

Strategic planning application stage 1 referral

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 the redevelopment of the site to in two buildings of 11 and 28 storeys in height respectively, separated by a publicly accessible square. The scheme would provide 314 residential units (Use Class C3); 449 sq.m GIA of retail floorspace (Use Class A1); 1,818 sq.m of commercial floorspace (B1 Use); and associated disabled parking, cycle parking, children's playspace, public realm improvements and landscaping.

The applicant

The applicant is **CB Southberm 2 Limited** and the architect is **SPPARC**.

Strategic issues summary

Principle: A residential-led mixed-use development is broadly supported within the Old Kent Road Opportunity Area. In order to satisfy the principle of no net loss of industrial capacity, the applicant must demonstrate that all options for the provision of industrial floorspace within the scheme have been explored, and that the space is suitably designed for B1c land uses. (paragraphs 13 – 19)

Housing: 35% affordable housing by habitable room, with a tenure split 70% Social Rent / 30% intermediate. The quantum of affordable housing is below the 50% threshold for developments on industrial land where industrial capacity is not reprovided, therefore the scheme is ineligible for fast track consideration. Early and late stage viability review mechanisms must be secured. A revised financial viability appraisal is required to address the detailed comments provided under separate cover. (paragraphs 20 – 31)

Urban Design: The broad layout, heights and massing arrangement are supported. However further work is required deliver a safe and welcoming pedestrian environment, including amendments to the servicing arrangements. The design of commercial units must achieve specifications for B1c light industrial use. Playspace design and location should be reconsidered to account for safety and security conflicts with B1c land uses. (paragraphs 32 – 45).

Sustainable Development: Further revisions and information are required before the energy proposals can be accepted and the carbon dioxide savings verified to comply with Policy 5.2 of the London Plan and Policy SI2 of the intend to publish London Plan. Contribution to the borough's offset fund must be secured in a s106. An amended drainage strategy and water consumption information are required to satisfy Policies 5.12, 5.13 and 5.15 of the London Plan and SI12, SI13 and SI5 of the intend to publish London Plan. (paragraphs 46 – 52)

Transport: The scheme must be amended to achieve healthy streets objectives and London Cycle Design Standards. Blue badge parking must be provided in accordance with Policy T6 of the intend to publish London Plan. Financial contributions for public realm improvements, wayfinding initiatives, a cycle hire docking station, and improvements to the surrounding bus network (£2,700/unit) must be secured in a s106 agreement. A CPZ must be adopted. A revised Delivery, Servicing and Management Plan, Travel Plan and Logistics Plan must be provided and secured by condition. (paragraphs 53 - 62)

Recommendation

That Southwark Council be advised that the scheme does not currently comply with the London Plan for the reasons set out in paragraph 66 of this report, but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 17 January 2020, 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 must 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 1A, 1B, 1C and 3E of the Schedule to the 2008 Order:

- *1A: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats"*
- *1B (1.c): "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 outside central London and with a total floorspace of more than 15,000 square metres."*
- *1C (1.c): "Development which comprises or includes the erection of a building which is more than 30 metres high and is outside the City of London."*
- *3E "Development which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated; comprising more than 2,500 square metres of floorspace for that specific use class"*

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

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

Site description

5 The application site comprises an area of approximately 0.6 hectares, bound by Ilderton Road to the west and Zampa Road to the south. On its eastern boundary the site is separated from elevated railway lines by a vegetated embankment. These lines connect with South Bermondsey Station in close proximity to the north of the site, which is served by National Rail (Southern Rail) train services. Immediately adjoining the sites northern boundary, and also located between Ilderton Road and the railway embankment is an established Travellers site.

