Southwark Park Sports Centre
in the London Borough of Southwark
planning application no. 08-CO-0117

Strategic planning application stage II referral (new powers)

The proposal
Re-development of existing Southwark Park Sports Centre involving; replacing and refurbishing the existing pavilion, addition of three multi use games areas, addition of six blue badge parking areas and the refurbishment of the existing track and artificial turf infield.

The applicant
The applicant is Southwark Council, and the architect is Studio E Architects Ltd.

Strategic issues
The Mayor previously raised a series of strategic planning concerns in relation to; urban design, access and inclusive design, climate change adaptation and mitigation and transport. Following the Mayor’s original comments these issues have all now been satisfactorily addressed

Recommendation
That Southwark Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal.

Context
1 On 5 February 2009 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. This was referred to the Mayor under Category Category 3D of the Schedule to the Order 2008: “ (a) development on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and (b) which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building.”

2 On 18 March 2009 the Mayor considered planning report PDU/2298/01, and subsequently advised Southwark Council that the application did not comply with the London Plan, for the reasons set out in paragraph 58 of the above-mentioned report; but that the possible remedies set out in paragraph 60 of that report could address these deficiencies.
3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. Since then, the application has been revised in response to the Mayor’s concerns (see below). On 28 July 2009, Southwark Council decided that it was minded to grant planning permission and on 30 July 2009 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged or direct Southwark Council under Article 6 to refuse the application. The Mayor has until 12 August 2009 to notify the Council of his decision and to issue any direction.

4 The decision on this case, and the reasons will be made available on the GLA’s website www.london.gov.uk.

Update

5 At the consultation stage Southwark Council was advised that the application did not comply with the London Plan, for the reasons set out in paragraph 58 of the above-mentioned report; but that the possible remedies set out in paragraph 60 of that report could address these deficiencies:

Urban design and effect on Metropolitan Open Land

6 The key issues raised at stage I related to visual impact of the proposal on the surrounding Metropolitan Open Land. Of particular concern was the three pitched sky light features as detailed in figure 1 below. The applicant has redesigned this aspect of the building and now incorporates one sky light as detailed in figure 2 below and this is considered an improvement on the original scheme. The design comments made at the consultation stage regarding the proposed orientation of the buildings have not been addressed and the proposed layout would not readily allow for clear and legible access to the facility from Hawkstone Road or the park or promote security in the vicinity. This is disappointing and fails to reflect the design principles of London Plan Policy 4B. The applicant has offered limited justification for the proposed layout, however Southwark Council officers are satisfied with the proposed layout.

7 Therefore all outstanding issues relating to urban design and the effect on Metropolitan Open Land have been resolved, although the orientation of the building has remained unchanged it is not considered to be of strategic importance nor warrant directing refusal.

Figure 1: Original proposed building as viewed from main racing track north. (Source: Studio E Architects).
Access and inclusive design

8 At stage I the areas of concern regarding access related to the orientation of the building, the provision of Blue Badge car parking, whether all entry and exit doors were automatic, the gradient and widths of external paths and also the access issues identified within the access audit. As discussed above the building orientation has been retained. The applicant provided further detail confirming the provision of the Blue Badge car parking and also that the external paths were of an appropriate width and gradient. The applicant has also investigated the potential improvement of the access deficiencies identified in the surrounding streets with the Council and an additional signalised crossing facility is to be provided within the vicinity of Hawkstone Road.

9 Therefore all outstanding issues relating to access have been resolved.

Climate change mitigation and adaptation

10 At stage I further information regarding climate change adaptation and mitigation was requested regarding the proposed energy efficiency measures to be adopted. The applicant responded detailing a list of measures including improved insulation levels, better air permeability and energy efficient lighting. Therefore all outstanding issues relating to climate change adaptation and mitigation have been resolved.

Transport for London’s comments

11 Transport for London (TfL) raised a number of issues at consultation stage. This included the provision of one dedicated coach parking space, the provision of a cycle lane along Hawkstone Road, and cycle parking to be provided in line with TfL’s cycle parking standards. Appropriate segregation of the shared walkway/cycleway and a final version travel plan was also requested.

12 The applicant has confirmed to TfL that two coach parking spaces are proposed on Hawkstone Road, less than 100m from the site entrance and this is welcomed.

