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**Date:** 30/11/2016

Dear Mr Morris

**TOWN & COUNTRY PLANNING ACT 1990 (as amended)**  
**PRE-APPLICATION ENQUIRY**

**At:** SITE BOUNDED BY SOUTHAMPTON WAY, WELLS WAY, COTTAGE GREEN AND PARKHOUSE STREET  
**Proposal:** Re-development of the site to deliver 4,100sqm of commercial floor space and 409 residential units.

I write in connection with your pre-application enquiry received on 08/08/2016 regarding a scheme to redevelop the site above. 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 (2016); The Core Strategy (2011) and saved policies from the Southwark Plan (2007).

The site is located within the:

- Urban Density Zone
- Air Quality Management Area
- Parkhouse Preferred Industrial Location (PIL) - local
- Possible Public Transport Depot
- Area where 35% affordable and 35% private housing is required.

The site is within the setting of a number of heritage assets including the grade II listed Collingwood House on Cottage Green and 73, 75 and 77 Southampton Way. In addition, the proposed development would affect the setting of a number of heritage assets including the grade II Listed 113 Wells Way, the Wells Way Baths, and the former St George Church on Wells Way, together with the Addington Square conservation Area which is to the west across Burgess Park.

**Other key material considerations**

The National Planning Policy Framework  
 National Planning Practice Guidance

**Land Use**

The site is designated a Preferred Industrial Location (PIL) where Industrial uses are both protected and encouraged (Southwark Plan saved policy 1.2 and Core Strategy policy SP10). The site is no longer required as a possible public transport depot because the cross river tram is no longer being pursued.

The proposal is to provide 4,100sqm of commercial floorspace and 409 residential units, with the commercial floorspace potentially including retail as well as employment space. Residential is not normally an acceptable use in Preferred Industrial Locations, which are protected for industrial, warehousing and industrial-style sui generis uses. The text which supports saved Policy 1.2 explains that the policy is intended to protect clusters of employment uses which may benefit from the segregation from more sensitive uses such as housing. However, the emerging policy within the New Southwark Plan (NSP) reviews this designation and indicates that the PIL would become a mixed use neighbourhood where development would be intensified, job numbers increased, and business growth promoted (policy DM23). The likelihood is that residential use would form part of the mixed use neighbourhood. The NSP is currently at the second consultation stage and over time additional weight would be attached to the emerging policy. In any event draft policy DM23 states that as a minimum, there should be no loss of commercial/employment floorspace.

The provision of residential on the site would represent a departure from the adopted development plan and as an application is likely to be submitted next year, it would be premature in relation to the emerging new planning policies for the borough. The proposal would therefore need to demonstrate significant regeneration benefits to justify the departure from adopted policy, and should not compromise the delivery of emerging objectives set out in the draft New Southwark Plan. In considering whether the benefits would justify supporting the proposal, officers would consider / require, among other things:

- The quantum and quality of business space to be re-provided on the site and its likely appeal to a range of businesses and sectors;
- Evidence of a clear understanding of the likely market for the employment space on the site, what their requirements would be, and how the proposal would help to meet them;
- Evidence of a marketing and management strategy that would give confidence that the site would remain as a viable and attractive business location;
- A strategy which identifies the potential for relocation of existing businesses or consideration of relocating existing businesses on the site and provision of affordable business space;
- Information about exemplar mixed-use projects and identification of those factors, including design, servicing, management, location and access, which help to make those projects a success and showing how this information informed the proposal.

Notwithstanding that your client intends to apply for a Lawful Development Certificate to change the existing employment floorspace to residential under permitted development rights, the starting point for any planning application on this site must be that all of the existing employment floorspace must be re-provided. There is currently approximately 8,000sqm of employment space on the site, and just over half of this would be re-provided. Whilst the principle of providing residential use on the site could be supported (subject to all other policy matters being found acceptable), there are significant concerns that insufficient employment space would be provided and officers consider this element of the proposal to be unacceptable.