6 The site is within the Old Kent Road Opportunity Area and is designated in the Draft Old Kent Road Area Action Plan (OKR AAP) as part of the Ilderton Road Area (OKR 20). The site is designated Strategic Industrial Land (SIL), but has been identified for potential future release from SIL in the New Southwark Plan (proposed submission version 2019), as part of a broad geography and phasing of development previously agreed by Southwark Council and the GLA for the area covered by the OKR AAP. The

site is presently vacant and undeveloped, having previously been used as an open-air storage site for the parking of disused lorries (Use Class B8).

7 The site records a Public Transport Access Level (PTAL) of 3 indicating moderate public transport accessibility on a scale of 0-6b, where 1a is the lowest and 6b is the highest. Access to public transport is provided by one bus service on Ilderton Road and two on Rotherhithe New Road, and by rail services at the nearby South Bermondsey National Rail station. Accessibility of the site, and across the Old Kent Road Opportunity Area as a whole, would increase with the opening of the Bakerloo Line extension (BLE) on the London Underground and the Surrey Canal Road Overground Station. However, there is only limited capacity on the transport network to accommodate the demand generated by additional homes and jobs generally in the Old Kent Road Opportunity Area (OA) in advance of the BLE which, subject to the granting of powers and availability of funding, would not be until the 2030's.

Details of the proposal

8 The application seeks full planning permission for the mixed use redevelopment of the site, in two buildings of 11 storeys and 28 storeys in height respectively, which are separated by a new public square and comprise:

- 314 residential units (Use Class C3);
- 35% affordable housing (by habitable room);
- 449 sq.m. GIA of retail floorspace (Use Class A1);
- 1,818 sq.m. GIA of commercial floorspace (Use Class B1)
- Public realm improvements and landscaping.

Case history

9 The scheme has not been subject to pre-application advice from the GLA.

Strategic planning issues and relevant policies and guidance

10 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 Council Core Strategy DPD (2011), saved Southwark Plan Policies (2007) and the London Plan 2016 (Consolidated with alterations since 2011).

11 The following are relevant material considerations:

- The National Planning Policy Framework;
- National Planning Practice Guidance;
- The Mayor's Intend to Publish London Plan (December 2019), which should be taken into account on the basis explained in the NPPF; and
- New Southwark Plan Proposed Submission Version: Amended Policies 2019, which should be considered on the basis explained in the NPPF;
- Draft Old Kent Road Area Action Plan (December 2017).

- Southwark Borough Views Background Paper (2017).
- Mayor of London's 23 November 2016 and 31 May 2018 consultation response to Southwark Council's draft Old Kent Road AAP.
- Mayor of London's 6 March 2018 response to the submission version of Southwark's draft New Southwark Plan.
- Letter from the leader of Southwark Council to Jules Pipe, Deputy Mayor for Planning, Skills and Regeneration dated 02/09/18.

12 The relevant issues and corresponding policies are as follows:

- Principle *London Plan; Land for Industry and Transport SPG;*
- Housing *London Plan; Housing SPG;; Affordable Housing and Viability SPG; Housing Strategy.*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG, Shaping Neighbourhoods: Play and Informal Recreation SPG;*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;*
- Transport *London Plan; the Mayor's Transport Strategy*

Principle of development

13 The application site falls within the area covered by Southwark Council's draft Old Kent Road Area Action Plan (draft OKR AAP) as well as the Old Kent Road Opportunity Area identified in the London Plan and intend to publish London Plan. The site is also a protected Strategic Industrial Location (SIL). The intend to publish London Plan identifies the Old Kent Road Opportunity Area as being capable of providing a minimum of 12,000 new homes and 5,000 new jobs and envisages the Bakerloo Line Extension (BLE) enabling significant residential and employment growth. On this basis the comprehensive redevelopment of the site for a residential led mixed-use development is broadly supported, subject to the following further considerations.

