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<b>Item No.</b> 7	<b>Classification:</b> OPEN	<b>Date:</b> 22 February 2021	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<b>Development Management planning application:</b> Application 20/AP/0969 for: Full Planning Application <b>Address:</b> STYLES HOUSE, HATFIELDS, SOUTHWARK, SE1 8DF <b>Proposal:</b> Redevelopment of the site to include the demolition of existing buildings (the Platform Southwark building, the existing tenant management organisation orhall, nine garages, a sub-station, eight studio apartments, and a storage and boiler room building); the retention and improvement to the existing Styles House building; the erection of 25 new dwellings, a new substation, a new community centre and tenant management organisation facilities; car and cycle parking; a new boiler house; landscaping; access and associated works.		
<b>Ward(s) or groups affected:</b>	Borough and Bankside		
<b>From:</b>	DIRECTOR OF PLANNING		
<b>Application Start Date :</b> 27 March 2020		<b>PPA Expiry Date :</b> 26 June 2020	
<b>Earliest Decision Date:</b> 19 June 2020			

## **RECOMMENDATION**

1. That planning permission be granted, subject to conditions and referral to the Mayor of London and the applicant entering into an appropriate legal agreement.
2. In the event that the requirements of (1) are not met by 1 August 2021 the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 195 of this report.

## **EXECUTIVE SUMMARY**

3. Styles House Estate is a Council owned housing estate located at the junction of The Cut and Hatfields, within the Bankside area of the LBS. The estate is located adjacent to the Transport for London (TfL) owned Southwark London Underground Station. The Estate is managed by the Styles House Tenant Management Organisation (hereafter known as TMO), which is managed by an elected Board of Management. Part of the Estate, including the Styles House allotments, are currently in the ownership of TfL.
4. On 30 April 2019 the LBS Cabinet made a decision for a land swap between the Styles House Estate and TfL land holdings at Southwark Station. This land swap sought to maximise the development opportunities for both the adjacent Southwark London Underground Station (hereafter known as the OSD) and the Styles House development. As a result of this land swap, the development boundary for the site does not follow the existing Styles House estate boundary.
5. In parallel to this application, and following the in-principle land swap agreement, TfL have submitted a full application for a commercial development over Southwark London Underground Station (hereafter known as the OSD). A 10m wide no build zone is proposed to the east of the Styles House development site between the new Styles House development and the proposed TfL OSD. This provides an opportunity for additional amenity space for residents and occupiers of the office, while also ensuring that both developments can be brought forward in parallel.
6. The recommendation for approval of this application is based on its individual planning merits, however it should be noted that this scheme cannot be built unless the OSD is approved and carried out. A decision on this application will not prejudice the planning committee's consideration and assessment of the OSD application.

7. The scheme would deliver 100% affordable housing and 146sqm of TMO community use. The loss of the existing Platform building and its B1 use class is contingent on approval of the Southwark OSD which has been secured through a S106 where the loss of the Platform building is acceptable on the basis that Southwark OSD is approved and carried out . If the Southwark OSD is not approved or carried out than this grant for planning permission would be voided.
8. A housing needs assessment was provided to inform the dwelling mix which is not policy compliant and identified the need for primarily 1 and 2 bed units on the site. The proposed dwelling mix responds to the identified housing need of existing residents on the estate and within the surrounding area.
9. The overall design and height of the scheme is well considered in relation to the proposed Southwark OSD and existing Styles House. Because the schemes are interdependent they have been assessed on the basis that the two developments will be experienced in conjunction in terms of design, however the approval of this scheme is dependent on approval on Southwark OSD which will be assessed at a separate planning committee on its own merits. The proposed layout is supported, with the TMO hall facing The Cut to provide active frontage. Landscaping improvements have also been provided and improvements to the entrance of existing Styles House.
10. There would be some impacts on neighbouring residents in terms of daylight and sunlight, particularly for the existing Styles House building, however these are considered to be acceptable within the context of the BRE guidelines.
11. A total of 300 consultation letters were sent out to residents and businesses in the area. A total of 11 responses have been received. Of these, 7 were in objection and 4 were general comments in respect of the application. The objections were largely around the impacts of extending the building in terms of height and the potential harm resulting to residential amenity, however there were some comments made about the design and additional disruption from development in the area. The details of the objections raised are discussed in paragraphs 58 of the officer report.
12. The proposal would implement energy strategies to secure a 48.3% overall carbon emissions reduction over the Building Regulations 2013. This would be based on a 10.9% saving in energy demand and a 37.5% saving from renewable energy.
13. Overall, the benefits of the proposal are considered to outweigh any potential harm and it is recommended that planning permission be granted, subject to conditions and a S106. This approval will be contingent on a separate assessment, approval and build-out of the Southwark OSD at a separate planning committee, where the outcomes of this decision will not prejudice the consideration and assessment of the OSD application separately.

## **BACKGROUND INFORMATION**

14. On 30 April 2019 the LBS Cabinet agreed a 'land swap' between the Styles House Estate and TfL land holdings around Southwark Station. This land swap sought to maximise the development opportunities for both the TfL OSD and the Styles House development. As a result of this land swap, the development boundary for the site does not follow the existing Styles House estate boundary.
15. In parallel to this application, and following, TfL has submitted an application for a commercial development over and around Southwark London Underground Station (hereafter known as the OSD) (current application ref: 20/AP/1189). A 10m wide no build zone is proposed to the east of the Styles House development site between the new Styles House development and the proposed TfL OSD. This provides an opportunity for additional amenity space for residents and occupiers of the office, while also ensuring that both developments can be brought forward in parallel. The two schemes are interdependent in that one can't be built without the other, in terms of land ownership. The grant of approval to this application is contingent on approval of the OSD application in planning policy terms, in order to justify the loss of 912.4sqm B1 office floorspace resultant from the demolition of the Platform Southwark Building. This contingency will be secured within the S106. Each application will be assessed separately and without prejudice for its own planning benefits and consideration. .

### **Site location and description**

16. The Site is located in the Borough and Bankside Ward of the LBS, and within the London Central Activity Zone. The Site comprises approximately 0.3 ha of developed land. The Site includes Styles House, a council owned housing estate, and the existing Platform Southwark building (former office building B1 use) which is currently in temporary use as a performance arts building. Located immediately adjacent to east of the Site is the Southwark London Underground Station. The Site forms part of a land swap agreement between Southwark Council and Transport for London which will facilitate the redevelopment of several underutilised sites to deliver a significant uplift in commercial and residential floorspace.
17. The existing site includes 56 residential units, split between the 12 storey Styles House building (48 one-bedroom units) and eight studio apartments (known as the Chalets) housed in a terrace of four, two storey maisonettes. A small, single story TMO building is located to the north east of the Styles House building and is connected to the Styles House building via a pram store and boiler room structure. Nine garages occupy the centre of the site with gardens and allotments to the north of the site. Landscaping and amenity space is also

provided to the south of the site fronting The Cut.

18. The Styles House estate has a single access point from Hatfields to the west. The Chalets can also be accessed from Joan Street to the east. The Platform Southwark building is accessed from Joan Street to the east, which is proposed to be closed as part of the separate Southwark OSD development. No pedestrian access to the site is gained from The Cut (to the south of the site).
19. The site is bound to the north by Isabella Street, which provides pedestrian access to a number of railway arches in A1/A3/A4 uses. The arches are located under the south eastern main line railway viaduct. The Cut bounds the site to the south and Hatfields, which runs along the western boundary of the site and forms the boundary between the Boroughs of Southwark and Lambeth, Joan Street, and beyond that the Southwark London Underground Station and Blackfriars Road are located to the east of the site.
20. The context of the surrounding area is mixed use in nature, with commercial, retail and entertainment uses occupying ground floor units and residential units on the upper floors. A number of substantial offices buildings are located along the nearby Blackfriars Road.
21. The site has a PTAL rating of 6b (excellent) being next to Southwark Underground Station, a short walk (approx. 200 yards to the west) to Waterloo East National Rail Station and Waterloo Railway Station (approx.300 yards to the west). The site is well located in terms of shops and services, with supermarkets, pharmacies, restaurants and public houses located in walking distance from Styles House.
22. The site has the following designations:
  - Bankside and Borough District Centre
  - Bankside, Borough, London Bridge Strategic Cultural Areas
  - Bankside, Borough and London Bridge Opportunity Area
  - Central Activity Zone (CAZ)
  - Air Quality Management Area (AQMA)
23. The Platform Southwark building is identified in the Blackfriars Road SPD (2014) as a potential development site, and in the draft Southwark Local Plan (2020) as part of the wider Southwark Station OSD site allocation (NSP17: Southwark Station and 1 Joan Street).
24. NSP17 (which includes part of this site): Southwark Station and 1 Joan Street states that redevelopment of the Southwark Station and 1 Joan Street should provide at least 50% of development as employment floorspace, with active frontages on the ground floor in town centre uses (A1, A2, A3, A4, D1, D2). The allocation also notes that the redevelopment of the site may provide new homes and cultural uses.

25. The site is not located in, or close to a Conservation Area, or close to any statutory listed buildings. The Anchor and Hope free house, located at the junction of Hatfields and The Cut is identified on Lambeth's Local List as a locally listed heritage asset. The Grade II listed 74, 75-78, 81, 82 and 83 Blackfriars Road, and associated railings are located along Blackfriars Road approximately 100m to the south east of the site. Views of these buildings to and from the site are obscured by the modern commercial developments along the southern boundary of The Cut.
26. The below image shows the land ownership boundaries where green dash represents TFL boundary and blue dash represents Southwark ownership following the landswap agreed on the 30<sup>th</sup> April 2019. The solid red buildings are to be demolished.



**Image: Styles House and Southwark OSD ownership boundaries following agreed landwap.**

### **Details of proposal**

27. The proposal is to demolish the existing building on site (the Platform Southwark building, the eight chalet dwellings, the existing tenant management organisation hall, nine garages, a sub-station, and a storage and boiler room building). These would be replaced by a new part 13, part 14 apartment building to provide 25 council homes (Use Class C3), a new part one, part two storey TMO Hall and community space building (Use Class Flexible D1/D2). The existing Styles House building will be retained and improved through internal and external amendments to facilitate a new entrance, new refuse store and the re-housing of the existing boiler house which is to be demolished.

