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Date: 22/01/2016

Dear Ms. Ang

RE: PRE-APPLICATION ADVICE

At: **ALBION STREET CIVIC CENTRE, (ROTHERHITHE CIVIC CENTRE) ALBION STREET, LONDON, SE16 7BS**

Proposal: **Demolition of existing building and erection of a 5 storey block, re-located Albion Street Health Centre on ground floor and 25 residential units above which are 100% social rent.**

I write in connection with your pre-application enquiry regarding a mixed-use scheme to redevelop the site above. The site has been put forward for redevelopment to deliver more housing in the borough as part of Southwark Regeneration in Partnership Programme. This letter summarises the council's written advice on your proposal and whether, based on the details submitted, it meets local planning requirements.

Planning Policy

The statutory development plan for the borough comprises The London Plan consolidated with further alterations (March 2015); The Core Strategy (2011) and saved policies from the Southwark Plan (2007).

The site is located within the:

- **Urban Zone**
- **Air Quality Management Area**
- **Canada Water Area Action Plan**

-There are no heritage assets within the site boundary area.

-There are heritage assets in the wider context of the site which are the adjacent St. Olav's Church and the Finnish Seamen's Mission Church which are both Grade II listed. The boundary of the

Borough, Bermondsey and Rivers Archaeological Priority Zone is also to the north of the site.

Other key material considerations

Gateway 1 - Southwark Regeneration in Partnership Programme Procurement Approval
The National Planning Policy Framework

Land Use

- The existing building is a former library (D1 use). The wider area is of a mixed use, including a number of residential uses. As such, a residential use on this site would be appropriate as well as the provision of a health care facility (D1).

- The building is no longer in use as a library and has effectively been replaced by the New Canada Water Library. Hence there is no net loss of community floorspace (Class D1) in compliance with the criteria set out in Policy 2.1 Provision of Community Facilities. Consequently the re-location of the Albion Street Health Centre with residential above on this site is acceptable in principle.

Access and site layout

- The proposed site layout is logical, retaining a street frontage, albeit set back from the pavement edge and as such no concerns are raised here. Generally the ground floor elevations would interact with and address the street appropriately. However, the locations of both residential entrances are of some concern as they are in close proximity to bin stores resulting in uninviting entrances and a hostile pedestrian frontage onto the street.

To address these concerns it is recommended that:

- The doors to the bin stores should be relocated away from the street entrance and the bin stores onto the square should be set back from the square façade.
- The entrance onto the street should be given more prominence with a clearer perception of the lobby.

- There are no proposed vehicular access points to the site, although entry may be required into the proposed public space to access the plant room to the rear of the site. There is also a proposal for a market to be held in this space which may require vehicular access. Any design for the space may need to plan for occasional access of this type. This area is not proposed to be adopted as public highway and will therefore need to be managed and maintained privately. A crossover from Albion Street will likely be required.

- The building is set back 10ft from the Rotherhithe tunnel wall which is understood to be Transport for London's requirement. Clarification is needed as to nature of required access. Notwithstanding this it is considered that the space at the back of the building should be gated to avoid anti-social behaviour. This space should preferably not be used to provide access to amenities such as cycle parking.

- A GPs surgery is proposed for the ground and part of first floor. Parking requirements for this use are considered according to evidenced need and this should be based on the existing surgery nearby that is being re-provided here.

- Pedestrian access is from Albion Street via the proposed public space. Bin stores on either side of pedestrian entrances should be avoided.

- There are no concerns regarding ease of access, as long as level access is provided in line with Approved Document M which introduces the category Accessible and Adaptable Dwellings (M4(2)), where practical and viable.

Scale, height and massing

- The proposed height and massing is considered excessive and is not appropriately illustrated in a contextual elevation. On this site the street context along Albany Road is especially important and yet it is not clear from any elevations how the scale of this development will relate to the neighbouring listed buildings. The only elevation shown is one which shows the proposed elevation of another intended development between this site and the Norwegian Church and the dimensions of this drawing appear to show the relative heights of the northern end of the church to the southern end of the church correctly.

- Provisionally it is suggested that the north eastern end (3 bays in the 3D view) be reduced to 4 storeys and the rest of the building be reduced to 4 storeys with a 5th floor set back. But this would only be acceptable if it can be shown that the relationship to the listed buildings is appropriate in a long (and accurate) contextual elevation showing the proposal and the listed buildings. This was an important omission from the pre-app statement and without it no significant increase in massing can be justified.