13 A financial contribution of £50,000 has been secured by Southwark Council towards the implementation of a new cycle land and measures to improve cycle safety along Hawkstone Road. This is welcomed and ensures compliance with London Plan policy 3C.22 (‘Improving conditions for cycling’).

14 A total of 32 cycle parking spaces are proposed to be provided on site. This is in line with TfL’s cycle parking standards as defined in Policy 3C.22 (‘Improving conditions for cyclists’).

15 The applicant has submitted additional information to TfL showing that the shared walkway/cycleway from Hawkstone Road to the entrance of the complex has been appropriately segregated through the use of raised surfaces to avoid user conflicts. This ensures compliance with London Plan policies; 3C.21 (‘Improving conditions for walking’) and 3C.22 (‘Improving conditions for cycling’).
A final version travel plan has been secured by condition.

The issues raised at consultation stage have been satisfactorily addressed through the submission of additional information and planning conditions. Therefore, TfL considers this application to be in general conformity with the London Plan and acceptable in transport terms.

Response to consultation

In response to Southwark Council’s consultation process, the Council received the following responses summarised below:

Local owners/occupiers

One objection was received and the objector raised the following issues:

- Increased traffic and noise.

Statutory and non-statutory bodies

In addition to local occupiers, a number of statutory and non-statutory organisations were consulted. The organisations, and their comments, are summarised below:

- **Hawkstone Estate Tenants and Residents Association:** Hawkstone Tenants and Residents Association are disappointed that the applicant did not seek their help and advice and their concerns are summarised as follows:
  - Number of visitors.
  - Effect on green spaces and views.
  - Availability of facility to the community groups such as Red Lion Boys club.
  - Noise effects on Hawkstone Road residents.
  - Insufficient car parking.
  - There is no disabled exit lift from Surrey Quays station.
  - Disturbance from deliveries and service vehicles.
  - Pricing of the entry fees to the complex.

- **Environment Agency:** Additional addendum to the flood risk assessment. No objection.

- **Metropolitan Police Service:** The car parking area does not benefit from good surveillance from the new buildings.

- **English Heritage:** The Sports Centre is located in Southwark Park which is included in ‘English Heritage’s Register of Parks and Gardens of special historic interest in England’ at grade II. It is considered that the MUGA will detract from the historic character of the park through the loss of open grassed area to the south east corner of the park. It is considered that the landscaping proposals do not specifically take into account the historic character of the park and strongly suggested that the detailed landscape scheme, which the landscape strategy states is to be drawn up in accordance with a planning condition, is required to take account of the historic character.

- **London Underground:** No comment.

- **Sport England:** No objection as the land to be used for the purposes of the development currently do not form part of any playing field space. Suggested two conditions relating to maintenance and management.
• **The Garden History Society:** No comment.

• **Southwark Cyclists:** Requested a condition requiring that secure and covered bike parking spaces are provided within the site for 30% of employees, provide fifty visitor spaces within the site and a further thirty within fifty metres of the site.

• **Cavendish School:** Requested clarification on carparking and charging.

21 The strategic issues raised other than those relating to the effect of the MUGA on the historic park have been addressed in this report and the previous Stage I report to the Mayor.

22 In terms of the historic park, the inclusion of a site on English Heritage’s Register of Parks and Gardens of Special Historic Interest and the effects of development on the Park or its setting is a material consideration (although there are no additional statutory controls). PPG15 states that local planning authorities should protect parks and gardens in determining applications. Draft PPS15 states that applications that do not enhance heritage assets (including registered parks) should weigh loss of enhancement against the wider benefits. In this instance the Council has amended the proposed landscaping condition to require the landscaping scheme to have regard to the historic character of the Grade II listed park. This will ensure the historic character is taken into account and strikes an appropriate balance between providing new sports facilities and heritage protection, in this instance.

**Legal considerations**

23 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice.

**Financial considerations**

24 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government guidance in Circular 8/93 (‘Award of Costs in Planning and Other (including Compulsory Purchase Order) Proceedings’) emphasises that parties usually pay their own expenses arising from an appeal.

25 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

**Conclusion**
The proposed redevelopment of Southwark Park Sports Centre is supported. The planning application is well considered and all outstanding strategic planning concerns have been satisfactorily resolved.