14 The BLE programme is subject to ongoing discussions between Southwark Council and TfL; as is the quantum of development the area could sustainably support in advance of the BLE, what additional transport measures would be needed in the interim, and how new development can fairly contribute towards these costs. GLA officers have worked closely with Southwark Council officers to agree the broad geography and phasing of development in the area covered by the OKR AAP to help provide certainty to communities, local businesses and developers in advance of committed funding and also powers for the BLE and a clear timetable for its delivery. The application site has been identified by Southwark, GLA and TfL officers as one which could come forward in advance of the BLE providing that public transport capacity (particularly buses) is significantly improved and no more than 9,500 new homes are permitted across the Old Kent Road AAP area from 1 April 2018, in advance of a BLE construction contract being in place. The need for a Grampian-style s106 obligation that would restrict implementation will therefore need to be assessed at determination stage in light of the number of homes permitted by Southwark in the AAP area at that time.

Industrial land

15 London Plan Policy 2.17 requires boroughs to promote, manage and where appropriate protect strategic industrial land, and London Plan Policy 4.4 commits the Mayor to work with boroughs to adopt a rigorous approach to industrial land management, to ensure a sufficient stock of industrial land and premises is retained, and to plan, monitor and manage the release of surplus industrial land where it can contribute to strategic and local planning objectives, especially the provision of new housing. Policy E5 of the Mayor's Intend to Publish London Plan confirms that non SIL uses within SIL should be refused unless there has been a strategically co-ordinated process of SIL consolidation carried out through a planning framework or Development Plan document review process (and adopted as policy in a Development Plan), or as part of a co-ordinated master-planning process in collaboration with the GLA.

16 Southwark Council has prepared a number of drafts of its OKR AAP and New Southwark Plan which proposed the release of significant areas of OKR SIL and would have resulted in the loss of much important industrial capacity within the OKR AAP area. The Mayor objected to these when he was consulted. GLA officers have worked closely with their Southwark counterparts to address these concerns and have now agreed a potential geography and phasing of strategic industrial land release and consolidation to provide a degree of certainty to residents, local businesses and developers in advance of a clear BLE delivery programme and Southwark's adoption of its emerging development plan documents. Southwark Council has also committed to a retention and relocation strategy for existing industrial businesses within the OKR AAP area, confirmed its commitment to intensifying industrial uses on existing and new SIL sites and to purchase additional land to deliver these objectives. In light of these processes and commitments, GLA officers accept that this site is potentially suitable for SIL release. However, in line with Policy 4.4 of the London Plan and Policy E7 of the Intend to Publish London Plan, any release of land from SIL must ensure no net loss of industrial capacity. Intend to Publish London Plan Policy SD1 re-iterates that there should be no net loss of industrial floorspace capacity in the Opportunity Area, and that areas that are released from SIL should seek to co-locate housing with industrial uses.

17 In accordance with the principles of 'no net loss' outlined in paragraph 6.4.5 and Policies E4 and E7 of the Intend to Publish London Plan, industrial floorspace must be re-provided at a rate equivalent to the existing floorspace which exists on the site, or which could be accommodated on the existing site at a 65% plot ratio, whichever is greater. In this instance, the entire site is open storage (B8 Use) and there is no built industrial floorspace, therefore the 65% plot ratio test is applicable for determining the quantum of replacement industrial floorspace required.

18 Where the 65% plot ratio is applied to the 0.6 hectare development site, 3,900 sq.m. of new industrial floorspace would be required to satisfy the principles of no net loss of industrial capacity as outlined in paragraphs 6.4.5 and policies E4 and E7 of the Mayor's Intend to Publish London Plan.

19 The application currently proposes 449 sq.m of A1 retail floorspace and 1,818 sq.m of B1 commercial floorspace. No replacement industrial capacity is proposed. The scheme therefore fails to satisfy the principles of no net loss of industrial capacity, as outlined in paragraphs 6.4.5 and policies E4 and E7 of the Mayor's Intend to Publish London Plan. The applicant must demonstrate that all reasonable endeavours to maximise industrial

capacity on the site have been explored, in accordance with the principles of ‘no net loss’, for the scheme to be supported. Light industrial space should be incorporated within the scheme and designed at an appropriate specification for light industrial uses (noting the specific design comments provided further in this report).