Benefits of this scheme includes:

- Provides 25 new Council homes, including 19x 1-beds, 3x 2-beds 3 x1-beds that are wheelchair accessible to provide an uplift of 16 homes
- 146sqm of flexible D1/D2 Use Class for TMO Hall and community space use
- Improvements to the existing Styles House building, including internal and external amendments to facilitate a new entrance, new refuse store and boiler house
- The relocation of the on-site UKPN sub-station
- A new pedestrian access point to the site from the cut
- Widening the existing vehicle access to the site from Hatfields; and,
- A comprehensive hard and soft landscaping scheme, including communal amenity space.

### Planning history

Address	Ref	Status	Description
Styles House			
49-56 Styles House, Hatfields, London, SE1 8DF	09/CO/010 8	11/08/2010 Granted	Refurbishment and upgrading of the building including replacement of timber windows with upvc double glazed units, and other external repairs.
Flat 1-48 , Styles House, Hatfields, London, SE1 8DF	09/CO/010 7	11/08/10 Granted	Refurbishment and upgrading of the building including replacement of timber windows with upvc double glazed units, renewal of roof coverings and other external repairs.
Styles House, Hatfields, London SE1 8DF	11/AP/169 5	09/12/14 Withdrawn	Installation of two bike lockers and conversion/upgrading of 22 existing pram sheds to provide cycle lockers, together with replacement of existing wooden doors with steel doors.
Styles House, Hatfields, London SE1 8DF	13/AP/165 2	06/09/13 Granted	Erection of a single storey extension to existing tenant management office to provide resident meeting hall.
Platform Southwark			
00/AP/147	1 Joan	Granted	Addition of two storeys at roof

5	Street, London, Southwark, SE1 8DA	26/05/03	level. Use of building as extended, for 14 flats with ground floor retained for business purposes.
13/AP/353 6	Algarve House, 1 Joan Street, London SE1 8DA	Certificate of lawfulness of existing use and development Issued 13/01/14	Certificate of lawfulness to confirm that planning permission 00/AP/1475 was lawfully implemented by the expiry date of 29/05/2008
15/AP/347 6	Algarve House, 1 Joan Street, London, SE1 8BS	Granted 23/11/15	Temporary change of use for a period of 18 months from office (use class B1) to artist studios, gallery and community arts centre (use class D1)
18/AP/197 0	Algarve House, 1 Joan Street, London, SE1 8BS	Granted 17/08/2018	Extension of temporary change of use for a period of 30 months from office (Use Class B1) to artist studios, gallery and community arts centre (Use Class

## KEY ISSUES FOR CONSIDERATION

### Summary of main issues

28. The main issues to be considered in respect of this application are:

- Principle of the proposed development in terms of land use;
- Environmental impact assessment
- Housing mix, density and residential quality
- Affordable housing and development viability
- Amenity space and children's play space
- Design, including layout, building heights, landscaping and ecology;
- Heritage considerations
- Archaeology
- Impact of proposed development on amenity of adjoining occupiers and surrounding area, including privacy, daylight and sunlight
- Transport and highways, including servicing, car parking and cycle parking
- Environmental matters, including construction management, flooding and air quality
- Energy and sustainability, including carbon emission reduction
- Ecology and biodiversity

- Planning obligations (S.106 undertaking or agreement)
- Mayoral and borough community infrastructure levy (CIL)
- Consultation responses and community engagement
- Community impact, equalities assessment and human rights

These matters are discussed in detail in the 'Assessment' section of this report.

## **Legal context**

29. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2016, the Core Strategy 2011, and the Saved Southwark Plan 2007. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications for development within Conservation Areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. Section 66 of the Act also requires the Authority to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.
30. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

## **Planning policy**

### **Adopted planning policy**

#### National Planning Policy Framework (NPPF)

31. The revised National Planning Policy Framework ('NPPF') was published in 2019 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental.
32. Paragraph 212 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications
33. Chapter 2 - Achieving sustainable development  
Chapter 5 Delivering a sufficient supply of homes  
Chapter 6 - Building a strong, competitive economy  
Chapter 7 - Ensuring the vitality of town centres  
Chapter 8 - Promoting healthy and safe communities  
Chapter 9 - Promoting sustainable transport

Chapter 11 - Making effective use of land  
Chapter 12 - Achieving well-designed places  
Chapter 14 - Meeting the challenge of climate change, flooding and coastal change  
Chapter 15 - Conserving and enhancing the natural environment  
Chapter 16 - Conserving and enhancing the historic environment

#### London Plan 2016

34. The London Plan is the regional planning framework and was adopted in 2016. The relevant policies of the London Plan 2016 are:

Policy 2.5 Sub-regions  
Policy 2.10 Central Activities Zone – Strategic priorities  
Policy 2.11 Central Activities Zone – Strategic functions  
Policy 2.13 Opportunity Areas and intensification areas  
Policy 2.15 Town Centres  
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 3.11 Affordable housing targets  
Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes  
Policy 3.13 Affordable housing thresholds  
Policy 4.1 Developing London's economy  
Policy 4.2 Offices  
Policy 4.3 Mixed use development and offices  
Policy 4.7 Retail and town centre development  
Policy 4.12 Improving opportunities for all  
Policy 5.1 Climate change mitigation  
Policy 5.2 Minimising carbon dioxide emissions  
Policy 5.3 Sustainable design and construction  
Policy 5.7 Renewable energy  
Policy 5.9 Overheating and cooling  
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 5.15 Water use and supplies  
Policy 5.17 Waste capacity  
Policy 5.18 Construction, excavation and demolition waste  
Policy 5.21 Contaminated land  
Policy 6.1 Strategic approach (Transport)  
Policy 6.3 Assessing effects of development on transport capacity  
Policy 6.9 Cycling  
Policy 6.10 Walking  
Policy 6.13 Parking

Policy 7.1 Building London's neighbourhoods and communities  
Policy 7.2 An inclusive environment  
Policy 7.3 Secured by design  
Policy 7.4 Local character  
Policy 7.5 Public realm  
Policy 7.6 Architecture  
Policy 7.7 Location and design of tall and large buildings  
Policy 7.8 Heritage assets and archaeology  
Policy 7.10 World heritage sites  
Policy 7.11 London View Management Framework  
Policy 7.12 Implementing the London View Management Framework  
Policy 7.14 Improving air quality  
Policy 7.15 Reducing noise and enhancing soundscapes  
Policy 7.21 Trees and woodlands  
Policy 8.2 Planning obligations  
Policy 8.3 Community infrastructure levy

#### Core Strategy 2011

35. The Core Strategy was adopted in 2011 providing the spatial planning strategy for the borough. The strategic policies in the Core Strategy are relevant alongside the saved Southwark Plan (2007) policies. The relevant policies of the Core Strategy 2011 are:

Strategic Policy 1 Sustainable development  
Strategic Policy 2 Sustainable transport  
Strategic Policy 3 Shopping, leisure and entertainment  
Strategic Policy 4 Places for learning, enjoyment and healthy lifestyles  
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

#### Southwark Plan 2007 (saved policies)

36. In 2013, the council resolved to 'save' all of the policies in the Southwark Plan 2007 unless they had been updated by the Core Strategy with the exception of Policy 1.8 (location of retail outside town centres). Paragraph 213 of the NPPF states that existing policies should not be considered out of date simply because they were adopted or made prior to publication of the Framework. Due weight should be given to them, according to their degree of consistency with the Framework. The relevant policies of the Southwark Plan 2007 are:

Policy 1.1 - Access to employment opportunities  
Policy 1.4 – Employment sites outside of preferred office locations and preferred industrial locations.

Policy 1.7 – Development within town and local centres  
Policy 1.11 – Arts, Culture and Tourism Use  
Policy 2.1 – Enhancement of Community Facilities  
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 3.15 - Conservation of the historic environment  
Policy 3.18 - Setting of listed buildings, conservation areas and world heritage sites  
Policy 3.19 - Archaeology  
Policy 3.20 - Tall buildings  
Policy 3.28 – Biodiversity  
Policy 3.29 – Development within the Thames Policy Area  
Policy 4.2 – Quality of Residential 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

#### Supplementary Planning Documents

37. Affordable Housing SPD 2008 and draft 2011  
Blackfriars Road SPD 2014  
Design and Access Statements SPD 2007  
Development Viability SPD 2016  
Residential Design Standards SPD October 2011 with 2015 technical update  
Section 106 Planning Obligations and CIL SPD 2015 and 2017 addendum  
Sustainability Assessment 2007  
Sustainable Design and Construction SPD 2009  
Sustainable Transport Planning SPD 2009

#### Greater London Authority Supplementary Guidance

38. Affordable Housing and Viability SPG 2017

Central Activities Zone SPG 2016  
Housing SPG 2016  
London View Management Framework 2012  
Providing for Children and Young People's Play and Informal Recreation 2008  
Sustainable Design and Construction SPG 2014

## **Emerging planning policy**

### **Draft New London Plan**

39. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2nd March 2018. Following an Examination in Public, the Mayor then issued the Intend to Publish London Plan, which was published in December 2019.
40. The Secretary of State responded to the Mayor in March 2020 where he expressed concerns about the Plan and has used his powers to direct changes to the London Plan. The London Plan cannot be adopted until these changes have been made.
41. The draft New London Plan is at an advanced stage. Policies contained in the Intend to Publish (ItP) London Plan published in December 2019 that are not subject to a direction by the Secretary of State carry significant weight. Paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.