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Southwark Park Sports Centre
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2 The application is referable under Category 3D of the Schedule to the Order 2008: “(a) development on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and (b) which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building.”

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; or allow the Council to determine it itself, unless otherwise advised. In this instance if Southwark Council resolves to refuse permission it need not refer the application back to the Mayor.

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

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

Site description

6 Southwark Park Sports Centre is located at the south-east corner of Southwark Park and is accessed via Hawkstone Road. Southwark Park is Metropolitan Open Land. The existing athletics and sports facility comprises of a clubhouse (which is currently derelict and unusable except for the weights room) and an athletics track, which has been unusable since 2005.

7 The park is located approximately 200 metres from Surrey Quays station (currently closed for upgrade) on the East London Line and is also within walking distance of Canada Water shopping Centre and Canada Water Station on the Jubilee Line.

Details of the proposal

8 The proposal aims to provide a development centre for disability athletics through redeveloping the existing sports centre as follows, and is shown in Figure 1 below:

- Demolition of the existing 800 sq.m. sports pavilion and replacement with a new 1100 sq.m. single storey pavilion containing an inclusive gym and coaching and changing rooms.
- Addition of three multi use games areas.
- Addition of six blue badge parking areas.
- Refurbishment of existing track and artificial turf infield.
Figure 1: The proposed layout
The existing sports pavilion is 800 sq m and the proposed is 1,100 sq.m, 300 sq.m. larger than the existing. The pavilion building will be single storey and accommodate eight team changing rooms, two disabled changing rooms, physiotherapy room, club and meeting rooms, kitchen and bar, free weights area, inclusive gym and plant and storage areas. An outdoor bike stand and site landscaping is also proposed.

The proposed three 5-a-side / multi use games areas will result in a loss of approximately 1,650 sq.m. area of wildflower meadow, however the applicant has agreed, in conjunction with Southwark Council to create a similar sized area of wild flower meadow located to the north of the athletics track.

Once redeveloped the facility will be available as a Paralympic training camp for athletics for London 2012, and will also be utilised by surrounding schools and colleges within Southwark.

Case history

The proposal has been subject to pre application discussions with GLA staff. Pre application advice report 2298/01, dated 11 November 2008 identified several aspects of the application that required further information, most importantly the need to incorporate inclusive design and access. This application has sought to address the issues identified within the previous report.

Strategic planning issues and relevant policies and guidance

The relevant issues and corresponding policies are as follows:

- Green Belt/MOL: London Plan; PPG2
- Open land: London Plan; PPG17
- Playing fields: London Plan; PPG17
- Access: London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Wheelchair Accessible Housing BPG; Planning and Access for Disabled People: a good practice guide (ODPM)
- Equal opportunities: London Plan; Planning for Equality and Diversity in Meeting the spatial needs of London’s diverse communities SPG; Diversity and Equality in Planning: A good practice guide (ODPM)
- Urban design: London Plan; PPS1
- Biodiversity: London Plan; the Mayor’s Biodiversity Strategy; Improving Londoner’s Access to Nature: Implementation Report; PPS9
- Sustainable development: London Plan; PPS1, PPS Planning and Climate Change Supplement to PPS1; PPS3; PPG13; PPS22; the Mayor’s Energy Strategy; Sustainable Design and Construction SPG
- Transport: London Plan; the Mayor’s Transport Strategy; PPG13
- Parking: London Plan; the Mayor’s Transport Strategy; PPG13

For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2007 Southwark Unitary Development Plan and the London Plan (Consolidated with Alterations since 2004).

The Southwark Core Strategy (issues and options) is also a material consideration.
Metropolitan Open Land and the principle of the development

16 The application site, Southwark Park, is designated as Metropolitan Open Land. Policy 3D.10 of the London Plan clearly indicates that Metropolitan Open Land is to be protected from inappropriate development, and such inappropriate development should not be approved except in very special circumstances. The London Plan also makes clear that London’s growth should be sustainable and not encroaches on London’s own precious green spaces (paragraph xi). The reference to “inappropriate development” flows directly from PPG2, which sets out the Government’s policy towards Green Belt.

