## Strategic planning application stage 1 referral


## The proposal

Demolition of the existing buildings and mixed use redevelopment of the site to provide a nine storey commercial building with two flexible A1/A3/B1 units at ground floor level and office floorspace on all upper levels; 171 apartments in three residential buildings of 8, 13 and 21 storeys in height with a flexible A1/A3/B1 unit at ground floor level; 3 mews houses (3 storeys); associated parking and access; new public realm including hard and soft landscaping; alterations to the public highways including widened footways, relocated parking and service bays, resurfacing and associated works.

## The applicant

The applicant is Gaterule Ltd, and the architect is Allies and Morrison.

## Strategic issues

**Principle of development:** the proposal for the mixed-use redevelopment of the existing site within an opportunity area to deliver a modern, fit-for-purpose office building within the Central Activities Zone (CAZ) that can support higher employment densities and a significant number of new homes is supported (paragraphs 13 to 17).

**Housing:** 174 units including flats and mews houses, 20% affordable housing by habitable room, 70:30 tenure split in favour of affordable/social rented - Southwark policy target is 35%. Financial viability appraisal is currently being independently reviewed by the Council. The applicant should provide at least 35% affordable housing (paragraphs 18 to 23).

**Urban design:** Buildings of 8, 13 and 21 storeys. The overall layout, scale and massing is supported. Further work to maximise active frontages on key routes required (paragraphs 36 to 41).

Further detailed assurances and discussion is sought with respect to the above-mentioned points, and others associated with **sustainability** (paragraphs 45 to 53) and **transport** (paragraphs 54 to 58).

## Recommendation

That Southwark Council be advised that while the application is broadly supported in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 63 of this report. However, the resolution of those issues could lead to the application becoming compliant with the London Plan.
Context

1 On 21 July 2016 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 and in agreement with the applicant and the Council, the Mayor has until 5 September 2016 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, 1B and 1C of the Schedule to the Order 2008:

- **1A** – “Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.”

- **1B(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 of Central London and with a total floorspace of more than 15,000 square metres.”

- **1C** – “Development which comprises or includes the erection of a building more than 30 metres high outside the City of London.”

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 0.6 hectare site is located in the Bankside area to the south of the Tate Modern and the River Thames. The site comprises a former industrial print works building constructed in the 1950–60’s which has subsequently been converted for office use, and an area of surface car parking. The proposed development is bound on its northern side by Lavington Street and on its eastern side by Ewer Street. Its southern boundary is defined by the railway line that links London Bridge Station to Waterloo Station and its associated railway sidings. Immediately to the west the site is a hotel and student accommodation.

6 Lavington Street forms part of the local road network and the nearest part of the Transport for London Road Network (TLRN) is Southwark Street; approximately 100 metres from the site. The North South Cycle Superhighway along Blackfriars Road is 350m from the site. The nearest bus stops are located on Southwark Street which serve two routes (381 and RV1) and the nearest London Underground Station is Southwark Underground Station. As a result, the site records a high public transport accessibility level (PTAL) of 6b, on a scale of 1a to 6b, where 6b is the highest.

7 The site is not within a conservation area and there are no listed buildings within the site boundary or adjacent to it.
Details of the proposal

8 The proposals seek the demolition of the existing building and the mixed use redevelopment of the site to provide an office building comprising 14,319 sq.m. of B1 floorspace and 171 residential units within three buildings ranging from eight, thirteen and 21 storeys in height with flexible commercial space at ground floor, and three Mews houses. The proposals also includes publicly accessible open space and associated landscaping including alterations to the public highway in Lavington and Ewer Street comprising widened footways, relocated car parking and servicing bays and tree planting.

Case history

9 Following a request by the applicant, a pre-planning application meeting to discuss this scheme was held by the GLA on 11 November 2015. The advice issued by the GLA following the meeting supported the principle of the mixed-use development of the site including office and residential accommodation. However, the applicant was advised to fully address those issues raised with respect to mixed use and employment space, housing, affordable housing, urban design, inclusive access, sustainable development and transport prior to the submission of any future planning application.