GG1 Building strong and inclusive communities

GG2 Making the best use of land

GG4 Delivering the homes Londoners need

GG5 Growing a good economy

GG6 Increasing efficiency and resilience

SD4 The Central Activities Zone (CAZ)

SD5 Offices, other strategic functions and residential development in the CAZ

SD6 Town centres and high streets

SD7 Town centres: development principles and Development Plan Documents

SD10 Strategic and local regeneration

D1 London's form, character and capacity for growth

D2 Infrastructure requirements for sustainable densities

D3 Optimising site capacity through the design-led approach

D4 Delivering good design

D5 Inclusive design

D6 Housing quality and standards

D7 Accessible housing

D8 Public realm

D9 Tall buildings

D11 Safety, security and resilience to emergency  
D12 Fire safety  
D13 Agent of Change  
D14 Noise  
H1 Increasing housing supply  
H4 Delivering affordable housing  
H5 Threshold approach to applications  
H6 Affordable housing tenure  
H7 Monitoring of affordable housing  
H8 Loss of existing housing and estate redevelopment  
H9 Ensuring the best use of stock  
H10 Housing size mix  
H11 Build to Rent  
H12 Supported and specialised accommodation  
S1 Developing London's social infrastructure  
S2 Health and social care facilities  
S3 Education and childcare facilities  
E1 Offices

#### New Southwark Plan

42. For the last 5 years the council has been preparing the New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy.
43. The council concluded consultation on the Proposed Submission version (Regulation 19) on 27 February 2018. The New Southwark Plan Proposed Submission Version: Amended Policies January 2019 consultation closed in May 2019. These documents and the New Southwark Plan Submission Version (Proposed Modifications for Examination) were submitted to the Secretary of State in January 2020 for Local Plan Examination.
44. In April 2020 the Planning Inspectorate provided their initial comments to the New Southwark Plan Submission Version. It was recommended that a further round of consultation takes place in order to support the soundness of the Plan. Consultation on the Proposed Changes to the Submitted New Southwark Plan and additional evidence base documents started in August until 2 November 2020.
45. The Examination in Public (EiP) is expected to take place in early 2021 and the amendments within the Proposed Changes to the Submitted New Southwark Plan will be considered along with the consultation responses received at each stage of public consultation. It is anticipated that the plan will be adopted later in 2021 following the EiP.
46. As the NSP is not yet adopted policy, it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give

weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.

- 47. Policy SP1a - Southwark's Development Targets
- Policy SP1b - Southwark's Places
- Policy SP1 - Quality affordable homes
- Policy SP2 – Regeneration that works for all
- Policy SP3 – Best start in life
- Policy SP4 – Strong local economy
- Policy SP5 – Healthy active lives
- Policy SP6 – Cleaner, greener, safer
- Policy P1 - Social rented and intermediate housing
- Policy P2 - New family homes
- Policy P3 - Protection of existing homes
- Policy P7 - Wheelchair accessible and adaptable housing
- Policy P12 - Design of places
- Policy P13 – Design quality
- Policy P14 - Residential design
- Policy P15 – Designing out crime
- Policy P16 – Tall buildings
- Policy P17 – Efficient use of land
- Policy P21- Borough views
- Policy P22 - Archaeology
- Policy P24- River Thames
- Policy P25 - Local list
- Policy P29 – Office and business development
- Policy P34 – Town and local centres.
- Policy P44 – Healthy developments
- Policy P45 - Leisure, arts and culture
- Policy P46 - Community uses
- Policy P49 – Highways impacts
- Policy P50 – Walking
- Policy P52 - Cycling
- Policy P53 – Car parking
- Policy P54 – Parking standards for disabled people and the mobility impaired
- Policy P55 – Protection of amenity
- Policy P59 - Biodiversity
- Policy P60 - Trees
- Policy P61 - Reducing waste
- Policy P63 - Contaminated land and hazardous substances
- Policy P64 - Improving air quality
- Policy P65 - Reducing noise pollution and enhancing soundscapes
- Policy P66 - Reducing water use
- Policy P67 - Reducing flood risk
- Policy P68 - Sustainability standards
- Policy P69 - Energy

### **Consultation responses from external consultees**

48. Summarised below are the consultation responses raised by external consultees including (Environment Agency (EA), Greater London Authority (GLA), Metropolitan Police, Historic England, Thames Water).
49. A revised Flood risk assessment was provided to address the EA's initial objection. The GLA provided supporting comments however raised concern that the energy strategy does not comply within London Plan. These were addressed by the applicant during the course of the scheme.

### **Consultation responses from internal consultees**

50. Summarised below are the consultation responses raised by internal consultees including (Design and Conservation, Transport Policy, Archaeology, Ecology, Highways Development, Urban Forester, Flood Risk Management Agency).
51. All consultees recommend grant of planning permission subject to the conditions, which have been included in the decision notice.

### **Consultation response from neighbours and representees**

52. In response to public consultation, a total of 11 responses have been received. Of these, 7 were in objection and 4 were general comments in respect of the application. Summarised below are the objections raised by members of the public with an officer response addressed in relevant sections in the report:
  - The development would result in a harmful loss of daylight and sunlight to nearby residents
  - Loss of privacy / view and overlooking from the proposal.
  - Loss of skyline and long and mid-distance views blocked by the proposed scheme
  - Construction impacts on neighboring residents
  - Adverse traffic impacts
  - Dislike architecture
  - Leaseholders no option to buy new flats
  - Existing Styles House block does not get enough benefits
  - Inaccessible wheelchair units
  - More trees should be planted
  - Poor layout
  - Noise impact

### **Principle of in terms of land use**

#### Introduction

53. The Styles House estate currently has eight studio flats in the 'Chalets' and 48

1-bed dwellings. The proposed scheme would retain 47 of the 1-bed dwellings in the existing Styles House and result in the removal of one the 1-bed unit and 8 studios to deliver 25 new homes comprising 22 1-beds, three of which would be wheelchair accessible, and three 2-beds. This is a net uplift of 16 new homes in a strategically important part of the borough identified for its new housing.

### Community Use

54. The proposals would introduce 146 sqm (GIA) of flexible community (D1/D2 uses) space within a new TMO Hall. This will replace the existing, sub-standard TMO Hall with a new, larger and improved facility, while also extending access to the facilities so that they are accessible for all members of the community. An uplift in accessible community floorspace is appropriate on this site, in accordance with emerging New Southwark Plan Policy P46 and existing Saved Policy 2.2 which support the provision of new Community facilities in Southwark.

### Housing

55. The proposed development comprises 25 residential units (C3 use class) in place of 9 existing dwellings, thereby resulting in the net addition of 16 homes within the existing Styles House Estate all to be affordable housing tenure. The benefits of this regeneration scheme will also facilitate the TfL Southwark OSD development, which will deliver a significant quantum of the office floorspace with the CAZ.
56. The principle of residential development on the site is appropriate and in keeping with the nature of the surrounding area and the proposed development will allow for the delivery of additional homes, on a sustainable site on underutilised public sector land within the CAZ. This is in accordance with the NPPF, London Plan and Local Plan.

### Loss of office floorspace

57. The application includes the demolition of the existing Platform Southwark building, which comprises of 912.4 GIA sq. of designated B1 office use. The Platform Southwark building is currently in use as a temporary performance arts centre, although the planning use for the site remains as B1 use class (office). The land swap boundary agreed in principle at the April 30<sup>th</sup> 2019 Cabinet Meeting runs through the centre of the Platform Southwark building and the demolition of the building is therefore required to facilitate both the Styles House development and the Southwark OSD.
58. Saved Policy 1.4 and emerging Policy P29 state that office floorspace in CAZ and Opportunity Areas will be protected and the net loss of office floorspace will be resisted except in the circumstances set out in the policy. The office floorspace lost through the demolition of the Platform Southwark building will be re-provided on the adjacent Southwark OSD as part of the land swap

agreement between Southwark and TfL agreed in the 30<sup>th</sup> April 2019 cabinet report. Therefore, there will be no net loss but an increase in a significant quantum of high-quality office floorspace, contingent on this application (ref: 20/AP/1189) gaining planning permission and being carried out.

59. The loss of the office floorspace is therefore acceptable, given the Southwark OSD, which is currently in planning under a separate application (ref: 20/AP/1189) receives planning permission. In order to comply with Saved Policy 1.4 and emerging Policy P29 permission, a grant of permission on this scheme is secured contingent on a grant of planning permission to the Southwark OSD office development within the S106.
60. The determination of this application will not prejudice the Council's determination of the parallel application for the OSD when it comes forward to be seen at planning committee separately. The delivery of replacement B class space will be secured through the S106 agreement on the Southwark OSD site which implies that this permission could not be implemented if the OSD is refused or not implemented. Therefore, grant of permission on this site is subject to an approval on the Southwark OSD, however their planning merits will be assessed and considered separately across these two applications.

#### Conclusion on Land Use

61. The proposal provides a net addition of residential use class (C3) and community (D1/D2) uses. The provision of additional housing is supported at national, regional and local levels and would represent a positive contribution towards housing need within the borough. It is noted that there would be a reduction in office floorspace, which would be re-provided as part of the interrelated Southwark OSD (ref: 20/AP/1189) as part of the terms of the agreed land swap (April 30<sup>th</sup> 2019 cabinet report). It is worth noting that this proposed scheme will not be implemented without the approval of the interrelated Southwark OSD, as outlined in the terms of the agreed land swap with TFL, secured in the S106. Thereby mitigating the risk of net reduction of office floorspace in this location as part of the approval of this scheme, which would be contrary to policy designations.
62. The Styles House development will deliver a net increase in 16 residential homes on an underutilised, publicly owned site in an area of excellent public transport connectivity. The development will also facilitate the delivery of a significant quantum of commercial floorspace on the adjacent TfL owned Southwark station, further optimising the development potential of underutilised, publicly owned sites in accordance with London Plan Policy GG2.
63. The proposed development, in combination with the Southwark OSD, would provide a mix of uses that are considered to be appropriate for the site's location within the CAZ, Opportunity Area, Strategic Cultural Area and district town centre. The community and cultural uses, which would support the cultural

and visitor functions of the area, it would provide a number of new homes, which is a priority of the current Government as well as local and London-wide planning policies.

### **Environmental Impact Assessment**

64. The proposal is below the threshold for an EIA to be required.

### **Dwelling mix, affordable housing and density**

65. Saved Policy 4.3 of the Southwark Plan requires a mix of dwellings sizes and types to be provided within major new developments in order to cater for a range of housing needs. There is a particular need for family units in the borough and therefore policy requires that the majority of units should have two or more bedrooms and at least 20% three or more bedrooms with direct access to private outdoor amenity space. At least 10% of the units should be suitable for wheelchair users.
66. Strategic Policy 7 of the Core Strategy increases the proportion of two bed plus accommodation to be provided and expects 60% of developments to have more than two bedrooms, and in this area at least 20% 3, 4, or 5 bedrooms and a maximum of 5% as studios.

