

<b>Item No.</b>	<b>Classification:</b>	<b>Date:</b>	<b>Meeting Name:</b>
8.2	OPEN	28 February 2012	PLANNING COMMITTEE
<b>Report title:</b>	<b>Development Management planning application:</b> Application 11-AP-2565 for: Full Planning Permission  <b>Address:</b> QUEBEC WAY INDUSTRIAL ESTATE, QUEBEC WAY, LONDON SE16  <b>Proposal:</b> Demolition of three existing warehouse buildings and construction of 7 blocks between 3 and 6 storeys high (max 21m AOD); containing 366 residential units (142x 1 bed, 113x 2 bed, 98x 3 bed and 13x 4 bed) and commercial floorspace for Class A1 (shops) / A3 (restaurant/cafes) / D1 (non-residential institutions / D2 (assembly and leisure)uses; with basement car parking, motorcycle and cycle storage, ancillary storage spaces and a new route through the site into Russia Dock Woodlands. New vehicle and pedestrian accesses to be created from Quebec Way.		
<b>Ward(s) or groups affected:</b>	Surrey Docks		
<b>From:</b>	Rachel Gleave		
<b>Application Start Date</b> 10/08/2011		<b>Application Expiry Date</b> 09/11/2011	

## RECOMMENDATION

- 1) 1) That planning permission is granted subject to conditions, the applicant entering into a legal agreement and subject to referral to the Mayor of London.
- 2) In the event that the legal agreement is not entered into by 30 March 2012 then the head of development management be authorised to refuse planning permission for the reasons set out in paragraph 141 of this report.

## BACKGROUND INFORMATION

- 2) **Site location and description**
- 3) This application site is within the are covered by the draft Canada Water Area Action Plan (CWAAP) and the Inspectors report following the examination in public (EIP) recommends that it should be included in the Core Area. It has a site area of 2.2 hectares.
- 4) The site itself is located alongside Russia Dock Woodlands, a designated Site of Importance to Nature Conservation, which follows the eastern boundary for the site. To the south of the site lies Redriff Road and low rise residential housing, with the Greenland Dock further to the south. To the east is Harmsworth Quays, which is currently operating as a 24hr newspaper printing works, and to the north there is the Alfred Salter Primary School. Harmsworth (Quays) Printing Ltd have recently

communicated their intention to vacate the site, and their relocation is expected to be completed by late 2013. Further north east of the site lies Canada Water Town Centre and leisure site.

- 5 Further to the north and west the area is characterised by denser residential developments which are located closer to the Canada Water Underground Station.
- 6 The application site is currently occupied by 3 single story buildings used for light industrial purposes, with hard surfaced servicing areas. A number of mature trees are located within the site boundary, and on street which screen the warehouse buildings from Quebec Way. There are two existing places of worship operating in one of the buildings without the benefit of planning permission.

### **Details of proposal**

- 7 The application proposes the demolition of all the existing buildings on the site, and the creation of a residentially lead, mixed use development. There are 366 residential units proposed, as well as a new gym, cafe, crèche, community space and one retail unit. There are 7 blocks intended to be constructed in phases. Phase A at the southern end of the site contains 3 blocks, Phase B at the centre of the site contains 2 blocks, and Phase C at the northern end of the site also contains 2 blocks.
- 8 Three new separate basement areas are proposed, one for each phase of development, all with individual ramp accesses from Quebec Way. A designated cycle route is provided on each ramp and there are also areas for bulk storage proposed within the basements. In total 111 basement car parking spaces are proposed, of which 28 are designated disabled parking bays, with 18 motor cycle spaces and 465 cycle storage spaces also proposed in the basement area.
- 9 The proposed blocks are arranged broadly perpendicular to Quebec Way and would retain distances of between 5m and 11m from the boundary with Russia Dock woodlands. The buildings are also set back from the road frontage and are between 2m and 8m away from the site boundary with Quebec Way. It is proposed that some of this area is given over to the public highway, to increase the width of the pavement running alongside the site.
- 10 The proposed buildings range from 3 to 6 storeys high and are generally lower in height towards the woodlands, stepping up in height towards Quebec Way. In most instances, the top storeys are set back from the main building line. Where set back storeys appear, it is proposed to create roof terrace areas for units, and it is also proposed to create a biodiverse green roof with PV panel area at the upper most roof level.
- 11 The blocks would be set within extensive areas of landscaping, with private and communal garden areas, as well as a new private pedestrian route along the rear (eastern boundary) of the site. A new public pedestrian route through the site is proposed providing access into Russia Dock Woodlands from Quebec Way. This new route which is indicated in the CWAPP would provide a benefit for the community and would remain freely accessible to the public. The site has a range of level changes across its extent incorporated into the landscaping scheme.

Below is a table detailing the tenure and unit sizes included in the proposed blocks, which are split into 3 phases A, B & C:-

12 Table 1: Tenure breakdown

	1 bed	2 bed	3 bed	4 bed	Total
<b>Block A1&amp;A2</b>					
Private	-	-	-	-	-
Social Rented	3	8	4	9	24
Intermediate	-	-	-	-	-
Sub total	3	8	4	9	24
<b>Block A3</b>					
Private	-	-	-	-	-
Social Rented	2	2	11	-	15
Intermediate	4	6	-	-	10
Sub total	6	8	11	-	25
<b>Block A4&amp;A5</b>					
Private	11	9	4	-	24
Social Rented	1	-	11	-	12
Intermediate	23	5	-	-	28
Sub total	35	14	15	-	64
					<i>(phase A 113 units)</i>
<b>Block B1&amp;B2</b>					
Private	34	17	16	-	67
Social Rented	-	-	-	-	-
Intermediate	-	-	-	-	-
Sub total	34	17	18	-	67
<b>Block B3,B4&amp;B5</b>					
Private	33	22	20	-	75
Social Rented	-	-	-	-	-
Intermediate	-	-	-	-	-
Sub total	33	22	20	-	75
					<i>(phase B 142 units)</i>
<b>Block C1&amp;C2</b>					
Private	15	19	4	4	42
Social Rented	-	-	-	-	-
Intermediate	-	-	-	-	-
Sub total	15	19	4	4	42
<b>Block C3,C4&amp;C5</b>					
Private	16	25	28	-	69

Social Rented	-	-	-	-	-
Intermediate	-	-	-		
Sub total	16	25	28	-	69
					(phase C 111 units)
<b>Scheme Total:</b>					<b>366</b>

The scheme total can be broken down into the following percentages:

Number of bedrooms	No. of social rent units (%)	No. of intermediate units (%)	No. of private units (%)
1	6 (1.6%)	27 (7.37%)	109 (29.78%)
2	10 (2.7%)	11 (3%)	92 (25.1%)
3	26 (7.1%)	0	72 (19.67%)
4	9 (2.45%)	0	4 (1%)

- 13 Phase A includes a retail unit proposed to be located onto Redriff Road providing 411.3sqm of Class A1 retail floorspace.

Phase B includes an Energy Centre fronting onto Quebec Way, as well as a 476sqm unit for a gym (use class D2) and a 124sqm unit for a coffee shop (use class A3), all at ground floor facing Quebec Way.

Phase C includes a 469sqm unit for a nursery (use class D1), a 122sqm unit for a community hall (use class D1) and a 35sqm substation.

- 14 Across the development, there are 28 designated wheelchair accessible units (12x 2 bed, 11x 3 bed and 4x 4bed), of which 6 are affordable and 22 private.

### Planning history

- 15 In 1989 the London Docklands Development Corporation granted permission for the erection of two warehouse buildings on the site, consisting of 18 units and B1 / Business use with hard and soft landscaping, together with third building plus associated car park in outline only.
- 16 A number of minor applications have since been received, for advertisement consent and the change of use of some of the units from light industrial (B1 Class) to warehouse storage (B8 Class). None are of relevance to this current planning application.
- 17 There are at least two places of worship in operation on the site, which do not have planning permission and enforcement action is underway.

### Planning history of adjoining sites

- 18 The existing developments on Sites C, E, the Surrey Quays (Mast) Leisure Site, and the Surrey Quays Shopping Centre were approved by the London Docklands Development Corporation during the mid to late 1980's.
- 19 Outline permission was granted in 2007 at Site A & B (05-AP-2539) for the following:

*Development of the site for mixed use purposes comprising residential flats,*

*community use/public library (Class D1), offices , studio workshops and retail, in buildings up to a maximum of 10 storeys in height; creation of new areas of open space, construction of new roads, pedestrian and cycle routes and new access to the public highway together with associated works including the provision of parking, servicing and plant areas and a replacement entrance to London Underground Station*

- 20 In 2007 the Council granted permission within Site B (07-AP-1174) for:

*Erection of a Library building on northern edge of the Dock (within Site B), comprising a public library, cafe, community and performance space, and incorporating a new entrance to Canada Water Underground Station; laying out of an adjacent Civic Plaza; together with associated enabling works and highway alterations.*

- 21 Construction of the library is now complete.

- 22 Reserved Matters were approved by the Council in 2008 at Site B1 (07-AP-2588) for:

*External appearance, internal layout, and access to buildings, following Outline Planning Permission dated 4 May 2007 (05-AP-2539) for the erection of an eight storey building comprising 63 dwellings and Class A1 (retail) and B1 (office/commercial) accommodation within the ground floor.*

- 23 Site B1, now known as Toronto House, and is now occupied.

- 24 An application was made for detailed permission at Site B2 which was granted in 2009 (08-AP-2388) for:

*Erection of a part 7, part 8 storey building to provide 169 residential units (Class C3), 938sqm of retail and/or food/drink (Class A1/A3) and 300sqm of ancillary residential floorspace (residents gym), 46 basement car parking spaces, together with access, hard and soft landscaping, and other associated works incidental to the development.*

- 25 This development is now complete and occupied, it is known as Montreal House.

- 26 Detailed permission was granted in 2011 at Site C - Decathlon (09-AP-1783) for:

*Redevelopment of existing retail warehouses and erection of 6 buildings varying in height from 4 to 10 storeys comprising 430 residential units (Class C3), 9104sqm retail store (Class A1), 1287sqm of other Class A1/A3/A4/A5 space, 644sqm of office space (Class B1a), 528sqmm of Class D1 community space, access, basement car park for 340 cars, public realm, landscaping and communal amenity space.*

The permission has not been implemented.

- 27 Outline planning permission was granted in 2010 at Surrey Quays (Mast) Leisure Site (09-AP-1999) for:

*Demolition of all existing buildings and erection of buildings ranging from 2 to 10 storeys comprising 11,105sqm leisure floorspace (including cinema) (Class D2), 2,695sqm retail floorspace (Class A1-A3), 49,276sqm of private and affordable residential accommodation (approximately 509 flats) (Class C3), 495 car parking spaces (142 for residential and 350 for leisure uses) and associated works including public and private open space, as well as detailed design for 123 rooms (4,250sqm) of student housing (Class Sui Generis), 2,500sqm commercial floorspace (Class B1), 86*

*residential units (included in the 509 flats referenced above) (Class C3) and the external appearance of any elevation facing Harmsworth Quays Printworks.*

No reserved matters applications have been made, and the permission has not been implemented.

- 28 Full permission was granted for Site A at Canada Water in 2010 (09-AP-1870) for:

*Erection of a series of buildings comprising a 26 storey tower, with ground floor mezzanine (maximum height 92.95m AOD), and 9 individual buildings ranging from 4 to 8 storeys in height to provide 668 residential units, 958sqm of retail (Class A1, A2 and A3), and 268sqm of community use (Class D1), creation of a new open space and construction of new roads, pedestrian and cycle routes and new access to the highway, together with associated works including the provision of public cycle facility, basement car parking for 166 cars and cycle parking, servicing, landscaping and plant areas.*

- 29 Construction of this development is underway, phase A1 is occupied, and phase A2 is structurally complete. Construction of the foundations and structure for phases A3 and A4 is underway.

- 30 Full permission was granted at the Mulberry Business Park, Quebec Way in 2008 (07-AP-2806) for:

*Demolition of existing buildings and the erection of a series of buildings up to 8 storeys comprising 256 residential units, 5105m<sup>2</sup> of Class B1 (Office) floorspace, basement car park with access to Canada Street, and landscaping works.*

A certificate of lawfulness has been granted which established implementation of the planning permission.

Last year an application was received to extend the time limit for this planning permission, and it was refused permission on 07-06-2011.

## **KEY ISSUES FOR CONSIDERATION**

- 31 **Summary of main issues**

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

- principle of the proposed development in terms of land use and conformity with strategic policies and the Canada Water Area Action Plan;
- design issues including layout, heights, massing and elevations;
- affordable housing;
- housing mix and type;
- quality of accommodation;
- traffic issues;
- impact on the amenities of occupiers of adjoining properties;
- energy and sustainability; and
- planning obligations.

- 32 **Planning policy**

The site is designated as:

Saved proposal site 34P of the Southwark Plan  
Proposal site CW AAP 11: Quebec Industrial Estate  
Air Quality Management Zone  
Canada Water Action Area  
PTAL level 3  
Flood Risk Zone 3

Adjacent to:

Russia Dock Woodlands a Site of Importance to Nature Conservation  
Harmsworth Quays Printworks proposal site 33P & CWAAP 12: Harmsworth Quays

33 Core Strategy 2011

The relevant strategic policies of the Core Strategy include:

- 1 – Sustainable development
- 2 – Sustainable transport
- 5 – Providing new homes
- 6 – Homes for people on different incomes
- 7 – Family homes
- 10 – Jobs and businesses
- 12 – Design and conservation
- 13 – High environmental standards

34 Southwark Plan 2007 (July) - saved policies

The relevant saved policies of the Southwark Plan include:

- 1.4 Employment Sites outside the Preferred Office Locations and Preferred Industrial Locations
  - 2.5 Planning Obligations
  - 3.1 Environmental Effects
  - 3.2 Protection of Amenity
  - 3.3 Sustainability Appraisal
  - 3.4 Energy Efficiency
  - 3.6 Air Quality
  - 3.7 Waste Reduction
  - 3.11 Efficient Use of Land
  - 3.12 Quality in Design
  - 3.13 Urban Design
  - 3.14 Designing Out Crime
  - 3.19 Archaeology
  - 4.1 Density of Residential Development
  - 4.2 Quality of Residential Development
  - 4.3 Mix of Dwellings
  - 4.4 Affordable Housing
  - 5.1 Locating Developments
  - 5.2 Transport Impacts
  - 5.3 Walking and Cycling
  - 5.6 Car Parking
  - 5.7 Parking Standards for disabled people and the mobility impaired
  - 7.2 Canada Water Action Area
- Proposal site 34P

35 Southwark's Supplementary Planning Documents

Submission Version of the Draft Canada Water Action Area Plan 2010, and Inspectors report 15th December 2011  
Sustainable Design and Construction 2009  
Affordable Housing 2008 (September) and 2011 Draft  
Section 106 Planning Obligations 2007  
Residential Design Standards 2011

36 London Plan 2011

2.12 Opportunity areas and intensification areas;  
2.14 Areas for regeneration;  
3.3 Increasing housing supply;  
3.5 Quality and design of housing developments;  
3.6 Children and young people's play and informal recreation facilities;  
3.9 Mixed and balanced communities;  
3.11 Affordable housing targets;  
3.16 Protection and enhancement of social infrastructure;  
4.3 Mixed use development and offices;  
5.1 Climate change mitigation;  
5.2 Minimising carbon emissions;  
5.3 Sustainable design and construction;  
5.5 Decentralised energy networks;  
5.6 Decentralised energy in development proposals;  
5.7 Renewable energy;  
5.11 Green roofs and development site environs;  
5.12 Flood risk management;  
5.13 Sustainable drainage;  
6.3 Assessing effects of development capacity and safeguarding land for transport;  
6.9 Cycling;  
6.10 Walking;  
6.13 Parking;  
8.2 Planning obligations.