Strategic planning issues and relevant policies and guidance

10 The relevant strategic issues and corresponding policies are as follows:

- Mix of uses London Plan
- Housing & affordable housing London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context,
- Urban design London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; London Housing Design Guide; 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 Climate Change Adaptation Strategy; Mayor’s Climate Change Mitigation and Energy Strategy; Mayor’s Water Strategy
- Transport London Plan; the Mayor’s Transport Strategy;

11 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); and the London Plan 2016 (The Spatial Development Strategy for London Consolidated with Alterations since 2011).

12 The following are also relevant material considerations:

- Southwark Plan saved policies (2007);
- Neighbourhood Plan for Bankside;
- The draft Bankside, Borough and London Bridge SPD; and,
- The draft London Bridge and Bankside Opportunity Area Planning Framework.

Principle of development

13 The site is located in the Central Activities Zone (CAZ) and the London Bridge, Borough and Bankside Opportunity Area. The London Plan identifies this area as having considerable potential for intensification, particularly at London Bridge Station and its environs and recognises the scope to develop the strengths of the area for strategic office provision as well as housing, especially in the hinterland between Blackfriars and London bridges. London Plan Policy 2.13 and Table A1.1 specifically identifies that the opportunity area is capable of delivering a minimum of 1,900 new homes and an indicative employment capacity of 25,000, with scope for intensification, regeneration, improvements to public transport interchanges and better pedestrian integration.

14 In addition to the above, London Plan policies 2.10 and 2.11 seek to support office rejuvenation and the rich mix of uses that exist within the CAZ. Furthermore, London Plan policies regarding offices and mixed use development (4.2 and 4.3) seek to support the management and mixed use development and redevelopment of office provision to improve London’s competitiveness and seeks to ensure that proposals to increase office floorspace within the CAZ include a mix of uses, including housing unless this conflicts with other policies in the plan.

15 The applicant has carried out an assessment of the quality of the existing office accommodation and has concluded that the current accommodation would fail to meet the expectations of the modern office market. This is mainly due to various factors resulting from its conversion from its original industrial use including the deep office floorplates effecting daylight penetration to central areas, further compounded by the poor distribution of windows; inefficient internal circulation; and limited flexibility to subdivide the space.

16 It is recognised that the proposed office building will result in a reduction in gross internal floor area when compared to the existing office building. However, when considering the existing and proposed net internal areas (NIA) the proposed building would deliver a marginal increase in employment floorspace, providing 10,787 sq.m. as opposed to the existing 10,673 sq.m. This is due to the current inefficiencies posed by the converted building. Furthermore, the modern office building will support higher employment densities and is anticipated to support 1,290 jobs when compared to the existing 1,100 which is supported. Notwithstanding this, the applicant is strongly encouraged to explore providing a certain quantum of the proposed B1 floorspace as affordable workspace and further discussions on this provision are welcomed.

17 Therefore, in light of the above policy framework, the proposal to redevelop the existing site to provide a modern, fit-for-purpose office building within the CAZ that can support higher employment densities and a significant number of new homes is supported.

Housing

18 London Plan Policy 3.3 provides explicit strategic support for the provision of housing within London, and sets a target for the Council to deliver a minimum of 2,736 homes in the Plan period 2015-2025. The proposed development includes 174 residential units. A detailed housing schedule is provided below:
Affordable housing

19 London Plan Policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. Southwark Council in its Core Strategy (2011) seeks to deliver a minimum of 665 affordable housing units in the opportunity area through requiring a minimum of 35% affordable housing on developments with ten or more units.

20 As presented at the pre-application stage, the proposals will provide 21 social rented units with Block A and the Mews houses at the western end of the site, providing a mix of affordable unit types. Following further viability testing, it is proposed that nine one bed units within will be delivered as intermediate products within Block B, increasing the overall provision to 30 units. This equates to a total affordable housing contribution of 20% on a habitable room basis.