Housing

20 The applicant proposes 314 residential units at the following size and tenure mix.

Units	Market housing	Social Rent	Intermediate	Total
Studio	15 units	0 units	0 units	15 units
One bed	100 units	7 units	3 units	110 units
Two bed	95 units	17 units	14 units	126 units
Three bed	20 units	33 units	8 units	61 units
Four bed	0 units	2 units	0 units	2 units
Total	230 units	59 units	25 units	314 units

Affordable housing

21 London Plan Policy 3.12 requires the maximum reasonable amount of affordable housing in all schemes. London Plan Policies 3.11 and 3.12, intend to publish London Plan Policies H5 and H6, and the Mayor’s Affordable Housing and Viability SPG also set a strategic target of 50% affordable housing. At the local level, the Southwark Local Plan sets a strategic target of 35% for the Old Kent Road area.

22 The Mayor’s Affordable Housing and Viability SPG and Policy H6 of the intend to publish London Plan set out the ‘threshold approach’ to planning applications. The Mayor’s SPG and Policy H1 of the intend to publish London Plan recognise that the generally lower existing use values for industrial land allows for higher levels of affordable housing to be provided on such sites, and therefore where surplus industrial land is deemed suitable for release for housing in line with London Plan Policies 2.17, 3.7 and 4.4, such sites should fully contribute towards the delivery of the strategic affordable housing target. On this basis, to capture the uplift in land values towards increased affordable housing provision, the Mayor’s Affordable Housing and Viability SPG and Policies H6 and H7 of the intend to publish London Plan set out that schemes on industrial land, such as the application site, that provide 50% affordable housing on site without public subsidy and meet the preferred strategic tenure split, would not be required to submit viability information nor be subject to a late stage review. Under the proposed revisions to policy H6 in the draft London Plan, the 50% threshold for fast track consideration would reduce to 35% where the scheme results in no net loss of industrial capacity.

23 The preferred tenure mix is outlined in Policy H7 of the Intend to Publish London Plan as at least 30% low cost rent (social rent or affordable rent), at least 30% intermediate (London Living Rent or shared ownership) and the remaining 40% determined by the local planning authority.

24 The application proposes 35% affordable housing by habitable room, with a tenure split of 70% Social Rent to 30% intermediate products (by unit). The proposed level of affordable housing falls below the 50% threshold for developments on strategic industrial land and, as discussed previously, the application has not re-provided industrial capacity on the site in accordance with the principles of no net loss. Therefore the scheme is ineligible for fast track consideration and must follow a viability tested route. Both early and late stage viability review mechanisms must be secured in any approval.

25 The applicant has submitted a financial viability appraisal (FVA) and review indicates further scope to maximise the provision of affordable housing. Detailed comments on the submitted FVA have been forwarded to the applicant and Southwark Council under separate cover in this regard, and GLA officers will continue to robustly scrutinise the viability appraisal to ensure that the maximum amount of affordable housing is delivered.

26 The viability assessment and independent review must be published to ensure transparency of information in accordance with the Mayor's Affordable Housing and Viability SPG and the Intend to Publish London Plan.

Residential unit size mix

27 London Plan Policy 3.8 and Policy H12 of the Mayor's intend to publish London Plan encourage a full range of housing choice, with affordable family housing noted as a strategic priority. This is supported by the London Plan Housing SPG, 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 3.11 of the London Plan states that within affordable housing provision, priority should be accorded to family housing.

28 The overall proportion of family size accommodation within the scheme is 20%, which increases to 51% within the affordable housing components of the scheme and 59% within the social rented tenure. This level of family sized housing is supported, as is the increased proportion of family sized units within the affordable housing tenures.