In relation to how a successful employment component could be provided, two studies have been carried out which provide useful guidance. In 2012 the Council prepared an employment study for Canada Water which aimed to assess demand for employment space in that area. The study was informed by a survey of agents and operators which sought to gain views on the types of space and their characteristics which help to comprise successful business locations (the study is available on the council's website:

[http://www.southwark.gov.uk/download/downloads/id/10363/harmsworth\\_quays\\_non-residential\\_use\\_s\\_study\\_october\\_2012.](http://www.southwark.gov.uk/download/downloads/id/10363/harmsworth_quays_non-residential_use_s_study_october_2012.))

Whilst the site is not in Canada Water, the study contains some messages which could be relevant to your proposal which in summary are:

- To maximise interest for the widest business community, operators interviewed considered that business space provision should be flexible in accommodating different sectors and uses. In terms of the characteristics of space, demand is strongest for serviced or managed space suitable for small and medium-sized enterprises (SMEs) with flexible leasing conditions (easy in and out leasing), low rental values and incentives to attract start ups.
- The research has shown that business space should ideally be provided in stand alone buildings and should be clustered to create a business community which can connect and share services. While ground floor B1 accommodation in residential buildings is often the preferred configuration for developers, it is generally more appropriate for particular types of users such as estate agents, accountants, solicitors and retail. A self-contained separate building is often a more attractive option for a cluster of similar business which can benefit from shared knowledge and services, and create a business community with a strong brand and identity.

A 2011 study carried out by Camden Council also reiterates the finding that ground floor business units in residential developments are often unattractive to business occupiers. Concerns included visibility, security and difficulties in subdividing large floor plates while retaining natural light:

([http://www.camden.gov.uk/ccm/cms-service/download/asset?asset\\_id=2688836](http://www.camden.gov.uk/ccm/cms-service/download/asset?asset_id=2688836)).

- Operators and developers were clear that commercial space would only work as part of mixed use schemes if provided in certain ways. For mixed-use development to work, careful consideration needs to be given to the relationship between uses as residential occupiers and commercial tenants would have different aspirations and requirements which require management.
- Successful workspaces have a centre or hub, which lends itself to a community feel and sense of place. Specific user requirements include:
  - Keenly priced, modern, well designed, serviced and flexible space.
  - Start-up space available on easy-out easy-in terms.
  - A combination of well managed and competitively priced serviced space.
  - Good levels of data connectivity, potential for fibre optic and high speed broadband.
  - A range of space to accommodate small and medium sized enterprises and to allow them to grow as their business develops.
  - Incubator space – inclusive, 'all-in' space.

You have already been provided with a list of specialist workspace providers and discussions have taken place with most of them, which is encouraging. It is acknowledged that the scheme is at an early stage of development and we assume that future discussions will be able to focus on the type and nature of the commercial space, based on advice from market specialists.

To conclude in relation to land use, whilst the principle of a mixed use development on the site could be supported under the emerging policy, the quantum of employment floorspace would need to be significantly increased. If the application were to come forward in advance of the adoption of the New Southwark Plan, it would be considered as a Departure from the adopted Southwark Plan, which would require a clear justification in terms of how the benefits of the scheme outweigh the adopted policies..

## **Environmental impact assessment**

Given the size of the site and the scale of the proposals, you are advised to apply for a screening opinion under the Town and Country Planning (Environmental Impact Assessment) Regulations (2015).

## **Design**

The main part of the site sits to the south of the curve formed by Parkhouse Street and has frontages to this road, to Wells Way to the east, and a modest frontage to Southampton Way to the south-west. The site also includes a smaller area of land on the north-western side of Parkhouse Street which extends to adjoin Burgess Park. With the exception of a brick chimney on the main

part of the site, it is understood that all of the existing structures would be demolished. This approach is considered to be acceptable. With the exception of the chimney, the retention of which is welcomed, the buildings make a limited contribution to the site and the streetscene and there are no objections to their loss.

