastructure (the corresponding draft replacement London Plan policy is policy 5.3). There are specific policies

covering overheating, living roofs and water. Further guidance on these policies is given in the Mayor's SPG Sustainable Design and Construction.

81 Policy 4A.11 and draft London Plan policy 5.11 seek major developments to incorporate living roofs and walls where feasible. Policy 4A.14 of the London Plan and Policy 5.13 of the draft replacement plan seek to ensure that surface water run-off is managed as close to its source as possible and sets out a hierarchy of preferred measures to achieve this. Policy 4A.16 of the London Plan and policy 5.15 of the draft replacement plan seek to ensure that new development has proper regard to the impacts on water demand and existing capacity by minimising the use of treated water and maximising rainwater harvesting.

82 The applicant has submitted a sustainability statement, which includes an assessment against the Mayor's essential standards and includes a Code for Sustainable Homes pre-assessment. The applicant states that it is intended that all homes be designed to meet Code for Sustainable Homes Level 4'. The energy strategy employs a number of techniques to reduce energy consumption and cut carbon emission, using low energy lighting, energy efficient appliances, metering, high levels of insulation, and by maximising solar gain. Low water use sanitary-ware and fittings will be specified in order to meet target water consumption levels, and a sustainable urban drainage system is proposed, including permeable paving, attenuation measures and rainwater harvesting. Green roofs are proposed to regulate surface runoff and enhance biodiversity. Southwark Council should secure these commitments as part of any planning permission.

Transport

83 It is proposed that the main vehicular access to the application site will be via the existing northern access from Neckinger. The southern access onto Neckinger would provide a secondary vehicular egress from the application site. Two pedestrian / cycle access points would be provided to the application site from its northern boundary via Grange Walk with an additional pedestrian/ cycle access point proposed from Spa Road to the south.

84 The applicant has prepared a pedestrian environment review survey (PERS) audit including recommended improvements, which is welcomed. The developer would accordingly be expected to commit to making identified improvements through the section 106 agreement. A contribution towards specific pedestrian improvements at the Abbey Street / Tower Bridge Road junction and the Abbey Street / Jamaica Road junction would be expected in order to mitigate increased pedestrian flows expected at this junction and to encourage walking. This will ensure compliance with London Plan policies 3C.21 and 3C.22 and draft replacement London Plan policies 6.9 and 6.10.

85 The transport assessment forecasts that the development will generate 36 additional bus trips during the AM peak and 33 during the PM peak. Route 1 has spare capacity, but routes 78 and C10 are both over capacity. A directional split of trips generated is requested, to provide an indication of which routes/corridors are worst affected and in order to determine whether a financial contribution is required to mitigate the impact of the development on the local bus network.

86 A total of 39 car parking spaces, including 18 wheelchair accessible spaces, two deliveries and servicing spaces and five commercial spaces (two blue badge commercial spaces) are to be provided. This equates to a 0.19 ratio per residential unit. Of this provision, eight spaces would be incorporated with active electrical vehicle charging points, a further eight will be incorporated with passive charging points, which is welcomed. These must be secured through any section 106 agreement or by planning condition, and must be shown on the site plan.

87 The scheme proposes an on-street car club space, which is welcomed and in accordance with London Plan policy 6.13 and 3C.23. Together with the controlled parking zone proposals set out within paragraph 4.19 of the transport assessment, the commitments will need to be secured through any section 106 agreement.

88 It does not appear that the additional vehicular trips generated would result in a significant impact on the surrounding road network including TLRN. The proposal is therefore compliant with London Plan policy 3C.17 and draft replacement London Plan policy 6.12.

89 The scheme proposes 252 cycle parking spaces, including the extra provision provided for the three and four bed units, which is welcomed. The bicycle stores would be located in secure and covered locations within each residential building. A total of 36 visitor / commercial cycle parking spaces would be provided by way of Sheffield stands adjacent to the commercial units. This provision is welcomed, but it will be necessary to ensure that cycle parking is allocated separately between staff and visitors to reduce the possibility of conflict of uses. Showering and changing facilities need to be provided for all employees on site. This will ensure compliance with London Plan policy 3C.22 and draft replacement London Plan policy 6.9.

90 The applicant has submitted a draft delivery and servicing plan, which is welcomed. The submission and approval of the full plan should be secured through any section 106 agreement. In order to mitigate any adverse impacts of construction traffic on the highway network including TLRN, a construction logistics plan (CLP) which identifies type, volume and construction routes should be submitted. This should be secured by way of planning condition. This will ensure compliance with London Plan policies 3C.17 and 3C.25, and draft replacement London Plan policy 6.14.