Children's playspace

29 London Plan Policy 3.6 and Policy S4 of the intend to publish London Plan require housing proposals to make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. Using the methodology within the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG, it is anticipated that there will be approximately 134 children within the development based on current housing mix. The guidance sets a benchmark of 10 sq.m. of useable child playspace to be provided per child, with under-5-year olds playspace provided on-site as a minimum. As such the development should provide a minimum of 1,340 sq.m. of playspace within the application site boundaries.

30 The design and access statement provided with the application identifies a total of 1,253 sq.m. of children's playspace across the development site, which includes areas at ground floor and roof level designated for a mixture of age groups. The quantum of play space proposed falls below the guidance outlined in the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG, and the applicant should revise the scheme to provide

additional playspace. In the event that all of the required playspace is unable to be accommodated on site, suitable financial contribution towards the upgrade of playspace available in the surrounding area should be secured in the s106 agreement.

31 The quality and design of equipment provided in play areas must be secured by planning conditions. The applicant must also demonstrate that all playspace is available to all children within the development and not segregated by tenure, in accordance with Policy S4 of the intend to publish London Plan. The ongoing availability of all playspace to all children in the development must be secured by appropriate conditions of approval.

Urban design

32 The design principles of chapter seven in the London Plan and chapter three of the intend to publish London Plan outline that all developments should achieve a high standard of design which responds to local character, enhances the public realm and provides architecture of the highest quality. In particular, Policy 7.5 of the London Plan and Policies D1 & D2 of the intend to publish London Plan require architecture to make a positive contribution to a coherent public realm, streetscape and wider cityscape, incorporating the highest quality materials and design appropriate to the surrounding context.

33 The broad layout principle of arranging blocks to create a consistent, active street frontage along Ilderton Road is supported. The heights and massing arrangement is also supported in terms of creating a gradual increase in height towards the station, which is beneficial in townscape terms. The proposals also appear to be consistent with the height strategy of the draft Old Kent Road Area Action Plan. The applicant must provide verified views which demonstrate the proposal would not harm the composition of Protected Vista 2A.1, as required by London Plan Policy 7.12 C and Policy HC4 of the Mayor's intend to publish London Plan. If harm is evident from this analysis, then the scheme will require amendments to address this.

34 Given the spatial constraints of the site and its long, linear shape there is very limited space available for servicing to ground floor commercial units. This risks impacting on the ability to deliver a safe and welcoming pedestrian environment and further information is needed to define key pedestrian routes and desire lines in the wider context. The existing route between the site and South Bermondsey station appears convoluted and should be improved to support the quantum of development proposed.

35 The two points of vehicular servicing access (the service yard at the northern end and the loading bay half way down the Ilderton Rd frontage) suggest that delivery and refuse arrangements would occur on the pavement, have to be moved along the building frontage, which would detract from the pedestrian environment. Further information is needed to demonstrate how the proposed servicing arrangement can be managed effectively.

36 The applicant is required to provide a significant amount of B1c floorspace and, as currently proposed, the access arrangements and design/specification of commercial units would fail to enable this. Significant design amendments are likely to be required to accommodate the required quantum of B1c floorspace. As part of this work, the applicant should explore options for removing the ground floor residential units and relocating the children's playspace currently proposed at ground floor, in order to utilise the railway line edge of the site for servicing and any B1c related yard space.

37 In particular, the inclusion of the proposed 0-5 years old children's play area in the ground floor 'courtyard' space raises significant safety and security concerns in the context of B1c provision, and this should be reconsidered accordingly. Introducing a podium level between blocks 2 and 3 should be considered as part of the work to relocate and improve playspace provision.

38 Commercial units should be built to a B1c specification, including minimum floor to ceiling heights, sizing of yard space/loading areas.

39 Details of noise/vibration/air quality mitigation measures will need to be provided to ensure that residential and light industrial activities can successfully co-exist on the site. This should include consideration for the introduction of winter gardens and avoidance of single aspect units facing onto industrial/servicing areas.