Arrangement, Height, Scale and Massing - The development would be arranged in four parts around a new, predominantly pedestrian route designed to link Wells Way with Parkhouse Street. This new route would divide the site into four legible blocks and would extend across Parkhouse Street to the edge of Burgess Park to the north-west. The buildings have been arranged to retain the option to extend the route to Southampton Way, depending on the way in which the adjoining site (which is in separate ownership) is ultimately redeveloped. Whilst this approach is considered to be sound, there are concerns that the proposal for the smaller part of the site on the north-western side of Parkhouse Street would not allow for a potential route to the park. It would deliver the start of a route, but a 6-storey building shown at the park boundary would close it off. The width of this building would therefore need to be reduced in order to enable the route to continue.

The development would be laid out as four urban blocks, with the buildings forming strong edges facing onto the existing streets and the proposed new route. A high quality landscaping scheme including new tree planting would be key to delivering a high quality environment which would be an attractive place in which to live and work. In particular, new tree planting should be provided along the street frontages and along the proposed new routes. The current layout does not appear to provide sufficient space for new street trees and the building footprints should be adjusted accordingly. Guidance for the planting of new street trees can be found in the Southwark Streetscape Design Manual, the link to which is below:

[http://www.southwark.gov.uk/info/200456/southwark\\_streetscape\\_design\\_manual\\_ssdsm](http://www.southwark.gov.uk/info/200456/southwark_streetscape_design_manual_ssdsm)

In the main the buildings would range from 4 to 8 storeys in height. Each urban block has been designed as a collection of mid-rise buildings with lower scaled link buildings which would create a unified frontage on the ground floor and introduce gaps in the roof-line. This highly articulated model of urban design would ensure that the built form would not be overly dominant or imposing, although the buildings would need to be set sufficiently far back along Parkhouse Street to avoid it appearing overly canyon-like. Where the development would abut the existing townscape on Wells Way and Parkhouse Street, the height of the blocks would be stepped down in deliberate stages to reflect the lower residential scale of these streets.

The proposal includes a wholly commercial building on Wells Way which would be an 'island' block which would mark the location of the new route into the site. Whilst this use would be appropriate in this location and gives the development a clear expression on a key frontage, the remainder of the development is likely to appear overly residential, especially where residential properties would start from the first floor level upwards. The design of the scheme should ensure that the commercial character of the area is preserved, with active commercial frontages placed on the perimeter of the new blocks, not just on the new central route. In particular, the 'bookend' blocks at the three corners of the largest block should include a stronger commercial offer, extending to two or three storeys in these locations, especially on Parkhouse Street where as currently shown residential properties would sit immediately adjacent to existing industrial sites. Incorporating this change would not only be an improvement in design terms, but it would also contribute to addressing the land use issue raised above.

In general the strategy for the height, scale and massing of the perimeter blocks is considered to be appropriate (the tall building is considered separately below). The range of heights proposed has the potential to result in a highly articulated built form which would be of an appropriate scale for this part of the borough and in relation to the proposed new route through the site. One area that appears to be less well developed and requires further refinement however, is the smaller part of the site on the north-western side of Parkhouse Street. In addition to the concerns raised above regarding the potential route to the park, there are concerns regarding the height of the buildings on this part of the site which are shown as being up to 5-storeys next to existing 2-storey dwellings, increasing to 6-storeys next to the park.

Officers consider that development on this part of the site would be more appropriate at 3-4 storeys on Parkhouse Street, potentially rising to 6 or 7 storeys onto the park edge provided the buildings were set at least 5m back from the park edge and serviced from Parkhouse Street. The southern section of this part of the site which extends to the rear of Southampton Way would be better suited to a modest group of 2-3 storey mews houses which could be accessed from Southampton Way, but serviced from Parkhouse Street. It is not considered necessary to provide a public route to Southampton Way through this part of the site.

