

Item No. 6.1	Classification: Open	Date: 2 February 2016	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 15/AP/2217 for: Full Planning Permission Address: 24-28 QUEBEC WAY, LONDON, SE16 7LF Proposal: Demolition of existing building and redevelopment of site to provide a mixed-use building ranging from 4 to 7 storeys plus basement comprising 94 residential units (Use Class C3) and flexible commercial floorspace (Use Classes A1/A2/A3, B1, D1/D2); associated highway, public realm and landscaping works, car and cycle parking and associated works.		
Ward(s) or groups affected:	Surrey Docks		
From:	Director of Planning		
Application Start Date	17/06/2015	Application Expiry Date	16/09/2015
Earliest Decision Date	25/07/2015	PPA Date	31/03/2016

RECOMMENDATION

1. a) That planning permission be granted, subject to conditions and the applicant entering into a satisfactory legal agreement.

b) In the event that a satisfactory legal agreement is not entered into by 30 April 2016, that the Director of Planning refuses planning permission, if appropriate, for the reason set out in paragraph 114 of the officer report.

BACKGROUND INFORMATION

Site location and description

2. The site is located on the north-eastern side of Quebec Way at the junction with Roberts Close, and contains a 2-3 storey building currently occupied and in light industrial use. There is a car park at the rear of the building, with vehicular access from Roberts Close. There is a vacant site to the north of the site with St Johns Roman Catholic Primary School and Russia Dock Woodlands beyond this, and a new mixed-use residential-led scheme (Quebec Quarter) is under construction to the south-east on the former industrial estate site. Harmsworth Quays Printworks (now vacant) is to the south, and Alfred Salter Primary School is to the west.
3. The site does not lie within or close to the boundary of a conservation area, and there are no listed buildings in the vicinity.

Details of proposal

4. Full planning permission is sought for demolition of the existing building on the site and erection of a new building ranging from 4-7 storeys in height (max. 29.175m AOD) plus basement. It would occupy a C-shaped footprint and would comprise 500 sqm of flexible commercial / community space on part of the ground floor of the building fronting Quebec Way (Use Classes A1/A2/A3, B1, D1/D2) and 94 residential units occupying the remainder of the ground floor and the upper floors (36 x 1-bed, 38 x 2-

bed, 16 x 3-bed and 4 x 4-bed). The commercial / community space would front Quebec Way and would be in the form of three separate units measuring 148.7, 242.9 and 111.3sqm respectively (net internal area).

5. There would be two vehicular accesses onto the site, both from Roberts Close. The southernmost access would lead to a basement car park with 28 spaces, plant room and cycle parking. The second access would be located further north along Roberts Close and would be for use by emergency vehicles and refuse trucks.
6. The building would be constructed of buff and grey brick with hit and miss brickwork to the corner elements fronting Quebec Way. The roof would be constructed of grey standing seam metal and metal framed windows and balcony balustrades are proposed.

Amendments

7. The 7-storey part of the building would be located at the junction of Quebec Way with Roberts Close and the plans as originally submitted showed this arranged as five storeys with two further floors set back above this (a 5+2 massing). This has subsequently been amended to six storeys with one further set back floor (6+1 massing), thereby increasing the size of the units on the fifth floor. Amendments have been made to the secondary vehicular access so that refuse trucks could turn in this location, as they were originally shown turning in the school's secondary access on the opposite side of Roberts Close. Other minor amendments have been made including increasing the size of some of the balconies, reconfiguring the layout and location of the wheelchair accessible units, amendments to the flat layouts, the omission of a parking space in the basement to provide additional cycle parking, and enlarged windows at ground floor level along Roberts Close.

Planning history

8. 15/AP/1457 Application type: Screening Opinion (EIA) (SCR)
Screening Opinion for the development of up to 100 residential units and 3 commercial units
Decision date 22/05/2015 Decision: Scoping Opinion - EIA Regs (SCP). EIA not required.
9. Pre-application advice was provided in advance of this application, the details of which are held electronically by the Local Planning Authority. A number of meetings were held with the applicant prior to the submission of this application. Discussions centred around the layout, height, scale and massing of the development, impact upon neighbouring properties, the quality of accommodation to be provided, affordable housing, and transport impacts.

Planning history of adjoining sites

10. Quebec Way Industrial Estate, Quebec Way
11-AP-2565 - Demolition of three existing warehouse buildings and construction of 7 blocks between 3 and 6 storeys high (max 21m AOD); containing 366 residential units (142x 1 bed, 113x 2 bed, 98x 3 bed and 13x 4 bed) and commercial floorspace for Class A1 (shops) / A3 (restaurant/cafes) / D1 (non-residential institutions) / D2 (assembly and leisure) uses; with basement car parking, motorcycle and cycle storage, ancillary storage spaces and a new route through the site into Russia Dock Woodlands. New vehicle and pedestrian accesses to be created from Quebec Way. Planning permission was GRANTED on 30/03/2012 following the completion of a legal agreement and works are underway on site.

11. Alfred Salter Primary School
13-AP-2824 - Erection of floodlighting to the existing MUGA (multi-use games area) of the school. Planning permission was GRANTED on 01/11/2013.
- 12-AP-0962 - Installation of a 14.4kWp roof mounted solar pv array (100 Square metres). Planning permission was GRANTED on 31/05/2012.
12. Former Mulberry Business Park, Canada Street / Quebec Way
13-AP-1429 - Redevelopment of the former Mulberry Business park to provide buildings of between 4 and 9 storeys (maximum height 42.85m AOD), comprising 770 student bedrooms with related living/kitchen and communal spaces (sui generis); 33 affordable residential units (Class C3); 610sqm retail uses (Classes A1, A2,A3); 322sqm health centre (Class D1); 75sqm area of retail (Classes A1, A2, A3) or alternate non-residential institutional use (Class D1); 4,490sqm offices (Class B1); associated car parking, cycle parking and landscaped public realm; new vehicular and pedestrian access/egress and associated works. Planning permission was GRANTED on 22/10/2013 following the completion of a legal agreement

KEY ISSUES FOR CONSIDERATION

Summary of main issues

13. The main issues to be considered in respect of this application are:
- a) Principle of the proposed development in terms of land use
 - b) Environmental impact assessment
 - c) Design
 - d) Density
 - e) Affordable housing
 - f) Housing mix
 - g) Quality of accommodation
 - h) Wheelchair accessible housing
 - i) Impact of proposed development on amenity of existing occupiers and adjoining development sites
 - j) Transport issues
 - k) Trees and landscaping
 - l) Planning obligations (S.106 undertaking or agreement)
 - m) Mayoral and Borough Community Infrastructure levy
 - n) Sustainable development implications
 - o) Ecology
 - p) Flooding.

Planning policy

14. The site is subject to the following designations on the Proposals Map:
- Canada Water Area Action Plan proposal site 10
 - Canada Water Action Area Core
 - Air Quality Management Area
 - Urban Density Zone
 - Strategic Heating Area
 - Public Transport Accessibility Level (PTAL) 3 (medium)
 - Adjacent to Russia Dock Woodlands (Site of Importance to Nature Conservation & Metropolitan Open Land).

15. National Planning Policy Framework (NPPF)
Section 1: Building a strong, competitive economy
Section 4: Promoting sustainable transport
Section 6: Delivering a wide choice of high quality homes
Section 7: Requiring good design
Section 8: Promoting healthy communities
Section 10: Meeting the challenge of climate change, flooding and coastal change
Section 11: Conserving and enhancing the natural environment

National Planning Policy Guidance

16. London Plan July 2015
Policy 2.13: Opportunity areas and intensification areas
Policy 3.3: Increasing housing supply
Policy 3.1: Ensuring equal life chances for all
Policy 3.8: Housing choice
Policy 3.9: Mixed and balanced communities
Policy 3.10: Definition of affordable housing
Policy 3.12: Negotiating affordable housing on individual private residential
Policy 5.1: Climate change mitigation
Policy 5.2: Minimising carbon dioxide emissions
Policy 5.3: Sustainable design and construction
Policy 5.5: Decentralised energy networks
Policy 5.6: Decentralised energy in development proposals
Policy 5.7: Renewable energy
Policy 5.9: Overheating and cooling
Policy 5.15: Water use and supplies
Policy 5.10: Urban greening
Policy 5.11: Green roofs and development site environs
Policy 5.12: Flood risk management
Policy 5.13: Sustainable drainage
Policy 6.3: Assessing effects of development on transport capacity
Policy 6.13: Parking
Policy 6.9: Cycling
Policy 6.10: Walking
Policy 6.11: Smoothing traffic flow and tackling congestion
Policy 7.1: Building London's neighbourhoods and communities
Policy 7.2: An inclusive environment
Policy 7.3: Designing out crime
Policy 7.4: Local character
Policy 7.5: Public realm
Policy 7.6: Architecture
Policy 7.21: Trees and woodlands
Policy 7.13: Safety, security and resilience to emergency
Policy 7.14: Improving air quality
Policy 7.15: Reducing noise and enhancing soundscapes
Policy 8.2: Planning obligations
Policy 8.3: Community infrastructure levy

17. Core Strategy (2011)
Strategic Policy 1: Sustainable development
Strategic Policy 2: Sustainable transport
Strategic Policy 5: Providing new homes
Strategic Policy 6: Homes for people on different incomes
Strategic Policy 7: Family homes
Strategic Policy 10: Jobs and businesses

Strategic Policy 11: Open spaces and wildlife
Strategic Policy 12: Design and conservation
Strategic Policy 13: High environmental standards
Strategic Policy 14: Implementation and delivery

18. Southwark Plan 2007 (July) - saved policies

The Council's cabinet on 19th March 2013, as required by paragraph 215 of the NPPF, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the Council satisfied itself that the policies and proposals in use were in conformity with the NPPF. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF.