37 Planning Policy Guidance (PPG) and Planning Policy Statements (PPS)

Planning Policy Statement 1: Planning for Sustainable Communities  
Planning Policy Statement 3: Housing  
Planning Policy Guidance 13: Transport  
Planning Policy Statement 5: Planning for the Historic Environment  
Planning Policy Statement 22: Renewable Energy  
Planning Policy Statement 25: Development and Flood Risk  
National Planning Policy Framework Bill 2011 (see below)  
Ministerial Statement 'Planning for Growth' 2011

38 National Planning Policy Framework (NPPF) Bill

The NPPF Bill was published at the end of July 2011 for consultation until 17 October 2011 and is capable of being a material consideration. The Government has set out its commitment to a planning system that does everything it can do to support sustainable economic growth. Local planning authorities are expected to plan positively for new development. All plans should be based on the presumption in favour of sustainable development and contain clear policies that will guide how the presumption will be applied locally.

The presumption in favour of sustainable development is a new policy designed to ensure that the planning system as a whole focuses on opportunities. The presumption, in practice, means that significant weight should be placed on the need to support economic growth through the planning system and local planning authorities should plan positively for new development and approve all individual proposals wherever possible. But development should not be allowed if it would undermine the key principles for sustainability in the Framework. The draft NPPF makes clear that the policies should apply 'unless the adverse impacts of allowing development would significantly and demonstrably outweigh the benefits'.

The draft NPPF also states that 'The primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent development' and that local authorities should look for solutions to problematic applications, so they 'can be approved wherever practical to do so'.

The draft NPPF also sets out core principles that should underpin both plan-making and development management. It states that 'every effort should be made to identify and meet the housing, business, and other development needs of an area, and respond positively to wider opportunities for growth'.

**Principle of development including density and residential capacity**

- 39 Quebec Industrial Estate is located within the Canada Water regeneration area and is marked as proposal site 'CW AAP 11: Quebec Industrial Estate' within the Canada Water Area Action Plan (CWAAP). The site is described as being suitable for an estimated residential capacity of 250 residential units and 1000sqm of non-residential uses [specifically 1,000sqm of business use (class B1) or community use (Class D1)]. Within the saved proposal sites in the Southwark Plan 2007, the site is identified as Proposal Site 34P with class D1 use (education) being a priority use of the site; however Table 2 in the adopted Core Strategy indicates that the Quebec Industrial Estate will no longer be needed for a new school. While the proposal site designation under the Southwark Plan is an adopted policy which forms part of the 'saved' policies for the borough, the draft Area Action Plan (AAP) for the area contains a different vision for the site, and now that the Examination in Public (EiP) Inspectors report has been received and the AAP found to be sound, the AAP has considerable weight as a material consideration in the assessment of appropriate development on this site. In these circumstances, the policies of the CWAAP, being the more up to date plan, would outweigh the designation in the older Southwark Plan.
- 40 The Councils draft Core Strategy identified the site as being within the proposed suburban zone for the borough, where development would be expected to normally range between 200-350 habitable rooms per hectare. The Inspectors report on the Core Strategy advised that the density zones be dealt with through supplementary planning documents or area action plans. The draft CWAAP showed the site as being within the Suburban Zone. However following an EiP of the plan, the Inspector has instructed the council to alter this designation, and re-classify the site as being within the Core Area, and therefore the Urban Zone. It is intended that the Council will accept this instruction and include this site within a revised Core Area boundary in the Plan due to be adopted in April 2012. As a result, policy would expect developments in this location to be within the Urban Density range, being between 200-700 habitable rooms per hectare.
- 41 The density of this proposed development is 517 habitable rooms per hectare which is in keeping with the kinds of densities expected in the Urban Density Zone. The proposal includes the creation of 366 residential units and in total 1,605sqm of non-residential floorspace, specifically 1,070sqm of D class use (community and assembly

/ leisure), 411.3sqm of A1 class use (shops) and 123.5sqm of A3 class use (restaurants / cafes). Currently located on the site there are warehouses which are primarily for storage purposes, but do provide a level of employment. The CWAPP does not require re-provision of this warehouse space, but instead requires that any development provide at least 1,000sqm of Class B1 or D1 floorspace.

- 42 The proposal includes over 1,000sqm of community uses, specifically a 591sqm crèche Class D1 (internal area), a 103sqm community hall space that is also Class D1, and 478sqm of Class D2 floorspace. The AAP does ask specifically for D1 uses, and therefore it is questionable whether the 478sqm of Class D2 gym could be said to contribute to the required 1,000sqm of community floorspace. However the majority of the D Class floorspace is for a crèche and community hall, and the AAP states that Southwark's evidence base identifies a need for additional pre-school facilities in the area, and that as part of this, there is opportunity to provide outdoor space for the pre-school. The proposal includes a segregated outdoor space attached to the proposed crèche, which in effect increases the level of space given over to the Class D1 unit by approximately 130sqm. In addition to this there is also 103sqm of community floorspace in the form of a 'Community Hall' which would also be within Class D1 use. Therefore it can be said that a total of 824sqm of Class D1 space is proposed as part of the scheme. Furthermore the proposal includes a new public route through the site into the Woodlands, as well as allotment areas which will be available for use by the wider public. In light of these additional community benefits of the proposal, and the full contribution towards community facilities in the area proposed under a section 106 agreement, it is considered that the proposed development is adequate when compared to the aims of the AAP in relation to community benefit resulting from the development. The shortfall in Class D1 / B1 floorspace would not be sufficient to warrant refusal giving the other benefits of this development. The AAP does also specify that an identified end user is required for any proposed Class D community uses proposed as part of a development, and the developer has identified occupiers for the gym space proposed. While a community hall is also identified, there is no particular 'end user' in mind for this unit, but it has resulted from the developer's consultation with the local community. It will be necessary to include provisions within the section 106 agreement to ensure that this unit is disposed of appropriately, and in the event that permission is granted, specific clauses will be included within the agreement to secure first refusal by the local community of this 'hall' at a peppercorn rent level.
- 43 In relation to the provision of a small retail unit on the site, while the site is not in the Town Centre the size of the retail unit would not adversely affect or divert trade from Town Centre shops, therefore the provision of a small retail unit on this site is acceptable. It should also be noted that and there is a current application to extend the existing shopping centre at Surrey Quays.
- 44 In relation to the residential use of the site, while the number of residential units is higher than that expected in the draft CWAAP, that estimated capacity was derived from an expectation that the site would be classified as being within the suburban zone, rather than the urban zone. The acceptability of this number of units will be dependent upon the appropriateness of the design and conformity of the proposal with all adopted policies, and these matters are discussed further below in this report. The development has a density which is in accordance with the Urban Zone designation for the site, particularly taking account of the relatively good access to public transport. Therefore the proposed mix of uses on this site is acceptable in principle and is broadly in accordance with the draft CWAAP in light of the advice in the Inspectors report.

## Environmental impact assessment

- 45 A request for a Screening Opinion was submitted under Regulation 5 of the Environmental Impact Assessment (EIA) regulations, in order to determine whether the redevelopment of the site at Quebec Way Industrial Estate would be considered EIA development. The request was received on 9th December 2010. According to the Regulations, the site could be classified as a Schedule 2 'urban development project' by virtue of its site area which exceeds 2.2ha. An assessment was then made as to whether the development is likely to have a significant effect upon the environment by virtue of its nature, size or location, based on a review of the Schedule 3 selection criteria for screening Schedule 2 Development.
- 46 It was determined that the proposed development was not of a nature, scale, or location, which would be likely to give rise to environmental effects of more than local significance. The site is not located within a 'sensitive area' as defined by the Regulations. It was therefore concluded that an Environmental Impact Assessment was not required.

## Mix of dwellings and tenure

- 47 Mix  
Strategic Policy 7 'Family homes' of the Core Strategy 2011, requires that developments of 10 or more units provide at least 60% of units with 2 or more bedrooms and at least 20% with 3, 4 or 5 bedrooms in the urban zone.
- 48 The table below shows the number of family sized units that are included in the scheme, as well as the breakdown of accommodation according to tenure.

Table 3: Percentage of units by bedroom number and tenure

	Private	Social rented	Intermediate	Total	Percentage by mix
1 bedroom	109	6	27	142	38.8%
2 bedroom	92	10	11	113	30.9%
3 bedroom	72	26	0	98	26.8%
4 bedroom	4	9	0	13	3.6%
Total units	277	51	31	366	100%

The proposal provides 61.3% of units with 2 or more bedrooms and 30.4% of units with 3 or more bedrooms, which fully complies with policy expectations for this site. The large number of 3 and 4 bedroom dwellings is a positive aspect of the development, and is particularly welcomed.

- 49 Wheelchair Accommodation  
Saved policy 4.3 'Mix of dwellings' of the Southwark Plan requires all major residential development to provide at least 10% wheelchair accessible units.
- 50 The proposed development would provide 28 wheelchair units. The wheelchair units are identified on the submitted schedule of accommodation and drawing number SK-05. There are 12 two bedroom, 12 three bedroom and 4 four bedroom wheelchair units proposed across the proposed development, and each has access to an accessible car parking space. This amounts to 10.1% of the development, when calculated on a habitable room basis. Six of these units are affordable, and this alongside the high number of family sized wheelchair accessible units, is a positive aspect of the proposed development.

- 51 Affordable Housing  
Strategic policy 6 'Homes for people on different incomes' of the Core Strategy 2011 requires a minimum of 35% affordable housing within the action areas in the borough. The application site is located within the Canada Water Action Area and as such it is necessary for the development to secure 35% of the development as affordable, calculated on a habitable room basis. The affordable housing should then be split between social rent (70%) and intermediate (30%) units.
- 52 The draft Affordable Housing Supplementary Planning Document gives guidance on how to calculate the level of affordable housing a development provides. It describes the habitable room calculation for affordable housing purposes, which takes into account an additional habitable room where the size of a room is 27.5sqm or more. The calculation for this proposal is 334 affordable habitable rooms and 997 private habitable rooms, giving a total of 1,331 habitable rooms. Of the 76 affordable units proposed, there are 6 units designed to wheelchair accessible standards. Policy 4.5 'Wheelchair affordable housing' states that for every affordable housing unit which complies with the wheelchair design standards, one less affordable habitable room will be required. Taking into account the 6 units in this scheme that are designed to wheelchair accessible standards and are also affordable, 461 affordable habitable rooms are required in this scheme or 34.6%, rather than the normal 35% (or 466 habitable rooms) in this scheme.
- 53 The application proposes 334 affordable habitable rooms or 25.1%, which is below the policy requirement of 35% affordable housing in this development. The applicant has submitted a Viability Appraisal, using the '3 Dragons' methodology, in order to demonstrate that the development cannot viably support more than the 25.1% affordable housing being offered in the proposal.
- 54 This Viability Appraisal has been the subject of lengthy and detailed negotiations between the Council and the applicant. As originally submitted, the application proposed between 15% and 21% affordable habitable rooms with social rent units forming 61% of the affordable units. This offer was based on the applicant's assumptions in terms of build costs, sales values and an uplift on the Established Use Value, amongst other variables. Several of these variables were contested by the Council officers as not being reasonable or supported by sound evidence. Following these negotiations, the applicant has now offered 25.1% affordable housing, as a mix of social rented and intermediate (shared ownership) units. This would equate to 76 new affordable housing units. It is considered that, taking into account the aspiration to build a high quality scheme, and in recognition of the current economic climate, that this provision would represent the most that the scheme could realistically deliver whilst remaining viable.
- 55 However, there are two factors which may significantly affect the economics of the development at the point of delivery. The first is the cost of decontamination of the site. The applicant has assumed that the industrial history of the site may mean that an unsafe level of contaminants would exist in the soil, and that a substantial volume of soil would need to be excavated and removed from the site, and new clean topsoil imported prior to development. This assumption is not necessarily unreasonable, but it represents a 'worst case' scenario, and is not based on a detailed testing of the current sub-soil. In the appraisal, the application has assumed a very substantial sum for carrying out this decontamination work. If, in the site investigations prior to construction, the soil was found to be less contaminated, then the costs of this decontamination could be considerably less than that allowed for in the appraisal. It is considered reasonable that, in those circumstances, the Council should be able to secure additional affordable housing contributions based on any reduced

decontamination costs. It is therefore recommended that the S106 agreement includes a provision that, if the actual costs are more than 20% below those shown in the appraisal, then the saving beyond that 20% should be made available to provide additional affordable housing on site.