### Housing needs assessment

67. A housing needs assessment was undertaken by the TMO by surveying the current residents of the chalets units (49-56 Styles House) and the existing tower (1-48 Styles House). While there is a total of 42 leaseholders or tenants at the time of the survey, 38 (90%) completed the housing needs survey. Findings from the survey identified existing dwelling mix needs as comprising of 27x 1-bed units, where 6x units are wheelchair accessible, 5x 2bed units, where 2x 2-bed units are wheelchair accessible, 1x 3-bed and 1x 4-bed unit.
68. The housing needs assessment shows that the need for family housing at the Styles House development in particular is limited. The intention of this development is to place existing residents into the new housing delivered on the site, therefore the housing needs assessment has particular weight in identifying local need in order to gain additional planning benefits of the overall regeneration of Styles House/Southwark OSD.

### Housing needs assessment undertaken of 90% of existing residents

Unit Type	Housing needs assessment	Proposed new building
Studio	0	0

1 Bed	21 (62%)	19 (76%)
2 Bed	3 (9%)	3 (12%)
1 bed Wheelchair accessible (1-bed)	6 (18 %)	3 (12%)
2 bed wheelchair accessible	2(6%)	0
3 Bed	1 (3%)	0
4 Bed	1 (3%)	0
Total	34 (100%)	25 (100%)

69. This table demonstrates how dwelling mix proposed as part of this scheme has been determined based on the highest quality knowledge of local need.
70. Furthermore 24% of respondents identified as requiring wheelchair accessible dwellings which is higher than the 10% required by adopted policy. It should be noted that 12% fully adaptable wheelchair housing has been provided within the proposed dwelling mix and the constraints of the site. The housing needs assessment note that the required wheelchair adaptations vary and that none of the respondents require a fully adapted home at the time of the survey. Where the needs have not been met in the proposed development, they have been considered more urgent case for relocation prior to completion of any future grant of planning permission and will be moved permanently to a suitable sized home independent of grant of this planning permission.
71. A secondary survey was undertaken via the council's homesearch database within a wider radius of the Styles House development showing that 77% surveyed within a 250m radius wanted a 1 or 2 bed, and 65% wanted a 1 or 2bed within a 500m radius. These figures identify a priority for additional 1-bed units to be achieved on site, which has been met with the proposed 76% 1-beds in the proposed dwelling mix.

Council's homesearch database:

Unit Type	250m radius of Styles House	% surveyed	500m radius of Styles House	% surveyed
1 Bed	9	41	24	41
2 Bed	8	36	14	24
3 bed	3	14	11	19
4 bed	2	9	6	10
5 bed	0	0	3	5
Total	22	100	58	100

72. In the immediate area, the council's homesearch database indicates that there is a high demand for 1 and 2 bed room properties with 77% of residents living in council estates within 250m of the development seeking to move to another 1 or 2 bedroom flat. There is scope for these residents and others on the homesearch database to move to the existing Styles House tower once the new block has been completed.

### Conclusions on Housing Needs Assessment

73. The existing Styles House estate is entirely 1 beds and studio units (56 x 1 bed or studio, chalet units) which has created a unique community based on the small size of all of the units, the tight geography of the estate, and the creation of a TMO with devolved powers. The land swap to facilitate the two developments requires estate regeneration with the demolition of the chalet block.
74. Given the sensitivities of the demolition to facilitate the wider scheme and create an efficient use of land, a resident led approach to designing the new council homes was agreed, with a community project board appointing development manager, design team, agreeing a design brief which included tenant mix, consulting on a scheme and achieving a 90% yes ballot.
75. A local housing needs assessment was carried out within the estate and a strategy to move residents to facilitate the scheme is directly linked to the proposed tenant mix. The new building thus reflects the character of the existing estate, and is an extension of the existing product.

### Dwelling Mix

76. The development provides a net gain of 16 units, and while the housing mix is not policy compliant, the reasoning for which has been outlined above for meeting urgent local need, the increase in 2-bed and wheelchair units is supported and will be an overall improvement of dwelling mix from the existing condition, whilst allowing appropriate housing to be delivered for those who will be decanted as part of the demolition and re-build.

### Residential mix:

Unit Type	Existing estate (Styles House and Chalets)	Existing homes to be retained	Proposed new building	Net gain / Net loss
Studio	8	0	0	-8
1 Bed	48	47	19	18
2 Bed	0	0	3	3
Part M4(3)	0	0	3	3

(1-bed)				
Total	56	47	25	16

77. The proposed mix of flats complies with current policy in having no more than 5% studios eliminating all studio units from the existing scheme. However, the number of flats with 3 or more bedrooms is not compliant with the 20% expected under policy 6 of the Core Strategy. Given the history of the site where the existing condition provides 1-bed 2 person (85.7%) units and studio units (14.3%), the proposed dwelling mix does provide uplift in 2-bed 3 person units (4.2%).
78. The majority of the 1-bed units are to be retained (97.9%), and the loss of the existing Styles House building includes one 1-bed unit. Separately, 8 studio chalets are also demolished as part of the proposal. The studio chalets will be re-provided in the form of 1-bedroom units, thereby improving provision of habitable rooms. Of the 16 net additional homes provided 13 will be one-bedroom homes (81% by unit, 74% by habitable rooms) where three of these are part M4(3) Wheelchair accessible dwellings, and three will be two-bedroom homes (19% by unit, 26% by habitable rooms).
79. The scheme proposes to provide 3 adaptable wheelchair units, which would be over 10% of the total, in accordance with saved policy 4.3 of the Southwark Plan.

#### Conclusions on dwelling mix

80. It is acknowledged that the housing mix for the site deviates from the requirements of Core Strategy Strategic Policy 7 and emerging Local Plan Policy P2, which require at least 60% of new homes to be at least two bedrooms or more, and 20% of new homes to be three bedrooms or more. However, the delivery of additional one and two-bedroom homes in this highly sustainable, CAZ location is considered to be appropriate and is in accordance with Draft New London Plan Policy H10, which notes that a higher proportion of one- and two-bedroom homes on sites is appropriate in locations which are closer to a town centre or station, or with high public transport access and connectivity.
81. LBS also acknowledges that urban and suburban areas are more appropriate for providing family homes (three or more bedrooms) than CAZ sites in the preamble of Draft Policy P2, which notes that these areas (urban and suburban locations) provide greater opportunities to accommodate family homes as they are better able to accommodate adequate amenity space. The delivery of adequate private amenity space on this site is particularly challenging as the site is located within Flood Zone 3 and as such residential development on the ground floor is not possible.

## Tenure Mix

82. The final tenure of the new homes will deliver the maximum possible level of affordable and social rented accommodation across the estate, with a minimum net addition of 16 affordable homes to be delivered through the development (100% net additional affordable housing). As part of the land swap agreement made with TfL, four private, one-bedroom, rented units within the estate (which are currently within TfL ownership) will be transferred to Southwark Council and the Styles House TMO. These units will be refurbished and re-let as social rented homes. This will result in a total increase of 20 affordable homes within the estate.
83. As part of the land swap agreement, some existing Styles House residents, including those who have bought their properties under Right to Buy, will be given the opportunity to move to the new residential building. The final location of the affordable homes will therefore be agreed following discussions between the council and the Styles House TMO; the new affordable units may replace existing private units within the existing Styles House.
84. The proposed scheme will deliver 25 new homes, which will result in a net addition of 16 affordable homes across the estate (over a 100% net additional of affordable housing). These affordable homes will be secured within the S106 to be identified and maintained as affordable housing in perpetuity, within either the new or existing Styles House.

## Density

85. Policy 3.4 Optimising Housing Potential of the London Plan states that development should optimise housing output for different types of location within the relevant density range shown in Table 3.2 of the Plan. It also requires local context, the design principles and public transport capacity to be taken into account. Strategic Policy 5 – Providing new homes of the Core Strategy sets out the density ranges that residential and mixed use developments would be expected to meet. As the site is located within the Central Activities Zone, a density range of 650 to 1100 habitable rooms per hectare would be sought. In order for a higher density to be acceptable, the development would need to meet the criteria for exceptional design as set out in section 2.2 of the Residential Design Standards SPD.
86. The proposed development will result in an increase in density on the site from 374 hr/ha to 528 hr/ha. The proposed development will therefore significantly increase the density of development on an underutilised, publicly owned brownfield site in the CAZ, maximising the efficient use of land in accordance with Draft Local Plan Policy P17.
87. While it is acknowledged that the proposed density falls below the target density for residential developments in this location, the proposals have been

developed undertaking a design-led approach to determining optimum development capacity for the site, in accordance with Draft London Plan Policy GG2. The design-led approach to development has been set out in detail in the Design and Access Statement. The quantum and density of the development in this location represents a positive and responsive townscape solution which responds to the sites context and characteristics, in accordance with emerging local and regional planning policy.

### Quality of Residential Accommodation

88. Saved Policy 4.2 of the Southwark Plan advises that planning permission will be granted provided the proposal achieves good quality living conditions. The adopted standards in relation to internal layout are set out in the adopted Residential Design Standards SPD 2011 (including 2015 Technical Update).
89. The following table sets out the minimum flat size requirements as set out in the Residential Design Standards 2011, and also the flat sizes that would be achieved:

Unit Type	SPD (sqm)	Size Range achieved (sqm)
1 Bed (flat)	50	54.5 – 73.25
2 Bed (flat)	61-66	76.55

90. All of the proposed dwellings comfortably meet or exceed the minimum standards and all of the units would be dual or triple aspects. All units benefit from storage space and naturally lit and ventilated kitchens. As a high density development the standard of accommodation would need to meet the exemplary criteria as set out below:

Exemplary residential design criteria from Southwark Residential Design Standards SPD	Commentary
Provide for bulk storage	Each flat type has a compliant quantum of private storage. The ground floor provides 23.69sqm of bulk storage.
Exceed minimum privacy distances	The minimum separation distances set out in the SPD have been met.
Good sunlight and daylight standards	The daylight and sunlight assessment demonstrates that a good standard of daylight and sunlight would be achieved across the development.
Exceed minimum ceiling heights of	All units would exceed this standard.