Policy 1.4: Employment sites outside the preferred office locations and preferred industrial locations

Policy 2.2: Provision of new community facilities

Policy 2.5: Planning obligations

Policy 3.1: Environmental effects

Policy 3.2: Protection of amenity

Policy 3.3: Sustainability assessment

Policy 3.4: Energy efficiency

Policy 3.6: Air quality

Policy 3.7: Waste reduction

Policy 3.9: Water

Policy 3.11: Efficient use of land

Policy 3.12: Quality in design

Policy 3.13: Urban design

Policy 3.14: Designing out crime

Policy 3.19: Archaeology

Policy 3.28: Biodiversity

Policy 4.2: Quality of accommodation

Policy 4.3: Mix of dwellings

Policy 4.4: Affordable housing

Policy 4.5: Wheelchair affordable housing

Policy 5.1: Locating developments

Policy 5.2: Transport impacts

Policy 5.3: Walking and cycling

Policy 5.6: Car parking

Policy 5.7: Parking standards for disabled people and the mobility impaired

19. Supplementary Planning Documents

- Affordable housing SPD (2008)
- Sustainable design and construction SPD (2009)
- Sustainable transport SPD (2010)
- Residential Design Standards SPD (2011)
- Draft Affordable housing SPD (June 2011)
- Section 106 planning obligations and community infrastructure levy (CIL) SPD (2015)

20. Canada Water Area Action Plan 2015 (CWAAP)

The CWAAP 2015 was adopted in November 2015. It supersedes the 2012 Area Action Plan, which was reviewed following the announcement by the Daily Mail Group of their intention to vacate the Harmsworth Quays Print Works.

21. The application site is designated as Site 10 within the CWAAP which lists residential use and a minimum of 500sqm of business use (class B1) and / or community use (class D) as required land uses, and hotel use (class C1) as the only other acceptable use. The estimated residential capacity is 50 homes.

Key policies:

Policy 4: Small scale shops, restaurants and cafes outside the town centre

Policy 10: Parking for residential development in the Core Area

Policy 15: Building blocks

Policy 18: Open spaces and biodiversity

Policy 17: Building heights in Core Area

Policy 21: New homes

Policy 22: Affordable homes

Policy 23: Family homes

Policy 24: Density of developments

Policy 27: Community Facilities

Principle of the proposed development in terms of land use

22. The proposed development would provide 500 sqm of flexible commercial space and 94 residential units. Housing (Class C3 use) is a required use under the site designation within the CWAAP 2015, and is therefore an acceptable use of the land. The number of units being proposed (94) exceeds the estimated capacity set out in the CWAAP. The delivery of a greater quantity of housing does not raise any concerns in principle, provided the urban design, housing quality and impact on the neighbours are not compromised; these issues are discussed later in this report. The site is within the CWAAP Core Area which is expected to accommodate a minimum of 4,500 new homes by 2026; optimising the use of all brown field sites will be necessary to meet this target.
23. The proposal site designation in the AAP specifically requires 500sqm of B1 or D class floorspace to be provided on the site. Whilst the application does provide that quantum of floorspace, it seeks permission for the units to also be capable of being used for A1 (retail), A2 (financial and professional services) and A3 (cafes / restaurants) use; this is because the applicant requires more flexibility to maximise the likelihood of the units being let. Whilst this is noted, given the proposal site designation and because the site is currently in employment use, a condition is recommended requiring the units to be marketed for B1 and D class purposes in the first instance. This should be for a period of 6 months from practical completion and, in the event that no occupier is found, they could be used for the other uses applied for. Whilst retail use is not listed within the site designation as an 'other acceptable use' and the site does not fall within the town centre designation, it is not considered that 500sqm of retail floorspace on the site would undermine the Core Strategy and AAP objectives for reinforcing the town centre to the south-west of the site and would not impact upon its potential vitality and viability. Furthermore, policy 4 of the CWAAP permits small scale shopping to meet day-to-day convenience needs, cafes and restaurants.
24. Concerns have been raised by a neighbouring resident that the commercial units may not be viable and could remain empty like several others in the area and then be converted to residential, that they would provide less jobs than the existing use, that discounted rents should be given to encourage start-up businesses, and the units should be provided with non-exclusive open access high speed fibre optic broadband. Whilst providing discounted rents and high speed broadband would be of significant benefit, there is no policy basis to require this. The inclusion of a wider range of permitted uses should maximise marketability, and it is recognised that the character

of the area will change in coming years with the development of the Harmsworth Quays and Mulberry sites, increasing the profile of the area and level of footfall on Quebec Way.

25. Overall it is considered that the principle of the proposed development would be acceptable in land use terms, subject to a condition requiring the commercial units to first be marketed for B1 and D class uses.

Environmental impact assessment

26. Prior to the submission of this application, a request for a screening opinion was submitted under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 'the Regulations' (as amended). The screening opinion was for a development of up to 100 residential units and 3 commercial units on the site (reference: 15-AP-1457).
27. A negative screening opinion was issued, i.e. it was concluded that the proposed development would not require an EIA to be undertaken. It was concluded that according to the Regulations, the site could be classified as a Schedule 2 'urban development project' by virtue of its site area which exceeds 0.5ha. An assessment was therefore made as to whether the development was likely to have a significant effect upon the environment by virtue of its nature, size or location, based on a review of the Schedule 3 selection criteria for screening Schedule 2 Development. Given the similarities between the proposal which was subject to the screening opinion and that for which planning permission is now sought, it is considered that the proposed development does not constitute EIA development based on a review of the selection criteria for Schedule 2 development. The changes to the EIA regulations in 2015 which increased the thresholds for requiring an EIA do not affect this conclusion.

Design

28. Strategic policy 12 of the Core strategy 'Design and conservation' states that 'Development will achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in'. Saved policy 3.12 of the Southwark Plan asserts that developments 'should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit' and saved policy 13 requires the principles of good urban design to be taken into account in all developments. CWAAP policy 15 'Building blocks' supports good design, including references to frequent entrances onto the street, and use of high quality, durable and robust materials.
29. The site is located amongst a wider townscape of docklands redevelopment that mostly took place during the 1980s and currently has little established regular form. However, the surrounding townscape will change significantly in the coming years as many of the adjoining sites come forward for redevelopment. The designation of Canada Water as an Opportunity Area under the London Plan and the adoption of the CWAAP bring an expectation for more intense forms of development in order to deliver housing targets and reinforce the town centre. This site sits on the edge of the CWAAP 'Core Area', which reflects its position at the juncture between the high density developments towards the town centre, and the lower rise housing to the west beyond Russia Dock Woodlands.

Site layout

30. The proposed building would occupy a C-shaped footprint with the commercial units fronting Quebec Way and amenity space in a courtyard at the rear. The site layout would allow for a strong and active frontage to Quebec Way which would provide activity and animation to the street. Residential units would line Roberts Close with front doors providing some activity to the street, and the building would be sufficiently set back from the new development under construction to the east (Former Quebec Way Industrial Estate, now known as 'Quebec Quarter') to provide some breathing space between the two. The layout is open towards the land to the rear (allocated for housing under proposal site 25 in the CWAAP) and would therefore not compromise the development potential of this land. Overall the site layout is considered to be acceptable and the building would be set sufficiently far back along the Quebec Way frontage to allow existing trees to be retained; this is considered further in the trees and landscaping section below.

Height, scale and massing

31. Policy 17 of the CWAAP states that prevailing heights in the core area should be between 4 and 8 storeys, with heights at the lower end of the range on sites at the periphery of the core. This is reinforced through the supporting text to the site designation, CWAAP10, which states that the building heights for the site should be towards the lower end of the range on the eastern side to protect the sense of openness in Russia Dock Woodland and its nature conservation value. It also advises that the Quebec Way boundary should be softened to help retain a sense of greenness which is a key part of the character of the area.
32. The proposed building would be between 4-7-storeys high. It would be 4-6 storeys along its eastern frontage, 6 and 7-storeys along its southern elevation facing Quebec Way, dropping to 4-storeys along Roberts Close. The heights are consistent with the range expected under the CWAAP, and the variations in height of the building reflect the AAP objective of using changes in height to add interest and relate more effectively to the surrounding development. Although it would be close to the single-storey Alfred Salter school, the neighbouring building being constructed to the east will be a maximum of 6-storeys high and to the west of the site on the Former Mulberry Business Park the consented building closest to the application site would be 7-storeys high. The height differential between the 7-storey corner block and the 4-storey terrace along Roberts Close is well handled, with windows, a terrace and areas of hit-and-miss brickwork to provide interest on the flank elevation and avoid it appearing overbearing. The 4-storey height along Roberts Close with set-back top floor would successfully mediate between the urban scale of Quebec Way and the suburban hinterland beyond.

Elevational design and materials

33. The Quebec Way frontage is articulated with two projecting wings and a central bay and the varied and textured brick finish would provide interest and activity to the frontage and would avoid it appearing overly monolithic. The commercial units would provide a strong base to the building; a similar but not identical fenestration pattern on the upper floors would provide rhythm to the elevation. The Roberts Close frontage appears as a terrace of houses, although it would comprise maisonettes and flats. Its rhythm would give this part of the building a regular, fine grain and a domestic appearance which would be appropriate to this secondary street. The eastern elevation would largely be viewed from the new development under construction at 'Quebec Quarter' and would contain contrasting brickwork and fenestration and would be acceptable in its detailed design.

34. The building is faced predominately in brick and uses texture, with some areas of hit and miss brickwork and some areas of recessed brick panels, to provide interest. The final quality of the building would rely on the quality of the bricks and conditions requiring sample panels and a mock-up are recommended, together with a condition for large-scale detailed drawings of the various elements of the building. There would be a single-storey refuse store building to the east of the Quebec Way frontage which has quite a large footprint but its modest height of 2.8m should ensure it does not appear too prominent in the streetscene.
35. Overall, the height and form of the building would follow the expectations of the CWAAP and sit comfortably in the emerging local townscape. The building would be of an acceptable design appropriate to its location and would use high quality and robust materials, in line with CWAAP policy 15.