- 56 In addition to this specific aspect of viability, it is recommended that the entire appraisal is subject to review if the permission is not implemented, through meaningful works and a construction contract leading to building completion, within a limited period. This is in recognition of the weight being attached to the current economic conditions to justify a provision of affordable housing below the normally required level of 35%. The permission, if granted, would be subject to a standard 3 year time limit for implementation, and implementation sufficient to 'save' the permission may comprise only limited ground works which do not lead directly to any units actually being delivered. During the period prior to implementation, if there was any material improvement in the housing market, the scheme viability could improve, and the development become capable of supporting a higher percentage of affordable housing. It is therefore recommended that if no meaningful implementation takes place within 2 years of the date of the permission, then the scheme would be subject to a further review of its affordable housing provision, and any improvement in its viability would result in additional affordable housing being delivered on site, up to the policy level of 35%. This approach is consistent with that used in relation to Site C (Decathlon) and the Surrey Quays Leisure site, both at Canada Water.
- 57 The scheme does include affordable housing in the policy compliant mix of social rented and shared ownership tenures. The rented units will therefore be available at 'target rent' levels, which is particular benefit in ensuring affordability to those in greatest housing need. It also includes a good number of high quality, family sized affordable units, which is a particular benefit of the scheme. Given the site specific circumstances for this development, and the submission of a viability appraisal, it is considered reasonable to grant permission for the application with the level of affordable housing being proposed. The suggested review mechanism would enable the Council to benefit from any improvement in economic conditions prior to implementation, or if the assumed decontamination costs are not actually required. The applicant is offering to deliver the affordable housing within Phase A of the development, which will bring forward the affordable housing early in the construction process. This is a particular beneficial feature of the development. In summary it is considered that the scheme is delivering the maximum quantum of affordable housing which it could support at this time, and the review mechanisms are a reasonable means to reflect any uplift in housing values or other positive impacts on viability in the future.

### **Quality of residential accommodation**

- 58 Saved policy 4.2 'Quality of residential accommodation' states that planning permission will be granted for residential development, where it achieves good quality living conditions, and includes high standards of accessibility, outlook, privacy, natural daylight, ventilation, outdoor amenity space, safety, security and protection from pollution including noise and light.
- 59 Internal space standards  
Supplementary Planning Document for Residential Design Standards details minimum space standards for residential units.
- 60 The table below shows the minimum sizes in the Residential Design Standards compared with the range of unit sizes in the scheme:

Table 2: Size of units

Unit size	Minimum standard (sqm)	Proposed size range (sqm)
1 bed (2 persons)	50	50-59
2 bed (3 persons)	61	70-87
2 bed (4 persons)	70	
2 bed (average)	66	
3 bed (4 persons)	74	92-114
3 bed (5 persons)	86	
3 bed (6 persons)	95	
3 bed (average)	85	
4 bed (5 persons)	90	108-136
4 bed (6 persons)	99	
4+ bed (average)	95	

- 61 The scheme proposes unit sizes that comfortably exceed the minimum standards set out in the Design Standards which demonstrates that they are likely to provide good quality accommodation and this is a positive aspect of the proposal.
- 62 Outdoor amenity space  
 Policy 4.2(ii) of the Southwark Plan and Section 3.2 of the SPD on Residential Design Standards states that development should provide high standards of outdoor/green amenity space. The draft SPD advises that development should as a minimum meet and seek to exceed the following standards:
- 50m<sup>2</sup> of communal space per development;
  - For units containing 3 or more bedrooms, 10m<sup>2</sup> of private amenity space;
  - For units containing 2 or less bedrooms, ideally 10m<sup>2</sup> of private amenity space, and where this is not possible the remaining amount should be provided to the communal amenity space requirement.
- 63 The proposal includes private amenity space to all units, with private garden, terrace or balcony areas ranging between 6.3sqm and 96sqm. All units with 3 or more bedrooms have over 10sqm of private amenity space, and of the 1 and 2 bedroom units there are 164 units with less than 10sqm of private amenity space. A shortfall of 421sqm of amenity space from these 1 and 2 bedroom units has then been added to the required 50sqm of communal amenity space, and therefore the development is required to provide a minimum of 471sqm communal amenity space across the site.
- 64 The proposal seeks to create 63% of the site area as soft landscaping / amenity space across this 2.2 hectare site, which not only exceeds the minimum requirements for communal amenity space for the site, but also reduces surface water run-off, and this is discussed further below. This is a particular benefit of the scheme and is appropriate in this sensitive location adjacent to the Russia Dock Woodlands. The proposal also has ample space to provide the required children playspace in accordance with the London Plan and Southwark's Supplementary Planning Guidance. The submitted Design and Access Statement also describes the kind of playspace that could be provided on the site. Other areas are also intended as part of the landscaping strategy for the development, including dedicated allotment spaces, and a range of communal garden types with different planting schemes to characterise each area. The quality of landscaping intended on this site and the large area of the site given over to outdoor amenity space is a positive feature of this application, and is an appropriate response to this site in such close proximity to the woodland area. In the event that planning permission is granted, a detailed landscaping scheme with

itemised planting and surface treatment should be required by condition, and this should also include the specifics of the playspace to be included.

65 Daylighting analysis

A report has been submitted with the application, prepared by Formas Sustainability Ltd which examines the living spaces of the residential units proposed as part of the development, to determine whether they meet minimum daylighting requirements. According to the Code for Sustainable Homes, the BRE guide and the Building Standards Regulations, the kitchens require a minimum daylight factor of 2%, and living rooms, dining rooms and bedrooms of 1%. In this proposal, where units are designed with open plan living room / dining room areas, they are required to meet a minimum daylight factor of 2%. In the submitted report, the daylight factor of ground and first floor living rooms / kitchens and dining rooms are tested, and it explains the results of the daylighting analysis which was carried out in a worse case scenario: overcast sky (4000lux). Only the ground and first floor units have been tested, because these units will receive the least amount of daylight, and therefore if these units achieve minimum levels, it will demonstrate that the proposed development as a whole achieves minimum requirements for daylighting levels.

66 All of the tested rooms within the proposed development meet the BRE requirements described above. Three of the proposed units have rooms that achieve the lowest results of 2.33%, 2.17% and 2.22% respectively, which still exceed the 2% minimum for kitchen (and open plan living / kitchen) areas. All of the other units within each of the blocks for the proposal have a result of more than 2.5%. Therefore the proposal will provide good daylight levels for future occupiers of the units, in accordance with minimum BRE requirements.

67 Outlook, privacy and disturbance

As described above, Supplementary Planning Guidance for Residential Design Standards 2008 states that in order to prevent unnecessary problems of overlooking, loss of privacy and disturbance, development should achieve the following distances between building faces, and more specifically habitable room windows:

- A minimum distance of 12m at the front of the building and any elevation that fronts onto a highway;
- A minimum distance of 21m at the rear of the building.

These minimum distances should be applied within a development site as well as to properties outside of the site, in order to prevent future occupiers suffering adverse impacts from overlooking and disturbance.

68 The application proposal has been designed in light of these requirements, and seeks to comply with these minimum distances between habitable room windows in the blocks. In the majority of cases, the relationship between proposed blocks ensures a minimum distance of 21m between habitable room windows. In the limited instances that this distance is less than 21m, blocks are still designed to be between 14m and 18m apart, which is more than the minimum distance expected between blocks across a highway (12m). It should be noted that there are a small number of instances where the blocks are closer than 12m apart, and on phase A in limited cases blocks have a distance range of 7.5m. However where windows appear in a closer proximity than 12m to one another, the use of obscure glazing and screens is proposed to prevent possible overlooking. Any room proposed to include an obscure glazed window, is also served by a clear glazed window that does not overlook other properties proposed or existing, and therefore this arrangement with the use of obscure glazing is considered to be acceptable. The use of obscure glazing is acceptable in this case because the rooms still retain a window with clear glazing and a view. It is

recommended that in the event that planning permission is granted, a condition be included to secure the appearance of these windows labelled as 'obscured' on the submitted drawing no.EW-SP-L00, to ensure an acceptable relationship and distance between the proposed blocks in relation to privacy and disturbance. Subject to this condition no objections are raised regarding outlook and possible impacts upon the privacy of future occupiers of the development.

69 Southwark's Supplementary Planning Document for Residential Design Standards includes guidance on the standards that developments should achieve, and includes the requirement that a majority of proposed residential units have a dual aspect. This allows solar gain and a daylight capture from a minimum of 2 directions. As originally submitted, the application proposal had 66% of units with a dual aspect, which is a majority of the proposed units. However of the 34% that were single aspect, 11% (or 43 units) were north facing single aspect units. North facing single aspect units will receive the lowest levels of daylighting and solar gain, and while the daylight levels within these units comply with BRE guidelines (outlined above) it was an unfortunate feature of the proposal. In response to concerns raised by officers, the applicant has provided revised drawings to demonstrate how an additional oblique angle to the wall at various points in the development can provide a further oblique aspect for some units, reducing the number of north facing single aspect units to 19, or 5% of the development. This revised proposal is welcome, and will result in a noticeable difference to the units that benefit from the additional oblique outlook. Not all of the units were able to be altered to benefit from an oblique angle, because in some areas this could then result in overlooking or adverse impacts upon the privacy of occupiers. The inclusion of the oblique angle to some walls will not alter the size of units or amenity areas, and detailed plans have been submitted to demonstrate this.

70 Impacts from air quality

The majority of the borough is within an Air Quality Management Zone, and as a result developments are required to take account of any impacts upon air pollution as a result of, or during construction of, a proposed development. An Air Quality Assessment has been prepared by Aether and submitted with the application. It concludes that the concentrations of particulate matter across the site are within the air quality objectives, and that the concentrations of nitrogen dioxide will be above the annual mean objective regardless of whether the proposed development takes place or not due to existing site conditions. The report recommends the following mitigation within the development to protect future occupiers amenity:

1. That the installation of mechanical ventilation is considered; taking air from the tops of buildings where air quality is better;
2. That a site travel plan is drawn up to encourage the use of public transport, walking and cycling; and
3. That consideration is given to moving the energy centre, so that it's located on the edge of the site and away from sensitive areas such as flats.

71 The Council's Environmental Protection Officer agrees with the conclusions reached by the report and recommends that the mitigation outlined in the report is secured by condition, in the event that planning permission is granted. The energy centre is located along the street edge for the site, at ground floor level below residential units, and this is inconsistent with the advice in the report. While consideration was given to moving the centre further away from the residential units, and to the basement, it was found that this would result in significant problems with maintaining the centre. However with the other mitigation measures in place, there will not be any significant alterations to Air Quality in the area as a result of the development, and therefore it would not be reasonable to require relocation of the Energy Centre as a condition of granting permission.

- 72 Secured by design  
The landscaping strategy for the development distinguishes between public and private spaces through level changes that define private garden space without the need for fences in all locations. Along the street frontage residential units overlook the public footpath and provide passive surveillance, and a concierge for each section of the site provides security within communal reception areas. The submitted External Lighting Strategy for the development proposal, describes how the proposal fulfils secure by design requirements, alongside the need to limit impacts upon the adjacent woodlands. This is achieved through a lighting strategy that limits glare and is also compatible with CCTV proposals for the site. The Metropolitan Police have confirmed that they have no objections to the proposal. A secure by design certificate will be required as part of achieving a minimum of Level 4 of the Code for Sustainable Homes, and the submitted Design and Access Statement with the application confirms that the development will be Secure by Design compliant and achieve Building for Life Standards.

### **Design issues**

- 73 Strategic policy 12 'Design and conservation' of the Core Strategy states that development should 'achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in'. The policy goes on to assert that development should conserve or enhance the significance of Southwark's heritage assets their settings and wider historic environment. Saved policy 3.13 'Urban design' of the Southwark Plan asserts that the principles of good urban design must be taken into account in all developments. This includes height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape. Saved policy 3.12 'Quality in design' asserts that developments should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive and high amenity environments people will choose to live in, work in and visit.
- 74 The proposed development is made up of seven 'finger' blocks arranged perpendicular to the Russia Dock Woodlands. Heights to the blocks range from 3 to 6 storeys, increasing from the south to the north part of the site, and with the building heights stepping down closest to the woodlands. At their highest, the blocks have a set back sixth storey onto Quebec Way. Each block is set in new landscaped courtyard areas that provide communal and private amenity spaces for future residents. A new public route is also created through the site, linking the Russia Dock Woodlands to Quebec Way.
- 75 The design successfully retains a physical and visual connection to the woods whilst addressing the roads that flank it, namely Quebec Way and Redriff Road. The design achieves this by deliberately fronting onto the roadways, but including large gaps between the long 'finger' like blocks extending towards the woods. The design of the blocks further reflects the character of the area with predominantly masonry cladding - brick and stone-like ceramic material used to road frontages, with timber and glass forming the main materials to the rear of the site as it faces the woodlands. This reflects the hierarchy of the site and uses the facing materials to give the buildings a stronger presence on the public facing street frontages and a warmer and more tactile appearance at the rear to create a private feel to the development.
- 76 The buildings themselves have been designed to compliment their setting, with the street frontages being designed in a formal way, utilising symmetry and a strong

building line to reinforce the street edge. At the top of the blocks, penthouse apartments are well set back and clad in timber to give the upper levels a recessive and less dominant appearance. To the rear of the site the buildings take on a highly articulated stepped form to capture views of the woods to the eastern flank of the site and give the development complexity and interest.

- 77 The east-west arrangement of blocks has meant that a number of the apartments face due north. In most instances these have been designed with a second aspect which means that the number of single-aspect north facing flats have been reduced to a minimum. In certain circumstances, a number of north-facing single-aspect flats remain, however the design also includes some angled faces to a number of rooms, to reduce the northerly outlook to some units. These angled faces will not only give these apartments a limited easterly aspect give some additional interest to the form of these northern faces to the blocks.
- 78 The street frontage onto Quebec Way has been activated by public uses with the inclusion of a nursery and the gym facility close to the new public footpath through the site to the woodlands. The scheme also includes a retail unit at the southern end of the site onto Redriff Road and makes appropriate use of this public frontage. This focus of activities at either end of the site has resulted in the loss of some planting that exists on the site, but is balanced against the extensive new planting that is proposed. At the centre of the site, an 'Energy Centre' is proposed to be located fronting onto Quebec Way. This is intended to be a feature of the development, providing information of the energy efficient aspects of the development and promoting energy efficient measures. Its details should be reserved by condition to ensure that it's success as a mechanism to display the environmental credentials of the scheme, whilst creating activity on the frontage here.
- 79 The council has received an objection in relation to noise from the Harmsworth Quays Print Works across the road from the scheme on Quebec Way. The objector has requested that the scheme does not have any residential windows facing onto its site. In design terms this would be detrimental to the scheme and result in a completely blank facade onto Quebec Way which could harm the streetscene significantly. The designers have attempted to address the noise issue with the open form of the development allowing noise to dissipate across the site and by providing a high degree of dual aspect units on the frontage. The issue of noise impacts is discussed further below at paragraph 96.
- 80 Rendered visual representations of the scheme have been submitted by the applicant. These take in views of the site from Archangel Way, Ropemaker Road, Shipwright Road, Omega Gate and Greenland Dock. These accurate images demonstrate that the scheme compliments the character of the site and of the area. Incursions into the local views have been kept to a minimum and, where the scheme is visible, it will be a positive enhancement of the area which could benefit from some orientating devices to guide the viewer towards the town centre nearby without dominating the existing character of the area. While the draft CWAAP describes heights of 3 to 5 storeys being appropriate for this site, the scheme has included a maximum 6 storey height at a significant set back which will be only perceived in long views of the site, and in these views the additional height gives some interest to the blocks as a 'pop-up' feature in the roofplane. The additional height above that specified in the CWAAP, is not considered to cause harm sufficient to warrant refusal of the planning application.
- 81 The proposed development takes inspiration from the adjacent woodlands in the landscape strategy for the scheme. The arrangement of the blocks along Quebec Way, tapering out and stepping down towards the woods, leaves clear gaps between

the buildings and punctuates the street with clear visual links to the woods beyond. The site is proposed to be landscaped with mature and semi-mature planting and includes water features which compliment the natural environment of the Russia Dock Woodlands to the east. The landscaping on the site is welcomed, and the servicing and fire engine access for the site has been incorporated whilst maintaining a green character. The landscaping strategy is discussed in more detail below.