17 Government guidance states that development is inappropriate unless it is for the following purposes:

- Agriculture and forestry.
- Essential facilities for outdoor sport and recreation; for cemeteries; and for other uses of land, which preserve the openness of the Green Belt.
- Limited extension, alteration or replacement of existing dwellings.
- Limited infilling or redevelopment of major existing developed sites identified in adopted development plans, which meet the criteria in Annex C of PPG2.

18 The proposed building itself occupies an additional 300 sq.m. of floor space over and above that of the existing building. This equates to an increase of 37.5%, but given the size of Southwark Park (259,000 sq.m.) this equates to only a 0.123% decrease to the Metropolitan Open Land. A comparison between the existing and proposed building footprint is provided below.

Figure 2: Comparison of the existing and proposed building footprint.
19 The majority of the building comprises an essential facility for outdoor sports and recreation and is therefore an acceptable use on the Metropolitan Open Land. However some elements are not necessarily essential such as the gym, therefore the applicant has identified the exceptional circumstances to justify the proposal as follows:

- Compliance with accessibility design requirements - including larger changing rooms, corridors, doorways.
- Energy Efficiency – larger plant room to accommodate the 20% renewable energy target
- Addition of an inclusive Gym – which would be used by athletes and complement outdoor training, as well as help the facility become financially sustainable.

20 The proposal also incorporates provision of three multi use games areas: one basketball court and two permeable astro-turf courts on land that is currently parkland. The area taken up by these courts will be compensated for elsewhere in the park where an area of meadow will be provided to the north of the athletics track.

21 The athletics facility at present is un-useable and this facility is the only athletics facility in the borough; all schools and clubs currently have to travel out of the borough to access such a facility. Policy 3A.18 (‘Protection and enhancement of social infrastructure and community facilities’) of the London Plan seeks to ensure that appropriate facilities such as sports and leisure facilities are provided within easy reach by walking and public transport and that the net loss of these facilities should be resisted and the increased provision be sought. The site is centrally located within walking distance from bus and tube routes.

22 The proposal will further enhance the provision of public sports facilities in the park and any adverse effects on the Metropolitan Open Land have been sufficiently mitigated. In addition a good case has been made to justify the special circumstances that exist for the development. The proposal fits within the functions identified in the London Plan and is accepted in principal as being an appropriate use in Metropolitan Open Land.

**Access and inclusive design**

23 Inclusive design principles, if embedded into the development and design process from the outset, help to ensure that all peoples, including older people, people with disabilities, children and young people, can use the places and spaces proposed comfortably, safely and with dignity. The aim of London Plan policy 4B.5 (‘Creating an inclusive environment’) is to ensure that proposals achieve the highest standards of accessibility and inclusion, not just the minimum as required by building regulations. The design of the landscaping and the public realm is crucial to how inclusive the development is to many people.

24 The aim to provide a truly accessible and inclusive sport facility providing specific facilities for wheelchair racing events is welcome, as is the consultation and design guidance that has been sought from various groups such as the Inclusive Fitness Initiative, WheelPower Elite Wheelchair, London Marathon Charitable Trust, Sport England and the Football Foundation.

25 The improved inclusive building design measures including the increased door and hallway widths and width and slope of outdoor tracks are welcomed. However there are still some access issues that need to be resolved before the application can be considered fully inclusive. It is considered the orientation of the building would be better suited if the entrance faced the car parking area to provide a clear pedestrian link and welcoming environment to visitors. It is requested that further detail is provided from the applicant clarifying the chosen building orientation. In addition the applicant is requested to demonstrate that there is the required transfer space either side of the Blue Badge car parks, and also provide further detail regarding the gradient.
and width of the access path from the car park to the sports center. Furthermore the applicant needs to clarify if all entry and exit doors to the main building will be automatic.

26 Further detail is also requested regarding the design of the access path leading from the main building to the multi use games areas, including the width of the path and also the gates entering the multi games areas. It is unclear if the spectator seating areas and steps down to the wheelchair racing areas are fully accessible, and if handrails are proposed. If so this needs to be demonstrated.

27 As internal detailed design of the pavilion is yet to be undertaken, the applicant should ensure that the access requirements of visually impaired visitors is adequately considered. Particularly the surface materials used, the routes to and within the building, the use of lighting, colour tone and contrast, the signage, the design of doors and glazing all help to make orientation and way finding easy and the spaces truly inclusive.