Density

36. The site is located in the urban density zone and strategic policy 5 of the Core Strategy 'Providing new homes' permits a density range of 200-700 habitable rooms per hectare in location, which is repeated through policy 24 of the CWAAP. Both policies state that the only exceptions to this should be when development is of an exemplary design standard.
37. The Southwark Plan sets out the methodology for calculating the density of mixed use schemes and requires areas of non-residential space to be divided by 27.5 to create an equivalent in terms of habitable rooms per hectare. Based on this methodology the density of the proposed development would equate to 698 habitable rooms per hectare which would be policy compliant.
38. Although the number of residential units would significantly exceed the 50 homes estimated capacity in the proposal site designation, that capacity was originally based on the site being located in the suburban density zone and during the EIP process for the now-superseded AAP, the Inspector instructed the Council to re-classify the site as being in the Core Area and therefore within the urban density zone. Although the estimated capacity was not adjusted in the 2015 CWAAP, it is reasonable to acknowledge that the Urban density would enable a larger number of units to be accommodated on the site.

Affordable housing

39. The CWAAP Policy 21 expects the provision of a minimum 4,500 new homes in the core area between 2011 and 2026. Policy 22 requires developments to provide at least 35% affordable housing. Core Strategy policy SP6, and the Affordable Housing SPD, expect the affordable housing to be delivered with a tenure split of 70% social rent and 30% intermediate housing. The affordable housing should be provided on site and in a range of types and sizes. In accordance with saved policy 4.5 of the Southwark Plan, for every affordable housing unit which complies with the wheelchair design standards one less affordable habitable room will be required.
40. In line with the NPPF, Core Strategy and the Affordable Housing SPD, where a development does not provide 35% affordable housing, in a policy-compliant mix of tenures, the application must be supported by a viability appraisal which demonstrates that the scheme could not viably support a larger amount of affordable housing. The NPPF makes it clear, at paragraph 173, that planning authorities must not impose affordable housing obligations which preclude a competitive return to developers and therefore prevent developments from proceeding.

41. The proposed development would provide 19 affordable housing units which would equate to 30% provision by habitable room (93 affordable rooms out of a total of 310). The provision of 4 affordable wheelchair units reduces the affordable housing requirement by 4 habitable rooms (as allowed for under saved policy 4.4 of the Southwark Plan) and would mean that a policy compliant level of affordable housing would equate to 104 habitable rooms - the proposal therefore falls short by 11 habitable rooms.
42. In terms of the tenure split, the affordable housing would comprise 11 social rented flats and 8 intermediate (shared ownership) flats, as set out in the table below.

	TOTAL	2B3P	2B4P	3B4P	3B5P	4B5P	4B6P
Social Rent	11				7	-	-
					-	2	2
Shared Ownership	8	4	2	2	-	-	-
TOTAL	19	4	2	2	7	2	2

43. The social rented units would be on the ground floor, including maisonettes along Roberts Close. The shared ownership units are on the first and second floor of the eastern wing of the building.
44. That application was accompanied by a viability appraisal, which was scrutinised on behalf of the Council by the District Valuer Service. The lengthy negotiations have focused on the Benchmark Land Value, profit levels and build costs. The provision of large family units as affordable housing impacts on overall viability because these units have a lower value per square metre of floorspace when compared to 1 or 2 bedroom units. Although full agreement has not been reached on all of the variables, DVS has advised the Council that the offer of 30%, with the proposed mix of units, is a reasonable one.
45. In the course of negotiations, a proposal was put forward by the applicant which provided 35% affordable housing, but this was achieved by including affordable rented units, a larger proportion of shared ownership units. Following consultation with housing officers, it was concluded that this proposal, whilst delivering more units in total, would not be affordable to those in greatest housing need. The provision of affordable rent for the larger family sized units does not accord with approach to affordable rent set out in the clarification of our affordable housing policies reported to the Planning Committee on 20 December 2011 and would incur high rent costs for tenants. It was therefore concluded that the offer at 30%, as set out in the table above, should be recommended to the Committee.
46. It is recognised that the viability of the development could improve in the future if house prices continue to rise. It is therefore recommended that the s106 agreement include a clause to require a viability review in the event that the development is not substantially commenced within 18 months of the date of the permission.
47. The affordable units being provided in the current offer are high quality, attractive and the social rented units are all larger family units. All are dual aspect and have good sized private gardens or patios. They will provide very good homes for families,

meeting priority needs. It is therefore recommended that this be accepted as the most the scheme can reasonably support and that the affordable housing be secured through a s106 agreement. This would secure the definition of social housing in line with the Rent Standard Guidance April 2015 and that the shared ownership units be marketed exclusively to those within Southwark's affordability income thresholds in the first instance and only released under the higher London Plan thresholds if units remain unsold after 5 months.

Housing mix

48. Strategic policy 7 of the Core Strategy 'Family homes' requires developments in this location to provide at least 60% 2+ bed units and at least 20% 3, 4 or 5-bed units. This is repeated in policy 23 of the CWAAP which also requires that no more than 5% of the units be studio flats and that the 3+ bedroom units in the action area core must have directly accessible amenity space. The proposed development would provide 61% 2+ bed units and 21% 3+ bed units which would be policy compliant.

Quality of accommodation

49. Saved policy 4.2 of the Southwark Plan 'Quality of accommodation' requires developments to achieve good quality living conditions. Further information is provided in the Residential Design Standards SPD which sets out minimum unit and room sizes together with amenity space standards.

Privacy

50. Overall the scheme is considered to be acceptable in relation to the privacy of the proposed units. There would be some instances of close relationships at inward-facing corners owing to the C-shaped footprint of the building but it is not considered that this would significantly compromise the quality of the accommodation. The window-to-window separation distance across the courtyard would be 21m which would provide a good standard of privacy, and this would drop to 20m between balconies which would be acceptable. A condition requiring details of boundary treatment is recommended as strong boundary treatment would be required to provide privacy for the private amenity space to the ground floor units which would adjoin the communal courtyard.

Aspect / outlook

51. The scheme would contain a predominance of dual aspect units with 67% being dual aspect and 33% single aspect, none of which would be north-facing. The 21m across the courtyard would allow for good levels of outlook and on the eastern side there would be a minimum of 18m between the proposed building and the building currently being constructed on the adjoining site; whilst this is below the 21 m normally expected, the staggered face of the building, and the angled building lines would mean that acceptable levels of privacy and outlook would be retained.

Unit sizes

52. The individual unit sizes within the development would be as follows:

Bed	Overall unit	CWAAP	Amenity space	SPD
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spaces	size	minimum		Minimum
1-bed	50-62.3sqm	50sqm	5-18.9sqm	5-10sqm
2 bed	61-99.7sqm	61-70sqm	6.1-130sqm	5-10sqm
3 bed	76.3-116.2sqm	74-95sqm	10.4-48.8sqm	10sqm
4-bed	137.3sqm	90-99sqm	21.8-24sqm	10sqm

53. All units within the development would comply with or exceed the minimum floor areas in the adopted CWAAP and, following revisions to the plans, all of the individual room sizes and storage areas would comply with the requirements of the Residential Design Standards SPD. Whilst there would be some long access corridors within the development the layout is generally considered to be acceptable.

54. Internal light levels

A daylight and sunlight report based on the Building Research Establishment (BRE) Guidance has been submitted which considers light to the proposed dwellings using the Average Daylight Factor (ADF). ADF determines the natural internal light or day lit appearance of a room and the BRE guidance recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens.

55. The report advises that of the 268 rooms within the development, 252 (94%) would comply with the BRE guidance. Of the 16 which would not achieve the required standard, 15 are living rooms or open-plan living / kitchen / dining rooms (LKDs) with overhanging balconies and the report notes that they would achieve ADFs in excess of 1.5% if overhanging balconies on the floors above were omitted.

56. One bedroom would fail with an ADF of 0.80 which is not considered a significant shortfall and bedrooms, being predominantly used at night, are generally considered to be less sensitive. Of the LKDs which would fail, their ADFs would range from 0.83% to 1.99%. The unit with the lowest ADF for its open plan living space would be located in the eastern wing of the building facing the building under construction on the adjoining site. The room would not be particularly deep but the combination of a balcony above and proximity to the neighbouring development is likely to be a factor. It is noted that five out of the six LKDs to the maisonettes fronting Roberts Close would have ADFs of between 1.61-1.95%, largely on account of the depth of the rooms. The ground floor windows along this frontage have been enlarged which should increase the ADF values within the rooms, although the daylight and sunlight report has not been updated to reflect this. Whilst the shortfalls are noted, the overall compliance rate would be high and when weighed in the balance with the unit sizes and amenity space provision this is considered to be acceptable and provide good quality accommodation.

Amenity space

57. Section 3 of the Residential Design Standards SPD sets out the Council's amenity space requirements for residential developments and states that all flat developments must meet the following minimum standards and seek to exceed these where possible:

- 50 sqm communal amenity space per development;
- For units containing three or more bedrooms, 10 sqm of private amenity space;
- For units containing two or less bedrooms, 10 sqm of private amenity space should ideally be provided. Where it is not possible to provide 10 sqm of private amenity space, as much space as possible should be provided as private

amenity space, with the remaining amount added towards the communal amenity space requirement;

- Balconies, terraces and roof gardens must be a minimum of 3 sqm to count towards private amenity space.