- 82 Overall the proposal has a high quality design that successfully relates to both the street frontage and the woodlands area. Towards the woodlands, the proposal includes a reduced scale and materiality that is sensitive to the woods, while creating an active frontage onto Quebec Way and Redriff Road. The development is set away from the rear boundary with the woodland, along with set backs from the third storey, that ensures that the development will not have an overbearing impact on the woods.

#### **Impact on character and setting of a listed building and/or conservation area**

- 83 The site is not located within or near a conservation area, and there are no listed buildings that would be impacted by the proposals.

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

- 84 Saved policy 3.2 'Protection of amenity' of the Southwark Plan, states that planning permission will not be granted for developments that result in a loss of amenity to surrounding occupiers.

85 Daylight, sunlight and overshadowing

A Solar and Overshadowing Report has been prepared Formas Sustainability Ltd in relation to the proposed development. The report assesses the impact of the proposed scheme on the sunlight received by adjoining / neighbouring residential properties in accordance with the Building Research Establishment (BRE) Guidelines. The total annual probable sunlight hours have been calculated for any window that has an orientation within 90 degrees due south. The report concludes that due to the large distance between the proposal site and surrounding residential properties, and the buffer zone of trees located in Russia Dock Woodlands, the development will not create any shadowing onto surrounding residential buildings. The tall trees within the woodlands currently impact the level sunlight received by surrounding residential dwellings, however the application site is located over 70m away from those residential properties to the east. The site is approximately 20m away from the residential properties to the south on the opposite side of Redriff Road, where windows are not within 90 degrees of due south of the development, and therefore have not been tested in the report. The application proposal is also at its lowest height of part 3 / part 4 storeys to the south of the site where it is closest to neighbouring residential properties. These properties have a northerly outlook onto Redriff Road and will not be overshadowed by the proposed development.

- 86 The existing buildings surrounding the site will also retain good interior diffuse daylighting, as the new development will not fall within a 25 degree line drawn perpendicular to the main face of the existing building, at a point 2m above ground level. Therefore no objections are raised to this current application in relation to impacts on the daylight and sunlight of existing adjoining residents.

- 87 Any planned future residential development close to the site should also be assessed in relation to daylight and sunlight impacts. On Surrey Quays Leisure Site, outline planning application reference 09-AP-1999 was granted on 20th October 2010 for the

erection of buildings ranging from 2 to 10 storeys comprising 11,105sqm leisure floorspace, 2,695sqm retail floorspace, 49,276sqm of private and affordable residential accommodation, student housing, and 2,500sqm commercial floorspace. This permission expires on 19th January 2015 and there have not been any subsequent approvals of reserved matters for the development scheme. The east end of the site fronts onto Quebec Way and would have residential flat blocks between 4 and 5 storeys in height. The approved flat blocks are more than 17m west of the proposed buildings on this current application site, and the buildings on this current application site are 3 / 4 storeys in height at this end of the site. There is a normal relationship between the buildings across streets that would be reflective of the relationship exhibited on streets around the borough. Buildings on the Leisure site have a slight south eastern angle to the facade which will also increase daylight gain for the proposed units within. It is not considered that any significant adverse impacts would result to the daylight and sunlight of the approved development on the Leisure Site as a result of this application, and conversely it is also considered that there would be no adverse impact on the residential dwellings proposed as part of this application. Given the extensive distance between the approved and proposed buildings on the two development sites, no objections are raised in relation to possible impacts upon residential dwellings daylight and sunlight on the two sites, which will be normal given the urban characteristics of the area.

88 Overdominance and visual impact

As described above, the closest existing residential properties are located on the opposite side of Redriff Road and are approximately 21m south of the application site. The proposed development has a maximum height of 4 storeys at this end of the site, and neighbouring residential properties are 3 storeys in height with pitched roofs. The development will not be overdominant in appearance at this end of the site, and while the visual impacts will clearly alter from the current situation on the site, it is not considered that this alteration will be harmful to residential amenity in the area. Visually the scale of the development at this end of the site is broadly in keeping with the surrounding scale of existing residential dwellings here.

89 The development proposal increases to a maximum of six storeys to the middle and northern parts of the site. This part of the site does not share any boundaries with residential developments and is surrounded by the Russia Dock Woodlands to the east and industrial buildings and a school to the north and west. While the proposed height at six storeys is taller than those residential dwellings to the south, this sixth storey is set-back significantly and will not be readily perceptible to passer-bys at street level. Quebec Way is largely dominated by the bulk of the Harmsworth Quays Printworks which stands the equivalent of about 9 residential storeys high. It is considered that the impacts upon the visual amenity of surrounding occupiers from the scale of the development are acceptable.

90 Privacy

All existing and proposed residential buildings on neighbouring sites exceed the 12m frontage separation required in the Residential Design Standards SPD and the intervening Russia Dock Woodlands to the rear would prevent any impact on residential dwellings beyond.

91 Impacts resulting from increased population in the area

Concerns have been raised by surrounding residents, about possible impacts upon the Russia Dock Woodlands and infrastructure in the area as a result of the increased population that the development would create here.

92 The woodland is an unrestricted area, currently open to members of the public at all times. The new footpath link would improve options for accessing the woodlands, but

this route conforms with the site requirements in the CWAAP, and therefore should be supported. The development proposal includes an extensive landscaped amenity space for residents, and therefore the development does not rely on the woodlands to meet the amenity requirements for the scheme. The Woodlands are a resource for the entire population, and it is not considered that the new residents of this particular development would cause overuse of the space or harm which could warrant refusal.

- 93 Policies within the Core Strategy and AAP describe how we can ensure that development can achieve growth sustainably. Strategic targets are set out in the Core Strategy for the growth in population in different parts of the borough, and policy 1 'Sustainable development' describes how we can allow the intensification of areas through development, while considering the needs of the community where development occurs. This means we can regenerate areas while requiring developments to contribute positively to the surrounding environment and infrastructure. As part of this, strategic policy 14 'Implementation and delivery' describes how development should use planning obligations to reduce or mitigate its possible impacts.
- 94 In relation to impacts upon infrastructure that could result from an increased population in the area, it should be noted that the applicant will be providing financial contributions to mitigate the impacts of the development. These planning obligations are provided in part to increase the capacity and quality of infrastructure in the area, including transport, education, health and open space in the area, and this is discussed further below in this report. The Canada Water AAP designates this site and a number of others for development, and there is an expectation that population numbers will increase as a result. Furthermore, the London Plan also identifies the Canada Water Area suitable for intensification. The AAP includes 'Policy 33: s106 Planning Obligations' which describes how planning obligations will be used to deliver key infrastructure to mitigate the impact of development. Appendix 6 and Appendix 7 go on to explain that the creation of a successful and sustainable town centre will depend upon the creation of shared infrastructure from which all future residents will benefit. The plan describes what improvements are required, and the planning obligations sought as part of this application proposal would be used in accordance with the Plan's strategy for mitigating impacts of development in the Canada Water Area.

### **Impact of adjoining and nearby uses on occupiers and users of proposed development**

- 95 The site is located within an area of mixed commercial and residential uses. However, the existence of the Harmsworth Quays Printworks immediately opposite raises particular issues for the amenity of any new residents on the application site.
- 96 Harmsworth Quays Printworks  
A Noise Assessment has been prepared by Sharps Redmore Partnership and submitted with the application. It identifies the noise implications arising from the nearby roads and the adjacent Harmsworth Quays Printworks upon the amenity of future occupiers within the proposed residential development, and necessary mitigation measures as a result of these impacts. The report concludes that the design of the development has been developed with specific regard to the noise issues.
- 97 The Harmsworth Quays Printworks have raised concerns in relation to applications on other adjoining sites that proposed residential development, could prejudice its industrial activities that are inherently noisy. The concern is that complaints from

future residents about noise levels from the printworks could result in restrictions that would leave them unable to operate in its established form; this in turn would impact its business. The site is located in a noise exposure category B area, with an area of category C located adjacent to Redriff Road. Category B areas are those where noise should be taken into account when determining planning applications and, where appropriate, conditions imposed to ensure an adequate level of protection against noise; Category C are areas where planning permission should not normally be granted, and if permission is given, conditions should be imposed to ensure a commensurate level of protection against noise. Whilst residential development adjacent to category C noise sources is not unusual, a key issue here is that much of the activity on the Harmsworth Quays Printworks site takes place at night, when sensitivity to noise disturbance is at its highest.

- 98 The usual World Health Organisation (WHO) target for residential development is a maximum exposure level of 45dB internally within bedrooms. The printworks have requested that this development is subjected to a higher 60dB L<sub>AMAX</sub> external noise level. This level (60dB L<sub>AMAX</sub>) has previously been advanced as an external noise target for other development sites surrounding the printworks.
- 99 The layout for the development has taken account of design constraints and has minimised the number of facades exposed to external noise levels above the 60dB L<sub>AMAX</sub> target. In summary, 70% of the proposed residential units will be compliant with the 60dB target externally.
- 100 It would only be possible to decrease the number of units exposed to noise levels above 60dB through the design of a single aspect frontage, with units facing away from Quebec Way. This would not be desirable from a design perspective, presenting a blank face to the main street frontage for the site. A level of activity and natural surveillance is encouraged from a design perspective and if this approach is taken it will inevitably result in units facing the printworks site. Other developments previously approved in the area have only ever achieved the 60dB L<sub>AMAX</sub> external target on the units closest to the Printworks, through the adoption of single aspect design, and were located on sites where such an approach did not jeopardise the street face of the development and its appearance in the townscape. However this site will have to use a combination of design, and technical solutions within the material of the facade, to meet the internal 45dB L<sub>AMAX</sub> in bedrooms.
- 101 In order to achieve the WHO recommended target of 45dB L<sub>AMAX</sub> internally within bedrooms, facades require thermal double-glazing, with an appropriate acoustically treated ventilation system to achieve the internal noise levels in all cases. For facades where external levels are above 60dB L<sub>AMAX</sub> an intermediate weight acoustic glazing system is required, for example 10mm glass - 12mm cavity - 8.4mm laminated glass system. With the appropriate glazing in place, the noise assessment concludes that the entire development will be fully compliant with WHO guidelines.
- 102 In light of the low number of facades with units that would be exposed to external noise above the 60dB target, and the glazing mitigation measures that will reduce internal noise levels to within WHO guidelines (45dB in bedrooms), it is considered that in the balance of amenity and urban design constraints, the proposal would create a satisfactory environment for future occupiers.
- 103 The Harmsworth Quays Printworks (HQP) have submitted an objection to the application, presented by Cole Jarman in a letter dated 14th September 2011 summarised in appendix 2 of this report. The applicants have responded to that letter, and confirm that the noise from the printworks formed a key consideration in

developing the design of the proposal, and as advised by the Council in the pre-application process, the applicant has engaged with the HQP acoustic consultants at an early stage. The response also clarifies that natural ventilation can be achieved through a number of ways, which need not require the opening of a window, and includes providing natural ventilation through the building facades. The applicant's response also counters a number of points raised by the Cole Jarman letter, and insist that the submitted noise assessment is an accurate representation of the noise exposure levels that would be experience by the development.

- 104 Council officers have assessed the submitted noise assessment and the mitigation measures to be incorporated into the development. Further information was requested, including clarification of the specific number of LAF max events (individual noise events) on the printworks site during the night time period, which would allow officers to better understand the potential for impact on amenity and nuisance. It is recognised that the activities at Harmsworth Quays have reduced, however this information was required to allow assessment of noise from the printworks site, should activities revert to their previous levels. Unfortunately this information has not been provided by HQP. While officers accept that the proposed mitigation to be incorporated within the fabric of the building will ensure that future occupiers will not be disturbed by noise from the printworks site with windows shut, and that there is a suitable mechanical ventilation system to allow residents to keep windows shut, it has not been possible to undertake a full assessment of impacts without clarification of the number and frequency of 'noisy' events during night time hours. While ordinarily the lack of this information could lead to a planning permission being refused, it has to be noted that the Harmsworth Quays printworks is in the process of relocating to an alternative site in Thurrock. This move is expected to complete in 2013 and the vacating of the site will be finalised prior to any new residential units being occupied on the application site. The planning permission for the printworks site also has limitations on the types of functions that can take place on it, without the need for further planning consent, and therefore any alternative industrial use can be assessed if necessary, in light of possible impacts on future residents of this application site. On balance, it is considered given the site specific characteristics and particular circumstances of the printworks at this time, that it would not be reasonable to refuse planning permission on the grounds of potential noise environment or adverse impact on the operation of the HQP site.

105 Other Uses

There are at least two places of worship in operation on the existing site, and there is current enforcement action in relation to these uses. The proposed development includes D class use floorspace, and places of worship would ordinarily be permissible as part of a D1 class use. It is however recommended that in the event planning permission is granted, the permission be restricted to prevent the operation of the D1 class unit as a place of worship. This is because of the number of vehicle movements that would be generated to and from the site, and the related noise and disturbance that results from the operation of a place of worship. These activities would result in adverse impacts upon future residential occupiers on the site, and therefore would not be considered acceptable. The council has a specific project with officers able to identify more appropriate locations and assist in the relocation of places of worship that do not have consent to operate and are inappropriately located.