- The proposal is to build right up to the boundary of the Norwegian Church. If, as is proposed, the church is extended this would disrupt the pattern of the three blocks: Norwegian Church - Civic Centre - Finnish Church. In other respects the massing responds well with the surrounding context in that this side of Albion Street consists of similar long blocks in contrast to the finer grain pattern of frontages on the other side of the side of the street. The length of the block is somewhat greater than the neighbouring listed buildings but this is ameliorated by the break in the mass with the setback along the frontage. To address this concern it is recommended that a gap be established between the development and the site boundary

Detailed design

- The proposed design details and elevation treatment is in its early stages of development but the approach so far to the elevation design is considered appropriate in the surrounding context. The suggestion that the design should be influenced by Scandinavian precedence is considered a reasonable one, but that precedent should take account of local character and materials such as timber and render would not be appropriate.

- The building will be visible from Brunel Street, between the listed Finnish and Norwegian Churches. The design of this elevation will be influenced by the need for an elevation that is less vulnerable to pollution, but the elevation should be as well considered as the Albion Street elevation and not give in to the temptation to fenestrate it with a meaner pattern of windows that make this facade appear bleaker.

- At this point there is little detailed design to comment upon, but a number of issues will require particular consideration, including but not restricted to:

- a) the quality of the public realm and the landscaping of the site, including the relationship between the materials used for the square and those for the footway and how they will be coordinated;
- b) the definition of the base/ground-level of the building and its active frontages;
- c) the treatment of facades and roof line as influenced by the point where the building line is set back and the top floor is set back;
- d) material palette.

Density

- The proposal is estimated to have a density of 695.21 habitable rooms per hectare in the Urban Zone, which is within the expected density range of 200 to 700 set out within Core Strategy Policy 5.

-The proposed density is acceptable by virtue of the proposed number of habitable rooms being within an acceptable range in accordance with policy.

Housing Mix

- The proposed dwelling mix would include 7 x 1 bed units (28%), 11 x 2 bed units (44%), 7 x 3 bed units (28%). As the combined total of the two and three bed units would exceed the minimum requirement of 60% as set out under Core Strategy Policy 7 the proposed dwelling mix is considered to be acceptable.

Housing tenure

- The proposal would provide 25 units as affordable housing which equates to 100% of the total by habitable rooms. This amount of affordable housing meets to Core Strategy Policy 6 which requires 35% affordable housing on site.

- The proposed tenure split equates to 100% social rent. This tenure split is in accordance with Southwark Regeneration in Partnership Programme which is a key material consideration for this site as the building is proposed to rehouse existing social rent tenants currently located within the nearby Albion Estate. For this reason, the proposed tenure split is acceptable.

Housing Quality

-There are no concerns regarding the layout of the flats, with only 7 of the 28 proposed units being single aspect, all of which would be south facing. The remaining flats are all dual aspect which is welcomed.

- The internal unit sizes and individual room sizes proposed for the new dwellings would all be in accordance with the 2015 Technical Update to the Residential Design Standards SPD (2011) and as such the quality of accommodation is considered acceptable.

- No wheelchair units are proposed which is clearly at odds with the 10% policy requirement. However, the applicants have advised that they are also developing the nearby Albion School site(15/EQ/0390) and that an over supply of wheelchair housing is proposed within that site to off-set the lack of wheelchair housing within this site. A total of 7 of the 49 units proposed on the Albion School site are proposed as wheelchair accessible units resulting in a total of 7 of the combined total of 74 units across the two sites being accessible wheelchair units,. This amounts to a total of 9.46% and is slightly short of the requirement of saved policy 4.3 of the Southwark Plan, however on balance this is deemed acceptable. The initial ratio of parking spaces proposed at 1:1 was acceptable taking account of site constraints and high PTAL of the sites. However, some concerns were raised in relation to the access to the parking as part of pre-app 15/EQ/0390 and as such this may be required to be revised. Whilst it would ideally be expected that a ratio of 1:1 would be provided, given the high PTAL level, a minor shortfall of this would be deemed acceptable.

- As this wheelchair housing provision will not be provided within this site, a mechanism to secure the provision of these units as part of the combined scheme would need to be secured, and this is likely to be addressed within a S106 legal agreement.

