Former Southwark Fire Station, Southwark
Bridge Road
in the London Borough of Southwark
planning application no. 17/AP/0367

Strategic planning application stage 1 referral

The proposal
Redevelopment of the site including alterations and extensions to listed buildings to provide a new secondary school with 6th form (up to 1,150 pupils), 199 residential units, 234 sq.m. of flexible commercial or community use, a 139sq.m. gym, associated landscaping, cycle parking, disabled parking and servicing access; and the redevelopment of land at Grotto Place for the provision of a new sports hall (1,452 sq.m.) and external multi use games facility and landscaping.

The applicant
The applicant is Hadston Southwark Ltd and the architects are Collado Collins and Peter Taylor Architects. The agent is Rolfe Judd Planning.

Strategic issues summary:

**Principle of development:** The provision of a new school is strongly supported. (paras. 15-22)

**Housing:** 199 units proposed. Residential development is enabling development, and 0% affordable housing is proposed. The applicant’s viability report will be robustly scrutinised and all options will be fully explored to increase affordable housing provision. Early and late review mechanisms will be secured. (paras 23-36)

**Design and heritage:** The design of the new build elements, and the conversion and alterations to the listed buildings, are supported. Further justification for the demolition of the west wing of Winchester House should be submitted. (paras 37-47)

**Climate change:** The shortfall in carbon savings for the residential element should be off-set. (para 51-53)

**Transport:** The number and design of cycle parking spaces should meet London Plan standards to support an increase in cycle mode share. Revised analysis of pedestrian environment and bus capacity is required together with suitable mitigation. Servicing arrangements should be reviewed to reduce cyclist safety risks. Financial contributions, conditions and s106 obligations are required. (paras 54-57).

Recommendation
That Southwark Council be advised that whilst the application is broadly supported in strategic planning terms it does not yet comply with the London Plan for the reasons set out in paragraph 62 of this report. Possible remedies are set out in that paragraph to ensure full compliance with the London Plan.
Context

1 On 6 April 2017 the Mayor of London received documents from Southwark Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 5 June 2017 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

2 The application is referable under Categories 1A and 1B of the Schedule to the Order 2008:

   Category 1A:
   “Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.

   Category 1B:
   “Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings—
   (c) outside Central London and with a total floorspace of more than 15,000 square metres.”

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 main site is an irregular shaped plot of approximately 0.88 hectares in area, bound by Copperfield Street to the north, Southwark Bridge Road to the east, and Sawyer Street to the south and west. The site contains two Grade II listed buildings: the former Southwark Fire Station (dating from 1878 and comprising the Engine House, Main and South Blocks and Cottage Block) in the southern part of the site and Winchester House in the central and eastern parts of the site. Winchester House dates from between 1777 and 1820 and is arranged in a quadrangle around an internal courtyard. This building is fronted by a large forecourt facing Southwark Bridge Road. Facing Sawyer Street is a modern three storey building. The site also contains operational structures such as four fire training towers. The buildings were until recently occupied by the London Fire Brigade, and the site has been acquired by the applicant, Hadston. Winchester House was used as the London Fire Brigade Museum (now vacated) and archive storage. The site is not within a conservation area, but the Union Street Conservation Area adjoins the site to the north and the Liberty of the Mint Conservation Area lies to the eastern side of Mint Street Park.

6 The buildings on the site are predominantly three to four storeys although part of the fire station fronting Southwark Bridge Road is five storeys in height. Adjoining the site to the north are two and three storey residential buildings on Copperfield Street and Sawyer Street. To the east across Southwark Bridge Road is Mint Street Park. Adjoining the site to the south east is the four storey Goldsmith Public House. Buildings in the surrounding area are predominantly
three to four storeys, although across Sawyer Street to the west there is a part 8, part 9 storey student accommodation building.

7 Also included within the application site is a piece of land on the south western side of Sawyer Street known as Grotto Place, fronted by Sturge Street and Great Suffolk Street. This is a roughly 0.6 hectare site which is occupied by a car park and a multi-use games area (MUGA) used by London Fire Brigade employees.

8 The site has a public transport accessibility level (PTAL) of 6a (excellent), with Borough and Southwark underground stations within a 400 metre walk. Southwark Bridge Road is also on bus route 344 and the route of Cycle Superhighway 7.

9 The site is within the Central Activities Zone (CAZ). The draft London Bridge and Bankside Opportunity Area Supplementary Planning Document also encompasses this site.