21 While the increase in the original affordable housing offer presented at the pre-application stage is welcomed, the current contribution falls below local policy requirements and is unacceptable. In accordance with London Plan requirements, the applicant will be required to demonstrate that the development will deliver the maximum reasonable amount of affordable housing and as part of this the supporting financial viability assessment will need to be independently assessed by the Council and the assessment and the results shared in full with GLA officers prior to the Council determining the application. Notwithstanding this, the applicant has shared an executive summary of the financial viability appraisal with GLA officers, which concludes that the current affordable housing offer results in a residual land value that is below the benchmark land value and is therefore the maximum reasonable contribution the scheme can make. Given the high sales values in this location GLA officers would expect this scheme to achieve at least 35% affordable housing.

22 It is understood that the full financial viability appraisal has been submitted to the Council for assessment and this should also be shared with the GLA. GLA officers require further discussions with the applicant and Council as the assessment progresses with a view to further increasing the current affordable housing offer to ensure that the development makes the maximum reasonable contribution towards meeting London’s affordable housing need.

<table>
<thead>
<tr>
<th>Unit type</th>
<th>No. of units</th>
<th>Percentage of total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Studio</td>
<td>7</td>
<td>4%</td>
</tr>
<tr>
<td>One bed</td>
<td>62</td>
<td>35.6%</td>
</tr>
<tr>
<td>Two bed</td>
<td>64</td>
<td>36.8%</td>
</tr>
<tr>
<td>Three bed</td>
<td>40</td>
<td>23%</td>
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<tr>
<td>Four bed</td>
<td>1</td>
<td>0.6%</td>
</tr>
<tr>
<td>Total</td>
<td>174</td>
<td>100%</td>
</tr>
</tbody>
</table>
With regards to housing tenure, London Plan Policy 3.11 establishes a strategic target that 60% of affordable housing provision be for social housing (comprising affordable rent and social rent), and 40% for intermediate provision. The current affordable housing offer reflects the Council’s target tenure split of providing affordable housing on a 70:30 social housing to intermediate housing split, set out in its Saved Policies (2007). The applicant has justified this approach on the basis that the proposed mix meets local housing need and that an increase in intermediate housing to reflect London Plan targets would reduce the number of social rented family-sized units which conflicts with strategic housing mix priorities. Subject to the further discussions regarding viability, based on the information currently provided the proposed tenure split is accepted.

Housing choice

London Plan Policy 3.8, together with the Mayor’s Housing SPG, seek to promote housing choice and a balanced mix of unit sizes in new developments. London Plan Policy 3.11 establishes that strategic priority be afforded to the provision of affordable family homes.

The scheme would provide a range of unit types, including family sized flats and a mews house in this central location at an overall mix that meets Southwark Council’s target housing mix set out in Core Strategy Policy SP7 and is supported.

Residential quality

London Plan Policy 3.5 establishes the strategic priority afforded to the quality and design of housing developments, with further guidance provided in the Mayor’s Housing SPG.

On assessment of the submission material, the proposed residential quality will be of a high standard and is welcomed. With regards to shared circulation, the maximum number of units per residential core is eight; however, the majority will be of a lower ratio. In addition, there are no single aspect north facing units and approximately 69% of the units will benefit from a dual aspect. All units will benefit from a policy compliant amount of private amenity space in the form of a balcony/terrace.

At the pre-application stage, concerns were raised with regards to overlooking and privacy and the relationship between the office and residential elements, and oblique overlooking that may result. Following these discussions and those with Council officers, the applicant has given further consideration to the junctions of residential buildings in order to ensure that they will not prejudice the residential quality of the units. As set out within the design and access statement, a number of key strategies have been used to help overcome potential overlooking issues. These include utilising the detailed elevational design to minimise oblique sightlines between dwellings by including pre-cast concrete mullions and full height louvred panels in the most sensitive locations; ensuring projecting balconies are distributed as to not overlook neighbouring flats and are limited in scale; and the careful consideration of internal flat layouts to ensure bedrooms and more sensitive rooms are positioned away from any areas at risk of overlooking. Overall, this approach is considered acceptable and will help provide a high quality residential environment for future residents that are appropriate to the urban context whilst optimising the housing potential of this central-London site within an opportunity area.
Children’s play space