- All wheelchair units should be designed to meet the South East London Housing Partnership Wheelchair Housing Design Guide space standards. Technical Guidance on these standards is set out in the Technical Update to the Residential Design Standards SPD on the Council's website dated October 2015.

http://www.southwark.gov.uk/downloads/download/2257/residential_design_standards_spd

- Dwellings have been designed to have integral bulk storage facilities, however they do not have a mix of open plan living-kitchen-diners and units with separate kitchen diners, and as such further

development may be required in order to offer choice to potential occupiers. All three bed affordable dwellings have been designed without separate kitchens as indicated in the guidance in the 2015 Technical Update to the Residential Design Standards SPD (2011). This is not generally acceptable and should be re-considered.

- Each dwelling would have access to some private amenity space, with the 3 bed units providing 8msq ms. These units should aim to have a minimum of 10sq ms. Other than within these dwellings, sufficient private amenity space is provided in accordance with the 2015 Technical Update to the Residential Design Standards SPD 2011. The level of communal amenity space proposed is 255m², however this is provided in the form of a public open space between the site and the adjacent Finnish Church. Whilst this communal space would not be private, it is considered to be sufficient in scale, taking account of physical constraints of the site.

- No playspace is provided with the scheme, however given the site constraints, this is considered acceptable. A contribution to off-site play facilities may be required as part of the legal agreement.

Amenity impacts

- The proposed site layout and massing is unlikely have a harmful impact on neighbouring occupiers in terms of daylight/sunlight, overlooking and outlook.

- However, a daylight, sunlight and overshadowing study should be carried out at the earliest opportunity allowing time for discussions with the local authority to address any issues in advance of a formal application.

- All new residential units should be designed to achieve good levels of internal daylight and sunlight in accordance with the BRE guidelines. It is recommended that calculations for the proposed new spaces are provided with any formal submission.

- The site is located in close proximity to a heavily trafficked road such that it is anticipated that noise will impact upon internal noise levels within the building and outdoor amenity areas. It is also likely that there would be plant associated with commercial uses on site. Consequently, any application should be accompanied by a noise and vibration assessment to demonstrate that any harmful amenity impacts to future residents can be appropriately mitigated by means of a range of measures including sound insulation, design of windows and proposed ventilation. Plant noise and vibration should be designed to avoid both creep and potential disturbance to new and existing residents. An assessment of current background noise should be undertaken to influence design and mitigation. Residential units will need to be sound insulated from the proposed community use at ground floor. Any required mitigation should be incorporated into the design of the scheme.

Trees

- There are no TPO constraints; however the submission includes the loss of 6 trees within the existing public space. These include three semi-mature London Planes which provide valuable screening and merit retention if pruned appropriately. New planting is proposed to the side of the building which would not mitigate this loss. Elsewhere trees within small planters are not sustainable. The site suffers from poor air quality due to its location directly adjacent to the tunnel entrance. The trees within the site should be retained where possible, however in order to mitigate against the loss of these trees, mature specimens would be required to screen the road to the rear. An Arboricultural Impacts Assessment (AIA) should be provided together with a revised outline landscape plan as part of any application.

Transport and servicing issues

Car parking

- The proposal does not provide any off-street car parking which, given the very high PTAL of 6a and location within the CWAAP is considered acceptable. Future occupants of the site would be excluded from being eligible for on-street parking permits (except for blue badge holders to avoid additional parking pressure on surrounding streets).

- Notwithstanding the absence of any off-street parking for residents or the surgery it is proposed to re-locate on-street doctor's bays from the existing surgery location on the same street. This is considered acceptable provided it can be demonstrated that there is no significant adverse impact on parking for the high street relating to trips from staff and visitors (short stay bays required) to the surgery. This will require parking stress surveys and discussion with Highways.

- No disabled units are proposed. On-street disabled bays should be retained for visitors to the surgery.

Cycle parking

- The submitted proposal would provide 56 residential cycle parking spaces which equates to at least 1 cycle space per 1 bed unit and 2 spaces for all other dwellings which is acceptable as it is in accordance with the London Plan (2015).

- However, the proposal is for 2 tier stackers throughout. This is not acceptable as the upper tier is not considered to be fully accessible. Other space efficient options should be explored, including 'walk in' wall rack / pod designs as well as Sheffield stands which are the preferred option.

- No cycle parking provision is shown for staff of the surgery. This should be provided at a ratio of one secure space per 5 members of staff and a minimum of 2 spaces.

- All parking should be conveniently located for building entrances, avoiding multiple doors.

- Visitor parking would be provided on street along Albion Street. It would be preferable to provide an element of visitor parking in the square as well as near to the surgery entrance.