Details of the proposal

10 The proposal is for the redevelopment of the site to deliver a new co-educational, 6-form entry secondary school and 6th form, plus residential development comprising 199 units, flexible commercial/community floorspace, and a new sports hall on the Grotto site. An application for works to the listed buildings has also been submitted to Southwark Council (ref: 17/AP/0368).

Relevant history

11 There are no relevant planning applications relating to the redevelopment of this site. In February and April 2016, pre-application meetings were held with GLA officers and a pre-application report was issued in May 2016. The applicant was advised that the principle of providing a new secondary school with enabling residential development is supported by strategic planning policy. Key issues to address related to the viability of the scheme and whether affordable housing could be provided, the layout of the residential scheme and the impact on heritage assets.

Strategic planning issues and relevant policies and guidance

12 The relevant issues and corresponding policies are as follows:

- **Education facilities**
  - London Plan, Social Infrastructure SPG;
- **Housing**
  - London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SP;G
- **Affordable housing**
  - London Plan; Housing SPG; draft Affordable Housing and Viability SPG; Housing Strategy;
- **Urban design and heritage**
  - London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;
- **Access**
  - London Plan; Accessible London: achieving an inclusive environment SPG;
- **Sustainable development**
  - London Plan; Sustainable Design and Construction SPG; Mayor’s Climate Change Adaptation Strategy; Mayor’s Climate Change Mitigation and Energy Strategy; Mayor’s Water Strategy;
- **Transport**
  - London Plan; Mayor’s Transport Strategy.
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 Core Strategy (2011), the Southwark Plan (2007) (saved policies), and the 2016 London Plan (Consolidated with Alterations since 2011).

14 The National Planning Policy Framework (NPPF), the Technical Guide to the NPPF and the draft New Southwark Plan: Area Visions and Site Allocations (preferred option, February 2017), are also relevant material considerations.

**Principle of development**

15 The former Southwark fire station closed in January 2014 and local fire and rescue services have been consolidated into alternative premises at Albert Embankment. The former Fire Brigade Museum was closed in September 2015 and the museum has reopened at a site on Lambeth High Street. In February 2016, the Education Funding Agency (EFA) approved Haberdashers’ Aske’s application for funding for a 6-form entry secondary school on the site. However, the costs of delivering the school exceed the EFA’s maximum funding arrangements and as such the inclusion of a residential element is necessary to cross-subsidise the delivery of the school. The proposed site would be split between residential and school use, with separate commercial uses in part of the retained fire station building.

16 The provision of a new secondary school is strongly supported by national and London Plan policy. Paragraph 72 of the National Planning Policy Framework (NPPF) states that “the Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities.” To achieve this objective, the NPPF encourages local planning authorities to adopt an approach (to meeting this requirement and to development that will widen choice) that is proactive, positive and collaborative.

17 London Plan Policy 3.18 (Education Facilities) states that “proposals for new schools, including free schools, should be given positive consideration and should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school and which cannot be addressed through the use of planning conditions or obligations.” Additionally, the Mayor’s Social Infrastructure SPG states that new sites for schools should be secured to meet additional educational need, particularly in those areas defined in the London Plan as Opportunity Areas.

18 The need for a new school in this part of the borough is well evidenced, and as such the principle of the establishment of the new school at the site is strongly supported in strategic planning terms.

**Education facility**

19 The Haberdasher’s Aske’s school will be a 6-form entry co-educational secondary school providing c.900 school places, with a sixth form providing c.250 student places. The school has been designed to comply with, and in many cases exceed, the relevant national standards for school design as set out in Department of Education’s Building Bulletin 103 (BB103). The EFA has written in support of the proposed school and its design.

20 In accordance with London Plan Policy 3.18 the school’s facilities, including the sports hall and MUGA, school hall, classrooms, dance studio and kitchen facilities will be made available out of hours for community or recreational use. This is welcomed, and a community use plan, secured by way of planning condition/obligation, should be put in place as a means of identifying and securing parts of the building that would be suitable for community access, and establishing a reasonable charging framework for the rental of such space.
Residential development

21 The main site would also accommodate 199 residential units, concentrated to the south of the site. The residential units would be enabling development, partly funding the new school. The provision of additional housing supports London Plan Policy 3.3 ‘Increased housing supply’ and would help to achieve the minimum annual housing target (2,736) for Southwark as outlined in London Plan Table A4.1.