28 The access audit of the surrounding streets provided is welcomed, however the identified deficiencies such as the degraded and cracked footpaths and lack of dropped kerbs should be rectified as part of this project before the new sports centre opens. Particularly given that the current proposal has the potential to be a high profile exemplar of a fully accessible facility. In addition the access audit should include all other paths that pass through the greater park area to the proposed new facility.

29 In summary, the proposed inclusive design measures are welcomed. However, further information as detailed above is required before it can be fully assessed against London Plan policy 4B.5 (‘Creating an inclusive environment’).

**Urban design**

30 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. In addition to Chapter 4B, London Plan policies relating to density (3A.3) and sustainable design and construction (4A.3) are also relevant. Design polices in the London Plan include specific design requirements relating to maximising the potential of sites, built heritage and views.

31 Southwark Park is a listed park (Grade II on the English Heritage register of parks and gardens of special historic interest). Given the sensitivity of the location, any proposal should be exemplar in its response to context, design quality including robust and high quality materials, inclusive design, and sustainable design and construction.

32 The scale and overall massing of the proposal is largely appropriate to the context. The sports facility block will incorporate extensive curtain wall glazing to the sports pavilion, enhancing the potential for transparency and lightness of the part of the building, which is more exposed and visible. Despite this relatively sensitive design, the monopitch/inclined roofline of this block does raise concern as it unnecessarily intrudes into prominent in views from the playing fields (see montage PL092, viewpoint receptor C). There is no clear rationale for this added height (it does not provide for any clerestory lighting or ventilation, for example), and furthermore, the inclined roof profile precludes any incorporation of a green roof into the scheme. The approach to the roof on this block should be reconsidered and a flat roof introduced to minimise the visual impact of the building and to enhance the contribution of the scheme in terms of biodiversity. The proposed development is demonstrated in Figures 3 and 4 below.

*Figure 3: Proposed building as viewed from main racing track north. (Source: Studio E Architects).*
33 The proposed changing room block will be sited behind existing trees and shrubbery which allows the largely blank walls of the changing room block to be camouflaged by planting, however the landscaping plan should ensure that appropriate planting is retained or reinstated following construction to minimise the visual impact of the proposal, particularly in views from the playing fields and from the car park.

34 The main access into the site is not clearly marked, although it appears to be from the Hawkstone Gate side of the site, along Hawkstone Road. The diagram informing the building layout suggests the main ‘entry wedge’ that connects the two parts of the facility is oriented to face the playing fields. Whilst a connection and access point from the playing fields is welcome, this approach should be complemented by an equally welcoming and appropriate entrance from Hawkstone Road and the proposed drop off areas in the car park. The provision of a space in front of the main entrance for informal meeting is welcome, but it is illogical to provide this out of view of the drop-off area, given that many users may want to wait for their lifts in this area. The primary entrance and main congregation spaces should be re-oriented to ensure clear visibility and overlooking to the car park and drop off areas. This will also ensure the facility is welcoming and open to the public as well. In addition, a fully illustrated access diagram should accompany the access statement, illustrating the routes into and out of the site as well as within the site.

35 The proposal incorporates an increase in the amount of hard standing on the site over the existing; whilst the increase in blue badge parking spaces is welcomed, it is disappointing that this has resulted in an overall increase in car parking and resulting hard standing areas. These should be minimised and permeable paving incorporated where possible.

36 The quality of the detailing and materials will be paramount to the success of the scheme; the use of robust materials and high quality finishes will be key to ensuring that a proposal of such a scale will have a positive impact on the surrounding Metropolitan Open Land. The use of timber and ceramic masonry cladding is encouraging, however the reliance on metal cladding panels is disappointing and should be revisited to ensure that the use of more durable and high quality materials is consistent across the scheme. Details of the boundary fencing was requested by the Council’s own design review panel, but these do not appear to have been provided. The proposals seek to retain most of the ‘better’ trees on site, however several other trees and shrubs would be removed. Further detailed information identifying which trees are to be removed and which to be retained should be submitted.
37 The passive design measures including provisions for natural day lighting and ventilation are welcomed. It is unclear whether provisions for improving water efficiency and use have been incorporated, such as grey water systems or sustainable drainage. Further information should be provided to ensure the scheme meets the highest standards of sustainable design and construction.