40 Notwithstanding concerns relating to the quality of public realm and accessibility of the site for pedestrians and cyclists, core entrances are positioned to be welcoming and legible from the street and are distributed to create efficient core to unit ratios and a reasonable proportion of dual aspect units overall. Separation distances between inward facing balconies should be confirmed.

41 The rationale behind the diamond shaped windows is not clear and officers would question whether this facade treatment is appropriate for a scheme of such prominent height, bulk and massing. The resulting diamond windows also create potentially awkward impacts on the interiors of residential units and should be reconsidered.

Inclusive design

42 Inclusive design principles should be embedded into the development and design process from the outset. The aims of London Plan Policy 7.2 and Policy D3 of the intend to publish London Plan are to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum).

43 London Plan Policy 3.8 and Policy D5 of the intend to publish London Plan require that 90% of new housing meets Building Regulation requirement M4 (2) 'accessible and adaptable dwellings' and 10% of new housing meets Building Regulation requirement M4 (3) 'wheelchair user dwellings'. The Council should secure compliance with Building Regulations M4 (2) and M4 (3) by condition, and also ensure that a minimum of 10% of units are delivered as wheelchair accessible units from the outset. The future marketing of the private wheelchair accessible homes must ensure that prospective occupiers are aware of the accessibility and adaptability of these units. The applicant is encouraged to consider how the units will be marketed and demonstrate how this would be secured in the s106 agreement.

Fire statement

44 In line with policy D12 of the Mayor's intend to publish London Plan, development proposals must achieve the highest standards of fire safety and ensure that they: are designed to incorporate appropriate features which reduce the risk to life in the event of a fire; are constructed in an appropriate way to minimise the risk of fire spread; provide suitable and convenient means of escape for all building users; adopt a robust strategy for evacuation which all building users can have confidence in and provide suitable access

and equipment for firefighting which is appropriate for the size and use of the development.

45 The applicant is required to submit a Fire Statement by a third party suitably qualified assessor. The statement should detail how the development proposal will function in terms of: the building's construction; the means of escape; access for fire service personnel and equipment, and the ongoing maintenance and monitoring of these how provision will be made within the site to enable fire appliances to gain access to the building. The Fire Statement should be submitted prior to determination.

Sustainable Development

Energy

46 The Energy Hierarchy has been followed and the proposed energy strategy is broadly supported; however, further revisions and information are required before the proposals can be considered acceptable to comply with Policies 5.2 and 5.13 of the London Plan as well as Policies SI2 and SI13 of the intend to publish London Plan. Detailed comments have been forwarded to the LPA and the applicant under separate cover in this regard.

47 The carbon dioxide savings meet the on-site target set within Policy 5.2 of the London Plan for both domestic and non-domestic uses. However, the proposed strategy is not in line with the GLA guidance and therefore it must be reviewed. The revised carbon emissions should be submitted for all stages of the energy hierarchy. The applicant has confirmed that £442,306 will be paid into the borough's offset fund, equivalent to 246 tonnes of carbon dioxide per annum; evidence of correspondence with the borough confirming this should be provided, and the figure secured in a s106 agreement.

48 The applicant is proposing to install a combined heat and power (CHP) unit; however, this is not supported given the scale of the development. The applicant should prioritise a connection to the SELCHP heat network as the energy strategy going forward, gas boiler plant should be used in any interim period. Should Veolia or Southwark provide any reason that a connection cannot be agreed in future and should not be assumed at this stage then the applicant will be required to investigate other low or zero carbon heating technologies for the site.

Flood risk and drainage

49 Detailed comments regarding flood risk and drainage have been forwarded to the LPA and applicant under separate cover. Review of the submitted information has confirmed that the approach to flood risk management for the proposed development does not comply with Policy 5.12 of the London Plan and Policy SI12 of the intend to publish London Plan.