Commercial/flexible community uses

22 The proposals include commercial/community uses at ground floor level (234 sq.m.) in the converted fire station building fronting Southwark Bridge Road. The conversion of the ground floor to an active use fronting on to the main road is welcomed. Community or cultural uses in this space could complement the community benefits of the development and the applicant should clarify how such occupiers can be incentivised and prioritised when marketing this unit.

Housing

23 The table below sets out the proposed residential schedule:

<table>
<thead>
<tr>
<th>tenure</th>
<th>type</th>
<th>Number of units</th>
<th>%</th>
</tr>
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<tbody>
<tr>
<td>private</td>
<td>studio</td>
<td>22</td>
<td>11%</td>
</tr>
<tr>
<td></td>
<td>1-bedroom</td>
<td>91</td>
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<tr>
<td></td>
<td>2-bedroom</td>
<td>78</td>
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<tr>
<td></td>
<td>3-bedroom</td>
<td>8</td>
<td>4%</td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>199</td>
<td>100%</td>
</tr>
</tbody>
</table>

Affordable housing

24 London Plan Policy 3.12 sets out that the maximum reasonable amount of affordable housing should be sought on developments. London Plan Policy 3.11 sets out that affordable housing should be provided at a ratio of 60:40 social rent to intermediate housing. Southwark Council’s Local Plan states that the Council will seek a minimum of 35% affordable housing in new developments on the basis of a 70:30 split of social/affordable rent to intermediate accommodation.

25 The application is proposing 0% affordable housing. The Financial Viability Assessment (FVA) accompanying the application shows that the scheme is unable to make an affordable housing contribution. The EFA is substantially funding the construction of the school with a grant of £47.5 million. The EFA has confirmed that this is the maximum available grant. The applicant has presented a cost plan for the building of the school, estimating construction costs of c.£31 million. The actual cost of acquiring the school land amounted to c.£36 million (66% of the £54 million purchase price, representing the portion of the land to be occupied by the school), resulting in a shortfall of c.£19 million that the applicant has stated it needs to make up on the residential development.

26 GLA officers acknowledge and support the substantial public benefit of providing a secondary school on this site. However, to ensure that the maximum reasonable amount of affordable housing is achieved on the site, an independent review of the applicant’s FVA is being
undertaken, and GLA officers are working with Southwark Council to explore and interrogate the applicant’s viability assumptions. Notwithstanding the purchase price paid by the applicant, the Mayor’s draft Affordable Housing and Viability SPG is clear that this is not the basis on which to benchmark the land value of a site for viability purposes. An existing use value (EUV) should be used in this case and this also reflects Southwark Council’s own local policies. The applicant has presented an assessment of the alternative use value (AUV) of the site. However, officers consider that the assessment presented significantly overstates the AUV.

27 The estimated build costs for the development and the sales prices for the residential units will also be independently reviewed, and scenario/growth testing carried out. These matters are currently under discussion with the Council, its independent viability assessors, and the applicant.

28 GLA officers will work with the Council and applicant to explore all opportunities to increase affordable housing provision. The applicant should show how the potential for grant funding has been explored in line with the Mayor’s Affordable Homes Programme Funding Guidance 2016-21. An early and late stage review mechanism, in line with the guidance within the Mayor’s draft Affordable Housing and Viability SPG, is required to be secured within the s106 agreement to enable uplift in viability (including review of grant levels, build costs and sales values) to be captured for affordable housing. GLA officers will update the Mayor of the conclusions of the viability review and of subsequent affordable housing discussions/negotiations at the decision making stage.

Housing choice

29 London Plan Policy 3.8 requires different sizes and types of dwellings to meet different needs. As set out in the table above, the proposals would provide 199 homes, of which 8 (4%) would be 3 bedroom units. Whilst the proportion of family-sized units is low, GLA officers recognise that this particular site, on a constrained plot within central London, may not be suitable to provide a larger proportion of family-sized homes, and none of the homes are currently proposed to be affordable.

Density

30 The site has a PTAL of 6a and is within the CAZ. The “Central” density guidelines are appropriate for the site, as defined in London Plan Policy 3.4 (Optimising housing potential) and Table 3.2. The London Plan density matrix suggests residential densities of between 650–1100 habitable rooms per hectare or 215–405 units per hectare would be appropriate.