58. There would be 1,250sqm of communal amenity space within the development spread across the central courtyard, an area to the north of this and an area on the eastern part of the site. The submission advises that within the private and communal gardens there would be new semi-mature trees including six fruit trees and areas given over for food growing.
59. Childrens' play space requirements are set out in the Greater London Authority's 'Shaping Neighbourhoods: Play and informal recreation SPG (September 2012). In this instance 340sqm of play space would be required, 102sqm of which should be for children of 0-4 years (125sqm would be provided), 136sqm for 5-11 years (145sqm would be provided) and 102sqm for 12+ years (105sqm would be provided). The proposal would therefore provide sufficient play space to meet the needs of the development. In terms of the distribution of the play space across this site this would generally be acceptable. The 12+ play space would be located on the eastern part of the site which would be close to the boundary with the adjoining site, but it would at least ensure that the provision would be spread out across the site with a range of options for residents. A condition requiring details of the play equipment to be provided is recommended, together with a condition requiring all of the communal amenity space and play space to be accessible to all occupants of the development.
60. All of the units would have access to at least 5sqm of private amenity space in the form of gardens, balconies and terraces and the plans have been amended so that all of the 3+bed units would have at least 10sqm of private amenity space. The principal gardens to the maisonettes along Roberts Close would front the street, but high boundary treatment is proposed which would provide them with privacy and they would be less overlooked than if they were located adjoining the central courtyard. There would be a shortfall of 250sqm of private amenity space across the development although this would be more than compensated for by the communal provision in accordance with the approach set out in the Residential Design Standards SPD.
61. The BRE guidance advises that for an area to appear adequately sunlit throughout the year at least half of the garden or amenity area should receive at least 2 hours of sunlight on 21st March. The central courtyard for the development would fall just short of this requirement with 49% of the space receiving at least 2 hours of sunlight on 21st March. This would increase to 95.2% in June and this is considered to be acceptable. The communal amenity space on the eastern side of the building would comply as 94.8% of the communal amenity space would receive at least 2 hours of sunlight in March and all of the private gardens would comply with the BRE guidance.
62. For those units with their private gardens fronting Roberts Close, four would comply with the BRE guidance and two would fail; for one unit none of its garden would receive 2 hours of sunlight on 21st March and for the other only 4.2% of its garden would receive more than 2 hours of sunlight. However, on June 21st all of the gardens would receive more than two hours of sunlight over their entire areas and this is considered to be acceptable.
63. Noise and vibration

A ground borne noise and vibration assessment and noise impact assessment have been submitted in support of the application. The groundborne noise and vibration

assessment considers the impact of passenger train movements from the Jubilee Line which runs close to the north-west corner of the site at a distance of approximately 10m at the closest point. The report concludes that there could be some audible noise and recommends mitigating measures. The noise impact assessment considers existing noise levels at the site and whether any mitigating measures are required. Both documents have been reviewed by the Council's Environmental Protection Team and a number of conditions are recommended to ensure that a good standard of accommodation would be provided.

64. Secure by design

The application has been reviewed by the Metropolitan Police Secure by Design advisor who has requested that a condition be imposed requiring the development to achieve secure by design certification. It is recommended that such a condition be imposed in the event that planning permission is granted.

Wheelchair accessible housing

65. Saved policy 4.3 of the Southwark Plan requires at least 10% of all major new residential developments to be suitable for wheelchair users, except where this is not possible due to the physical constraints of the site.
66. There would be 10 wheelchair accessible units within the development which would equate to 10.6% provision, and all of the units would be lifetime homes compliant. The wheelchair accessible units would be located at ground, first and second floor levels within the development and would comprise 2 x 1-bed units, 4 x 2-bed units, 2 x 3-bed units and 2 x 4-bed units. Of these, 2 x 3-bed and 2 x 4-bed units would be in the social rented sector, and the remaining six would be private. The location and layout of the wheelchair accessible units has been amended during the course of the application and now all of the wheelchair accessible units would be served by two lifts and storage for electric wheelchairs would be incorporated. There are still some concerns regarding the access route from the basement parking to the wheelchair accessible flats and the door opening to the master bedroom of unit A-1-3 and it is recommended that these matters be addressed by way of a condition.
67. The wheelchair accessible social rented units must be fully fitted out rather than adaptable; the private wheelchair units would be required to be first marketed exclusively to disabled occupiers and fitted out in line with the requirements of any disabled purchaser prior to first occupation. If no disabled purchaser is found during the marketing period, they could be released as general needs housing but the layout and base specification would mean that they remained adaptable by any future occupier.

Impact of proposed development on amenity of existing occupiers

68. Strategic policy 13 of the Core Strategy 'High environmental standards' seeks to ensure that development sets high standards for reducing air, land, noise and light pollution and avoiding amenity and environmental problems that affect how we enjoy the environment in which we live and work and saved policy 3.2 of the Southwark Plan states that permission will not be granted for developments where a loss of amenity, including disturbance from noise, would be caused. The adopted Residential Design Standards SPD expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.

Use of the proposed development

69. The use of the proposed building for retail, office or community use, and residential, would sit comfortably alongside the neighbouring uses and should not result in any loss of amenity. Use of the commercial units for places of worship could result in transport and noise issues which could cause a loss of amenity so it is recommended that this be prevented by way of a condition. It is recommended that the hours of use of the commercial units be controlled by condition in order to protect the amenity of nearby residents and, if the units were used for A3 (café/restaurant) purposes, details of any extraction and ventilation equipment should also be secured by way of a condition.
70. Alfred Salter Primary School occupies a single-storey building and is located to the west of the site. The principal access to the school is further west along Quebec Way although it has a secondary access to the north of the site further along Roberts Close which does not appear to be in use. Given that the school's main entrance is further along Quebec Way it is not considered that the use of the site for commercial and residential purposes would hinder activities associated with the school. Following consultation with the school, the developer has agreed to provide a new boundary fence to the school fronting Roberts Close to improve privacy to outdoor play areas. This can be included in the s106 agreement in the event that permission is granted.

Daylight and sunlight

71. The daylight and sunlight report submitted with the application considers the impact of the development on the following buildings / sites:
- Alfred Salter Primary School;
 - Quebec Quarter site C (this is the new building being constructed on the adjoining site to the east);
 - Harmsworth Quays.
72. Although the massing of the building has changed slightly on the Quebec Way/Roberts Close corner during the course of the application, the daylight and sunlight consultant has confirmed that this would not materially affect the results in the report and no further analysis is required. The following tests have been carried out:
73. Vertical Sky Component (VSC) - the amount of skylight reaching a window expressed as a percentage. The guidance recommends that the windows of neighbouring properties achieve a VSC of at least 27%, and notes that if the VSC is reduced to no less than 0.8 times its former value (i.e. 20% reduction) following the construction of a development, then the reduction will not be noticeable.
74. No-Sky Line (NSL) - the area of a room at desk height that can see the sky. The guidance suggests that the NSL should not be reduced to less than 0.8 times its former value (i.e. no more than a 20% reduction).
75. Sunlight - Annual Probable Sunlight Hours (APSH). This should be considered for all windows facing within 90 degrees of due south (windows outside of this orientation do not receive direct sunlight in the UK). The guidance advises that windows should receive at least 25% APSH, with 5% of this total being enjoyed during the winter months. If a window receives less than 25% of the APSH or less than 5% of the APSH during winter, and is reduced to less than 0.8 times its former value during either period and has a reduction in sunlight received over the whole year of greater than 4%, then sunlight to the building may be adversely affected.
76. Overshadowing - The BRE guidance advises that for an outdoor area to appear

adequately sunlight throughout the year, at least half of the garden or amenity area should receive at least 2 hours of sunlight on 21st March. If an area would not meet the above and the area which can receive two hours of sun on 21st March is less than 0.8 times its former value, the loss of sunlight is likely to be noticeable.

77. Average daylight factor - This looks at the overall light levels within a room, and is normally used for new development rather than for assessing the impact on an existing building. It has been used in this case only in relation to the adjoining building at Quebec Way, currently under construction, where the room sizes / layouts and uses have been verified.

Alfred Salter Primary School

78. The impacts upon all of the windows tested would comply with the BRE guidance in relation to vertical sky component, no sky line, sunlight hours to windows and sun on the ground for its external play space.

Quebec Quarter

79. This building will be up to 6-storeys high adjacent to the application site and will contain windows in its west-facing elevation. In this instance, because there is a very recent planning permission in place which is being built out, the room uses and layouts within the building can be verified therefore the ADFs can be relied upon. Where the impact on the ADF would bring the neighbouring rooms below the required percentage, the VSC and NSL results provided in the daylight and sunlight report have been referred to. The daylight and sunlight report advises that of the 98 rooms tested in the adjoining building 83 (85%) would meet the required ADF for their use, although the report assumes that 1.5% is acceptable for a LKD whereas the BRE expects 2% for kitchens.
80. An open plan living space (R3/10) would have its ADF reduced from 1.70% to 1.5%, the standard for a living room. This would not be a significant reduction and the room would be served by two windows and their VSC and NSL would be reduced by less than 20%. The same applies for a kitchen window (R6/11) which would see its ADF reduced from 1.11% to 1.04%. However, it would experience less than a 20% reduction in VSC and no change in NSL. R6/10, a living room, would have its ADF reduced from 1.04% to 0.96%. However, its VSC would only be reduced by 12.48% and there would be no reduction in NSL.
81. Six rooms would have their ADFs reduced below the BRE guidance and would not comply with the tests relating to VSC and NSL. These comprise four open plan living spaces where the ADF levels would be well below the recommended levels, and two bedrooms which fail to meet the recommendation, but are less severely affected.
82. The eastern wing of the proposed building and the affected building at Quebec Quarter are similar in height and length but the Quebec Quarter building is slightly closer to the shared boundary. Many of the units in the development are dual aspect. It was designed with the knowledge that the adjoining site was allocated for development. The scale, disposition, density and building heights of the application are reasonable and it is off-set from the boundary. It could not be considered as an un-neighbourly form of development. Although the impact on the Quebec Quarter buildings is noted, the impact is not so severe that it would warrant refusal, and the flats could continue to be attractive with a reasonable level of daylight amenity.
83. In relation to sunlight, two bedrooms would not comply with the BRE guidance because they would lose all of their winter sun, and up to 40% of the annual sunlight,

and the difference between the existing and proposed APSH would exceed 4%. However, given that they are bedrooms this is not considered to be a significant issue.