**Traffic issues**

- 106 Saved policies 5.1 'Locating developments', 5.2 'Transport impacts', 5.3 'Walking and cycling', 5.6 'Car parking' and 5.7 'Parking standards for disabled people and the mobility impaired' of the Southwark Plan, require the impacts that a development may

have upon the transport network, be taken into account in the determination of planning applications. Strategic policy 2 'Sustainable transport' of the Core Strategy details that developments should seek to encourage walking, cycling and the use of public transport rather than travel by car.

107 The application proposal is located within an area with a Public Transport Accessibility Level (PTAL) of 3, which indicates the area's medium level of access to all forms of public transport. The site is not located within a designated Controlled Parking Zone (CPZ) but does have double yellow lines running the length of Quebec Way.

108 The proposal creates new vehicle accesses from Quebec Way into the basement areas. There are also two new routes created into the site, and these are for pedestrian use only.

109 Car Parking

The proposed development includes the creation of a basement parking area for 111 car parking spaces, equating to a ratio of 0.3 spaces per unit or 30%. This is in accordance with standards for the expected parking levels for a development of this size. While the development is not located within a CPZ, the existence of double yellow lines along Quebec Way will assist in preventing overspill parking from the site. Other measures to reduce car ownership are also to be incorporated into the scheme, including the provision of on-street car club bays and cycle storage space. Conditions will be required to secure measures to reduce car ownership, and should also require provision of electric vehicle charging points within the basement area. Previously there have been studies undertaken which support the provision of a CPZ in this area, and other recently approved developments have been expected to contribute to this. However this site is considered to have particular characteristics that would reduce the necessity of a contribution to implement a CPZ here. This particular site is located on a street with double yellow lines, and the distance to surrounding streets where on-street parking would be possible is considered to be sufficiently large to deter any overspill parking from this development. Surrounding residential streets to the south where on-street parking is possible are more than 50m away at their closest point. Therefore the level of parking is considered acceptable.

110 The proposal includes 28 disabled parking bays as part of the 111 space provision. This will equal 1 space for each wheelchair accessible unit proposed, and is in accordance with minimum policy requirements.

111 Servicing and refuse collection

Servicing is proposed to take place on-street through the provision of new loading bays. Ordinarily, servicing for new developments should take place on site. However given the existing site situation with double yellow lines along the length of Quebec Way, it is considered that an on-street arrangement is acceptable, and can be controlled through provision of short stay pay and display loading bays. These would need to be provided by the applicant as part of the development and this can be secured through the section 106 agreement for the application.

112 Cycling

The proposed development includes 503 cycle spaces, it equates to 1.37 spaces per unit. This exceeds Southwark's minimum cycle storage standards and is compliant with London Plan policies. Cycle storage is proposed within the basement of the development, and a segregated cycle / vehicle access ramp entrance is proposed as part of the scheme. Further details of cycle storage should be required by condition in the event that planning permission is granted.

113 Travel Plan

A Travel Plan has been submitted with the application, it describes how the development will promote the use of non-car forms of transport when the development is occupied. The plan currently requires additional information and therefore in the event that planning permission is granted, a revised Travel Plan should be requested by condition.

114 Necessary measures to improve public transport and infrastructure are described below in the section of this report concerning the planning obligations.

**Landscaping, ecology and biodiversity**

115 The scheme includes four communal garden spaces, as well as additional communal allotment areas, pedestrian routes and timber decked spaces. The communal gardens include formal landscaped areas at points of arrival, (entrances to buildings) and the main four communal garden spaces would include informal naturalistic toddlers play area with large lawn, a general play area for all children, and a SUDs (sustainable urban drainage system) pond feature to the rear of the garden adjacent to Russia Dock Woodland.

116 The landscaping strategy can be summarised as including the following features:

- Open pedestrian and cycle public link, connecting Russia Dock Woodland;
- Gated entrances off the new public link controlling access to residential garden spaces and timber decks linking to residential blocks;
- Private residential terraces to all ground floor units;
- Informal grass meadow planting adjacent to new public link to Woodlands;
- Informal water rill running adjacent to public link and around gardens, transporting rain water to wetland area and Russia Dock Woodland (SUDs feature);
- Central lawn areas within communal garden spaces;
- Changes in levels across landscaped areas to indicate public / private divides;
- Informal activity area;
- Herb garden and allotment areas (to be managed by the developer and made available to residents and wider community);
- Ornamental and herbaceous shrub planting areas;
- Focal tree planting at entrance points;
- Tree planting along streets and within site;
- Boundary habitat wall to woodlands; and
- Rear pedestrian path and fire engine access route.

*Impact upon the Russia Dock Woodland*

117 Within the site adjacent to the Woodland it is proposed to create a pedestrian route, which will also serve fire engines in the event of an emergency. A reinforced grass system is proposed along the sections where fire engine access may be required. The use of this system has the benefit of appearing attractive with a natural grass surface, whilst being capable of bearing heavy loads such as a fire engine. The system also combines well with SUDs and gives rapid surface drainage. The fire engine route is only required to the rear of blocks C1 to C5 and B1 to B2. The remaining rear access routes are landscaped in the normal way, with gravel paving and planting along the edge of the boundary with the Woodland.

118 A new habitat wall is also proposed along the boundary with the Woodland and comprises the following:

- i) wicker fence with views to woodland;
- ii) Gabion wall (Gabion walls are constructed of wire mesh frames filled with stones or

rock);

iii) edible espalier fence (for example an apple tree trained to grow along wall / fence) or living willow fence.

- 119 The purpose of this wall is threefold; it provides a secure barrier for residents while preventing unorganised access occurring at any point along the boundary, other than through the designated entrance points. This is a benefit to the wood and biodiversity within it. Furthermore the barrier creates a living route along the edge of the site, which allows movement of flora and fauna between the site and the woodland. It is also visually pleasing as a landscaped soft edge to the site, integrating the site with the Woodland area beyond.
- 120 In summary, the proposed landscaping along the edge with the Woodland is an improvement upon the existing site characteristics, and will be a benefit to the woods and the biodiversity within it, and is a positive aspect of the scheme.

121 Trees

The application proposal results in the removal of a number of mature trees along the Quebec Way and Redriff Road frontages. In total 21 individual trees and 9 groups made up of trees and hedges are proposed to be removed, all varying in quality. The trees are made up of a number of different species including Lime, Whitebeam, Maple, Willow, Ash, Beach, Sycamore, Poplar, Cherry and Rowan. Currently the trees have a medium level of amenity value, shielding the existing warehouse buildings on the site from view, and greening the street edge. However the trees in themselves are not of such a high quality that preservation would be recommended, and with suitable mitigation in the form of replacement planting, removal of all of these trees will be acceptable.

- 122 A drawing has been submitted which demonstrates that of the trees to be removed, there are a number which fall outside of the red line of the proposed development. However retention of these trees would be problematic during construction and a number would also be damaged or need to be removed as a result of the excavation of the basement area for the proposed development. Whilst a number of 'B' grade trees (B meaning moderate quality) are located along the boundary with Quebec Way, their value is inherently linked to their function screening the industrial estate. Other than that screening function, the trees demonstrated limited landscape and amenity value.

- 123 The proposal has an extensive landscaping strategy, which includes the planting of a new line of street trees, specifically 27 trees along the Quebec Way and Redriff Road frontages. The details of this planting will need to be specified in a legal agreement attached to any grant of consent, since the replacement planting takes place along the public highway areas. The streetscene would also benefit from the proposed landscaping within the site, with views of planting within the site possible from the street edge. There are three trees proposed to be removed adjacent to the rear (eastern) boundary of the site with Russia Dock Woodlands. Two of these trees (those closest to the boundary) are category C trees meaning low quality, the remaining tree is category B and is of medium value. While these trees would be removed by the proposed development, the replacement planting along the edge of the site with Russia Dock Woodland is recognised to be of very high quality and will represent a significant improvement to the treatment here, to the benefit of biodiversity. The replacement planting consists of the planting of a number of trees which will amount to more than the number removed. It will be necessary to replace through tree planting the equivalent of 2038cm girth (of tree trunk), which can be provided through trees of varying maturity and crown spread. The size of tree trunk

(maturity) of each tree will impact the overall number to be planted, but there is sufficient room on the site to accommodate this tree planting as part of the development. A tree planting strategy with detailed landscaping plan can be requested by condition to ensure that a 2038cm girth of replacement planting is provided across the site as a minimum. The species of tree currently proposed to be planted include Maple, Cherry, Ash and Rowan within the site and Alder along the street. The details of this tree planting, as well as species type should be reserved by condition in the event that planning permission is granted.

124 In light of the specific landscaping scheme proposed for the site, the high quality and level of planting proposed, and in particular the planting of a new line of street trees along Quebec Way and Redriff Road; and new boundary habitat wall and tree planting along the boundary with Russia Dock Woodlands, it is considered that in these exceptional circumstances the removal of trees is acceptable as part of the application proposals for the site.

125 Ecology and biodiversity

An Ecology Evaluation Report has been prepared by Ecology Network and submitted with the application. It explains that despite the close proximity to the woodland area, the site in its existing state offers little opportunity to wildlife. There are no records of protected animals on the site, apart from foraging bats that currently use the shrub area at the southern boundary to the site. In summary, the report finds that the planned development has the potential to provide an overall enhancement to biodiversity, through measures to create diverse plant cover as well as considering bats in the construction design. It is worthy of note that the vegetation at the southern boundary will be removed as part of the development, and the report concludes that as this hedge appears to perform an important function in providing an extension to the foraging area for bats from the woodland, its removal is unfortunate. However the removal is unlikely to result in an adverse effect on the conservation status of the bats, due to the size of the woodland and the extensive foraging opportunities it offers. It is also proposed to incorporate within the development features offering a similar function to the current hedge, as part of the landscaping scheme proposed for the development.

126 A Bat Preliminary Survey and Activity Survey have also been submitted with the application. These reports conclude that while bat activity was detected close to the application site, it remains largely confined to the Woodland. The lack of floodlighting and a favourable belt of shrubs at the southern end of the site is a localised suitable place for bats to feed, but the current activities on the site and site characteristics as a whole make it an unfavourable place for bats. The landscaping and water features planned as part of the development would be of considerable benefit in encouraging bats to forage further afield from the woodland edge. The reports recommend a number of mitigation measures to be incorporated into the development in response to bat activities near the site, including the use of light in buildings that will be of a type and intensity that will be no more severe than present, and the consideration of features within the landscape to encourage bats to use the area, and this can be secured by condition. An External Lighting Statement prepared by PMA Building Services describes the lighting strategy for the site and details that it is intended to use a lower output lamp to limit the glare and light spill across the site, and this is in accordance with the recommendations of the bat survey.

127 The Council's Ecology Officer has confirmed that the submitted report on Ecology and the Bat Surveys are consistent with best practice, and the conclusions and recommendations reached are sound. Therefore where the mitigation recommended within the reports is secured by conditions attached to any planning permission, there

are no objections to the development as a result of impacts to ecology or biodiversity on or around the site.

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

128 Saved policy 2.5 of the Southwark Plan and Policy 6A.5 of the London Plan advise that planning obligations should be secured to overcome the negative impacts of a generally acceptable proposal. Saved policy 2.5 of the Southwark Plan is reinforced by the Supplementary Planning Document (SPD) on Section 106 Planning Obligations, which sets out in detail the type of development that qualifies for planning obligations, and Circular 05/05, which advises that every planning application will be judged on its merits against relevant policy, guidance and other material considerations when assessing planning obligations.

129 The table below demonstrates the standard contributions generated from the Supplementary Planning Documents s106 toolkit and the contributions proposed by the applicant:

Planning Obligation	Amount of planning gain calculated by toolkit	Applicant contribution
EDUCATION	809,875	809,875
EMPLOYMENT DURING CONSTRUCTION	255,245	255,245
EMPLOYMENT DURING CONSTRUCTION MANAGEMENT FEE	19,677	19,677
PUBLIC OPEN SPACE, CHILDRENS' PLAY EQUIPMENT, AND SPORTS DEVELOPMENT	429,540	429,540
TRANSPORT STRATEGIC	177,978	177,978
TRANSPORT SITE SPECIFIC	183,000	183,000
TFL	35,000 (upgrade of 2 nearest bus stops and provision of wayfinding totems)	35,000
PUBLIC REALM	274,500	179,700 (in addition to delivery of significant new public realm costed at £94,800 on site)
HEALTH	375,294	375,294
COMMUNITY FACILITIES	57,631	57,631
<i>Sub total</i>	<i>2,617,740</i>	<i>2,617,740 +(2,750 TMO)</i>
ADMIN CHARGE	52,354	52,409
<b>TOTAL</b>	<b>2,670,094</b>	<b>2,672,899</b>

130 The Community Infrastructure Levy Regulations came into force on 6 April 2010. The regulations state under 122 – “Limitation on use of planning obligations” that it is unlawful for a planning obligation to be taken into account when determining a planning application for a development, or any part of a development, that is capable of being charged CIL if the obligation does not meet all of the following tests:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

- 131 A contribution towards education provision in Southwark is required as part of the development, in order to cover the capital cost of providing new school places required as a direct result of a proposed development. Without appropriate mitigation of the impacts from residential development upon education, schools will be put under undue pressure and reduce the ability of the Local Education Authority (LEA) to fulfil its statutory function, which will be unacceptable in planning terms. The applicant has agreed to pay the sum required under the section 106 SPD toolkit.
- 132 High levels of unemployment, low incomes and deprivation persist in the borough because of certain barriers to employment that people experience, most notably the lack of skills that are required in the jobs market. Reducing deprivation is an essential part of developing socially sustainable communities, especially in growing and intensifying communities. Sourcing local labour, and reducing the need to travel is a fundamental part of creating of sustainable communities, and delivering the objectives of the London and Southwark Plans. The WPC contribution would secure the cost of providing a WPC to assist in the placement of unemployed jobseekers from the local area into jobs within the final development either through an existing WPC programme, or through setting up a new programme to target the employment sector of the final development. The applicant has agreed to pay the sum required under the section 106 SPD toolkit.
- 133 A sum of money is also sought towards improvements to local public open space and sports facilities. The sum is necessary to ensure that additional pressure on existing facilities is mitigated through either up-grading the quality or intensification of use of existing resources, or providing new additional public open space and sports facilities. There are a number of open spaces and sports facilities which the future occupiers and workers of the proposed scheme could directly access, and would require additional infrastructure improvements as a result of the increased demand on those facilities. The applicant has agreed to pay the sum required under the section 106 SPD toolkit.
- 134 Contributions are sought to mitigate the impact on the public realm in the vicinity of a development, through works to a developments environs including footpaths and carriageways, street lighting, community safety initiatives, public art and landscaping. The development proposal creates a new route through the site into Russia Dock Woodlands and the applicant has included the cost of providing the path in their calculations of contributions towards the public realm. The applicant has agreed to pay £179,700 being £94,000 less than the sum required under the section 106 SPD toolkit. The applicant will then be undertaking works on the site to provide a new public route through the site, and this will cost £94,000 to provide. Therefore the applicant is compliant with the expected contributions to improve public realm, when reference is made to the total sum of financial contribution alongside works on the site to be carried out at the developer's expense.
- 135 Residents in the Borough require access to primary healthcare, they will need to use local PCT GP clinics, and acute and mental services which will directly impact on demand for existing services. Standard charges apply to mitigate the additional demand as per the S106 Planning Obligations SPD, and the applicant has agreed to pay the sum required under the section 106 SPD toolkit.