31 The applicant has calculated that the residential density of the scheme would be 915 habitable rooms per hectare, although it is noted that the residential site area is measured to the centre of the road in this calculation. A density calculation (by unit and habitable room) excluding the public highway should be provided. Notwithstanding this, it is recognised that the density of the scheme would be at the upper limit of the London Plan’s indicative optimum density ranges. In this site within central London, a high density scheme may be appropriate, but this is dependent on the scheme providing high quality residential accommodation and high design quality. These factors will be discussed further below.

Residential quality

32 All the proposed residential units have been designed to meet the space standards set out in the Mayor’s Housing SPG and the Nationally Prescribed Space standards. The units (with the exception of the units provided within the converted listed building) would be provided with an
area of private amenity space which meets the amenity space requirements as set out in the Mayor’s Housing SPG. Generally a maximum of 8 units per core would be provided, in compliance with the standards within the Housing SPG.

33 The residential site area and its layout is necessarily constrained by the nature of the site and the fact that it would be shared with the school uses. As such, the horseshoe layout around the southern edge of the site is a logical approach to the residential layout, but this result in some north-facing units. Since the submission of the application, revised plans have been submitted which seek to address this by maximising the number of dual aspect units. There would be a total of 21 north facing single aspect units (11%).

34 The applicant has carried out internal daylight and sunlight assessments for the units and the amenity spaces. The results show that 81% of the units meeting BRE recommended minimum standards. The units on the ground floor would receive lower levels of daylight in their living areas, however these have been designed to be duplex units with habitable rooms receiving good daylight levels on the upper floors.

35 Given the constraints of the site, it is considered that the applicant has addressed the aspect of the units as far as possible and the small overall number of north facing units and minor breaches in daylighting to some units is an acceptable compromise in order to achieve the benefits provided by the development.

Children’s play space

36 The Mayor’s ‘Shaping Neighbourhoods: Play and Informal Recreation’ SPG sets a benchmark of 10 sq.m. of useable children’s playspace to be provided per child, with particular emphasis on playspace for children under five years old to be provided on-site. Based on the proposed tenure mix, a child yield of approximately 11 children could be expected from this development, of which 6 would be under five. This equates to a total provision of 110sq.m. of playspace, of which 60 sq.m. should comprise doorstep play for under-fives. A total of 70sq.m. of doorstep playspace would be provided within the internal courtyard, meeting these requirements. It is recognised that the child yield of a development of this nature is low, and that Mint Street Park is located opposite the development which can provide additional facilities.

Urban design

Layout

37 As acknowledged above, the site is constrained, given that it must accommodate two substantial and discrete uses in the form of housing and school development. However the acquisition of the Grotto site, which enables the school hall and MUGA to be located away from the main site, has relieved the pressure on the main site and has benefited the layout of the scheme.

38 The principle of using the Winchester House site for the school buildings, incorporating new build elements, and the positioning of the residential elements to the south of the site is supported. This approach allows the fullest and most sensitive reuse of the listed buildings on the site whilst redeveloping the less sensitive built development to the south west. The taller residential buildings would be concentrated to the south where they would have lesser impact on the setting of the listed buildings and the amenity of adjacent residents. The layout of the school is appropriate and endorsed by the EFA, and maximises the amount of open space available.
39  The Sawyer Street elevations would be well animated by the proposed residential uses. The ground floor units are proposed to be split-level maisonettes with their own front doors and defensible space in front of the living room windows. This is welcomed both in terms of the quality of these units and the level of activity that would be provided on to Sawyer Street. The main entrance to the residential units would be from the internal courtyard, and this space is also flanked by active residential entrances to ground floor accommodation. Whilst the courtyard would have limited sunlight penetration, with careful landscaping which should be secured by condition, it has the potential to be a pleasant and useable amenity space for residents.

**Height, massing and architecture**

40  The height and massing of the residential elements has undergone extensive design development in consultation with Southwark Council and GLA officers in order to ensure that these would have an acceptable impact on the surrounding area, and in particular managing the impact on the adjacent listed buildings and the conservation area. The resulting buildings, which would be up to 10 storeys in height, would be visible above the listed buildings in longer views such as from Mint Street Park. However, the proposals allow the listed buildings to remain the dominant element in the foreground, and the new buildings would recede completely in shorter range views. The proposals would not adversely affect the setting of the listed buildings or the conservation area, and would sit comfortably within the surrounding townscape.