84. The external amenity space to the Quebec Quarter development has been tested and whilst the area receiving more than 2 hours of sunlight on 21st March would be reduced from 51.6% to 43.1%, on 21st June 96.3% of the space would receive two or more hours of sunlight on the ground. Given that people are more likely to use external amenity space during the summer months, this is considered to be acceptable.
85. Whilst it is noted that there would be some instances where the impact upon units within the neighbouring development would not comply with the BRE guidance, it is not considered that any significant loss of amenity would occur. Where reductions in excess of the BRE guidance would occur, this is likely in part to be due to neighbourliness, as the proposed building would be located a minimum of 11m from the shared boundary whereas the building being constructed on the adjoining site is a minimum of 5m from the boundary. Overall, the impact upon daylight and sunlight to this neighbouring development is considered to be acceptable.

Harmsworth Quays

86. The Harmsworth Quays printing works is directly to the south of the site on the opposite side of Quebec Way. It is a large and imposing building which is now vacant and officers are in pre-application discussions with the owners (British Land) about a redevelopment of the wider site including predominately residential uses along the Quebec Way frontage.
87. British Land has produced a number of massing studies looking into the way in which the former printing works site could be developed. The daylight and sunlight report includes a facade study which has been undertaken based on massing diagrams produced by British Land. It concludes that VSC values would be between 20-25% on the lower floors of any building on that site, which would increase higher up the building; officers note that there could be commercial space on the ground floor in the future. Whilst below the 27% target, this is not considered to be a significant issue and would not unduly compromise the ability to provide high quality living accommodation on the former printing works site. Windows in that facade would be north-facing and as such would not need to be tested for sunlight.

Vacant plot to rear (north) of the site

88. The vacant plot to the north of the site is allocated for housing in the CWAAP with an estimated capacity of 28 residential units. The early massing studies by British Land (who also own this site) have been drawn up acknowledging the proposed development under consideration, and the layout would be compatible with achieving reasonable levels of light and outlook. Therefore whilst no formal report on daylight and sunlight impacts upon this site has been provided, it is not considered that the proposed development would cause any undue blight to its redevelopment potential. The proposed building would be set 4m back from the shared boundary and the units closest to this boundary would be dual or triple aspect; most of the north-facing windows would be secondary to east / west facing living spaces and those which would be the only windows serving the room would be bedrooms which would be less sensitive to light and outlook. Careful window positioning on any development on this neighbouring site could avoid any overlooking issues.

Privacy and outlook

Alfred Salter Primary School

89. Concerns have been raised by Alfred Salter school that the proposed development would overlook a sports pitch presenting a security risk. Whilst this is noted, schools are commonly found in built up urban areas and overlooked by houses which can increase natural surveillance and security and the sports pitch is already overlooked from the street. The separation distance would be approximately 15m between the balconies facing Roberts Close and the boundary with the school, in excess of the 12m recommended in the Residential Design Standards to maintain privacy where properties face each other across a street. Nonetheless the applicant has agreed to provide some form of fencing or screening along the school boundary and a clause to secure this has been included in the draft s106 agreement. In addition to balconies facing west, there would be a large roof terrace at fourth floor level and a further terrace at sixth floor level but given the separation distances from the school it is not considered that these would result in any unacceptable loss of privacy or undue noise or disturbance. The separation distances are such that an acceptable level of outlook to the school would be retained.

Quebec Quarter

90. Owing to the stepped footprint of the building under construction on the neighbouring site, window-to-window separation distances would range from 18m to 21m; although the minimum distance recommended in the SPD is 21m, the shortfall is not considered to be significant and the proximity of the neighbouring building to the shared boundary is again noted. Large roof terraces are proposed at 4th and 5th floor level on the eastern side of the building next to Quebec Quarter. These would be private rather than communal and given the separation distances it is not considered that any significant loss of privacy or noise or disturbance would occur, and the separation distance would allow a reasonable level of outlook to be maintained.

Harmsworth Quays

91. Formal proposals for the Harmsworth Quays site have not yet been submitted, however the separation distance of approximately 21m between the proposed building and the boundary to the former printing works site would be sufficient to maintain privacy and outlook.
92. Overall it is concluded that the proposed development would not result in any significant loss of amenity to neighbouring properties or blight to potential development sites. Whilst there would be some loss of daylight and sunlight to flats under construction at Quebec Quarter, this not considered to be significant and would in part be as a result of the proximity of that new building to the boundary with the application site.

Transport issues

93. Strategic policy 2 of the Core Strategy 'Sustainable transport' asserts the commitment to encourage walking, cycling and the use of public transport rather than travel by car and requiring transport assessments with applications to show that schemes minimise their impacts, minimise car parking and maximise cycle parking to provide as many sustainable transport options as possible. Saved policy 5.1 of the Southwark Plan requires major developments to be located near transport nodes and saved policy 5.2 states that planning permission will be granted for development unless there is an adverse impact on the transport network or if adequate provision for servicing is not made. Saved policy 5.3 requires provision to be made for pedestrian and cyclists and

saved policies 5.6 and 5.7 relate to car parking.

94. The site has a PTAL of 3, which indicates a moderate level of access to public transport, although it is within easy walking distance of both Surrey Quays Overground and Canada Water underground stations, and the bus services at Canada Water bus station. CWAAP stresses the need for new development to encourage non-car modes of transport, due to the road congestion at Lower Road and around the Rotherhithe Tunnel approach.

Servicing, trip generation and access

95. The existing building generates 14 vehicle trips in the morning peak, eight in the afternoon school peak and 12 in the evening peak. The proposed development, both for commercial and residential servicing plus day-to-day vehicle movements would generate nine vehicle trips in the morning peak, three in the afternoon school peak and four in the evening peak. Given the reduction in vehicle movements, no adverse impacts on the local highway network are anticipated as a result of the proposal. The Transport Assessment (TA) submitted with the application considers the likely trip generation arising from the proposed development and has been updated during the course of the application. The original document based the assessment on the commercial units being used for B1 purposes and this has been amended to A3 to represent the worst case scenario. If all of the units were in A3 use this could result in up to six deliveries per day, which would not be significant and would not cause any harm to the operation of the road network. Transport for London (TfL) has requested a condition for a servicing management plan and this forms part of the draft recommendation.
96. A partially in-set loading bay would be provided on Quebec Way, making use of an existing dropped kerb access onto the site. The submission advises that an on-site servicing solution would be a poor use of space given the limited number of serving trips that the development would likely generate, hence an on-street solution has been pursued.
97. The loading bay would be used for servicing the commercial and residential units within the development, and has been amended to partially inset during the course of the application to ensure that two vehicles would be able to pass on Quebec Way if the loading bay was in use. The Highways Development Management Team has confirmed that there would be no loss of on-street parking as a result of the loading bay and is satisfied with its size and position.
98. The entrance to the basement car park would be set sufficiently far back from the junction of Roberts Close with Quebec Way to avoid any conflict. It was originally proposed that refuse trucks would turn in the school's secondary access along Roberts Close, which would not have been acceptable. The plans were subsequently amended to enable the secondary vehicle access to accommodate refuse trucks. A small section of highway would need to be stopped up in this location which could be secured through a s278 agreement, and the draft s106 agreement makes provision for this. In addition, tracking diagrams have been amended to demonstrate that large vehicles could still reach the secondary access even if cars were parked on the opposite side of Roberts Close. Vehicle speeds in this location would be very low and it is not considered that any safety issues would arise.

Impact on public transport

99. The TA concludes that the development would result in an additional 0.3 passengers per bus in the morning peak and an additional 0.17 per bus in the evening peak which

would be negligible. For train and tube journeys an additional 0.81 passengers are anticipated in the morning peak and an additional 0.4 passengers in the evening peak which again would have a negligible impact on capacity.

Car parking

100. Policy 10 of the CWAAP requires residential parking in the core area to be limited to 0.3 spaces per dwelling. Following a revision to the scheme there would be 28 parking spaces to serve the development which would equate to 30% (0.3) provision. The car parking is all within a basement which is in line with CWAAP policy 15 which expects developments to minimise the visual impact of car parking. The entrance to the basement car park would be controlled by entry fob with priority to vehicles wishing to enter the car park. Ten of the spaces would be accessible to serve the wheelchair accessible flats within the scheme and it is noted that no parking would be provided for the commercial units. However, given their modest size no objections are raised in this regard.
101. The London Plan requires electric vehicle charging points for a minimum of 20% of parking spaces and the submission advises that this would be provided; a compliance condition to secure this is therefore recommended.
102. To avoid any overspill parking onto the surrounding highway the Council is considering extending the current controlled parking zone (CPZ) in the area and the CWAAP advises that s106 contributions will be used to secure this. A contribution of £15k towards the CPZ review is required in this instance, and a clause to secure this has been included in the draft s106 agreement. All occupiers of the development should be prevented from obtaining parking permits within any future CPZs in the area and this can be secured by way of a condition.

Cycle parking

103. The 2015 London Plan requires 151 long-stay and two short-stay cycle parking spaces to serve the development. The proposal would provide 157 residential cycle parking spaces in total which would be in the basement of the building. Of these 77 would be space pods and the remaining 80 a two tier solution. A further ten Sheffield stands would be provided in front of the building outside the commercial units and this provision is considered to be acceptable and should be conditioned.