- 136 Strategic Transport contributions are sought for improvements to the Lower Road Gyrotory which is in close proximity to the site. Improvements are also sought to sum required under the section 106 SPD toolkit.
- 137 Site Specific Transport Contributions are also identified cover the cost of pavement and street furniture improvements adjoining the site as well as amending the Traffic Management Order to prevent future occupiers obtaining parking permits in the event that a Controlled Parking Zone is put in place around the site, as well as the provision of 2-3 car club bays, improvements to the cycle network and to bus stops serving the site. The applicant has agreed to pay the sum required under the section 106 toolkit.
- 138 The applicant has agreed to pay the sum required under the section 106 toolkit.
- 139 It is the opinion of the Council that the planning obligations sought meet the planning tests of Circular 05/05 and the CIL regulations (122 and 123). The contributions would be spent on delivering new school places as a result of the development, job creation during construction and in the final development, improvements to open spaces and sports facilities, improvements to increase the capacity of transport provision across the borough, improvements to the public realm, new health facilities and improvements to community facilities. These are necessary in planning terms, directly related to the development and fairly and reasonably related to the impacts of the development.
- 140 The Mayor's CIL comes into effect in April 2012 and will apply a financial levy against all developments which will go towards the delivery of Crossrail. The levy is not discretionary and must be applied to all developments at a rate of £35 per square metre in Central London and will be prioritised over all other planning obligations. As the officer recommendation for this application requires a Section 106 to be completed before 30 March 2012, the Mayoral CIL does not apply at this time.
- 141 In accordance with the recommendation, if the Section 106 Agreement is not signed by 30th March 2012, the application should be refused for the reason below:  
'In the absence of a signed Section 106 Agreement, there is no mechanism in place to avoid or mitigate the impact of the proposed development on the public realm, public open space, health care service, the transport network, and employment and the proposal would therefore be contrary to Saved policy 2.5 of the Southwark Plan and Policy 8.2 of the London Plan'.

### **Sustainable development implications**

- 142 Strategic policy 13 'High environmental standards' of the Core Strategy 2011 requires developments to meet the highest possible environmental standards, including targets based on the Code for Sustainable Homes and BREEAM (Building Research Establishment Environmental Assessment Method) standards. This includes requiring residential development to achieve a minimum of Code for Sustainable Homes Level 4, and other non-residential development to achieve at least a BREEAM 'excellent' except community uses which should achieve a minimum BREEAM level of 'very good'. Major Developments are also expected to achieve a 44% saving in carbon dioxide emissions above building regulations requirements for energy efficiency, as well as achieving a reduction in carbon dioxide of 20% from using on-site or local low and zero carbon sources of energy.
- 143 The applicant has submitted a Code for Sustainable Homes Pre-Assessment prepared by Formas Sustainability Ltd. The report shows a pre-assessment of the development according to the methodology of the Code and demonstrates that the scheme can achieve a minimum of Code level 4. This should be secured by condition

in the event that planning permission is granted.

- 144 Policies 5.2, 5.3, 5.6 and 5.7 in The London Plan 2011 outline the measures that the Mayor expects developments to incorporate as part of the sustainable design and construction of energy efficient development schemes. In the consideration of energy efficient measures, application proposals should apply the Mayors energy hierarchy, using passive design and energy efficient measures to reduce heating and cooling loads, and feasibility assessments for low and zero carbon energy systems described in the London Renewable 'Toolkit'.
- 145 A Sustainability Report has been prepared for the development proposal by Formas Sustainability Ltd, and it explains the energy efficient solutions that are intended to be adopted for the development. The development proposal includes passive design measures, including building orientation, daylighting and insulation to improve the performance of the building, reducing carbon emissions by 32%. It is also proposed that the development be served by an onsite communal heat network serving all dwellings, and fed from a single energy centre. Further details of this network are requested by the Greater London Authority, in order to ensure compliance with London Plan policy 5.6. The proposal includes a 140kWe combined heat and power system and 3,500sqm of roof mounted photovoltaic panels. The submitted Energy Strategy justifies this approach, and demonstrates that the greatest carbon saving is achievable with this combination of CHP and PVs than through the use of alternative zero carbon energy sources. Further clarification has also been provided on the calculation of energy savings as a result of the incorporation of PVs into the development as requested by the GLA.
- 146 A biodiverse green roof is also included at roof level on each of the blocks, and is proposed in combination with the use of this space for PV panels. The PV panels are angled to allow release of space around them for the biodiverse roof. Further details of the biodiverse roof and the use of roofs for both PVs and green roofs can be requested and secured by condition.
- 147 Strategic policy 13 of the Core Strategy also requires major developments to reduce surface water run-off by at least 50%. The existing run-off on the site has been calculated by the applicant and it is proposed to include discharge flow control devices and reduce surface water run-off by 50%. It is also intended to use sustainable urban drainage techniques, including landscape features, to act as storage ponds during storm events increasing attenuation. It is proposed to incorporate SUDS features into the landscaping scheme for the site, which will channel water to the woodlands, supporting native wildlife and tree planting there. This is considered to be a positive aspect of the development proposal.

#### **Other matters**

- 148 Construction management  
A Construction Management Plan has been submitted with the application. It details the intended site management arrangements during the construction of the proposed development, including measures to reduce dust pollution, airborne debris, noise, and security and safety measures. It is intended to have a Senior Project Manager on site to liaise with neighbours on a regular basis. It is recommended that in the event that planning permission is granted for the development, a condition is attached to the grant of consent to ensure compliance with the mitigation measures outlined in this plan.
- 149 Archaeology

An Archaeology Desk-Based Assessment Report has been submitted with the application. This provides some baseline information on the historic environment for this part of the borough; however important elements of the baseline information have not been included, such as an assessment of the geoarchaeological potential of the site. While the lack of this information would not prejudice a decision being reached on an application, in the event that permission is granted, this information would be required prior to the commencement of any development on the site. The report recommends the monitoring of geotechnical works, and this is not suitable to ensure the archaeological interests of the site are maintained. It is therefore recommended that a programme of archaeological evaluation works are undertaken on site to investigate the archaeological potential of the site, including the survival of dock features within the proposed area, including a programme of geoarchaeological analysis should suitable deposits be identified during the evaluation.

150 Flood risk

The application site is located within flood zone 3 of the Environment Agency indicative flood map and therefore has a 1 in 200 or greater annual probability of flooding from the River Thames. A number of mitigation measures have been incorporated into the design of the proposal to account for this probability, and the Environment Agency have confirmed that there are no objections to the development as a result of flood risk, where these mitigation measures are in place. In the event that permission is granted, conditions will need to be attached to ensure appropriate mitigation measures are in place.

151 Contaminated land

A Phase 1 Detailed Desk Top Study has been produced for the site by Curtins Consulting. The report describes that the site has an industrial history and refers to a site investigation in 2001 when metals and hydrocarbons were identified in the ground. The report recommends further investigation, and conditions should be attached in the event that planning permission is granted to ensure further investigation of land contamination on the site and mitigation where required. The cost of removing contaminated soil from the site, could potentially be very high, and this has significantly impacted the viability of the proposed development. As a consequence of this and other cost factors the level of affordable housing expected to be provided on the site is below the 35% expected under Core Strategy and CWAAP policies. More information is included in the affordable housing section of this report at paragraph 51.

**Conclusion on planning issues**

- 152 The proposed development will provide a mix of uses within a residentially lead scheme, and this is in accordance with the vision for this site in the Canada Water Area Action Plan (AAP). While the quantum of units is higher than expected in the Canada Water AAP, the Inspector concluded in his report that this site should be included within the Action Area Core. Therefore the number of units proposed on the site is more in keeping with this revised designation within the Urban Density Zone, rather than the Suburban Density Zone which was in place at the time the capacity of the site was originally considered. The scheme would provide much needed new housing, including high quality family housing, as well as new community facilities and social infrastructure.
- 153 The proposal provides sufficient mitigation of its impacts, and limits impacts upon future occupiers from surrounding uses, including the Harmsworth Quays Print Works. The landscaping scheme is particularly high quality, and will improve the relationship between this site and the adjacent Russia Dock Woodlands to the benefit of biodiversity both in and around the site. The design of the proposed development is

acceptable and responds sensitively to the woodlands whilst addressing the street frontage with active uses.

- 154 However, the proposal fails to provide the minimum level of affordable housing expected of developments in this area. The submitted viability appraisal demonstrates to the satisfaction of officers that the development can only support 25.1% affordable housing if it is to remain viable and capable of delivery. This is based on certain assumptions, including current market conditions and sales values, and an assumed high cost for site decontamination. It is therefore recommended that any permission is subject to a review to take into account any lower than forecast decontamination costs. In addition, the financial appraisal should be reassessed in the event that substantial implementation has not occurred within 2 years of the date of any permission, and in any case for any phases which are not constructed concurrently with the construction of the first phase. This will ensure that, in the event that economic circumstances improve, the scheme delivers any additional affordable housing units which it was then able to support.
- 155 In summary, it is considered that the proposed development is acceptable in so far as it achieves the main aspirations for this site outlined in the AAP, within a development that is sensitive to the proximity of Russia Dock Woodlands and provides a much improved street frontage onto Quebec Way. Whilst the level of affordable housing proposed as part of the development is not in keeping with normal policy requirements, it is supported by a viability appraisal and can be subject to a review mechanism within the legal agreement. Therefore on balance it is considered that the development is acceptable, and will contribute to the provision of much needed good quality family housing in the area. It will also contribute to the provision of local infrastructure and other improvements through the S106 contributions. It is recommended that the application be approved subject to the completion of a legal agreement and referral to the Greater London Authority.

### **Community impact statement**

- 156 In line with the Council's Community Impact Statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process. In addition to this, the applicant has undertaken their own consultation prior to lodging the application. This consultation is described in the applicants 'Statement of Community Involvement' which accompanied the application.
- 157 Four Communications have produced a report of the consultation they have undertaken on behalf of the applicant on the development proposal. Activities undertaken as part of the consultation process included:
- 158 - Regular meetings with local stakeholder groups, including the Friends of Russia Dock Woodlands and the Canada Water Consultative Forum;
- Letters to ward councillors for both Surrey Docks ward and Rotherhithe ward, inviting them to meet with the planning team to discuss the proposals;
  - Meeting with Councillor Peter John, the Leader of LB Southwark Council, and Councillor Fiona Colley, the Cabinet Member for Regeneration and Corporate Strategy;
  - Newsletters delivered to approximately 2,200 local residents and businesses, informing them of plans to redevelop the site and bring forward a mixed use scheme and inviting them to the two public consultation exhibitions;
  - Invitations to the public exhibitions were also sent to local community groups and the ward councillors for Surrey Docks and Rotherhithe offering them individual briefings;

- Public consultation exhibitions, held on Wednesday 13th April 2011 and Wednesday 1st June 2011, took place at Alfred Salter School next door to the site, for local residents, businesses and other neighbours. The second exhibition presented revised proposals based on comments received at the first exhibition as well as from other stakeholders and LB Southwark planning officers;
- Provision of questionnaires (feedback forms) at both exhibitions, enabling residents to provide feedback.

- 159 Key issues identified by the local community and stakeholders were:
- Details of the residential proposals - the size of units (particularly the number of 3 bedroom homes), the amount of affordable housing, sizes of rooms, the total number and mix of sizes proposed;
  - Height and density - related to the suburban / urban debate for the area generally;
  - Transport - pressures on existing bus routes (related to infrequent services) and underground at Canada Water;
  - Employment - the need for jobs in the area;
  - Lack of amenities - need for health centre (including dentist), secondary school, something for children;
  - Mini-market - requested detail;
  - Timescales - requested detail;
  - Routes through the site - request detail;
  - Relation to Russia Dock Woodland - clear majority thought one route sufficient, no objection to distance of 4m between buildings and the woodland, wish to see more information on the natural habitat boundary wall and SUDS system;
  - Car parking - amount and location; and
  - Landscaping - requested detail.
- 160 The submitted report describes the responses received, the method of consultation undertaken and how the responses informed the development of the proposal.

### **Consultations**

- 161 Details of the Councils consultation undertaken in respect of this application are set out in Appendix 1.

### **162 Consultation replies**

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

#### Summary of consultation responses

9 responses received from local residents / residents groups in objection to the application, 1 received in support of the application (from Friends of the Earth), and 1 received with comments.

Main issues raised:

Currently high number of flats in the area; impacts on traffic; impact on infrastructure from increase in population; height; density; and impacts on the woodland.

No objections received from internal consultees, conditions recommended as described in Appendix 2. Further information sought by Greater London Authority and Transport of London

### **163 Human rights implications**

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.