2.3m	
Exceed amenity space standards (both private and communal)	The proposed amenity space is set out in detail further below. Whilst there would be a small shortfall on some private amenity spaces, this is compensated by the large areas of communal amenity space that would be provided that significantly exceed the SPD requirements.
Secure by Design certification	The scheme should achieve Secure by Design accreditation. Conditions to require this are recommended.
No more than 5% studio flats	This standard has been met and no studio units have been proposed as part of this development.
Maximise the potential of the site	The potential of the site would be maximised, providing a residential tower block for affordable homes, high quality public realm and landscaping and a new community hall.
Include a minimum 10% of units that are suitable for wheelchair users	This standard has been exceeded.
Have excellent accessibility within buildings	Accessibility within the buildings is considered to meet this criteria.
Have exceptional environmental performance	The environmental performance would be fully policy compliant, taking into account a contribution to the Southwark Carbon offset Fund.
Minimise noise nuisance between flats by stacking floors so that bedrooms are above bedrooms, lounges above lounges	Accommodation is generally stacked to minimise disturbance and noise transfer will be further mitigated by condition.
Make a positive contribution to local context, character and communities	The proposed development would make a positive contribution to local context, character and communities in terms of its quality of design and regeneration benefits including affordable housing, and Class D1 space for community use as well as improving connectivity with generous and high quality public spaces.
Include a predominance of dual aspect units	All units would be dual aspect, some triple aspect, and there would be no north facing single aspect units.
Have natural light and ventilation in all kitchens and bathrooms	The vast majority of kitchens would have access to natural light and

	ventilation.
At least 60% of units contain two or more bedrooms	This standard has not been met, the reason for this has been described in a separate section.
Significantly exceed the minimum floor space standards	All units would meet the space standards, and many would exceed them, some to a significant degree.
Minimise corridor lengths by having additional cores	This has been achieved where the relatively slender building provides two flats per floor.

91. The proposed development provides accommodation that is considered to be of an exemplary standard overall. This issue has been overcome by the needs of the community and an overall improvement in dwelling mix. The relatively large apartments suggests that the quality of residential accommodation and exception design is sufficient to support the high level of density on the site.

#### Internal daylight

92. Drawings P2311/I/09-12 within the Daylight/Sunlight statements show the internal arrangements of the proposed scheme, together with the ADF values for each habitable space.
93. Of the 28 rooms tested within the proposed development, 71.4% meet or exceed the required minimum Average Daylight Factor for the room type. Of the rooms assessed, all 8 that have been identified as open plan kitchen, living, dining, and spaces attained an ADF of more than the 1.5% target, and all 19 rooms identified as a bedroom space attained an ADF of more than the 1%, satisfying the target ADF and meeting the BRE criteria. Only one room identified as a kitchen attained just marginally under the recommended target of 2%
94. Overall, using the 2% kitchen target for open plan LKDs, the compliance rate would be 84%. This increases to 100% when adopting the living room target of 1.5% for LKDs. Given the principal use of these spaces are as living rooms, this should be considered acceptable, and is a very good compliance rate.

#### Private and Communal amenity space

95. All new residential development must provide an adequate amount of useable outdoor amenity space. The Residential Design Standards SPD sets out the required amenity space standards which can take the form of private gardens and balconies, shared terraces and roof gardens. The London Plan requires new developments to make provision for play areas based on the expected child population of the development.
96. In terms of the overall amount of amenity space required, the following would need to be provided:

- For units containing 3 or more bedrooms, 10sqm of private amenity space as required by the SPD;
- For units containing 2 bedrooms or less, ideally 10sqm of private amenity space, with the balance added to the communal gardens;
- 50sqm communal amenity space per block as required by the SPD; and
- 10sqm of children’s play space for every child space in the development as required by the London Plan

97. All of the proposed units have at least 5sqm of private amenity space and shared communal amenity space is in excess of 50sqm. Where the full recommended provision of 10sqm per residential unit has not been provided, the shortfall has been added to the communal requirement. In this case, a total of 73.48sqm communal space would need to be found. The proposed development would provide a total of 1,427sqm of communal amenity space which would comfortably exceed the policy requirement taking into account the communal amenity space requirement and the shortfall on private amenity space requirement.

Amenity areas:

Unit Type	Existing (sqm)	Proposed (sqm)	Net gain / Net loss (sqm)
Allotment area	245	85	-160
Communal amenity area (ground floor)	1038	1427	389
Playspace	0	43	43
Total	1283	1555	272

Children’s play space

98. Southwark’s Residential Design Standards identifies that children’s play areas should be provided in all new flat development containing the potential for 10 or more child bed spaces. Based on the GLA child yield calculator expects 7.1 children thereby not meeting the minimum threshold for a playspace contribution. The proposal does provide a playspace of 43sqm, which is supported and above policy requirements. It is recommended that the landscaping condition also requests details identifying the location and layout and children’s play.

**Design, layout and impact on townscape views and heritage assets**

99. The development proposals include two new rectangular buildings designed in a

modern contemporary style. The new residential building would be classed as a tall building by virtue of being in excess of 30 metres in height. The buildings would be positioned around a new public realm and landscaping improvements. The new public realm provided by the development would be generous, well planted and varied in design and character. The existing pedestrian and vehicle access from Hatfield's will be retained, and a new pedestrian access route would be available from the Cut to improve activity along this important frontage while also improving natural surveillance on the site. Height would be well distributed across the site and in sympathy with the general context. The new TMO Hall and community space has been carefully sited along the Cut frontage to improve active frontage in line with the town centre policy designations.

100. In terms of the locational requirements for tall buildings the site is situated within a highly accessible location, a CAZ and a town centre. Because the TfL OSD and Styles House schemes are interdependent, the design impacts of a proposed new tall building are assessed on the basis that the two developments will be experienced in conjunction with one another. It should also be noted that this application could not be built out unless the OSD is carried out, however the determination of this application does not prejudice the planning committee's consideration and assessment of the OSD application. It is necessary to test the current application against all the requirements of saved policy 3.20 of the Southwark Plan, which requires that all tall buildings should:

- 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 standards; and
- iv. Relate well to its surroundings, particularly at street level
- v. Contribute positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.

i. Make a positive contribution to the landscape; and

101. Landscape and the public realm is an important part of any proposal for tall buildings. The public realm not only creates a setting for the towers, allowing them to 'land' appropriately but also offers an opportunity for such a development to demonstrate the benefits that can flow from reaching vertically to free up more space at grade in a congested part of the city such as this.

102. This part of Southwark is characterised by busy arterial routes, surrounding Southwark Underground Station and extending roughly between Waterloo Station to the west and north and east by railway lines, which creates a degree of physical separation between the area and the wider surroundings. The southern boundary is contiguous with development south of The Cut/ Union Street.

103. The landscape proposals have been developed to reflect the significance of this site. In developing the public realm the designers have addressed the following

points:

- The proposed layout offers a winding route through the estate with material changes and intimate spaces from small areas for sitting or larger areas for BBQs or group events;
- A functioning sheltered space to hold small gatherings and also provide an external space for the community facility between the new Styles House block and the new TMO hall;
- Fenced dog walking area;
- Tree planting;
- Biodiverse roofs;
- Re-provision and improvement to the existing residents' allotment.

ii. Be located at a point of landmark significance; and

104. The emerging New Southwark Plan identifies the area as a key development opportunity site along Blackfriars Road. The corner of Blackfriars Road and The Cut have potential for active frontages, whilst Joan Street should be developed to improve connectivity for pedestrians and cyclists. The site is also next to Southwark Underground Station, a point of landmark significance, and will serve as an important wayfinding point alongside the TfL OSD.

105. Also of relevance is that there is a tall building on the site which will be retained. Within this context the layout makes sense, the new apartment building is to be placed at right angles to Styles House and adjacent to what will be the large over-station development on Blackfriars Road, thus leaving the quieter side of the site available for community gardens. A landscaped garden will provide some space between the development and the over-station development. A small separate TMO meeting hall is to be placed on the most active boundary at The Cut so that it is visible and accessible as a public building.

106. The height of the proposed apartment block will be somewhat taller than the existing Styles House. Whilst quite tall in the existing context, it will step down from the proposed over-station development (ref: 20/AP/1189) and thus acceptable in its context. The constrained site layout is such that the building will have a small footprint of only two flats per floor, thus creating an elongated building of unusual proportions. However, in design terms this is not a disadvantage. It might form a welcome foil to what is proposed as a more bulky over-station development.



**Image: Proposed north elevation including Southwark OSD**

iii. Be of the highest architectural standards; and

107. Buildings of this stature have to demonstrate their contribution to the appearance of the wider area. The highest architectural standard is called for and requires an elegance of proportion, innovation in design and a demonstrable exceptional quality of accommodation.
108. The architectural style of the proposed tall building takes the form of a slab block with a slightly complex castellated top to provide some interest to its silhouette. The corner balconies provide some modelling and elude to the balconies of the existing Styles House.
109. The main facing material will be ribbed terracotta cladding. This will add a robust and distinctive character to the building. The ribs vary in spacing and texture according to their location on the facades, with finer ribs spanning vertically between window on different floors to add a vertically to this part of the façade. Given the rather squat proportion of the windows (a product of energy constraints) this variation is welcome. Full size sample panels at least a storey high and illustrating all cladding and windows and their junctions is required by condition to explore this matter further.
110. As indicated on the drawings and in the Design and Access Statement, the main mass of the apartment block will have cladding in a pink colour with green tops and base. This is acceptable although the exact colour will have to be

chosen with care so that it relates to the red brick of the existing Styles House and potentially to the chosen material of the over-station development. The aim should be to provide a building that mediates between its neighbouring buildings of Styles House and the OSD rather than one which seeks to stamp an assertive third character on this small area.

111. The TMO building will be consciously small compared to what will be its surrounding context. It is important that its public function is obvious. To this extent its architecture, essentially a miniature version of the larger apartment block, is assertive enough to hold its own as a focal point pavilion building.

112. In conclusion, the proposed development is of an exceptional quality of architectural design. The main residential tower complements its urban setting, is unique and distinctive in its design and has a well-designed base middle and top. The group of buildings consolidate the emerging cluster in line with the higher heights reached at the Southwark OSD development (ref: 20/AP/1189).



**Image: Proposed view from the new entrance of the existing Styles House.**

iv. Relate well to its surroundings, particularly at street level

113. In terms of its contribution to the streetscene every building should seek to activate all its edges. This is a highly accessible site with the Cut from the south, Hatfields from the west and Southwark Station to the east. As such the architects have considered this site as having a pedestrian crossings, active frontage towards the Cut with the TMO hall location and. The proposal achieves this aspect of the policy through a combination of high quality public realm, a mix of active uses at ground floor and by capitalising on and revealing existing features.



**Image: Proposed views from The Cut**

v. Contributes positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views

114. The scheme has been tested in the local and wider views as well as the strategic views as set out in the London View Management Framework (2012). These accurate visual representations which comply with the requirements of the LVMF demonstrate the contribution of this proposal to the London skyline.