29 Policy 3.6 of the London Plan sets out that “development proposals that include housing should 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 in Appendix Two of the Mayor’s Shaping Neighbourhoods: Play and Informal Recreation SPG (2012), the applicant has calculated an expected child yield for the proposals of 52, of which 22 would be under five years old. As a result of the expected child yield, the development would generate a play space requirement of 519 sq.m. of which a minimum of 220 sq.m. should be provided on site.

30 Each of the residential courtyards spaces have been sized to accommodate the door-stop play space requirements for children aged under five years old in each building. Notwithstanding this, the play strategy intends that all play facilities are shared across each of the three amenity courtyards which are to be fully accessible and free from vehicular traffic. Each of the space will provide a mix of formal and informal play features, including stepping stones, balancing beams, climbing/play walls and stimulating soft landscaping and planting schemes. Overall, the scheme will provide 1,341 sq.m. of informal playable space which meets and exceeds the SPG requirements.

31 In addition to the onsite facilities, the applicant has identified a number of facilities within 800 metres of the site which provide formal recreation facilities such as multi use games areas which will help meet the needs of older children who live at the development. However, the applicant should be mindful of any other high density schemes coming forward in the area that may also place pressure on existing open spaces.

32 Overall, the approach to play space provision is in general accordance with the principles set out in London Plan Policy 3.6 and the Mayor’s revised Supplementary Planning Guidance ‘Shaping Neighbourhoods: Children And Young People’s Play And Informal Recreation and is supported.

Residential density

33 Given the characteristics of the site, the public transport accessibility level (PTAL) of 6b and its central location, the London Plan density matrix (Table 3.2 in support of London Plan Policy 3.4) would suggest a residential density of between 650 to 1,100 habitable rooms per hectare (hr/ha) for this development. The density calculated for the proposed development is 1,329 hr/ha.

34 It is acknowledged that the density ranges recommended in Table 3.2 of the London Plan should not be applied mechanistically and that PTAL alone is not an appropriate measurement to inform residential density. It is also important to acknowledge that the site is within an identified opportunity area and is therefore a location where residential output and densities should be optimised and one where development proposals should contribute towards meeting, or where appropriate, exceeding the minimum guidelines for housing, in accordance with London Plan Policy 2.13. In this context, the principle of a high-density proposal is supported, however, in accordance with paragraph 1.3.41 of the Mayor’s Housing SPG, in order to be acceptable any development will need to be of the highest standards of design and provide high quality residential accommodation that is well designed, and delivers an appropriate mix of units, including affordable housing, with sufficient play and amenity space.
As set out above, the development would deliver high quality new homes in a highly accessible location within an opportunity area at a unit mix that accords with local policy requirements and would provide onsite private and communal amenity space. Therefore, subject to the submission and satisfactory review of the further information/revisions requested within this report and the outcome of further discussions with regards to maximising affordable housing delivery, the proposed residential density is supported.

**Urban design**

The overall layout creates a series of connected private, public and semi-public open spaces of differing character fronted by commercial and residential uses which is welcomed. In particular the office building has been generously set back from Lavington Street to create a new public square on the street (Lavington Place) which will also link into a new north-south connection through the site to the potential Low Line to the south and the Tate Modern and River Thames to the north. As set out at the pre-application stage, the schemes contribution to open space provision and wider pedestrian connectivity is supported. The provision of mews houses within the scheme is particularly welcomed.