50 The surface water drainage strategy for the proposed development does not comply with Policy 5.13 of the London Plan and Policy SI.13 of the intend to publish London Plan, as it does not give appropriate regard to the drainage hierarchy. Further details on how SuDS measures at the top of the drainage hierarchy will be included in the development should be provided. Additional attenuation storage volume calculations, attenuation tank dimensions, exceedance assessment information, and SuDS maintenance information should also be provided.

51 The proposed development generally meets the requirements of Policy 5.15 of the London Plan and Policy SI.5 of the intend to publish London Plan in respect to the residential water consumption targets of these policies. However, the applicant should also consider water harvesting and reuse to reduce consumption of wholesome water across the entire development site. This can be integrated with the surface water drainage system to provide a dual benefit.

Green infrastructure

52 The applicant should calculate the proposed development's Urban Greening Factor, as set out in Policy G5 of the intend to publish London Plan, and aim to achieve the specified target.

Transport

Walking, and active travel

53 The development has been set back from Ilderton Road in order to provide parking and loading bays. The profile of the proposed buildings and the depth of these bays leads to a footway which meanders considerably and in places appears to be under 2.5 metres in width. These proposals would not meet Healthy Streets objectives and would discourage active travel, the scheme should therefore be amended to address these deficiencies.

54 Ilderton Road and the surrounding streets present a generally poor environment for walking and cycling. As a result, financial contributions towards public realm improvements and wayfinding initiatives in the surrounding area should be secured, in accordance with Policy T4 of the intend to publish London Plan.

55 The site is very close to the Greenwich to Waterloo cycleway (formerly Quietway 1) and a new cycle route from Peckham to Rotherhithe which is currently under design development. Notwithstanding this, Ilderton Road itself currently offers a poor cycling environment and this must be improved to ensure good connections to these cycle routes and to encourage cycling more broadly. To support cycling by new building occupiers and as part of a network for the whole Opportunity Area, a proportionate contribution should be provided towards the costs, including necessary land, for a new cycle hire docking station along with free membership for residents. Contribution towards the provision of a Cycle Hire Docking Station must be secured through the s106 agreement.

Cycle parking

56 Cycle parking must be provided and secured in line with policy T5 of the intend to publish London Plan. The proposed cycle parking does not satisfy the requirements of the London Cycling Design Standards, as required by Policy T5 of the intent to publish London Plan, and must be amended to achieve this.

Public transport

57 Until the Bakerloo Line Extension and new Surrey Canal Overground Station are delivered, buses will remain a significant mode of public transport for users of the proposed development. Notwithstanding this, the existing bus network is already at or close to capacity and cannot cater for the additional demand. Therefore, a financial contribution of £2,700 per residential unit must be secured towards improvements to the bus network over

a five-year initial period, commensurate with the impact of the development, and in accordance with Policy T4 of the intend to publish London Plan.

58 South Bermondsey Station offers six trains per hour in each direction, but passengers interchanging at the London Bridge terminus to/from London Underground services experience considerable peak time congestion. A proposed London Overground station on Surrey Canal Road would be approximately 600 metres from the centre of the site. Funding has yet to be confirmed for this new station and the associated service frequency increase which could help address the current overcrowding on trains and at key interchange stations such as Canada Water. Subject to a review of trip generation and Network Rail/Southern Rail's assessment of their station, a contribution toward improvements at South Bermondsey and/or the delivery of the proposed Surrey Canal Road London Overground station may be considered appropriate to mitigate the impact of the development.

Car parking

59 The development is car-free with the exception of 2 Blue Badge parking spaces. Whilst the car-free nature of the scheme is welcomed in accordance with Policies 6.13 of the London Plan and T6.1 of the intend to publish London Plan; Policy T6 also requires a minimum of blue badge parking spaces for 3% of dwellings from the outset, with an additional 7% capacity for Blue Badge spaces to be identified should future demand exceed the initial provision. The scheme does not achieve this, and therefore the applicant must further investigate options for additional blue badge parking spaces over and above the current provision. A car parking design and management plan should be secured by condition and which ensures Blue Badge spaces are allocated on the basis of need and not tied to a particular unit. Electric Vehicle Charging points should be provided and secured by condition in accordance with policy T6 of the intend to publish London Plan.