Limited architectural details have been provided to date. Whilst the use of brick would be appropriate, efforts should be made to ensure that the various buildings would be sufficiently distinct; double height commercial space with strong bases could help to achieve this. Given the scale of the development, and the number of new buildings proposed, we would expect to see additional architects involved, in order to achieve architectural variety and to create more distinctiveness to the individual buildings.

Tall building - A 14-storey tower is proposed in the centre of the main part of the site. As it would be over 30m high and significantly taller than the immediate context it would need to comply with all of the requirements of saved policy 3.20 of the Southwark Plan 'Tall buildings'. This requires all tall buildings to:

- i. Make a positive contribution to the landscape; and
- ii. Be located at a point of landmark significance; and
- iii. Be of the highest architectural standard; and
- iv. Relate well to their surroundings, particularly at street level; and
- v. Contribute positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.

Taking each of these in turn the following issues have been identified:

i. In order to conform with this requirement, the proposed public realm and the landscaped setting of the tall building would need to be very high quality, proportionate to the proposed height, and delivered within the confines of the site. The proposal currently has the potential to achieve this, and the landscape design should be developed to demonstrate its quality. The space to be created should be bench marked against similar urban spaces to demonstrate that it would be suitable for a building of the scale proposed.

ii. Demonstrating that the proposed location is a point of landmark significance. The site is considered to be of a size that could support a concentration of scale. In addition, the confluence of a number of new routes across the site in close proximity to Burgess Park - an extensive open setting - as well as the possibility of creating a new destination in this industrial area suggest that this could be justified at the central square location shown on the plans.

iii. The submitted information is architecturally 'neutral' at this stage. The tall building is illustrated as a larger brick building and does not give the impression of a high quality design. This design runs the risk that it may appear like all of the other buildings in the development, and would not be sufficiently distinct as a local landmark building of higher stature or importance in the master plan. Furthermore, the internal layouts suggest that the tower would accommodate 6-7 units per floor, however from certain angles (in particular View 2) it would lack elegance when viewed from its broad flank. The design requires further refinement to achieve a vertical emphasis and a more slender proportion when viewed from the side. It should also include a careful re-appraisal of the proposed materials with a view to incorporating new high quality materials (such as stone and or metal cladding for example ) that would complement the brick but distinguish the tall building more deliberately from the other buildings in the development.

iv. The tall building should integrate itself into the activities on the ground, including the new square which would form its setting, and the proposed new route through the site. The proposal is for a colonnaded design and an active commercial space at the base which would be appropriate. However, the confluence of routes at the base of the tower would give it a higher status and the commercial activity in this location should be more dominant, extending to two or three floors to bring

a better focus onto the square.

v. The views submitted demonstrate that the tall building would be visible from certain vantage points and would appear as a pinnacle at the centre of the development. This would appear as a natural stepping up in scale rather than a stark contrast in height, with the buildings generally peeling away from sensitive landmarks - listed buildings - and in the main appearing over the rooftops of development in the foreground. With regard to the point above in respect of the proportions and elegance of the building from certain locations, the proposal requires further refinement. Local views which include the tall building in the setting of listed buildings, especially views 1, 2; 5 and 6 (without the Southwark proposal on the adjoining site shown in the foreground) should be rendered. In addition, two additional views should be prepared:

1. from Cottage Green to demonstrate how the development would affect the setting of the Grade II listed Collingwood House
2. from Addington Square - south-west corner - to demonstrate how the tall building would affect the setting of the conservation area

### **Density**

Strategic policy 5 of the Core Strategy permits a density of 200-700 habitable rooms per hectare in the urban density zone. Maximum densities may be exceeded where developments achieve the highest standard of design, exceeding minimum internal space standards as well as providing an acceptable standard of daylight and sunlight, privacy, good outlook and amenity space; further guidance is provided in the Council's Residential Design Standards SPD, the link to which is below:

[http://www.southwark.gov.uk/downloads/download/2257/residential\\_design\\_standards\\_spd](http://www.southwark.gov.uk/downloads/download/2257/residential_design_standards_spd)

The submission advises that the density of the proposed development would be 1,081 habitable rooms per hectare, which would significantly exceed the prescribed range. It is not known whether this would include the B1 floorspace which would increase the density further and this should be clarified. The methodology for calculating the density of mixed-use developments is set out in the Southwark Plan, which requires areas of non-residential space to be divided by 27.5 to create an equivalent in terms of habitable rooms per hectare. As the proposed development would exceed the prescribed range, the quality of accommodation would need to be exemplary and guidance as to the criteria used to assess this can be found in the Residential Design Standards SPD.

### **Housing Mix**

The proposed dwelling mix would comprise 58% 2+ bed units (60% is required) and 17% 3+ bed units (20% is required). The proposal would therefore need to be amended to provide a policy compliant mix of units in accordance with strategic policy 7 of the Core Strategy. Given that the proposal would not include the conversion of any existing buildings, there should be no reason why the required dwelling mix cannot be achieved.

### **Housing tenure**

No information has been provided regarding affordable housing. Given that the proposed development would represent a departure from the development plan and would be premature of emerging new policies, as a very minimum a policy compliant amount of affordable housing would be expected. This would be important in demonstrating the regeneration benefits of the proposal. Strategic policy 6 of the Core Strategy requires 35% affordable housing on site and this is calculated by habitable rooms for developments of 15 or more units. With regard to tenure, saved policy 4.4 of the Southwark Plan requires a split of 70% social rented and 30% intermediate in this area. A mix of housing types and sizes for the affordable units would be required and studio units are not permitted as affordable units. A viability report would be required to support the proposed affordable housing offer, in accordance with the Council's adopted Development Viability SPD.

### **Housing Quality**

Detailed guidance is contained in the Residential Design Standards SPD including amenity space and childrens' playspace requirements. All 3+bed units must have at least 10sqm of private amenity space. Although your document describes the development as providing 'generous private and shared amenity space' it is not clear how communal space would be provided for some of the blocks, and the townhouses and maisonettes appear to have little opportunity for garden space. It is also not clear how childrens play has been provided in the scheme.

Dwellings should be designed to have integral bulk storage facilities and should have a mix of open plan living-kitchen-diners and units with separate kitchen diners to offer choice to potential occupiers. All three bed affordable dwellings should be designed to have self-contained kitchens in accordance with guidance in the 2015 Technical Update to the Residential Design Standards SPD (2011).

In the absence of detailed accommodation layouts it has not been possible to assess the internal space standards, the quality of residential accommodation or amenity space. It is noted however, that the layouts have been amended to increase the number of dual aspect units which is welcomed. Maisonettes are shown close to the boundary with Burgess Park and given that the boundary with the park is very overgrown and contains mature trees, maisonettes are considered to be appropriate. There should be sufficient separation distance to ensure that the trees would not result in unacceptably low levels of light into the accommodation, and consequent pressure from future occupiers for the trees to be pruned or removed. All new residential units should be designed to achieve good levels of internal daylight and sunlight in accordance with the BRE guidelines, and daylight calculations for the proposed residential units and amenity spaces would be required.

The submission advises that 10% wheelchair accommodation would be provided which would be policy compliant. Details as to which units would be adaptable and which would be fully accessible would be required, and the units should each have their own accessible parking space. Guidance can be found in the 2015 Technical Update to the Residential Design Standards SPD.

There are commercial / industrial uses surrounding the site and the scheme should be designed to ensure that future residential occupiers would not experience unacceptable noise and disturbance from these adjacent uses. The onus would be on the development to secure this, as a situation where future occupiers make noise complaints about legitimate activities taking place at long established commercial / industrial sites would not be acceptable. A noise report would be required which should include an assessment of weekend working / hours at the adjoining sites together with plant noise from the proposed employment / retail uses. A lighting study would also be required to establish whether any lighting from the adjoining industrial premises would cause light pollution to future occupiers. The development would need to provide any necessary mitigation, not the existing commercial occupiers.