The slender character of the tower, the gaps between the separate buildings as well as the stepped arrangement of the distinctive forms consolidates the emerging cluster.

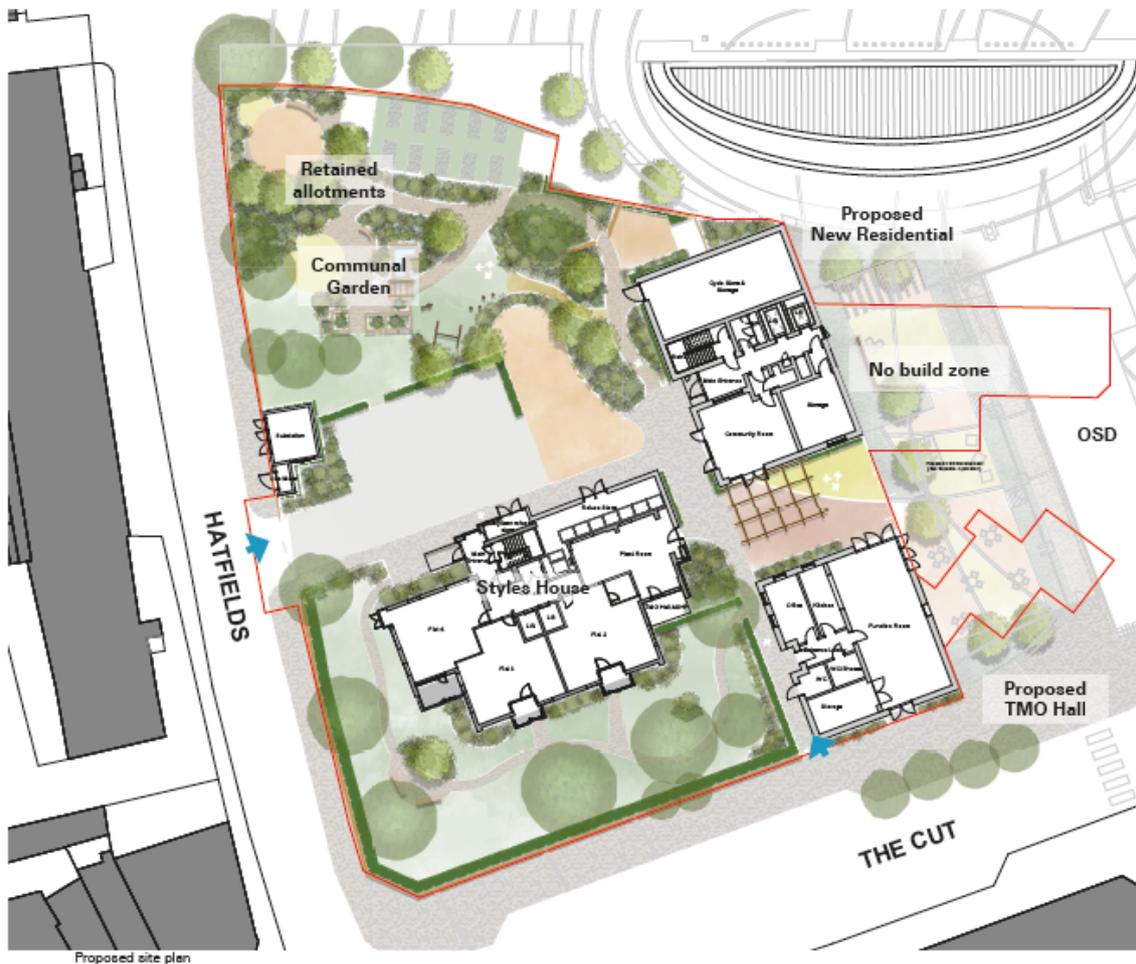
115. Views of these buildings to and from the site are obscured by the modern commercial developments along the southern boundary of The Cut, outlined in the submitted Townscape Visual Impact Assessment (TVIA). High resolution images including Accurate Visual Representations (AVRs) of selected views demonstrate that the tall building in the proposal will not impact on any strategic views or heritage assets.
116. The views considered include:
- View 1: Blackfriars Road (eastern pavement at the junction with Union Street)
  - View 2: The Cut (the southern pavement outside of Byron Burger)
  - View 3 - The Cut (the southern pavement outside of the Old Vic)
  - View 4 - Hatfields (western pavement underneath the railway bridge)

#### Heritage assets

117. The site is not located in, or adjacent to a Conservation Area, or in the close proximity of any listed buildings. The Anchor and Hope free house, located at the junction of Hatfields and The Cut is identified on Lambeth's Local List as a locally listed heritage asset. The Grade II listed 74, 75-78, 81, 82 and 83 Blackfriars Road, and associated railings are located along Blackfriars Road approximately 100m to the south east of the site. Views of these buildings to and from the site are obscured by the modern commercial developments along the southern boundary of The Cut. The proposal wouldn't harm these heritage assets or their settings and preserve them.

#### Landscaping and Trees

118. Ecological measures are proposed within the site, including the planting of climbers, biodiverse roofs and a comprehensive soft landscaping scheme. In accordance with Draft London Plan G5 the site proposals exceed the Mayor's target score of 0.4 for urban greening with a score of 0.409 incorporated through the proposals of green roof and green walls, water features and permeable paving.
119. In relation to tree protection, an Arboricultural Method Statement has been prepared which details the fencing to be used, restrictions within root protection areas and monitoring of the development. To inform the Arboricultural Method Statement an Arboricultural Survey of the site was undertaken. One category B tree and nine Category C trees are required to be removed as a result of the proposal. Ten new trees will be planted as part of the soft landscaping strategy for the site. This is controlled though a condition that is recommended.



**Image: Proposed landscaping layouts.**

### Conclusion on Design Issues

120. The building, in terms of its location, its architectural design, and its response to the local streetscape, is considered to meet the requirements for a tall building set out in Saved Policy 3.20. Given its setting within a group of existing and planned very tall buildings, its height would have no impact on the London skyline. Whilst the contribution to the public realm has not been specified, it will be secured through a S106 and conditions and the scheme does contribute new active frontages and access via the new pedestrian pathway. Overall, the building is considered to make a positive contribution to the character of the surrounding area.

### **Impact of proposed development on amenity of adjoining occupiers and surrounding area**

#### Daylight, sunlight and overshadowing

#### Daylight

121. The impact of the proposed development on neighbours' amenity has been a significant concern of local residents. A full daylight and sunlight assessment has been submitted with the application. The report assesses the scheme based on the Building Research Establishment (BRE) guidelines on daylight and sunlight. The conclusions of this state that the reductions in daylight and retained daylight levels are commensurate with this urban locality. Officers have reviewed the daylight and sunlight assessment and note that while there are some impacts on the buildings surrounding the site, these are not unusual within built up town centre locations where buildings of scale are considered to be appropriate.

122. The Daylight and Sunlight assessment considers the impact on daylight for the following buildings:

VSC Calculations

Residential Buildings Assessed	Windows Tested	Non-BRE Compliant (VSC)	Compliant
1-48 Styles House, Hatfields	115	24 (20.9%)	91 (79.1%)
1-36 Benson House, Hatfields	64	0	64
36 The Cut	10	0	10
3-11 The Cut	15	0	15
1 The Cut	10	0	10
72 Blackfriars Road	6	0	6
Rowland Hill House, Nelson Square	11	0	11
<b>Total</b>	<b>231 (100%)</b>	<b>24 (10.8%)</b>	<b>207 (89.6%)</b>

Vertical Sky Component

123. VSC transgressions are entirely based within 1-48 Styles House, Hatfields, which is a property that is part of the site but is being retained as part of the redevelopment.

124. Transgressions are limited to a column of flank wall windows that will experience noticeable proportional VSC reductions with a ratio of up to 0.53 their present levels (47% loss) and will retain VSC values of between 14% and 18%. However, windows with these transgressions serve triple aspect

living/kitchen/dining rooms (LKDs), and in each case the principal south facing window and a second flank wall window will not be materially impacted by the proposed development.

125. A fourth north facing window on each level will experience proportional VSCs with a ratio of up to 0.74 their present levels (26% loss) but will retain reasonable VSC values of between 22% and 26% at first to fifth floor. At sixth floor and above, these windows will retain VSC values in excess of 27% and are therefore compliant with the BRE guidelines.
126. Windows with VSC transgressions, comply in overall NSL levels. That means they share a room with another window meaning that while the impact on a window might be significant, the impact on the room would not give rise to unacceptable living conditions.
127. Overall 10.8% of windows VSC will suffer from non-compliant BRE levels as a result of the proposed development. These are entirely within 1-48 Styles House.

#### No Sky Line Calculations

Residential Buildings Assessed	Rooms Tested	Non-BRE Compliant (NSL)	Compliant
1-48 Styles House, Hatfields	42	0	42
1-36 Benson House, Hatfields	64	0	64
36 The Cut	9	0	9
3-11 The Cut	14	0	14
1 The Cut	8	0	8
72 Blackfriars Road	6	0	6
Rowland Hill House, Nelson Square	4	0	4
<b>Total</b>	147 (100%)	0	147 (100%)

128. There are no transgressions to NSL in regards to any of the neighbouring buildings, therefore there will not be a noticeable impact to daylighting in these rooms.

## Sunlight

### APSH Calculations

Residential Buildings Assessed	Rooms Tested	Non-BRE Compliant (NSL)	Compliant
1-48 Styles House, Hatfields	42	0	42
1-36 Benson House, Hatfields	0	0	0
36 The Cut	5	0	5
3-11 The Cut	0	0	0
1 The Cut	2	0	2
72 Blackfriars Road	0	0	0
Rowland Hill House, Nelson Square	0	0	0
<b>Total</b>	49 (100%)	0	49 (100%)

129. There are no transgressions to APSH in regards to any of the neighbouring buildings, therefore there will not be a noticeable impact to sun lighting in these rooms.

### Conclusion on daylight and sunlight

130. The site is in a dense central London area, identified as an Opportunity Area where substantial change is anticipated. The neighbouring daylight and sunlight assessments demonstrate an 89.6% compliance with the vertical sky component, and a 100% compliance with the no sky line test, and a 100% compliance in terms of APSH levels.