The ground floor of the office building will be part office entrance lobby, part flexible commercial space. The location of these uses at ground floor will help provide animation along Lavington Street, Ewer Street, the proposed north-south connection and Lavington Gardens; a semi-public courtyard space at the centre of the site. However, the applicant should clarify the layout of the flexible unit on the south-west corner of the office building as it is currently unclear from the submitted plans how much of its frontage will be visually permeable. In any case, the applicant should ensure that this unit maximises its contribution towards providing a visually permeable and active frontage to the western elevation of the building in order to increase passive surveillance on this key north-south pedestrian route and onto Lavington Gardens. Similarly, the applicant should provide further clarification on the access arrangements along the southern boundary of the site and whether this is a secure access from Ewer Street, as officers have concerns over the levels of passive surveillance that will be achieved in this area, particularly given the location of the service yard and substation at this corner.

As set out in the pre-application advice, there is a concern over the amount of residential servicing uses that front onto Lavington Street, which undermines the positive contributions made to the public realm elsewhere in the development. This is a particular issue within the ground floor layout of Building A. The uses on this key frontage include refuse stores, cycle lifts, a deliveries and holding area, security room and car park ramp and whilst it is acknowledged that these are necessary elements, the current layout creates a high proportion of inactive frontage along the street and the applicant is therefore strongly encouraged to reconsider this aspect of the scheme. As previously suggested, the entrance to Block A could be located closer to the entrance courtyard and the refuse access points for this block could be located closer to the car park ramp. This would help to reduce the impact on pedestrian flow along Lavington Street and also create more activity around the entrance courtyard.

The provision of a retail unit within the base of Block C is supported as this will help activate Lavington Place and Lavington Street. However, in order to help address the above concerns, a second entrance should be provided from Lavington Street to help further improve the ground floor relationship between this building and the existing street network.

The development includes a part 21 storey building, which is significantly taller than the existing building. The application includes a townscape, visual impact and built heritage assessment which demonstrates that while the proposed tall building will be visible from some views within nearby conservation areas, the proposed massing will not cause harm to the significance of their settings or to the settings of any nearby listed buildings within them and is of an appropriate scale.
when compared with Great Suffolk House and emerging cumulative schemes in the vicinity of the site. Furthermore, the site is located in an opportunity area within the CAZ, has excellent access to public transport and, as set out above, will make a positive contribution towards improving permeability of the area, and is therefore considered an appropriate location for a taller building. Notwithstanding this, the comments raised above regarding the layout of ground floor uses should be addressed in order to further justify the scale proposed.

41 With regards to the appearance of the development, the predominant use of brick within the material palettes draws upon the warehouse character of Bankside area and is supported.

**Inclusive design**

42 The supporting design and access statement demonstrates that inclusive design principles have been considered throughout the development process and will be embedded within the detailed design of the scheme in order to ensure that the office, commercial and residential uses will be accessible by all. This is strongly welcomed. The strategy sets out that the constraints posed by the level changes across the site will be successfully resolved through the use of gently sloping gradients that meet relevant standards and ensure that all entrances, public spaces and residential amenity spaces will have step-free access.

43 In line with London Plan Policy 3.8 in the March 2016 Minor Alterations to the London Plan, 90% of units are designed to meet Building Regulation requirement M4 (2) ‘accessible and adaptable dwellings’ and the remaining 10% of units meet Building Regulation requirement M4 (3) ‘wheelchair user dwellings’. This is welcomed and compliance with these standards should be secured by planning condition.

44 Eighteen Blue Badge parking spaces are to be provided in the basement which equates to one space per wheelchair user dwelling and accords with strategic policy requirements. The parking spaces should be equipped with electric vehicle charging points in accordance with London Plan policy. A further Blue Badge parking space for the office use will be provided for within the service yard which is accessed from Ewer Street.

**Sustainable development**

Energy strategy

45 The applicant has applied the energy saving hierarchy detailing savings from energy efficiency measures of 21% and savings of 14% through the provision of Combined Heat and Power (CHP). The applicant has investigated the feasibility of a range of renewable energy technologies but is not proposing to install any technology for the development. Overall this results in a total carbon reduction of 35% compared to a 2013 Building Regulations compliant development, however, as set out below, further information is required before the savings can be verified.