### **Amenity impacts**

Detailed existing and proposed block plans would be required showing the footprint of the neighbouring buildings together with their use; the window positions of any adjoining residential uses should be marked on the plans to enable officers to assess whether the proposed site layout would result in any loss of amenity. Care must be taken to ensure that the development would not hinder the development potential of any adjoining sites, and the updated mater plan shows how they could potentially be developed.

A daylight, sunlight and overshadowing study based on the BRE guidance 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. On the smaller part of the site on the north-western side of Parkhouse Street the buildings would have a close relationship with existing 2-storey houses, particularly 13 Parkhouse Street, and detailed information is required to enable officers to assess the potential impacts.

### **Trees and landscaping**

There are a limited number of trees on the site including in front of 45 or 47 Southampton Way, along Park House Street, and along Wells Way. Valuable trees should be retained and protected during the course of construction, and a full arboricultural assessment and method statement would be required. Other than that the site is largely devoid of vegetation and opportunities should be taken to incorporate new tree planting and soft landscaping within the new development. As set out in the design section of the report this should include new street trees along Parkhouse Street and Wells Road, and the buildings would need to be set sufficiently far back to allow for this.

## **Transport**

Parkhouse Street is a mixed residential and commercial road with a 20mph speed limit, and is within Controlled Parking Zone (CPZ) EC. The surrounding streets, including Southampton Way and Wells Way, are also part of CPZ EC. Directly north of the site is Burgess Park which provides links to the cycle route to central London and joins the north-south cycle superhighway (CS7) at Elephant and Castle. According to TfL's Planning Information Database, the site has a Public Transport Accessibility Level (PTAL) of 2 /3, which indicates a moderate to low level of accessibility, and the nearest bus stops are located approximately 3 -4 minutes walk away on Wells Way.

A transport statement would be required which must include trip generation information based on a development of similar size, operation and location. It should also consider the potential impact upon public transport.

Access and site layout - The eastern end of the new route through the site would be created close to the junction of Parkhouse Street close to Wells Way. Changes may be required to the existing junction, and a specific meeting to discuss highways requirements would be necessary. Details of the numbers and types of vehicles using the new route through the site and an indication of how this would be managed would be required.

Parkhouse Street is predominantly used for access to industrial sites and therefore has a high volume of freight traffic. Changes to the footway may be required for pedestrian road safety, and emergency access to the site, especially fire service requirements, would need to be agreed to determine the extent of access.

Car parking - The plans show 83 parking spaces which would be accessed from Parkhouse Street and Wells Way, although the arrangements are not sufficiently detailed for comment at this stage, including the appropriateness of the proposed number of spaces. An indication of likely car ownership levels should be provided, together with details of existing on-street parking stress based on the Lambeth methodology which would help to inform the best location for accessible parking. Future occupiers of the site would be prevented from obtaining a parking permit in the CPZ and each eligible occupier, including business occupiers, should be provided with 3 years free car-club membership or van club membership for the commercial uses.

Cycle parking - This would need to be provided in accordance with the London Plan standards. The preferred option would be for horizontal cycle parking such as 'Sheffield' stands at ground floor level, and separate stores for the commercial and residential uses. The proposed cycle parking should be secure, convenient and weatherproof in accordance with policy.

Servicing - Consolidating the servicing for the whole site at one location accessed from Parkhouse Street would be sensible. However, without a clearer understanding of the proposed operation of the commercial units it is not possible to assess how effective the servicing and delivery would be.

A servicing strategy and tracking drawings would need to be provided detailing what provision would be made to ensure that 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 or refuse collector. 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”.

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.

Yours sincerely

*Simon Bevan*  
Director of Planning