This application has the legitimate aim of providing a mixed use residentially lead development. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/403-B  Application file: 11-AP-2565  Southwark Local Development Framework and Development Plan Documents	Regeneration and Neighbourhoods Department 160 Tooley Street London SE1 2TZ	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: <a href="mailto:planning.enquiries@southwark.gov.uk">planning.enquiries@southwark.gov.uk</a> Case officer telephone: 020 7525 5597 Council website: <a href="http://www.southwark.gov.uk">www.southwark.gov.uk</a>

## APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Images

## AUDIT TRAIL

<b>Lead Officer</b>	Gary Rice Head of Development Management	
<b>Report Author</b>	Rachel Gleave	
<b>Version</b>	Final	
<b>Dated</b>	15 February 2012	
<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 Communities, Law & Governance	No	No
Strategic Director of Regeneration and Neighbourhoods	No	No
Strategic Director of Environment and Housing	No	No
<b>Date final report sent to Constitutional Team</b>		17 February 2012

**Consultation undertaken**

**Site notice date:** 24/08/2011

**Press notice date:** 18/08/2011

**Case officer site visit date:** numerous most recent on 18/08/2011

**Neighbour consultation letters sent:** 15/08/2011

**Internal services consulted:** 22/08/2011

Access Officer  
Archaeology Officer  
Design and Conservation Team  
Ecology Officer  
Environmental Protection Team  
Housing Regeneration Initiatives  
Public Realm  
Streetscene  
Transport Team  
Urban Forester  
Property  
Greater London Authority  
Planning Policy  
Waste Management  
Economic Development

**Statutory and non-statutory organisations consulted:**

Metropolitan Police  
Aqiva  
Environment Agency  
Natural England  
Transport for London  
London Borough of Lewisham  
Thames Water  
London Underground  
London Fire and Emergency Planning Authority

**Neighbours and local groups consulted:**

Canada Water Forum;  
Redriff Tenants Association; and  
Friends of Russia Dock Woodlands.

469 letters sent to occupiers on the following streets surrounding the site:  
Finland Street, Plover Way, Russell Place, Mulberry Business Centre, Brunswick Quay, Onega Gate, Redriff Road, Quebec Way, Surrey Quays Road, Ropemarket Road, Farrow Place, Victory Way, Vincent Close, Shipwright Road, St Elmos Road,

Teredo Street, Lovell Place and Somerford Way.

**Re-consultation:** None required.

### Consultation responses received

#### Internal services

- 1 Urban Forester  
No objections to the proposal - suggest conditions as described below:  
The landscaping plan amended further to DRP is an improvement, especially in its form and relationship to Russia Dock Woodland, the provision of links and a stronger frontage to Quebec Way.  
The removal of medium quality semi-mature trees and groups is acceptable and will improve the streetscene by introducing a line of new street trees and planting within courtyards and communal gardens. The use of water rills and ponds is welcome feature and should be included whether or not a SUDS scheme is agreed as part of as yet unconfirmed works with RDW.  
Happy to leave species and other specifications to condition, although it is worth noting that native trees are not essential along the Quebec Way frontage or in more formal courtyards, thereby allowing a wider species palette. Larger tree species should include Lime, however the shorter lived species of Rowan and Cherry suggested in the Design and Access Statement are not recommended. In any case replacement planting will need to be a minimum of 2038cm girth to mitigate loss of individual trees and tree groups.  
Where any planting is proposed above car parking space, podiums and on terraces a condition is recommended to provide specific details of how these will adhere to weight loading, soil volumes and maintenance requirements to support the intended landscaping. Surfacing around trees should be Cedec type compacted hoggin and not resin bound gravel.  
All landscaping and tree protection, including site monitoring, should adhere to the submitted Arboricultural Report.  
Highways are likely to require high specification and amply sized tree pits using a load bearing cellular soil system, such as Permavoid. These may also be designed to form part of a SUDS.  
Conditions concerning the landscaping plan, tree planting, green roof, boundary treatments, trees and tree protection.
- 2 Public Realm  
The site in question, is bounded by an adequate footway, constructed of setts and granite kerbs of reasonable standard. However should any of the footway be damaged during construction, or proposed to be altered in any way, this be reconstructed in keeping with the tone of the area, with like for like materials, by the developer entering into a s278 agreement.  
New level crossing point recommended on Quebec Way for safe pedestrian crossing to west of the site to allow the new residents to access local transport hubs and amenities.
- 3 Environmental Protection Team  
The report indicated that part of the development will expose residents to levels above air quality objectives. The identified mitigation in the report, including the incorporation of a mechanical system and the relocation of the plant room may bring about an improvement. Recommend conditions in relation to noise, air quality, land contamination, and construction management plan.

- 4 Ecology Officer  
The Bat surveys and Ecology Phase 1 habitat reports are consistent with best practice. Agree with the conclusions and recommendations. Welcome the ecological enhancements proposed and feel that the developers proposals will improve the site and the adjacent Russia Dock Woodland to the benefit of biodiversity. Conditions are recommended concerning Implementation of agreed biodiversity mitigation / enhancement, including the creation of a habitat wall or hedgerow boundary to Russia Dock Woodland, the SUDS scheme to capture and feed at least two water bodies in the development, the planting of at least 30 native trees of UK provenance, provision of features suitable for pipistrelles (bats) incorporated within the new building and monitored, and creation of species rich sward and scrub planting within the communal gardens and landscaped areas. Also recommend a condition concerning green roofs for biodiversity.

- 5 Archaeology Officer  
The applicants have submitted a desk-based assessment which provides some baseline information concerning the historic environment for this part of the borough, however, important elements of the baseline information have not been included, such as an assessment of the geoarchaeological potential of the site.

The applicant's archaeologists have also recommended the monitoring of geotechnical works. This is not suitable to ensure the archaeological interests of the site are maintained. It is recommended that a programme of archaeological evaluation works are undertaken on site to investigate the archaeological potential of the site, including the survival of dock features within the proposal area, including a programme of geoarchaeological analysis should suitable deposits be identified during the evaluation. Depending upon the results of these studies further archaeological recording may well be necessary and should be secured by condition.

- 6 Transport Group  
Request further information and suggest conditions as described below:  
No information has been supplied with regards to the gradient of proposed ramps leading into the basement parking area. This information is needed in order to determine the acceptability of this proposal.

It is unclear from the plans provided as to whether there will be conflict with vehicles entering and exiting the basement parking at the bottom of the ramp (in the basement). The applicant will need to provide the Transport Group with swept path analysis demonstrating that vehicles can enter and exit the ramp with out any conflict.  
*[Case officer comment: additional information now received, drawing no.SK02 shows the gradient of the ramp and confirms that the scheme has been designed to allow sufficient space ensuring that the car park is usable and that access and egress onto the public highway is not in conflict or compromised.]*

For both residential and commercial aspects of the cycle parking the Council expects the applicant to meet a high standard of design that meets best practice guidance. From plans provided it is unclear as to whether the required dimensions that are set out in the Manual for Streets are achievable. The applicant will need to demonstrate that the required dimensions are achievable for both the residential and commercial element of the development. Stands must be accessible to all users, and for this reason only 'Sheffield' stands are acceptable. It is recommended that this is resolved before this application is determined.

*[Case officer comment: the submitted plans identify the stands proposed as being of the Sheffield variety. The scheme architect has advised that the Manual for Streets data has been applied to the scheme and the layouts accord with the layout*

*guidance.]*

The applicant has proposed to provide on street 'short stay parking' and there is no objection raised to this proposal. However the Transport Group request that these bays will be pay and display bays. It is also understood that the applicant is willing to provide on street (minimum of three) electric vehicle charging points, and this proposal is welcomed.

Normally the Transport Group would require servicing / loading to be undertaken within the curtilage of the proposed site. However, giving the circumstances that are associated within the site it is proposed to provide loading bays within the proposed lay-bys. The Transport Group require the proposed loading bays to be located close to the refuse collection areas. The bays will be subject to loading time restrictions.

The applicant has suggested that they are willing to provide three car club spaces these are to be located on street at the cost of the developer. The Transport Group welcome this proposal and request that 3 years membership for occupiers is also secured.

The travel plan is not of a standard that is acceptable to London Borough of Southwark and has failed the TfL ATTrBuTE, and therefore cannot be approved at this stage. The following areas for improvement have been identified in the travel plan assessment:

- Targets must also focus on increasing levels of walking and cycling.
- Interim targets must be set for years 3 and 5 from occupation
- The Travel Plan Coordinator (TPC) must be named and contact details given. An interim TPC (prior to the building being occupied) will suffice at this stage. It is not acceptable for the TPC to be a resident / occupier; commitment must be given to having a resource for this, whether it be within the developer's company or via an appointed consultant.
- In accordance with TfL standards, this travel plan is a 'strategic level' travel plan and must be monitored using a TRAVL-approved Independent Field Company. This must be noted. It must be noted that TRAVL surveying will be undertaken at 1 (75% occupation), 3 and 5 years by an Independent Field Company and will be funded by the developer.
- An action plan must be provided.
- It must be noted that the developer will fund the TPC role, measures and independent TRAVL monitoring.

The travel plan must pass the TfL ATTrBuTE assessment and take into account the above comments before it can be approved.

## 7 Design Review Panel

(Comments on pre-application scheme, which was revised following the Review and prior to submission of this formal planning application).

The Panel welcomed the opportunity to comment on this important scheme. They acknowledged that the presentation had prompted a lot of discussion and were enthused by the fantastic opportunity that a site which shares a boundary with a local woodland has presented to the architects. The Panel however raised fundamental concerns about the way the scheme had been developed, the vision for the site and the architectural expression of that vision.

They noted that one of the most important environmental constraints of the site, the

Harmsworth Quays print works across the way had not been mentioned in the presentation. The print works are an important consideration for any proposal and a vocal and articulate influence in the area. The Panel urged the architects to gain a deeper understanding of the challenges that their proposals will need to confront before they can develop their vision for the site.

The Panel raised serious concerns about the arrangement of the built form on the site. The proposed arrangement of blocks as 'fingers' simply located in wooded surroundings, fails to relate to its urban context and equally raises fundamental questions about the proposed vision for the site. Most importantly the chosen form of the development lacks a clear relationship with the street, is ambiguous the relationship of public spaces to private spaces, fails to distinguish the 'backs' of the buildings from the 'fronts' and lacks a sense of place which will result in a scheme that will feel unsafe, for residents and visitors alike. Whilst they acknowledged that the instinct to create courtyards was appropriate on this site, the Panel felt the form fails to do this in a meaningful way. They challenged the architects to address Quebec Way, to use its built form to create a frontage onto the street that articulates the hierarchy across the site, from the public footway to the main entrances and cores, to articulate the difference between communal courtyards and private gardens and to give the private residential units a distinctive character that relates to its place. They felt the current ambiguity of space across the site, the way that public footways gives pedestrians unfettered access across the site, and the lack of resolution of vehicular and pedestrian access to the site is detrimental and is likely to need to require artificial barriers in the longer term resulting in a poor environment on the site which will run counter to all the designer's aspirations for the site.

The Panel raised detailed architectural questions about the viability of a scheme for example the proposal to provide all servicing to the site via a 4.5m, deep basement whilst at the same time enabling the creation of a mature landscaped environment. They felt fundamental aspects of the proposal, and their associated costs had not been sufficiently considered by the designers, including servicing, parcel and furniture deliveries, postal deliveries, communal and private amenity as well as security by design. They asked the architects to develop a detailed strategy for the site which addresses each of these aspects both from the point of view of the proposed residents including children and the full range of visitors to the site.

The Panel were concerned that the designers had not considered a more diverse housing mix when they developed their proposals for the site. They were disappointed that a substantial scheme on a prominent site which has good connections to the natural environment has not considered a range of dwelling types and instead had simply resorted to a flatted proposal. This reinforced their earlier concerns about the hierarchy of spaces and the ambiguity of public to private and raised fundamental questions about the quality of the place that is being proposed here. Whilst they acknowledged that the scheme has the potential to meet the residential design standards on measures like separation, dual aspect, unit and room sizes, they expressed on-going concerns about the arrangement of built form and housing mix, the sense of safety and legibility across the site and the relationship of the scheme to its context.

Finally, the Panel raised serious concerns about the environmental credentials of this proposal. The designer's assertion that the scheme will achieve Code for Sustainable Level 6 did not chime with a heavily car parked, concrete framed, traditionally constructed proposal that was presented. They welcomed the ambition to achieve this exceptional standard on this site and encouraged the architects to adhere to that vision however they felt that the form of the proposed development failed to reflect the

environmental concepts and principles that were presented to them. To achieve Code Level 6 the designers cannot rely on a check-list of features bolted onto the proposed design as was presented, instead the form of the development, its use of materials and arrangement on the site will have to emerge from the environmental requirements of the site and the needs of the community that it will house. The architects were encouraged to: find out more about the environmental qualities of their site; to investigate other developments that have approached the environmental standard they are proposing; to involve the advice of environmental specialists; and to explore proposed materials for their longevity and recyclability, before develop their vision for the site.

In conclusion, the Panel raised fundamental concerns with this proposal in relation to its urban design, its detailed architectural design and its sustainability. They challenged the designers to address their concerns in a meaningful way and requested that the scheme be brought back to the Design Review Panel before a planning application is submitted.

### **Statutory and non-statutory organisations**

#### **8 Greater London Authority**

Recommendation:- That Southwark Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 76 of this report, but that the possible remedies set out in paragraph 78 of this report could address these deficiencies.

- The London Plan policies on employment, social infrastructure, retail, housing, urban design, inclusive access, sustainable development and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

*Employment:* The proposed loss of employment uses at this site does not raise strategic concern, however, the Council should satisfy itself that the loss would not undermine local employment capacity within the borough in accordance with the principles of the London Plan policy 4.4;

*Social infrastructure:* Concerns are raised with respect to education facilities and social infrastructure in respect to London Plan policies 3.16 and 3.18. the council should satisfy itself that this site is no longer required for educational purposes in accordance with the principles of London Plan Policy 3.18. The applicant, and the Council, should ensure that all reasonable steps are taken to enable the relocation of this place of worship in accordance with the principles of the London Plan policy 3.16;

*Retail:* The Council should satisfy itself that the impact of any trade diversion from the primary shopping frontage at Canada Water district town centre, caused as a result of this proposal, would be acceptable in accordance with the principles of London Plan policy 4.7;

*Housing:* Further discussions are sought with regard to the proposed housing and affordable housing provision in accordance with the principles of London Plan policies 3.8, 3.11 and 3.12. Concerns are also raised in respect of children's playspace in accordance with London Plan policy 3.6. Following assessment of the viability report the applicant should engage in joint discussions with the Council and GLA and present a deliverable housing mix for the scheme, using a cascade mechanism if necessary, in accordance with the principles of London Plan policies 3.4, 3.8, 3.11 and 3.12. The applicant should also demonstrate that the scheme will include appropriate provision of children's playspace, based on the expected child population of the development, in

accordance with London Plan policy 3.6;

*Urban design:* The proposed design is supported in accordance with London Plan policy.