46 The demand for cooling will be minimised through passive solar shading, natural ventilation where possible and heat recovery on mechanical ventilation systems.
Thermal dynamic modelling has been undertaken to assess the overheating risk within the conditioned areas of the building which demonstrates that all spaces comply with the CIBSE TM52 criteria. However, it is not clear if the spaces have been assessed under the future weather scenarios (CIBSE TM49) and there are still a number of units demonstrating ‘medium’ risk of overheating. Furthermore, the BRUKL files provided demonstrate that the cooling demand of the actual units is higher than the notional units. Therefore, the applicant should investigate further passive design measures in order to both reduce the unwanted solar gains and provide evidence that there is only a slight risk of high summer temperatures, in addition to reducing the cooling demands of the non-domestic areas. Further dynamic thermal modelling in line with CIBSE TM49 weather scenarios is therefore recommended and the BRUKL files for all stages of the energy hierarchy should be provided to confirm the savings stated.

The applicant has carried out an investigation and has stated that there are currently no local district heating networks within the vicinity of the proposed development. However, the London Heat Map identifies a proposed network less than 500 metres from the site. The applicant should therefore contact the Council’s energy officer to determine the current status of this network and any potential for a future connection. Evidence of correspondence should be provided to demonstrate that these options have been fully investigated. Notwithstanding the above, the applicant has provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

The applicant should confirm if a site heat network is being proposed and that all domestic and non-domestic building uses will be connected to it. A drawing showing the route of the heat network linking all uses on the site should be provided. The submitted plans identify one energy centre at basement level and the applicant should confirm that this is the only energy centre on-site and should provide further information on its floor area and internal layout.

A 70 kWe (109 kWth) gas fired combined heat and power (CHP) unit is proposed to provide the lead heat source for the site heat network and is sized to provide the domestic hot water load, as well as a proportion of the space heating and is expected to run for approximately 5,475 hours annually. The applicant should provide the total space heating and domestic hot water (DHW) demand of the development (MWh annually) and the proportion of heat met by the CHP. The plant efficiencies used when modelling carbon savings should be based on the gross fuel input for gas rather than the net values often provided by manufacturers.

As set out above, no renewable technologies are proposed. The applicant has stated the installation of photovoltaic panels (PV) are considered potentially viable but have not been taken forward at this stage as it is a large area that would be required to make a significant contribution to the renewable energy requirement. The installation of solar PV should be pursued in order to maximise carbon savings on site and to comply with Policy 5.7 and therefore a roof layout indicating the potential locations available for a PV installation and/or any likely constraints associated with such an installation should be provided.
Flood risk and sustainable drainage

52 A flood risk assessment has been submitted to support the application which confirms that the site is within Flood Zone 3 but is protected to a high level by the existing Thames Tidal Flood Defences. The assessment has considered the residual risk of flooding and identifies that flood depths could reach one metre at the site. A range of mitigation measures are proposed to reduce the impact in the unlikely event of a breach of the tidal defences which include using flood resilient materials and construction methods; flood protection to plant rooms; preparation of a flood warning & evacuation plan; access to upper floors from ground and basement level; and raising all residential accommodation above any likely flood level. The measures set out within the assessment will provide acceptable mitigation and as a result the proposals are compliant with London Plan Policy 5.12.

53 There is significant surface water flooding risk on and close to the site. The development will achieve at least a 50% reduction in surface water discharge rates by utilising green/blue roofs; landscape design to maximise rainwater storage and distribution and a subsurface attenuation tank. The details of the drainage strategy have not yet been finalised but the principles proposed accord with London Plan Policy 5.13. Therefore an appropriate planning condition requiring the submission and approval of a sustainable drainage regime which meets the requirements of London Plan Policy 5.13 by the Council in consultation with the lead local flood authority prior to commencement should be secured. In addition, the design of the proposed attenuation tank should follow the Method 2 design taken from the Curia SUSDRAIN website.

Transport

Cycling

54 Overall the cycle parking provision is in general accordance with London Plan Policy 6.13. However, the location of the spaces will need to be clearly shown on plans and the management arrangements should be secured by planning condition to ensure safe and easy access for cyclists to and from the basement. Adequate facilities for cyclists such as staff lockers/showers should be provided for the proposed commercial uses and secured by planning condition.