### Overshadowing Assessment

131. Drawing P2311/S/01 shows that the garden amenity spaces will receive good levels of sunlight with around 90% of each garden receiving over 2 hours of sunlight on 21st March. There is one shared balcony on the eleventh floor of the proposed scheme which could be regarded as amenity space, and, due to its enclosed nature, will achieve 2 hours of sunlight on 21st March over 9% of its area. However, since the residents will have access to excellent levels of sunlight in the three garden amenity areas, this should be acceptable.

132. There are no neighbouring amenity areas in close proximity to the proposed scheme. Therefore, there will not be any noticeable overshadowing to neighbouring amenity areas.

### **Overlooking and privacy of neighbouring properties**

133. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear. These distances are all met in terms of the impact of the proposal on adjacent buildings.

134. The new residential tower has been located to avoid any frontal overlooking with the existing Styles House and maintains views to the north of Styles House. To mitigate diagonal overlooking issues the flats have been designed to avoid any windows in the corner closest to Styles House, whilst maintain light within the flats. The balconies have been positioned away from Styles House.

135. Windows to the east side of the development are secondary could be screened to mitigate overlooking issues with the OSD.

### **Noise and vibration (construction / operational impacts)**

136. A noise and vibration impact assessment was submitted with ref 20021.NVA.01 Rev B with the key elements considered including:

- Effects from construction works;
- Effects from construction traffic;
- Effects from the completed development in terms of vehicle movements and plant noise; and
- Site suitability for the proposed use.

137. The noise and vibration impacts from the site would be highest during the demolition of the existing buildings and substructure works and lowest during the internal fit out and landscaping. The noise impacts from demolition and construction would be temporary in nature and it is not envisaged that any long term disturbance would be caused. The Construction Environmental Management Plan (CEMP) that is recommended to be submitted though a condition would allow for coordination with TfL and the Council's highways team to take account of other projects due to take place within the vicinity. The retention of much of the existing structure will reduce the amount of noise, disruption and traffic which would be associated with full redevelopment, which is a benefit of the current proposals. The demolition element is expected to last for eight months with the remaining programme to be completed within 16 months.

138. The Environmental Noise and Impact Assessment confirms that desirable internal noise levels can be achieved through the introduction of double glazing to habitable rooms, with recommended specifications set out in the assessment. In addition, a mechanical ventilation heat recovery is proposed for all dwellings.

### **Energy and Sustainability**

139. The London Plan Policy 5.2 sets out that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy Be lean: use less energy; Be clean: supply energy efficiently; Be green: use renewable energy. This policy requires development to have a carbon dioxide improvement of 35% beyond Building Regulations Part L 2013 as specified in Mayor's Sustainable Design and Construction SPG.

#### Be Lean

140. The measures proposed in the Energy Statements submitted by XCO2 dated March 2020, provide a regulated carbon saving of 10.9% over the site wide baseline level, and include:

- Building envelope will act as an important climatic modifier, with a well-designed façade significantly reducing the building's energy demand and U-Values that exceed the minimum standards;
- Façade optimisation of the glazing for balancing cooling loads against daylighting to ensure good daylight without unwanted solar gain and heat loss;
- The building form and massing will provide passive control of solar gains to ensure that solar gains are maximised in winter months and minimised in summer;
- Low water consumption;
- The energy required to heat or cool the incoming fresh air supply to the buildings will be significantly reduced by using an efficient heat recovery system;
- Low energy lighting; and
- Automatic lighting control.

#### Be Clean

141. The measures proposed include an assessment of the provision of a Combined Heat and Power scheme, which has been deemed as not viable for the proposed development, and no carbon savings are achieved for this step of the Energy Hierarchy.

#### Be Green

142. The measures proposed include incorporation of renewable technologies in the form of photovoltaic panels and ASHP. This step of the Energy Hierarchy would

achieve a total carbon reduction of 37.5% over the 2013 building regulations across the whole site. This is further broken down to a 37.3% reduction for the residential part of the development and a 39.7% reduction for the non-residential part of the scheme.

### Conclusions on Energy

143. Cumulative CO<sub>2</sub> savings on site are estimated at 47.6% for the domestic part and 56.3% for the non-domestic part of the development, against a Part L 2013 compliant scheme. The regulated CO<sub>2</sub> savings for the site as a whole are 48.3% with SAP10 emission factors. This meets the minimum 35% CO<sub>2</sub> reduction on-site post-planning set by the New Southwark Plan and London Plan.
144. Current London Plan policy requires the residential aspect of major developments to achieve carbon zero. It is not considered that there are further options available to making additional CO<sub>2</sub> savings for the residential aspect of the scheme and as such it considered appropriate to off-set this shortfall with a financial contribution to the Carbon Off-set fund. This would include a payment covering an offset to zero carbon for the domestic element of the scheme of 461.4 tonnes over 30 years and 37.8 tonnes over 30 years for the non-domestic element.
145. The current carbon offset payment requires £95/tonne for a period of 30 years. In the case of this scheme the carbon offset payment would be £43,833 for the domestic component and £3,591 for the non-domestic component in order to reach zero carbon talking the total to £47,424.

### Sustainability

146. The sustainability strategy for Styles House is provided in the submitted Sustainability Statement produced by XC02 dated March 2020. BREEAM 'Excellent' rating is not required for this development due to the domestic component relating to a new build and the non-domestic component falling under 500sqm.

### **Ecology and biodiversity**

147. Ecology has been scoped out in the Preliminary Ecological Appraisal (PEA) which identified no significant impacts upon ecological receptors. All identified impacts within the PEA will be addressed through a Construction Environmental Management Plan (CEMP) which would be a conditioned requirement of any consent issued and is supported by the Council's Ecologist who considers that the proposed development offers an opportunity to enhance biodiversity and ecology on the site through the landscaping of the open spaces and the introduction of bird and bat boxes.

## **Air quality**

148. Air quality impacts have been assessed as part of the Air Quality Assessment submitted. This includes:
- Impacts on air quality arising from the construction project;
  - Impacts from the completed and operational development; and
  - Suitability of the site for the proposed uses.
149. During the construction phase it is recognised that there would be impacts such as dust in the air as well as dust and dirt on the highway as a result of construction vehicle movements. This can be suitably managed and mitigated through a Construction Environmental Management Plan which would be a conditioned requirement of any consent issued. The impact of construction vehicle traffic emissions is not considered to be significant.
150. In terms of the completed and operational development, the predicted annual mean concentrations of NO<sub>2</sub> and particulate matter have taken into account emissions generated by road traffic and energy plant with the result being that no significant air quality effects have been identified at any of the existing surrounding receptors subject to ensuring the energy plant installed on site will be efficient. The site has been declared for exceedances of the annual mean Air Quality objective (AQO) for nitrogen dioxide (NO<sub>2</sub>) and the 24-hour mean AQO for particulate matter (PM<sub>10</sub>).
151. Given that the air quality for future residents and users of the proposed development would be acceptable, the site is considered to be suitable for the range of uses being proposed.

## **Ground conditions and contamination**

152. Any permission issued would be subject to appropriate conditions to test for, investigate and remediate any land contamination. Furthermore, the construction project would be bound by the terms of a Construction Environmental Management Plan which will be secured through a condition.

## **Water resources and flood risk**

153. A Basement Impact Assessment, Flood Risk Assessment and Surface Water Management plan were provided as part of the submitted documents. The site is located within Flood Zone 3 which is considered to be an area of high risk of flooding due to the proximity of the tidal River Thames. However the site is protected by the Thames Barrier and related defences. The Environment Agency were consulted on the application and whilst they initially objected in request for specification over finished floor levels and to demonstrate that floor levels for all sleeping accommodation were above the relevant modelled breach flood level. They subsequently lifted their objection following revisions to the FRA taking these comments into account.

## **Archaeology**

154. This area is shown on the 18th century Rocque's map as occupied by buildings, land management and some potential tender ground uses. Works to the east side of Blackfriars' Road for the construction of the office building on this location revealed remains of geoarchaeological interest, as did the construction of Southwark Tube Station. The site is also located within the proposed north Southwark and roman roads APA. Archaeological Evaluation, Archaeological Mitigation and post-excavation report are conditioned to any decision notice. Furthermore, a S106 planning obligation for the monitoring of archaeological matters will be secured for the sum of £3,389.

## **Wind Microclimate**

155. Wind microclimate has been considered as part of the Wind and Microclimate Analysis Report submitted by XCO2 dated March 2020. This report, taking into account pedestrian comfort and safety during construction and once the development has been completed and is operational. The analysis notes that once the development is completed the wind conditions at ground level thoroughfares and at building entrances will be appropriate to their use with no adverse impacts.

156. There is only one receptor experiencing a major adverse impact and is located on the 12th floor balcony of the proposed development. This is expected as the receptor is located 42m above ground level and wind speed is significantly higher at this altitude. It should be noted that this was tested as worst-case scenario without balustrades or balcony obstructions, hence it is expected that the results will perform better in reality.

157. Four receptors at 1.5m above ground level experience a minor adverse impact in this assessment in the cumulative assessment. This includes receptors 4, 21, 34 and 43.

158. Receptor 4 is a backyard amenity space and is not within close proximity to the proposed development. The receptor will perform better in reality as there are fences and landscaping surrounding the site that have not been modelled in this assessment.

159. Similar to the proposed development conditions, receptor 21 located at the allotments within the site boundary most likely experiences an adverse effect due to the lack of shelter from south west winds. However, considering there is existing landscaping nearby that have not been modelled in this assessment, it is expected to perform better in reality.

160. Receptors 34 and 43 are outdoor seating areas of cafes. Receptor 34 is not within close proximity of the proposed development and therefore the impact is

not likely to be caused by the development. While receptor 43, is close to the proposed development and the new TfL Building, as this receptor showed a negligible impact in the proposed development, this adverse impact is due to the cumulative context and not the proposed development.

161. It is worth noting that the wind conditions of the amenity spaces at higher levels of the proposed development slightly improved in the cumulative assessment due to the TfL Building being constructed directly to the east of the proposed development.
162. In terms of the amenity spaces and some of the amenity terraces, there are instances where wind conditions are windier than desired and as such could have a minor to moderate adverse impact. As such, mitigation would be required in these locations and this would be secured by way of a planning condition. The types of mitigation proposed include balustrade height and screens added to the balconies. The mitigation would be key to sheltering the amenity spaces from the winds.