Refuse storage

104. The maisonettes fronting Roberts Close would store their bins in their front gardens. There would be a communal refuse and recycling store further south along Roberts Close and a separate refuse storage building fronting Quebec Way which would provide segregated refuse storage for the commercial and residential uses; this would be quite close to a vehicular access for the Quebec Quarter development, but refuse trucks could use the inset loading bay if necessary. The amount of refuse and recycle storage for the flats has been calculated in accordance with the Council's standards and would be acceptable. Concerns have been raised by the school and a neighbouring resident regarding bins blocking the pavements on collection days, therefore the condition for a servicing management plan requires details of the arrangements for refuse collection to be submitted for approval; it is noted that any obstruction of the carriageway or pavement can be dealt with under highways legislation.

Travel Plan

105. A framework travel plan for the residential element of the scheme has been included in the Transport Assessment. It includes the provision of cycle parking, limited car parking and electric vehicle charging points, together with soft measures including notice boards, residents' travel pack, setting up cycle user groups, one year cycle hire membership and one years car club membership; it is noted that 3 years membership is required for each eligible adult within the development and a clause to this effect has been included in the draft s106 agreement. Given the proximity to other car club spaces in the vicinity, no on-site or on-street car club space is required in this instance. Overall the travel plan details are considered to be acceptable and should be conditioned.
106. Overall, subject to conditions and a number of clauses within the s106 agreement, it is concluded that the proposal would not result in any adverse transport impacts.

Trees and landscaping

107. The site features a line of seven good quality category B Maple trees to the front of the site along Quebec Way, together with sixteen smaller and poorer condition category B and C Ailanthus, Cherry and Pine trees along Roberts Close. The trees with the greatest amenity value are along the Quebec Way frontage, and all of the trees, including those along Roberts Close, are protected by Tree Preservation Order 480 which was made on 2nd March 2015.
108. A total of twenty two trees equating to 1,278cm stem girth would be removed in order to facilitate the development, including four category B and six category C trees of minor contribution to amenity which are growing in the centre of the site. All of the most valuable trees along Quebec Way would be retained and there would be a minimum of 5m between the existing trees and the proposed buildings to ensure they can continue to thrive.
109. The layout shows a pathway behind the retained maples on Quebec Way for which surfacing, cross sections and general protection measures would need to be agreed. The trees are located on a raised bank which would therefore also need to be retained and these details can be secured by way of conditions. The new loading bay would be in the same location as the existing dropped kerb access which should therefore reduce any impact upon the retained trees. The applicant's arboricultural consultant has advised that the loading bay would comprise a small 'loading only' cage and markings on the existing crossover surfacing which would avoid the need for cutting new kerb lines where shallow roots could be present; as such the loading bay is unlikely to have any impact on the root protection areas.
110. The outline landscape plan submitted shows suitable mitigation of tree loss with better quality and more appropriate species located along Roberts Close and within the central courtyard; these would comprise 14 larger and 29 smaller trees and shrubs. Some of the replacement trees along the Roberts Close frontage would be within private front gardens therefore the existing TPO would need to be amended to include the replacement trees. A number of the new trees in the courtyard would be podium planting above the basement car park. This would necessitate a minimum amount of soil volume to ensure that the landscaping would be sustainable and this could be secured by way of a condition.
111. The landscape and open space/play strategies would provide an acceptable layout with good quality surfacing, seats, play equipment and lighting. Of note is that the ground floor and other plans show planting on Quebec Way not featured within the 3D visualisations. Two new trees are shown outside the red line boundary which may not

be acceptable to the Highways Development Management Team or in relation to access to refuse storage facilities. As such, in the event that the trees cannot be provided a clause has been included in the draft s106 agreement to secure funding for the planting of two trees elsewhere in the vicinity of the site.

Planning obligations (S.106 undertaking or agreement)

112. Saved policy 2.5 'Planning obligations' of the Southwark Plan and policy 8.2 of the London Plan advise that Local Planning Authorities should seek to enter into planning obligations to avoid or mitigate the adverse impacts of developments which cannot otherwise be adequately addressed through conditions, to secure or contribute towards the infrastructure, environment or site management necessary to support the development, or to secure an appropriate mix of uses within the development. Further information is contained within the Council's adopted Planning Obligations and Community Infrastructure Levy SPD.

113. The draft s106 agreement would include clauses to secure the following:

- Provision of 19 units of affordable housing, social rent terms and shared ownership thresholds, no more than 50% of the private units to be occupied before the affordable housing units have been completed, and a viability review mechanism;
- 10 wheelchair accessible units to South East London Wheelchair Housing Design Guide standards and a claw-back mechanism for any wheelchair accessible social rented housing units not fully fitted out.
- Provision of fencing to screen the school's play areas from the new development;
- Three years car club membership for each eligible adult within the development;
- Employment during construction clauses, including a payment of £105,400 in the event that the developers agents fail to deliver the expected outputs;
- A contribution of £15,000 towards a CPZ review;
- Potential for the development to connect to a district heat and power network;
- Highway works to be secured through a s278 agreement, including resurfacing of the footways along the perimeter of the site;
- A contribution towards tree planting (£3,00 per tree) in the event that two new trees cannot be planted on Quebec Way;
- Administration cost for monitoring the agreement.

114. In the event that a satisfactory legal agreement has not been entered into by 30 April 2016 it is recommended that the Director of Planning refuses planning permission, if appropriate, for the following reason:

The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of affordable housing and mitigation against the adverse impacts of the development through projects or contributions in accordance with saved policy 2.5 'Planning Obligations' of the Southwark Plan (2007), strategic policy 14 'Delivery and Implementation' of the Core Strategy (2011), policy 8.2 'Planning obligations' of the London Plan (2015) and the Planning Obligations and Community Infrastructure Levy SPD (2015).

Mayoral and borough community infrastructure levy

115. Section 143 of the Localism Act states that any financial contribution received in terms of community infrastructure levy (CIL) is a material "local financial consideration" in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is

therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, primarily Crossrail, while Southwark's CIL will provide for infrastructure that supports growth in Southwark. The proposed development would be liable for a Mayoral CIL payment of £317,378 and a Southwark CIL payment of £1,458,680.

Sustainable development implications

116. Policy 5.2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the Mayor's energy hierarchy. Policies 5.5 and 5.6 require consideration of decentralised energy networks and policy 5.7 requires the use of on-site renewable technologies, where feasible. Of note is that developments must reduce their carbon dioxide emissions by 40% when compared to the 2010 Building Regulations requirement. The applicant has submitted an energy strategy in support of the application which details how the proposal would comply with the Mayor's hierarchy as follows:

Be lean (use less energy)

The development would require less energy through the use of thermal insulation, good air tightness, maximised daylighting, passive solar gain, automatic lighting in communal areas and low energy lighting throughout the development. As a result of these measures the carbon dioxide would be reduced by 15.99%.

Be clean (supply energy efficiently)

The energy strategy recognises that there may be scope to connect to SELCHP in the future and clauses have been included in the draft s106 agreement to secure this. The energy strategy has considered the possibility of a combined heat and power plant at the site but this was not deemed to be feasible owing to the relatively modest size of the development; as such there would be no reduction in carbon dioxide emissions under this category.

Be green (use renewable energy)

A range of different technologies have been considered through the energy strategy and discounted. The proposal would utilise 150 photovoltaic panels to provide electricity to the development and there would be an on-site energy centre located in the basement of the building which would provide low temperature hot water; as a result of these measures carbon dioxide emissions would be reduced by 19.01%. Overall and notwithstanding the fact that no reductions would be achieved under the 'be green' category, the combination of these measures would reduce the carbon dioxide emissions from the development by 35% which would be policy compliant.

117. In terms of Southwark's policies, strategic policy 13 of the Core Strategy 'High environmental standards' requires developments to meet the highest possible environmental standards, including targets based on the Code for Sustainable Homes (now withdrawn) and BREEAM (Building Research Establishment Environmental Assessment Method) standards. This includes requiring non-residential developments to achieve at least a BREEAM 'excellent', except community uses which should achieve a minimum BREEAM level of 'very good'.
118. A BREEAM pre-assessment indicator has been submitted which advises that the commercial space within the development would be on track to achieve BREEAM 'excellent' which would be policy compliant; it is recommended that this be secured by

way of a condition.

119. Major Developments are required to achieve a reduction in carbon dioxide of 20% from using on-site or local low and zero carbon sources of energy and to reduce surface water run-off by at least 50%. Policy 20 of the CWAAP requires developments in the strategic heating area to be future-proofed and designed for connection to a district heating network and as stated above clauses to secure this have been included in the draft s106 agreement.
120. Photovoltaic panels on the roof of the building would meet 13.13% of the development's energy needs, somewhat short of the 20% requirement. However, as the overall carbon dioxide reduction when compared to a scheme compliant with the Building Regulations would be policy compliant, and the strategy has followed the London Plan hierarchy, and no objections are raised. Surface water run-off would be restricted to 50% of the existing rate for a 1 in 100 year event which would be achieved through the use of attenuation tanks, brown roofs and a large amount of soft landscaping. Water use would be limited through the use of dual-flush or low-flush toilets, low flow / flow restricted wash hand basin taps, showers with an efficient flow rate and rainwater butts.
121. Saved policy 3.3 of the Southwark Plan 'Sustainability assessment' advises that planning permission will not be granted for major development unless the applicant demonstrates that the economic, environmental and social impacts of the proposal have been addressed through a sustainability assessment; the applicant has submitted a sustainability statement in order to address this requirement.
122. Limited information has been provided regarding the economic impacts of the development. However, although there would be a loss of commercial space on the site the 500sqm provision would be in line with the proposal site designation and the introduction of new housing would contribute towards meeting housing need. New residents would help to support local businesses and there would also be employment opportunities during construction and within the completed commercial space.
123. For environmental factors the assessment refers to the energy statement and the measures which would be incorporated into the development to reduce carbon dioxide emissions in line with the London Plan policy. Limited car parking and measures including cycle parking, a car club contribution and travel plan would reduce reliance on the private car. For the social impacts the assessment advises that the residential units within the scheme would provide a good standard of accommodation including private outdoor amenity space and would be designed to Lifetime Homes standards making them accessible to a broad range of people. Officers note that wheelchair accessible and adaptable units would be provided and again that the commercial space would generate employment opportunities. The commercial units have been designed to ensure that they would provide good working environments.