60 To support the car free development, the applicant should enter into a permit free agreement and contribute towards the implementation of a Controlled Parking Zone for the area, both secured through the section s106 agreement.

Servicing

61 No analysis has been provided to demonstrate that the proposed servicing space has sufficient capacity to meet demand. Refuse collection appears to rely on storing large numbers of large bins on the (narrow) footway on collection day. Since these are fundamental design issues and changes would conflict with disabled parking spaces, a full assessment of servicing should be provided before the planning application is determined. A Delivery & Servicing Management Plan should be provided and secured by condition

Logistics and Travel Plans

62 A draft Logistics Plan and Travel Plan have been submitted in support of the application. Final revised versions of these should be submitted and secured by condition and discharged in consultation with Transport for London.

Local planning authority's position

63 Council Officer's from the London Borough of Southwark are currently assessing the

application. The proposal is intended to be presented to the Council's Committee in March 2020.

Legal considerations

64 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. 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

65 There are no financial considerations at this stage.

Conclusion

66 London Plan policies on land use principle, housing, urban design, sustainable development and transport are relevant to this application. The below issues must be addressed to ensure the proposal complies with the London Plan:

- **Principle:** Redevelopment for a residential-led mixed-use development is broadly supported in Southwark Council's draft Old Kent Road Area Action Plan (draft OKR AAP) as well as the Old Kent Road Opportunity Area. In order to satisfy the principle of no net loss of industrial capacity, in accordance with policies E4 and E7 of the intend to publish London Plan, the applicant must maximise delivery of light industrial floorspace within the scheme, and ensure all light industrial floorspace is suitably designed and secured for occupation by B1c land uses.
- **Housing:** 35% affordable housing by habitable room, with a tenure split 70% Social Rent / 30% intermediate. The quantum of affordable housing is below the 50% threshold for developments on strategic industrial land and on public land, therefore the scheme is ineligible for fast track consideration. Early and late stage viability review mechanisms must be secured. A revised financial viability appraisal (FVA) must be provided which addresses the detailed comments provided under separate cover to ensure that the maximum amount of affordable housing is delivered.
- **Urban design:** The broad layout, heights and massing arrangement are supported. However further work is required deliver a safe and welcoming pedestrian environment, including amendments to the servicing arrangements. The design of commercial units must achieve specifications for B1c light industrial use. Playspace design and location should be reconsidered to account for safety and security conflicts with B1c land uses.

- **Sustainable development:** Further revisions and information are required and the carbon dioxide savings verified to comply with Policy 5.2 of the London Plan and Policy SI2 of the intend to publish London Plan. Remaining regulated carbon dioxide emissions must be met through an adequately secured contribution to the borough's offset fund. An amended drainage strategy and water consumption information are required to comply with Policies 5.12, 5.13 and 5.15 of the London Plan and SI12, SI13 and SI5 of the intend to publish London Plan. The applicant must embed urban greening in line with Policy 5.10 of the London Plan and Policies G1 and G5 of the intend to publish London Plan.
- **Transport:** The scheme must be amended to achieve healthy streets objectives and the London Cycle Design Standards. Blue badge parking is inadequate and must be provided in accordance with Policy T6 of the intend to publish London Plan. Financial contributions towards public realm improvements, wayfinding initiatives, a cycle hire docking station, and improvements to the surrounding bus network (£2,700/unit) must be secured in a s106 agreement. A CPZ must be adopted in the surrounding area. A revised Delivery, Servicing and management Plan along with a Travel Plan and Logistics Plan must be provided and secured by condition.

for further information, contact GLA Planning Unit (Development & Projects Team):

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