## **Transport**

### Introduction

163. The proposal would provide car parking for 5 spaces (residential), comprising of one car parking space, three disabled bays and one motorcycle space. This represents a net reduction of nine parking spaces across the site. 54 cycle parking spaces has been proposed which is in excess of the 40 spaces required in the New London Plan. Vehicular access to the site will be from Hatfields via the existing vehicle and pedestrian access will be retained. This is on the western edge of the site. A new pedestrian access point will be available from The Cut to the site.

### Site context

164. The site has the highest level of public transport accessibility with a PTAL level of 6b, rated on a scale of 1-6 where 1 represents low accessibility and 6 the highest accessibility. There are several railway and London Underground stations located within the vicinity of the site including Southwark station, Waterloo East National rail station and the bus routes on Blackfriars Road eastern side. The site is well connected to the London bus network, cycle routes and walking routes.

### Site layout

165. The proposed site layout include retention of the existing vehicle entrance leading to a new car parking area and cycle/refuse bin stores on Hatfields, plus two secure pedestrian entrances on Hatfields and the Cut as shown on Plan Nos. 0529-P112/P1 and 0529-BPA-P113/P1 with shared space to the east of

Styles House and landscape improvements. Although there is no obvious east-west pedestrian route through the site, there is an alternative one linking Hatfields to Blackfriars Road beside the northern boundary of this site on Isabella Street. Vehicular access to the site will be from Hatfields via the existing vehicle and pedestrian access will be retained. This is on the western edge of the site. A new pedestrian access point will be available from The Cut to the site.

#### Car parking

166. Saved Policy 5.6 (Car Parking) of the Southwark Plan and Core Strategy Policy 2 (Sustainable Transport) state that residential developments should be car free. For office use, a maximum of one space per 1500sqm is permitted which would equate to a maximum of six spaces. No parking (except disabled provision) is permitted for retail or culture uses.
167. Bankside CPZ provides adequate parking control at this location weekdays from 0800hrs and 1830hrs plus between 0930 and 1230hrs on Saturday. There are currently around 5 car club bays within short walking distance of the site.
168. A total of 4 car parking spaces will be provided on site, three of which are disabled, has been proposed. Three of these will be disabled bays, one car parking space and one motorcycle space. This will be detailed through condition and must include an updated to drawing (see Plan 0529-BPA-P112/P1) with three disabled car parking with at least one disabled bay and the standard bay equipped with active electric vehicle charging point (EVCP) and the remaining two disabled bays fitted with passive EVCPs. Residents will be excluded from CPZ car parking permits.
169. The proposal leads to a reduction of 9 spaces from the current 14, which is welcomed, particularly given the application site's location within the CAZ and an area with the highest level of public transport availability. The reduced level of parking will encourage more people living within the development to walk, cycle or take public transport and such accords with the Council's sustainable transport aspirations. Given the weight which can be attached to the implemented consent, the level of car parking could be justified. The proposed car parking spaces will need to be fitted with electric vehicle charging points and spaces will be allocated and reserved for blue badge holders.

#### Cycle parking

170. The site is well serviced by cycle routes including National Cycle Network 4 (to the east), Quiet way 1 and Cycle Superhighway 6 (to the south).
171. The development has incorporated 54 cycle parking spaces on the ground floor level, as detailed on plan (0529-BPA-P120/P1) This cycle parking provision meets the New Southwark Plan standards and is significantly higher than the 40

spaces required in the New London Plan. It is unclear what type of cycle parking would be provided and at least 20% of the spaces should have been contained in Sheffield cycle racks. A minimum of 2 disabled spaces will also be necessary. This will be confirmed through condition.

### Servicing

172. The proposals include improvements to the existing vehicular access for fire tenders through localised widening of the access and removal of on street parking. This responds to the requirements in the New Southwark Plan for safe and efficient operations included at Policy 49, and NPPF paragraph 102 with transport considerations to be integral to the scheme. The proposals enable small delivery vehicles to access and turn within the car park area with larger deliveries occurring on street within the loading bay on Hatfields as for the existing situation.
173. Servicing will continue to take place on street on Hatfields. The development is predicted to generate an extra 1-2 delivery vehicles per day. The existing access for fire tenders is to be improved with widening of the vehicular entrance/exit and the removal of on street parking on Hatfields.
174. The location of the electricity substation abuts the northern site's vehicle entrance and within the footway visibility, splay of its junction with Hatfields, culminating in drivers' impaired vision of the pedestrians traversing along the adjacent footway. This is currently unacceptable, but can be resolved through condition.

### Refuse

175. A communal waste and recycling area is currently provided at Styles House, the new apartments will use the same communal waste area which will be increased to provide more space for the additional waste. The current refuse collection occurs on street on Hatfields, which is proposed to continue with the new development.
176. One residential unit within the existing Styles House building will also be lost to accommodate a new boiler house and refuse storage facilities for the development. All doors must be inward opening which will be secured by condition. Details for two refuse bins along the pedestrian walkway will also be secured by condition.

### Conclusion on Transport Impacts

177. An east-west pedestrian route through this development to the impending neighbouring OSD development via the potential shared surface at the eastern end of this site and ultimately to the nearby Southwark tube station has been provided which is positive for accessibility and movement through the site.

178. The applicant has reduced the level of on-site car parking which is positive and through providing London Plan compliant levels of cycle parking. The proposed development will make suitable provision for sustainable forms of transport.

179. The provision of on-site servicing will minimise impacts on the transport network and the revised Construction Management and Delivery and servicing plan will be secured via conditions. A S278 has been included as part of the S106 agreement.

**Planning obligations (S.106 undertaking or agreement)**

180. The following obligations are required for this scheme and would be included in the legal agreement:

Planning Obligation	Mitigation	Applicant Position
Carbon offset	£47,424	Agreed.
S278	<ul style="list-style-type: none"> <li>• Repave the footway fronting the development including new kerbing on Hatfields and The Cut using materials in accordance with Southwark's Streetscape Design Manual (Yorkstone paving slabs and granite kerbs).</li> <li>• Upgrade existing vehicle crossover on Hatfields to current SSDM standards.</li> <li>• Since the application site falls within 'World Centre' designation the footway should be paved with Yorkstone paving slabs with 300mm wide silver grey granite kerbs.</li> <li>• Repair any damages to the highway due to construction activities for the Development</li> </ul>	Agreed

	including construction work and the movement of construction vehicles.	
Parking Permit Exemption	CPZ exclusion	Agreed
Archaeological monitoring	£3,389 for the monitoring of archaeological matters.	Agreed
Secure the location of new affordable homes	In agreement between Southwark council and Styles House TMO	Agreed
Agreement of Southwark OSD (20/AP/1189)	Loss of commercial floorspace is acceptable contingent on Southwark OSD agreement	Agreed

181. The agreement will also secure an admin charge of 2% of the total contributions.

182. In the event that an agreement has not been completed by 1<sup>st</sup> August 2021, the Committee is asked to authorise the Director of Planning to refuse permission, if appropriate, for the following reason:

183. In the absence of a signed S106 legal agreement there is no mechanism in place to mitigation against the adverse impacts of the development through contributions and it would therefore be contrary to 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 (2016) and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015).

### **Community involvement and engagement**

184. This is a community led development and the proposals have therefore been subject to engagement with existing Styles House residents, this included seven consultation events, garden and community centre tours and a resident ballot on 18th-27th February 2020.

185. The proposals for the site have been developed to respond to the feedback received at these events and the final proposals for the site have been positively received by residents. At the residents' ballot, of the 81% of residents who took

part, 90% support the proposed development.

186. The public consultation events were held on the 15 and 18 January 2020 and the 19 February 2020 at the Styles House TMO Hall. The venue is located within the development site and was accessible for all those who live locally.

187. As part of its statutory requirements the Local Planning Authority sent letters to surrounding residents, displayed site notices in the vicinity, and issued a press notice publicising the planning application. Adequate efforts have, therefore, been made to ensure the community has been given the opportunity to participate in the planning process. Details of consultation and any re-consultation undertaken by the Local Planning Authority in respect of this application are set out in the appendices. The responses received are summarised later in this report.

### **Community impact and equalities assessment**

188. The Council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights

189. The Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.

190. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three "needs" which are central to the aims of the Act:

1. The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
2. The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
  - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
  - Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
  - Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low
3. The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and

promote understanding.

191. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

### **Human rights implications**

192. 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.
193. This application has the legitimate aim of providing new offices and retail opportunities. 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.

### **Positive and proactive statement**

194. The Council has published its development plan and Core Strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
195. The Council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.

### **Positive and proactive engagement: summary table**

Was the pre-application service used for this application?	YES
If the pre-application service was used for this application, was the advice given followed?	YES
Was the application validated promptly?	YES
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	YES
To help secure a timely decision, did the case officer submit their recommendation in advance of the agreed Planning Performance Agreement date?	YES

## **CONCLUSION**

196. The principle of refurbishing and extending the existing Styles House to provide additional residential units and a commercial space is supported by current and emerging planning policy. The development would provide new housing and unlock additional office space as part of the neighbouring Southwark OSD development. In joint, the proposed uses would provide an enhanced office workplace offer and increased residential units which, would support the Council's objectives.
197. The development is in an appropriate location for a tall building, being located within a CAZ and with sufficient surrounding amenity space. Officers are satisfied that the proposal is of the highest architectural standard, furthermore, the proposal provides an appropriate response to context and would not harm the character or setting of the nearby conservation areas or listed buildings. Careful consideration has been given to the impact of the proposal on townscape views, and the impact of the increased height is not considered to cause harm to nearby listed buildings or surrounding conservation areas.
198. Other policies have also been considered but, as set out in the report, no impacts and/or conflicts with planning policy have been identified that couldn't adequately be dealt with by planning obligation or condition. Having regard to all the policies considered and any other material planning considerations it is recommended that planning permission is granted subject to conditions and the completion of a legal agreement.

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Application file: 20/AP/0969  Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5513 Council website: www.southwark.gov.uk

## APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Planning History
Appendix 4	Recommendation

## AUDIT TRAIL

<b>Lead Officer</b>	Eleanor Kelly, Chief Executive Officer	
<b>Report Author</b>	Vendela Gambill, Senior Planning Officer	
<b>Version</b>	Final	
<b>Dated</b>	02 February 2021	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Strategic Director of Finance & Governance	No	No
Strategic Director, Environment and Social Regeneration	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
<b>Date final report sent to Constitutional Team</b>	03 February 2021	