Servicing

- Servicing is proposed from the street which is against policy. Given site constraints, however, and the scale of the development, it is considered that servicing from Albion Street is acceptable subject to provision of a new/re-located loading bay and kerbside space review as above. The surgery will require separate waste collection and operation of this should be assessed.

- A servicing strategy and tracking drawings will need to be provided with any submission detailing what provision will be made to ensure servicing would be safe and would not have harmful impacts on either vehicle or pedestrian safety. The tracking drawings should illustrate a worst case scenario i.e. for the largest delivery vehicle that could be used by a commercial operator/refuse vehicle. The servicing strategy should include the predicted number of vehicles to and from the site and the nature of those vehicles. The document should be prepared in accordance with Transport for London document "London Freight distribution plan: A Plan for London" and "Managing Freight Effectively: Delivering and Servicing Plans

Sustainable development implications

Energy

- No information is provided and as such the Local Planning Authority is unable to assess whether the scheme would comply with London Plan Policy 5.2. The policy requires a reduction in carbon emissions of 35% below Part L 2013 target. A detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction outlined are to be met within the framework of the energy hierarchy should be provided.

- The development fails to include meaningful areas of green living roofs and sustainability measure into the design to ensure the development contributes positively to the environment and biodiversity.

Air Quality

- The site is in an Air Quality Management Area and potential air quality impacts may arise as a result of the major road located to the rear of the site, impacting on nearby sensitive receptors. Details of appropriate mitigation should be provided with any formal application to demonstrate that the proposal would not impact on air quality would not be significant and would be in accordance with the Mayors guidance.

Flood risk

- The site is situated in Flood Risk Zone 3. The submission does not include consideration of the acceptability of ground floor residential uses at this site. A Flood Risk Assessment should be provided any formal submission.

Ground contamination

- There is a risk of exposure to potential contaminants during construction and in the completed development to construction workers, future occupiers, ground water and surface water. For these reasons a full land contamination exploration and assessment will be required.

Archaeology

- The site is not located within an Archaeological Priority Zone. Given the distance from the Borough, Bermondsey and Rivers Archaeological Priority Zone to the north of the site, it is not considered that there would be any significant archaeological remains within the site.

BREEAM

- A proposed rating of 'Very Good' for the non-residential component would be required. A pre-assessment should be submitted with any future application.

Planning obligations (S.106 undertaking or agreement)

- The submission fails to fully account for policy compliant planning obligations in accordance with the Planning Obligations SPD. Planning obligations will be required to offset the negative impacts of any development on the site. Draft Heads of Terms may be required to secure the off site wheelchair housing and should be submitted in accordance with the S106 SPD as part of any formal application and are required for the purposes of validation.

Community Infrastructure Levy

- This development will be subject to the Mayoral CIL and Southwark CIL. The charge will be calculated according to the amount of new floor space the development will provide. The chargeable rate for Southwark is £35 per square metre under MCIL and £200 per square metre for SCIL (both subject to indexation). It is necessary to complete a 'Planning Application Additional Information Requirement Form' to determine the amount of chargeable floorspace on the site and submit this with any formal planning application on the site. The amount to be paid is calculated when planning permission is granted and it is paid when development starts. Further details about the CIL can be found using the links below.

<http://www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil>

<http://www.communities.gov.uk/publications/planningandbuilding/communityinfrastructurelevymay11>

Other matters

- It is advised that prior to the submission of application discussions should be had with the Council's Highway Development Control Team regarding any works on or adjacent to the Highway. Regard should be had to the material palette set out in the Council's SSDM (Southwark Street Design Manual). All development will be required to incorporate the principles of inclusive design, with

suitable access provided for people with disabilities or those who are mobility impaired.

Conclusion

- Redevelopment of the site would increase housing supply in accordance strategic objectives to deliver 25 more affordable housing in the borough and provide a new purpose built doctors surgery. The overall principle of the redevelopment of the site is supported; however some concerns are raised in relation to the proposed height and massing of the building and the loss of the trees within the site which will require addressing prior to submission. Further details will also be required in relation to Flood Risk, Air Quality, Noise, Daylight/Sunlight, Energy, Transport and Highways impacts and further design details.

This advice is given to assist you but is not a decision of the council. Further issues may arise following a formal planning application, where a site visit and public consultation and consultation with statutory consultees would be undertaken.

Please accept this letter as the closure of your current enquiry. A copy of this letter will be available to view on the council's website under reference 15/EQ/0389 following the submission of a formal application.

Your sincerely,

Simon Bevan
Director of Planning