91 A framework travel plan has been submitted, however officers note that a full travel plan is required because the end uses are known. The travel plan has failed the ATTrBuTE assessment and a number of changes must be made before the travel plan can be deemed acceptable. A more detailed travel plan assessment, which identifies required improvements has been forwarded to the applicant. Financial incentives such as pre-loaded oyster cards, bicycle shop vouchers and car club memberships should also be considered within the travel plan. The travel plan must be secured, enforced, monitored, reviewed and funded through any section 106 agreement. This will ensure compliance with the relevant elements of London Plan policy 3C.2 and draft replacement London Plan policy 6.3.

92 In summary, a number of measures are required in order to ensure compliance with the London Plan. This including contribution towards pedestrian works at key nearby junction, a directional split of bus trips generated, cycle parking allocation, construction and logistics plan and electric vehicle charging points, secured by condition and a section 106 agreement inclusive of financial contributions towards pedestrian upgrades identified within the PERS audit, a full delivery and servicing plan and a full travel plan inclusive of recommendations.

Local planning authority's position

93 It is understood that Southwark Council will be considering the planning application later this month, and officers are understood to support the proposal.

Legal considerations

94 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

95 There are no financial considerations at this stage.

Conclusion

96 London Plan policies on regeneration, housing, density, urban design, play space, inclusive design, sustainability 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:** The principle of redevelopment of this site within the Bermondsey Spa Action Area, with an increased housing provision is supported by London Plan policy.
- **Housing:** The re-provision of existing affordable housing, and the introduction of intermediate housing is in accordance with London Plan policies. Further information is required to demonstrate that the maximum reasonable amount of affordable housing will be provided, and that an appropriate housing mix will be achieved in order to comply with the London Plan.
- **Standard of residential accommodation:** The applicant has committed to providing a satisfactory residential environment for its occupiers in terms of size and layout of the units, in accordance with the draft interim Housing Design Guide.
- **Density:** The proposed residential density exceeds the guidance range set out in the London Plan for this urban location but the surrounding context supports a scheme of this form.
- **Urban design:** The proposal is broadly consistent with the design principles of the London Plan, subject to further clarification and information.
- **Children's play space:** A play strategy has been submitted, however further clarification and details are required to demonstrate that the scheme complies with London Plan policy 3D.13 and relevant planning guidance.
- **Inclusive design:** The applicant has committed to meeting Lifetime Homes standards, together with provision of 10% wheelchair accessible units. Sufficient detail has been provided in relation to the location of the wheelchair accessible units, however further information is required to ensure full compliance with London Plan policies 3A.5 and 4B.5.
- **Energy:** The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole, however further information is required before the carbon dioxide savings can be verified.

- **Climate change adaptation:** The applicant has given consideration to the Mayor's SPG on sustainable design and construction, with details of green roofs and other measures proposed in order to achieve Code for Sustainable Homes Level 4. These commitments should be secured by way of condition.
- **Transport:** The scheme will only be acceptable from a transport perspective with appropriate mitigation and further information being provided.

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

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

- **Housing:** Further discussion with the Council is required before the scheme is reported back at Stage 2, so as to ensure that the maximum reasonable amount of affordable housing is secured over the life of the scheme (in light of its dependence on grant funding) and that the housing mix is reflective of local housing needs.
- **Urban design:** Further information and discussion is required before the scheme is reported back at Stage 2, in relation to the north-south links through the site, the viability of commercial space with respect to public realm, and the choice of materials.
- **Children's play space:** Further discussion and information is required in relation to the details of on-site play space provision and an assurance that nearby parks have sufficient capacity for this and recently constructed schemes in the vicinity.
- **Inclusive design and accessibility:** Typical layout plans that are annotated to show how the scheme would meet all of the relevant standards should be provided, together with confirmation of the accessibility of the communal gardens and shared spaces, details of which should be secured by way of condition.
- **Energy:** The applicant should provide an estimate of the overall regulated carbon dioxide emissions. Additionally, the carbon savings, expressed both in tonnes carbon dioxide per annum and percentages, compared to a 2010 Building Regulations compliant development should be provided.
- **Transport:** Measures are required in order to mitigate the transport impacts of the development. These include contributions towards pedestrian upgrades identified within the PERS audit, and details of the directional split of bus trips generated. Details of staff and visitor parking requires clarification, and further work on the travel plan (inclusive of recommendations from TfL), as well as the construction logistics plan and delivery and servicing plan, are required, and which will need to be secured by way of condition.

for further information, contact Planning Decisions Unit:

Colin Wilson, Senior Manager - Planning Decisions

020 7983 4783 email colin.wilson@london.gov.uk

Justin Carr, Strategic Planning Manager (Development Decisions)

020 7983 4895 email justin.carr@london.gov.uk

Samantha Wells, Case Officer

020 7983 4266 email samantha.wells@london.gov.uk