Ecology

124. Strategic policy 11 of the Core Strategy 'Open spaces and wildlife' seeks to improve, protect and maintain a network of open spaces and green corridors and to protect important open spaces, trees, woodlands and site of importance for nature conservation. Saved policy 3.28 of the Southwark Plan requires biodiversity to be taken into account in the assessment of all planning applications and requires the submission of ecological assessments where relevant.
125. The site is located in close proximity to Russia Dock Woodland which is a site of interest for nature conservation and a phase 1 ecology report has been submitted with

the application. Other documents within the submission advise that the proposal would include 655sqm of biodiverse roof, bird and bat boxes and a stag beetle loggery.

126. The ecology report concludes that the proposal would not give rise to any negative impacts on designated sites for nature conservation and that the potential for protected species on the site is negligible or low; it advises that there are no ecological constraints on the development other than a requirement to avoid impacting upon nesting birds; an informative advising the applicant of this is recommended. The report has been reviewed by the Council's Ecology Officer and a number of conditions are recommended to enhance the ecological value of the development including bird and bat nesting boxes / bricks, brown roofs and new landscaping. It is noted that Natural England does not wish to comment on the application and has issued standing advice.

Contaminated land

127. A contaminated land report has been submitted with the application which concludes that previous activities on or in the immediate vicinity of the site represent a medium risk of significant or widespread contamination and that intrusive investigation would allow for a range of contamination testing. The report has been reviewed by the Council's Environmental Protection Team (EPT) and the Environment Agency and is found to be acceptable, and conditions are recommended to secure further testing and remediation if necessary.

Air quality

128. The site is located in an air quality management area (AQMA) and an air quality statement has been submitted with the application which considers the potential air quality impacts during the construction and operational phases of the development. EPT has advised that the report demonstrates that the development would have a negligible effect on air quality in the area and a condition for a construction environmental management plan is recommended, which would include measures to limit dust, smoke and plant emissions during building works.

Flooding

129. The site is partially located in flood zones 1, 2 and 3 and a flood risk assessment (FRA) has been submitted in support of the application, together with a letter setting out why the development should be permitted in a flood risk zone with regard to the requirement for a sequential test set out in the NPPF.

Sequential Test

130. There is a current shortfall in housing in the area and an increase in provision is needed to cope with growing demand. It is therefore necessary that the proposed development is located within this area to provide much needed housing; it is noted that the site is designated for residential and B1 / D class use in the CWAAP. The applicant's letter regarding the sequential test advises that the applicant is not aware of any alternative sites that could deliver this level of development in flood zones 1 and 2 in a nearby location and as such, the only available option in this instance is to redevelop the existing site to meet demand.

Exception Test

131. The site is located on previously developed land and there are strong sustainability reasons why the site should be redeveloped. The development of brownfield sites such as this will be necessary if accommodation is to be provided to meet the current shortfall in housing in the area. The site has good access to public transport and the proposed design is capable of providing good quality housing and commercial / community floorspace.
132. The proposal has been reviewed by the Environment Agency (EA) which has confirmed that there are no objections to the application on flood risk grounds, subject to conditions. The Council's Flood and Drainage Team initially raised concerns which have subsequently been addressed, and have also requested conditions which form part of the draft recommendation.

Archaeology

133. Saved policy 3.19 of the Southwark Plan requires sites within archaeological priority zones (APZ) to be accompanied by an archaeological assessment and evaluation of the site. The site is not located in an APZ but the applicant has nonetheless submitted an historic environment report which assesses the impact upon archaeological remains within the site. It concludes that there is a low likelihood of remains of more than a low to medium significance being present on the site. The report has been reviewed by the Council's Archaeologist and no conditions are required in this instance.

Statement of community involvement

134. A statement of community involvement (SCI) has been submitted setting out consultation which the applicant carried out before the application was submitted. Formal consultation and engagement about the development started in April 2015 with a news letter to 800 local residents and businesses advertising a public exhibition. The exhibition was held on 8th and 9th May 2015 and attracted 40 attendees including representatives from the Canada Water Consultative Forum, Rotherhithe and Surrey Docks Neighbourhood Housing Forum, Friends of Russia Dock Woodlands and Stave Hill Ecological Park, and representatives from Sellar Property Group and British Land. One-to-one briefings were offered to 19 local groups and individuals including councillors, and the project team met with Councillor Okosun (Surrey Docks ward). There was generally support for redevelopment of the site but concerns were raised about the loss of commercial space; there was support for small retail units and cafes on Quebec Way and it was considered that there should be employment opportunities for the local community.
135. A supplementary SCI has been submitted which advises that a second public exhibition was held on 4th July at Alfred Salter Primary School to explain the planning application proposals. Approximately 12 people attended including local residents, representatives from Canada Water Consultative Forum and Councillor Whittam (Rotherhithe ward). The project team also attended the Canada Water Consultative Forum on 6th July and on 28th July held a briefing session with Councillor Rajan (Surrey Docks ward).

Conclusion on planning issues

136. The site has been allocated for development in the CWAAP, and the height, form, density and land uses proposed comply with the designation. The commercial units would include potential for A Class uses which were not listed as acceptable uses within the CWAAP, but their inclusion would be acceptable in this location and would

not undermine the delivery of retail in the town centre. The building is of a good standard of design which would sit comfortably in the streetscape both as it exists now and as it is expected to appear as neighbouring sites undergo redevelopment. The high quality maple trees on the Quebec Way frontage would be retained, and augmented by new trees on street and within the site to replace those lost through the development.

137. The new housing is of a high quality, including a good proportion of dual aspect units, and high quality amenity space including children's play. The development would provide 19 affordable homes and, whilst this is less than the 35% expected under adopted policies, the viability appraisal has demonstrated that this could only be increased by including affordable rent, or a higher proportion of shared ownership housing. The affordable housing includes 11 social rented homes, all of which are larger 3 and 4 bedroom homes, and this is a positive aspect of the development. Given the need for social rented family homes, and the excellent quality of the affordable homes, it is recommended that this is a reasonable provision. This position would be reviewed in the event that substantial commencement was delayed beyond 18 months from the grant of permission.
138. The proposal would have some impact upon levels of daylight and sunlight to a new building being constructed to the east of the site, but it is not considered that it would significantly compromise the quality of the accommodation within that building, or to any of the other surrounding sites and buildings including Alfred Salter School and Harmsworth Quays printing works. No adverse transport impacts would occur, and the 30% car parking provided in a basement meets the requirements of policy 10 of the CWAAP. The developer would be required to carry out public realm works including re-paving the neighbouring footways, and creating new lay-bys. Conditions are recommended in relation to energy efficiency and carbon dioxide reductions, landscaping and ecological measures, contaminated land and flooding. A s106 agreement is being drafted to secure the obligations set out in the report. In the light of this it is concluded that planning permission should be granted, subject to conditions and the applicant entering into a satisfactory legal agreement.

Community impact statement

139. In line with the Council's Community Impact Statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process.
- a) The impact on local people is set out above.
 - b) The following issues relevant to particular communities/groups likely to be affected by the proposal have been identified above.
 - c) The likely adverse or less good implications for any particular communities/groups have been also been discussed above.

Consultations

140. Details of consultation and any re-consultation undertaken in respect of this application are set out in Appendix 1.

Consultation replies

141. Details of consultation responses received are set out in Appendix 2.

Summary of consultation responses

142. Responses were received from one residential neighbour in Wolfe Crescent, and from Alfred Salter Primary School. These responses raised issues relating to:

- Serious reservations that the commercial space within the proposed scheme is not viable and unlikely to create at least the same number of jobs as will be lost from the current occupiers.
- Request a condition that the developer must provide non exclusive open access high speed fibre broadband to all units in the scheme.
- Cycling and car club membership is not an option for the elderly. To enforce such a policy for prospective occupiers is possibly age discrimination. Car ownership is a necessity for many other people. Hence car parking spaces within the development must reflect this established need.
- Concern that overlooking of the school playground could invade privacy – request new planting or fence on boundary.
- Concern about refuse vehicles turning in Roberts Close, and bins being left on the street, cluttering the footways.

Human rights implications

143. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.