38 The proposal does not comply with the design policies of the London Plan, particularly 4B.1 (‘Design principles for a compact city’) and 4B.3 (‘Enhancing the quality of the public realm’). In particular, the applicant should reconsider the site layout to make the main entrance legible and accessible to those accessing the site from Hawkstone Road and the car park, reconsider the approach to the roof profile to minimise visual impact of the sports centre, and review the materials palette to ensure the most robust and highest quality materials are used throughout the scheme.

Biodiversity

39 Southwark Park is a Site of Borough Importance for Nature Conservation, as identified through the adopted procedures for London. Consequently, the applicant has submitted an ecological assessment in support of the application.

40 The application site itself is of low value for biodiversity, consisting predominantly of hard surfaces or amenity grassland. The present sports centre building has been identified as having limited potential to support bat roosts. A small meadow area has recently been created in the northeast corner of the application site as a biodiversity enhancement project and the application includes a proposal to re-create this elsewhere in the park.

41 London Plan policy 3D.14 (‘Biodiversity and nature conservation’) expects boroughs to identify and protect Sites of Borough Importance. Where development is proposed which would affect any site of importance for nature conservation, the approach should firstly seek to avoid adverse impact on the nature conservation value of the site. This procedure has been followed in this case, and the application is therefore compliant with London Plan policy.

42 To conclude, there are unlikely to be significant impacts on biodiversity and the application is considered to comply with London Plan policy 3D.14 (‘Biodiversity and nature conservation’).

Climate change adaptation and mitigation

43 The London Plan climate change policies as set out in chapter 4A collectively require developments to make the fullest contribution to the mitigation of and adaptation to climate change and to minimize carbon dioxide emissions.

44 The estimated baseline emissions of 111 tonnes of Carbon provided appear to be quite large however, as suitable benchmarks have been used as opposed to building modelling results the information provided is sufficient and accepted.

45 It is proposed to install approximately 30 sq.m. of solar thermal collectors for domestic hot water provision, and a total capacity of 65kW of ground source heat pumps to provide heating and hot water to the building which will be topped up with gas boilers. Given the small size of the scheme (1,100 sq.m.) and the absence of a significant heat load such a swimming pool, the proposed level of renewable energy is appropriate. The applicant is however, requested to calculate the key energy efficiency measures that are being proposed and that will be implemented.

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1 All species of bats and their roosts are protected in the UK as ‘European protected species’ on Schedule 2 of the Conservation (Natural Habitats &c.) Regulations, (as amended). The relevant authority involved for regulation is Natural England.
in the building design to reduce the demand for energy in the first instance. This should include a list of key commitments could be added to the energy strategy statement.

46 In summary, the Carbon emission modelling and proposed level of renewable energy generation via solar thermal collectors and ground source heat pumps is satisfactory and compliant with London Plan policies 4A.4 (‘Energy assessment’) and 4A.7 (‘Renewable energy’). However, further information is required regarding the to proposed key energy efficiency measures and that will be implemented in the building design to reduce the demand for energy in the first instance before the application can be considered to comply with London Plan policy 4A.3 (‘Sustainable design and construction’).

Transport

47 The transport assessment does not give details of trip generation by mode or time intervals or an impact assessment of the trips generated. However, given the nature of the demand for the new sports facilities, Transport for London (TfL) does not expect that the development will have a significant impact on TfL roads or public transport services.

48 A total 32 parking spaces, six disabled parking spaces and one minibus space exist on site. Six additional disabled parking spaces are proposed and TfL considers this level of car parking acceptable. The transport assessment acknowledges the need for reserved coach parking along Hawkstone Road. Given the expected use of the site by numerous schools, universities, and clubs, at least one dedicated space for coach parking should be secured in consultation with the Council.

49 The total number of cycle parking spaces has not been confirmed and this must be provided in accordance with TfL’s standards. All cycle parking provided should be safe, covered and secure; evidence of this is necessary before the cycle parking can be considered to be compliant with London Plan policy 3C.22 (‘Improving conditions for cycling’).

50 It is noted that there is no provision for cycle routes along Hawkstone Road. The accident analysis identified an issue with the safety of cyclists at the roundabout; therefore TfL expects cycle routes along Hawkstone Road to be provided as part of this proposal to enhance safety and connectivity for cyclists.