55 Cycle docking stations are in high demand in the vicinity of the site and this would be further increased by the proposed development. An additional cycle hire docking station will therefore need to be installed to help mitigate the increased demand and Transport for London (TfL) requests that £210,000 is secured via planning obligation towards the installation of a docking station in close vicinity to the proposed development.

Delivery, servicing and construction logistics

56 Delivery and servicing for the residential element and the flexible unit within Block C is proposed from Lavington Street via an on street servicing bay. The Council as the highway authority for this road should determine whether this solution is appropriate in this location. Delivery and servicing for the office block and flexible units is to take place on site within the service yard which has space for two servicing vehicles. In accordance with London Plan Policy 6.13 a detailed delivery and servicing plan should be secured by planning condition to ensure that this activity is appropriately managed.

57 A construction management plan should be prepared in accordance with TfL guidance and submitted prior to construction. This should include outline plans identifying the routes for construction vehicles and be secured by planning condition.
Travel plan

58 A residential travel plan has been submitted which is supported. Any subsequent versions should be secured, enforced, monitored and reviewed as part of the Section 106 agreement. A workplace travel plan has not been submitted and TfL recommends that this is also secured by condition. The travel plan should accord with TfL’s Travel Planning Guidance which is available online.

Community Infrastructure Levy

59 In accordance with London Plan Policy 8.3, the Mayoral Community Infrastructure Levy (CIL) came into effect on 1st April 2012. The levy is charged at £35 per square metre of additional floor space in Southwark Council.

Local planning authority’s position

60 The local planning authority’s position is unknown at the time of writing.

Legal considerations

61 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

62 There are no financial considerations at this stage.

Conclusion

63 London Plan policies on CAZ, opportunity areas, employment, housing, affordable housing, urban design, inclusive design, sustainable development and transport are relevant to this application. Whilst the scheme is broadly supported in strategic planning terms, the application does not yet fully comply with the London Plan, as summarised below. The resolution of these issues could, nevertheless, lead to the application becoming compliant with the London Plan.

- **Principle of development**: the proposal for the mixed-use redevelopment of the existing site within an opportunity area to deliver a modern, fit-for-purpose office building within the CAZ that can support higher employment densities and a significant number of new homes is supported. The applicant should explore providing some of the proposed commercial floorspace as affordable workspace.

- **Affordable housing**: The current affordable housing offer of 20% on a habitable room basis falls below the Council’s policy target and is unacceptable. GLA officers consider that this offer should be a minimum of 35%.
• **Housing**: The proposed residential unit mix, quality and density is supported in principle, subject to the design issues raised above being satisfactorily addressed and the outcome of further discussions with regards to maximising affordable housing delivery.

• **Urban design**: the overall design of the proposal is generally supported with regards to building layout, public realm, and scale and massing. The applicant is however strongly encouraged to further explore opportunities to minimise inactive uses fronting onto key public routes through the site and onto Lavington Street through the revising internal ground floor layouts. The applicant should also provide further clarification on the access arrangements for the east-west route running along the southern site boundary, particular the access from Ewer Street.

• **Sustainable development**: the applicant has broadly followed the energy hierarchy; however, further information regarding overheating, potential connection to a nearby district heat network, the site heat network, the combined heat and power system and renewable energy is required before the proposals can be considered acceptable.

• **Flood risk**: an appropriate planning condition requiring the submission and approval of a sustainable drainage regime which meets the requirements of London Plan Policy 5.13 by the Council in consultation with the lead local flood authority prior to commencement should be secured.

• **Transport**: A contribution of £210,000 towards cycle hire should be secured, further details regarding car and cycle parking provision should be provided and the Council should secure a construction logistics plan and delivery and servicing plan through the Section 106 agreement and/or conditions, as appropriate in order to comply with London Plan Policies 6.3, 6.9, 6.13 and 6.14.

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