41  The most visible new build intervention to the school site would be the construction of the new wing to the north of Winchester House, extending towards Southwark Bridge Road. Officers consider this to be a modest, well designed addition, which would be subservient to the three storey Grade II listed Winchester House, preserving its setting and also the character and appearance of the Union Street Conservation Area.

42  The architectural approach to the new buildings is supported. The residential element, with its well-detailed red brick front facade and white brick rear elevations, has been designed to complement the detailing and materials of the fire station buildings and would be a high quality appearance. The strong vertical emphasis of this new wing echoes that of the original fire station buildings. The quality of the detailing and materials should be secured by condition.

**Grotto Place site**

43  A new sports hall for the school would be constructed on the Grotto Place site, fronting on to Great Suffolk Street. The MUGA would be positioned behind the sports hall and this site can also be accessed from the north via Sawyer Street. The height and scale of the sports hall building is appropriate in its context, although due to the nature of the building it would not provide activation or surveillance to Great Suffolk Street. It is also noted that several large trees would be removed to accommodate the building which reduces the softening impact of landscaping. Further consideration should be given to the facade treatment and landscaping around this building to ensure the highest quality of design to the street frontage.

**Impact on heritage assets**

44  The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings section 66 of the act states that all planning decisions should “have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”. The NPPF states that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset’s conservation, and the more important the asset, the greater the weight should be.
The 20th century buildings and structures which form part of the existing fire station complex make a neutral contribution to the architectural character of the site and their demolition is acceptable. The proposals will refurbish the listed 19th century fire station building and its 1911 extension and will retain and enhance the character and appearance of these buildings. As outlined above, the tallest new build residential elements will be visible in the background to the listed buildings in views from Mint Street Park, however the grey adonized metal cladding and set back paired dormer elements will significantly mitigate this impact. The new buildings will recede in short range views, preserving the appreciation of the roofscape of the Victorian fire station from principle thoroughfares.

The retention and reuse of the East and North blocks of Winchester House is supported, as is the refurbishment of the courtyard elevation to the west wing (former workhouse). The complete removal of the rear elevation of the west wing is regrettable, but the difficulty in adapting this block for reuse given its narrow footprint is acknowledged. The removal of this rear part of the listed building will cause harm to its character and integrity but it is considered that the public benefits of the new educational use of this part of the site may outweigh this harm. Further detailed justification for the demolition of this element should be submitted to demonstrate that no alternative options are feasible, to enable the harm vs. the public benefit to be fully assessed. The lowering of the central courtyard and the completion of the quadrangle with a new southern wing are also significant interventions to the listed building complex but these have been designed in such a way as to minimise harm.

Conclusion

In summary, the design of the new build elements is supported. The proposals would preserve the settings, the character and the historic and architectural significance of the listed buildings on the site, notwithstanding the removal of the rear part of the west wing of Winchester House, which could be justified due to the public benefits of providing a school and securing the preservation and reuse of the listed buildings. Further justification should be submitted on this element. The proposals will preserve the setting of the adjoining Union Street and Liberty of the Mint conservation areas.

Inclusive access

The applicant’s design and access statement addresses key points regarding inclusive access. The applicant presented the scheme to the GLA’s Strategic Access Panel in March 2016, and has incorporated a number of the panel’s recommendations within the proposals.

Within the residential scheme, 10% of the units would be M4(3) compliant (wheelchair accessible or adaptable). Full compliance with M4(3) and M4(2) should be secured by condition. Whilst there is limited space on the site for parking, three disabled parking spaces would be provided within the courtyard. There is an additional requirement for disabled parking in line with the number of wheelchair accessible/adaptable units, and the applicant has indicated that this requirement can be met on-street, using existing parking bays and single yellow lines. It should be clearly set out how many spaces are available in this way, the location of the potential spaces and how the needs of disabled residents can be met.

The applicant has confirmed that relevant legislation will be followed to ensure that the school development is accessible to students and staff with disabilities. A specific access statement for the school element, demonstrating how this will be achieved, should be submitted and secured via condition.
Climate change

51 The proposals will achieve a 36% reduction in carbon emissions for the residential element, compared to a 2013 Building Regulations compliant development, and a 43% reduction for the non-domestic element. Whilst the London Plan’s carbon reduction target is met for the non-residential elements, domestic development is now required to be zero carbon, and the remaining regulated carbon dioxide emissions, equivalent to 107 tonnes of carbon dioxide per annum, should be met through a contribution to the borough’s offset fund.