51 TfL welcomes the proposed improvements to pedestrian facilities, including a shared walk/cycleway through the car park however; this should be a minimum of 3m in width and appropriately segregated to avoid user conflicts. This will ensure compliance with London Plan policies 3C.21 (‘Improving conditions for walking’) and 3C.22 (‘Improving conditions for cycling’) regarding the improvement of walking and cycling conditions.

52 TfL is satisfied with the delivery and servicing arrangements which are considered to conform with London Plan policy 3C.25 (‘Freight Strategy’).

53 The travel plan submitted requires further work before it can be considered acceptable. This includes setting site-specific objectives and SMART targets, establishing the role and responsibilities of the travel plan coordinator, developing a parking management strategy, and identifying how the travel plan will be marketed. A final version should be submitted and approved by TfL prior to any planning consent.

54 In summary, TfL agrees in principle with this proposal provided the issues raised above are satisfactorily addressed. This includes further information regarding cycle parking, revision of the travel plan, and the provision of coach parking.

Local planning authority’s position
55 Southwark Council is understood to support the proposal subject to revised external appearance of the main building.

Legal considerations

56 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. 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

57 There are no financial considerations at this stage.

Conclusion

58 London Plan policies on metropolitan open land, urban design, access, inclusive design, sustainable development and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Metropolitan Open Land:** The applicant has adequately demonstrated that the proposal represents a very special circumstance for development within the Metropolitan Open Land and is therefore considered complies with London Plan policy 3D.10 (‘Metropolitan Open Land’).

- **Access and inclusive design:** The access audit of the surrounding streets identified deficiencies that do not encourage or support inclusive design, which is contrary to London Plan policy 4B.5 (‘Creating an inclusive environment’).

- **Urban design:** The overall scale and massing of the proposal is largely appropriate to the context. However, the roof height and incline unnecessarily protrudes into prominent views within the Metropolitan Open Land, contrary to London Plan policy 4B.1 (‘Design principles for a compact city’). In addition, the building orientation and layout does not encourage a welcoming environment, and the reliance on metal cladding is considered contrary to London Plan policy 4B.3 (‘Enhancing the quality of the public realm’). The applicant has also not provided sufficient information on fencing, what vegetation is being retained and water retention measures to fully determine compliance with London Plan Policies.

- **Biodiversity:** The application approach has sought to avoid any adverse impact on the nature conservation of the site and therefore complies with London Plan policy 3D.14 (‘Biodiversity and nature conservation’).

- **Climate change mitigation and adaptation:** The Carbon emission modelling and proposed level of renewable energy generation via solar thermal collectors and ground source heat pumps is satisfactory and compliant with London Plan policies 4A.4 (‘Energy assessment’) and 4A.7 (‘Renewable energy’). However, further information is required regarding the proposed key energy efficiency measures and that will be implemented in the building design to reduce the demand for energy in the first instance before the application can be considered to comply with London Plan policy 4A.3 (‘Sustainable design and construction’).
• **Transport:** The application complies with London Plan policy 3C.25 (‘*Freight Strategy*’). However, insufficient information regarding the coach and cycle parking, cycle routes or pedestrian access has been provided, which is contrary to London Plan policies 3C.21 (‘*Improving conditions for walking*’), 3C.22 (‘*Improving conditions for cycling*’) and 3C.23 (‘*Parking strategy*’). Also, the travel plan provided is insufficient which is contrary to London Plan policy 3C.3 (‘*Sustainable transport in London*’).

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

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

• **Urban design:** The applicant is requested to amend the building design an orientation in light of the concerns raised in paragraphs 31 - 32 above and also provide further information detailing the proposed fencing, identify what vegetation will be retained and what water efficiency measures are proposed as detailed in paragraphs 33 - 38 above.

• **Access and inclusive design:** The applicant is requested to address and rectify the access deficiencies identified in paragraphs 25 - 29 above as part of the proposal.

• **Climate change mitigation and adaptation:** The applicant is requested to provide further information regarding the proposed energy efficiency measures as identified in paragraph 45 and 46 above.

• **Transport:** The applicant is requested to provide further information regarding the coach and cycle parking, cycle routes and pedestrian access as detailed in paragraphs 47 –54 above.

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