144. This application has the legitimate aim of providing residential units and commercial / community space. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

BACKGROUND PAPERS

Background Papers	Held At	Contact
Site history file: TP/403-24 Application file: 15/AP/2217 Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquires telephone: 020 7525 5403 Planning enquires email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5410 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Recommendation
Appendix 4	Computer generated images 1 and 2

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Victoria Lewis, Team Leader	
Version	Final	
Dated	20 January 2016	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director, Finance and Governance	No	No
Strategic Director, Environment and Leisure	No	No
Strategic Director, Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team		22 January 2016

Consultation undertaken

Site notice date: 25/06/2015

Press notice date: 02/07/2015

Case officer site visit date: n/a

Neighbour consultation letters sent: 22/06/2015

Internal services consulted:

Ecology Officer
Economic Development Team
Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]
Flood and Drainage Team
HIGHWAY LICENSING
Highway Development Management
Housing Regeneration Initiatives
Waste Management

Statutory and non-statutory organisations consulted:

Arqiva - digital communications
EDF Energy
Environment Agency
Historic England
London Borough of Lewisham
London Fire & Emergency Planning Authority
London Overground
London Underground Limited
Metropolitan Police Service (Designing out Crime)
Natural England - London Region & South East Region
Network Rail (Planning)
Thames Water - Development Planning
Transport for London (referable & non-referable app notifications and pre-apps)

Neighbour and local groups consulted:

Alan Camp Architects 88 Union Street SE1 ONW	3 Maple Leaf Square London SE16 6SB
Time And Talents St Marychurch Street SE16 26 Wolfe Crescent London SE16	2 Maple Leaf Square London SE16 6SB 5 Maple Leaf Square London SE16 6SB 8 Wolfe Crescent London SE16 6SF
Flat 2 Saunders House SE16 6SW	6 Wolfe Crescent London SE16 6SF
Flat 1 Saunders House SE16 6SW	6 Maple Leaf Square London SE16 6SB
Flat 6 Amherst House SE16 6SH	1 Maple Leaf Square London SE16 6SB
Flat 3 Saunders House SE16 6SW	Units 14 To 18 Ground Floor Mulberry Business Centre SE16 7LB

Flat 6 Saunders House SE16 6SW	Units 14 To 18 First Floor Mulberry Business Centre SE16 7LB
Flat 5 Saunders House SE16 6SW	First Floor Flat Church Of The Immaculate Conception Of Our Lady SE16 6SJ
Flat 4 Saunders House SE16 6SW	Unit 24 Mulberry Business Centre SE16 7LD
Flat 5 Amherst House SE16 6SH	27 Fishermans Drive London SE16 6SG
27 Wolfe Crescent London SE16 6SF	Ground And First Floor Unit 9 And First Mulberry Business Centre SE16 7LB
26 Wolfe Crescent London SE16 6SF	19 Wolfe Crescent London SE16 6SF
25 Wolfe Crescent London SE16 6SF	18 Wolfe Crescent London SE16 6SF
Flat 1 Amherst House SE16 6SH	17 Wolfe Crescent London SE16 6SF
Flat 4 Amherst House SE16 6SH	20 Wolfe Crescent London SE16 6SF
Flat 3 Amherst House SE16 6SH	23 Wolfe Crescent London SE16 6SF
Flat 2 Amherst House SE16 6SH	22 Wolfe Crescent London SE16 6SF
Units 24 To 27 Mulberry Business Centre SE16 1LB	21 Wolfe Crescent London SE16 6SF
Units 16 To 18 Ground Floor And First Floor Mulberry Business Centre SE16 1LB	16 Wolfe Crescent London SE16 6SF
28 Quebec Way London SE16 7LF	11 Wolfe Crescent London SE16 6SF
Daily Mail Building Surrey Quays Road SE16 1PQ	10 Wolfe Crescent London SE16 6SF
Alfred Salter Primary School Quebec Way SE16 7LP	9 Wolfe Crescent London SE16 6SF
St Johns Primary School St Elmos Road SE16 6SD	12 Wolfe Crescent London SE16 6SF
Church Of The Immaculate Conception Of Our Lady 2 St Elmos Road SE16 6SJ	15 Wolfe Crescent London SE16 6SF
Flat 7 Saunders House SE16 6SW	14 Wolfe Crescent London SE16 6SF
7 Wolfe Crescent London SE16 6SF	13 Wolfe Crescent London SE16 6SF
26 Quebec Way London SE16 7LF	Email
24 Quebec Way London SE16 7LF	Email
Christian Pentecostal Mission International Unit 1 Mulberry Business Centre SE16 7LB	York House 45 Seymour Street W1H 7LX
24 Wolfe Crescent London SE16 6SF	Email
4 Maple Leaf Square London SE16 6SB	One Kings Hall Mews Lewisham SE13 5JQ
	By Email

Re-consultation: 24/08/2015

APPENDIX 2

Consultation responses received

Internal Services

Archaeology Officer

No archaeological conditions are necessary for this application.

Environmental Protection Team

Approval with conditions. Air Quality - Have reviewed the details submitted in the WSP air quality assessment report ref 70009562 dated May 2015. The report and results (taking into consideration the energy centre and the proposed traffic emissions) demonstrated that the development will have a negligible effect on air quality in that area. The construction management plan will contain measures to limit the impact of the construction process on existing environment. NOx and PM2.5 were assessed to be within the air quality standards and no further mitigation measures to be applied to this development.

Highways Development Management

If consent is granted the developer must enter into a S278 agreement to complete the following works:

1. Construction of a loading bay on Quebec Way.
2. Construction and adoption as highway a turning head on Robert Close at the entry to the development.
3. Construction of the proposed crossover off Roberts Close is to be to the relevant SSDM standard including surfacing materials.
4. Promote a traffic management order (TMO) for Quebec Way and Roberts Close to regularise the loading bay and turning head and any parking prohibitions that may be required. Works to include signage and road markings.
5. Upgrade street lighting on Quebec Way and Roberts Close to current LBS standards.
6. Repaving of the footways along the extent of the site, including replacing any gully covers damaged during construction.

Ecology Officer

The Ecology report is agreed. The ecology report makes a number of recommendations for enhancement of the site, notably:

- Brown roof
- Native planting
- Nest boxes
- Bat Roost boxes
- Stag beetle loggery

These roof and native planting features appear to be included in the landscape plan and condition wording to secure these elements can be provided.

Flood and Drainage Team

Overall, the FRA is of a suitable standard with regards to tidal / fluvial, surface water and groundwater flooding. We would recommend a second condition stating that the

works are to be undertaken in accordance with the recommendations of the Flood Risk Assessment (developed by Waterman Group, dated 29th May 2015), in particular with regards to the provision of Sustainable Drainage Systems and the recommendations for finished floor levels. Recommend a small bund on the inside of the Aco-channel to provide further protection against ingress of surface water into the basement. Pass this on to the applicant for consideration.

Statutory and non-statutory organisations

London Underground

Though LU have no objection in principle to the above planning application there are a number of potential constraints on the redevelopment of a site situated close to underground tunnels and infrastructure. Therefore, it will need to be demonstrated to the satisfaction of LUL engineers that:

the development will not have any detrimental effect on our tunnels and structures either in the short or long term
the design must be such that the loading imposed on our tunnels or structures is not increased or removed
we offer no right of support to the development or land.

Condition and informative recommended.

Additional comment - Can confirm that the planning applicant is in consultation with London Underground on this project. As such LU have no objection to the planning application for the site. However LU do ask that a condition is included on any planning permission.

London Overground

No comments.

Thames Water

Waste Comments - Thames Water would advise that with regard to sewerage infrastructure capacity, would not have any objection to the above planning application. Water Comments - Thames Water recommend an informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development. Condition relating to impact piling recommended.

UK Power Networks

No comments.

Transport for London

Cycle parking currently falls short of London Plan (2015) standards. To accord with this standard; a minimum of 153 cycle parks (151 long stay; 2 short stay) must be provided for the residential component of the scheme. Further cycle parking would need to be provided for the commercial component of the scheme in accord with the most relevant London Plan (2015) standard. Whilst TfL accepts the level of car parking proposed, electric vehicle charge points and blue badge parking must accord with London Plan (2015) standards. Furthermore TfL requests that residents are exempt from applying for

parking permits. This will assist the Council in managing the effects of on street parking, particularly if the Controlled Parking Zone is extended as alluded to in the Transport Assessment.

The TA also makes reference to existing car club spaces in the area. The Council should consider whether there is sufficient on street car club provision and whether the application should fund car club membership (for three years) for each new resident. A Delivery and Service Plan must be secured for the site. This should cover the residential and commercial activities on the development site. Council should consider whether on street loading is appropriate in this instance. TfL also expects that a Travel Plan is secured, monitored and enforced as part of the S106 agreement.

Environment Agency

EA have no objection to the planning application as submitted, subject to conditions being imposed on any planning permission granted. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would wish to object to the planning application.

Metropolitan Police

Request a planning condition be attached that the development must achieve Secured by Design certification.

Historic England

On the basis of the information provided, do not consider that it is necessary for this application to be notified to Historic England under the relevant statutory provisions, details of which are enclosed.

Natural England

Natural England has no comments to make regarding this application. The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment.

Neighbours and local groups

Alfred Salter Primary School

The school would like reassurance that there will be a permanent barrier of trees where our site meets Roberts Close to stop the ball games zone being overlooked. This is for safeguarding reasons because children will be in sportswear for lessons in this area. The current barrier consists of deciduous trees which do not provide adequate protection in Autumn, Winter and Spring. Alternatively, the fence could be raised to allow evergreen climbers to establish and create a permanent barrier.

RE Design & Access statement 5.19. Are concerned that there will be paladins and bins on the road most days, as indicated in the drawing. This will cause access problems for large vehicles using our rear site entry. Additionally, the drawings show refuse lorries using our rear access as a turning area. This is not a dedicated turning area. Large numbers of pupils use this entrance/exit regularly and turning lorries presents a hazard.

26 Wolfe Crescent

The site is currently an employment site. Have serious reservations that the commercial space within the proposed scheme is viable and likely to create at least the same number of jobs as will be lost from the current occupiers. The area has a history of ground floor commercial units in new developments remaining empty for several years and then being converted into residential. Request a condition that if the commercial units are not let at a market rent within 6 months they are then let at a peppercorn rent to start up businesses. Request a condition that the developer must provide non exclusive open access high speed fibre broadband to all units in the scheme.

D & A 5.7 Balconies overlook Alfred Salter Primary School (ASPS) much used PE cage thus there is the potential to monitor / stalk a child. Request a condition that a minimum 10m permanent dense evergreen barrier be provided and maintained along Roberts Close. D & A 5.17 Not appropriate to use ASPS fire exit in Roberts Close as a turning place for rubbish and delivery vehicles. All rubbish paladins must remain within the perimeter of the site at all times and not occupy road space. Vehicles must empty from within the site. Transport - cycling and car club membership is not an option for the elderly. To enforce such a policy for prospective occupiers is possibly age discrimination. Car ownership is a necessity for many other people. Hence car parking spaces within the development must reflect this established need.