52 The applicant should also investigate the potential for further savings from the proposed combined heat and power (CHP) unit. Further information should also be provided on passive cooling in the residential element and overheating within the refurbished buildings. The applicant has provided a commitment to ensuring that the development is designed to allow future connection to a district heating network and this should be conditioned.

53 In terms of flood risk and drainage, the applicant should consider an integrated water management strategy including above-ground attenuation methods which could reduce discharge of water to the sewer network. The proposed surface water drainage strategy should be reviewed in order to ensure that the proposals contribute towards reducing surface water discharge rates in lower order storm events. This could be achieved by using a variable flow control outfall or by using a Method 2 attenuation tank design.

Transport

54 The site has excellent access to public transport and the car free proposals are therefore welcomed. As mentioned above, however, further analysis of how the parking provision will meet the needs of disabled residents should be submitted.

55 Cycle provision for the school and residential uses should be secured in accordance with London Plan standards, and located and designed in accordance with the London Cycle Design standards. The existing cycle hire docking stations in the area are under a large amount of pressure and the additional demand from the development will place further stress on the system. A contribution of £20,000 is therefore requested to be secured through the s106 agreement for the expansion of the Great Suffolk Street docking station.

56 The applicant’s transport assessment should be revised to account for the high number of students that are likely to travel to school by bus, in order to fully assess the impact of the proposals on local bus services. A revised analysis of pedestrian comfort levels on Southwark Bridge Road should be carried out, taking account of students waiting at bus stops and pedestrian crossings. Appropriate physical and/or demand management mitigation measures should be secured as part of any permission. The proposed signalised pedestrian crossing to serve the school is acceptable in principle, although further modelling is required to assess its impacts on the junction of Marshalsea Road and Southwark Bridge Road.

57 A delivery and servicing plan (DSP) and construction logistics plan (CLP) should be secured by condition. Vehicles servicing the school would be required to cross the cycle superhighway, which is a potential safety risk to cyclists. Servicing trips should be managed by condition to avoid peak periods. Travel plans for the residential and school elements should be secured by condition or s106. Given the close proximity of the cycle superhighway, the target for increasing cycling as a mode share should be more aspirational. School travel demand management to spread demand over a longer period before and after school should also be included.
Community Infrastructure Levy

In accordance with London Plan policy 8.3 ‘Community Infrastructure Levy’, the Mayor has agreed a CIL Charging Schedule which came into operation on 1 April 2012. The proposed development is within the London Borough of Southwark, where the Mayoral charge is £50 per square metre Gross Internal Area (GIA).

Local planning authority’s position

Southwark Council planning officers are still assessing the application, and are awaiting the response from the independent viability review before reporting the case to the Council’s planning committee.

Legal considerations

Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor’s statement and comments.

Financial considerations

There are no financial considerations at this stage.

Conclusion

London Plan policies on education facilities, housing, affordable housing, urban design, inclusive access, sustainable development and transport are relevant to this application. The principle of providing a new secondary school and enabling residential redevelopment on this site is strongly supported; however the application does not fully comply with the London Plan and the following matters should be addressed:

- **Principle of development**: The provision of a new school and new housing is strongly supported.

- **Housing**: The application is proposing 0% affordable housing. Whilst the residential development would facilitate the provision of essential social infrastructure, it must be ensured that the development provides the maximum reasonable amount of affordable housing. The applicant’s viability report will be robustly scrutinised and all options will be fully explored to increase affordable housing provision. Early and late review mechanisms will be secured.

- **Design and heritage**: The design of the new build elements is high quality, and the conversion and alterations to the listed buildings is supported, subject to further detailed justification for the demolition to the west wing of Winchester House.
• **Inclusive design:** A full access strategy for the school site should be submitted and compliance secured by condition. The applicant should further justify the level of disabled parking provision for the residential uses.

• **Climate change:** The shortfall in carbon savings for the residential element should be off-set. Additional information is required to confirm compliance with London Plan climate change policy.

• **Transport:** The number and design of cycle parking spaces should meet London Plan standards to support an increase in cycle mode share. Revised analysis of pedestrian environment and bus capacity is required together with suitable mitigation. Servicing arrangements should be reviewed to reduce cyclist safety risks. Financial contributions, conditions and s106 obligations are required.

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