*Inclusive access:* Whilst the proposed approach is supported, further information and / or commitments are sought with respect to London Plan policies 3.8, 6.13 and 7.2. The applicant should identify the proposed wheelchair units clearly on plan, and provide an indicative unit layout which demonstrates how the lifetime homes standards would be met in accordance with the principles of London Plan policy 3.8. The council should also ensure that landscaping and way finding measures, lifetime homes standards, 10% wheelchair accessible units and the proposed provision of blue badge parking are secured through planning condition in accordance with London Plan policies 3.8, 6.13 and 7.2;

*Sustainable development:* Further work, information and commitments are sought in respect to energy efficiency, district heating, decentralised energy, renewable energy, expressing carbon dioxide savings, urban greening, and flooding and sustainable urban drainage in accordance with London Plan policies 5.2, 5.5, 5.6, 5.7, 5.10, 5.11, 5.12 and 5.13;

*Transport:* further work, information and commitments are sought in respect to car parking, walking, trip generation, buses, servicing, deliveries and construction, and travel planning in accordance with London Plan policies 6.2, 6.3, 6.7, 6.10, 6.13 and 6.14.

## 9 Transport for London

No objections to the application, request further information and contributions to improve transport infrastructure in the area:

Car Parking;

111 car parking spaces proposed for the 366 units, equating to a residential parking ratio of 0.3 spaces per unit, which is in line with the parking standards set out in the London Plan policy 6.13 Parking. Welcome the proposal for 28 of these spaces to be for blue badge holders. A condition is recommended to secure a ratio of 20% active and 20% passive vehicle charging points on site. Condition recommended to secure provision of on-street car club bay. No on-site parking proposed for the commercial uses on the site, supported if a CPZ is introduced prior to the occupation of the site.

Cycling;

503 cycle spaces proposed, welcome the provision of 1.37 spaces per unit and is compliant with London Plan policies.

Walking;

Request a contribution towards the provision of a series of monoliths as part of the Legible London wayfinding scheme to help pedestrians navigate around the local area.

Trip generation;

Request that the modal split is re-calculated given the large number of proposed units, on occupancy rather than applying it to a trip rate.

Buses;

Request a contribution towards providing an extra bus service in order to mitigate the capacity issues that are expected to arise with such a large residential development. Also request a contribution towards the upgrading of four bus stops located along Redriff Road so that they become in line with TfL's Accessible Bus Stop Design Guidance.

Servicing, deliveries and construction;

Further details required in addition to the submitted Delivery Servicing Plan, to show

how deliveries will be managed once the development is occupied. A Construction Management Plan should also be submitted. Conditions should secure the submission of this information.

Travel Plan;

The Travel Plan submitted has failed the ATTrBuTE assessment. More detailed information is required for target setting and measures to be applied. Details are needed on how the travel plan will be secured and funded. As this travel plan is for the residential part of the development, all of these details should be provided in the travel plan prior to submission of the planning application, with amendments being secured afterwards through the appropriate s106 agreements / planning conditions / obligations.

10 Natural England

The proposed site is very close to Russia Dock Woodland local site and as such the authority should ensure that it has sufficient information to fully understand the impact of the proposal on the local wildlife site before it determines the application.

It also appears that Natural England has been consulted on this proposal to offer advice on the impact on a protected species.

Natural England have adopted national standing advice for the protected species. As standing advice, it is a material consideration in the determination of the proposed development in this application. The protected species survey has identified that bats, a European protected species may be affected by this application. Our 'Standing Advice Species Sheet: Bats provides advice to planning officers to assess protected species surveys and mitigation strategies without needing to consult us on each individual application. Following the standing advice flowchart, it is determined that the authority can be advised that permission could be granted (subject to other constraints) and that the authority should consider requesting enhancements.

11 Metropolitan Police

No objections to the application.

12 Environment Agency

The site lies in Flood Zone 3 and is protected by the Thames tidal flood defences. The proposals will locate all residential units 300mm or greater above the design flood level in the Thames, including an allowance for climate change. Welcome the proposals to restrict all surface water runoff from this site to 50% of the existing 1 in 1 year discharge rate. This is a significant reduction for the larger order events. Also welcome the proposal to utilise ponds for attenuation. Recommend the use of Green roofs and non-infiltrating permeable paving. Recommend conditions concerning submission of a detailed surface water strategy, land contamination, foundation designs and surface water drainage.

13 Friends of the Earth

Strong support for the application for the following reasons:

1. That there are few trees to be removed - compared to many which have already been removed from the Rotherhithe Peninsula. Strongly recommend that as many native species trees are planted as possible to continue the green corridor to the Russia Dock Woodland;
2. This application is making the best use of a very large area of hard standing with lorry park and factory units;
3. Support the council's policy of the sub-urban densities range of 250 flats comprising 3-5 storeys, although very concerned that this may cause the loss of the underground car park, which is supported as it will reduce the affect upon the Russia Dock Woodland;
4. There is a 4m ecological buffer zone between the proposed development and

woodland edge;

5. A maximum of 3 storeys nearest the woodland;

6. A far more eco-sensitive barrier is proposed between the two sites;

7. We absolutely support allotments;

8. One main public entrance into the Woodlands rather than two originally proposed to keep the human impact and light pollution to the woodlands to the absolute minimum. We also support the flow of green corridors from the woodlands into the site;

9. We also most strongly recommend this development to start at Code Level 4 aspiring to Code Level 5;

10. Finally we ask for as many wildlife habitat measures to be included: bird and bat boxes, and swift bricks to be included in the construction of the development.

## **Neighbours and local groups**

### **9 letters in objection to the application**

14 Cole Jarman on behalf of Harmsworth Quays Printing Limited (HQP)

Object to the application:

- Whilst the Daily Mail Group have announced their intention to relocate from Harmsworth Quays their financial and other obligations imposed by the long leasehold interests which they hold means that reuse or redevelopment of the site for commercial purposes will be actively pursued. However, the application for Quebec Way Industrial estate development must be considered against the current permitted use, planning conditions and planning guidance;

- The HQP site is controlled by a number of planning conditions to the consent S/86/145. There are no conditions restricting noise or movements that would protect the application site from noise disturbance;

- There are previous appeal decisions and decisions from the Secretary of State that opined that the failings inherent of the design of some parts of previous schemes meant that they failed to meet policy 4.14 of the then London Plan, and complaints from future residents could lead to attempts to constrain HQP's activities, and that this could be an unreasonable burden on the business;

- Approved schemes in the area were agreed to be designed so that noise from HQP incident upon the residence would be limited to 40dBA (plant noise), so as to commensurate with existing dwellings, and that noise from intermittent activities would be limited to a maximum level of 60dB LAMAX;

- National and local policies requires residential development to be protected from noise;

- Southwark's Supplementary Planning Document 'Sustainable Design and Construction' states that mechanical systems should only be used as a complement to natural ventilation to ensure constant standard of indoor air quality, and gives noise standards;

- Schemes including single aspect dwellings have been included in three other proposed schemes around HQP, so it is unclear as to why such a solution cannot apply to the application site. The section of the Quebec Way is commercial in nature, with Commercial uses on the application site to one side and the HQP to the other. The outlook for the dwellings would be into the HQP site. A single aspect design would not mean avoiding all windows facing onto HQP. For example the commercial and the community uses could be on the HQP side. Access corridors and stairwells

can have windows;

- The submitted noise assessment omits to mention that condition 11 of the HQP original consent only protects the existing dwellings against plant noise, not the application site. It could not reasonably be expected that having single aspect dwellings could protect the dwellings against plant noise as allowed under the existing consent, but not if windows face into the site;

- The noise assessment concludes that 111 dwellings out of the 366 proposed would be subject to L<sub>MAX</sub> levels above 60dB due to activities on the HQP site, this assessment will be an underestimate of the number of dwellings affected;

- The noise assessment assumes that the point sources would be at only four defined positions. In reality the positions of activities C (fork lift) and D (lorry decoupling / coupling) could be anywhere along the yard area close to the Quebec Way boundary. This can be clearly seen (submitted aerial photograph), in how articulated lorries park up on the site, however the assessment only assumes a lorry decoupling around 100m from the application site whereas it could be as close as 50m. This has a twofold effect. Firstly it means the worst affected dwellings being exposed to higher noise levels, likely over 80dBA. Secondly it means that the numbers of dwellings affected will be increased further;

- The noise assessment also does not take account of noise from any activity in the van park area, and this would also increase the number of dwellings affected in particular at the south end of the development;

- The design of the scheme with blocks perpendicular to Quebec Way means that the numbers of dwellings affected will be substantial;

- Having identified that a number of dwellings will be subject to noise levels above 60dB L<sub>MAX</sub> It is proposed that there be mitigation to the dwellings by means of sound insulation treatment and the use of acoustically treated ventilation (likely whole building systems);

- In the design and access statement (section 'Passive Design' ) it is said that the development will have windows located to get best exposure to cross flow of air through the building. If many of the dwellings require closed windows and mechanical ventilation it is difficult to see how this can be;

- If dwelling occupants open their windows they would be exposed to noise from the HQP site and will be able to complain to environmental health, with consequent effects on night time business operations which will continue to be required on this site;

- The use of sealed shut sound insulated windows and mechanical ventilation was rejected as a design solution for other sites around HQP and by the UDP inspector, the same conclusion should apply to this site and the planning application be refused.

15 124 Plover Way

Objects to the development:

1. There is already a huge percentage of housing in the area and little employment unless travel is undertaken;

2. The infrastructure cannot cope with the additional 1000 plus people. There will be no additional schools health facilities etc. And more importantly no additional public

transport on already overcrowded underground and bus and overground;

3. Roads are already very heavily overcrowded and up to 900 additional cars and other vehicles constantly on the local roads;

4. There is inadequate shop and recreational facilities in the area. Tesco is the only supermarket and this is very over used with virtually 24/7 queues. This proposal only provides for a very small albeit welcome extra shop space which is insufficient for additional needs;

5. The proposals appear to reduce still further the much needed green spaces and take absolutely no notice of councils green policy and the governments need to manage climate change. Any housing building should be to sustainable code level 6 even though this is not a legal requirement in England for a few more years;

Not against new housing in Southwark in general, however there has been substantial new housing stock in Bermondsey, Deptford and Surrey Quays with no additional infrastructure or social resources added.

16 St Elmos Road (partial address only)  
Object to the proposed development:

1. Density - the proposed mix of uses is likely to result in around 1,000 residents living on the site together with whatever number of visitors for shopping and recreational. The latter is likely to include uses which will result in late night traffic and noise and probably drunkenness, resulting in an environment which will not be conducive to peaceable enjoyment of their homes by residents nor a safe environment for those families who may occupy the larger flats. The area of green and open space proposed is totally inadequate;

2. Height - The height of the tallest unit should be reduced to no more than 4 storeys to achieve a more human and acceptable scale and reduced density;

3. Massing and Scale - The height and scale proposed for the development will result in an unacceptable massing which will dominate and overpower in what is generally a low rise area and will result in an unacceptable general loss of amenity and environment for existing residents in the visitors to the area;

4. Traffic - The proposed development will result in a substantial increase in traffic in the local area. It is likely that the 366 dwelling units proposed will generate a parking requirement for at least 500 vehicles.

17 SE16 7TS (partial address only)  
Object to the proposed development:

1. Currently have a high density of flats already existing in the area;

2. The current facilities are not sufficient to meet the needs and demands of the current population let alone adding more;

3. The buses are always full and the train at Canada Water is packed in rush hours (the population is mostly working professionals);

4. Do not see the overall contributions of adding more flats to the community;

5. We need more shops, restaurants, coffee shops, up market boutique stores (the

Surrey Quays Shopping Centre does not represent the need or population profile);

6. There is no sense of community. Very few families around and when children start in schools, the families tend to move away because of a lack of good schools.

18 Pauline E Adenwalla

Acknowledge the application endeavours to sensitively address the site's relationship with Russia Dock Woodland, however wish to object to the following aspects:

1. Ground floor nursery located in inappropriate place -

Too near the underground car park entrance;

The rooms and outdoor area will lack natural light and be gloomy as in the shadow of the existing adjacent 2 storey commercial building;

The space provision appears limited in size and mix of indoor / outdoor areas, resting / hygiene facilities;

It will create considerable traffic congestion and poses a safety hazard;

Quebec Way has width restrictions near Alfred Way Primary School;

Alfred Salter Primary School is a large primary school and nursery which excels at inclusion. Quite apart from the existing congestion in the area at the beginning and end of each school day, specialist vehicles are coming and going all day long taking special needs children to and from various activities;

The drop off area is inadequate as people will very likely have to perform U turns;

Harmsworth Quays land in Roberts Close has permission for a vehicle park. Roberts Close is a dead end, so all vehicles will have to use Quebec Way;

Harmsworth Quays have permission to use the large commercial lorry entrance in Quebec Way 07.00 to 23.00 hours. This entrance is very near the proposed nursery site;

It is unclear how the safety of the nursery / crèche will be guaranteed. Residential units within C5 and C4 appear to overlook the outdoor area;

The application formally applies for D1 usage for C5. This use class also includes churches. Any permission must exclude churches and have a limit on the number of people being able to use the space and hours of operation. Frequently, the noise and congestion created by certain establishments operating 24/7 in residential areas is detrimental to the whole community being able to enjoy their amenity spaces.

2. B1 has residential units within that are located immediately opposite the large industrial vehicle entrance to the Harmsworth Quays site. This entrance has permission to be used 07.00 to 23.00. Should this permission be implemented the quality of life for the residents of B1 will be poor;

3. C5, B3, B1 have residential units facing onto Harmsworth Quays. Whilst it is acknowledged that the existing point works have started they intend to relocate by 2014, any incoming tenant can continue the industrial usage. Hence the 24/7 noise for residents of C5, B3 and B1 and possibly other units could be considerable and significantly impact of their quality of life.

19 26 Finland Street

Object to some aspects of the scheme:

- Frontage onto Redriff Road for blocks A1 and A2 - cannot find any views of this, and consider that a 3 - 4 storey building immediately adjacent to the woods and fronting onto the road will be imposing and unnecessary;

- Poor positioning of mini-market - vehicles outside this will cause a hazard at the junction;

- Height and density of the flats - this is not in keeping with the proximity of the woodland and the neighbouring area which has a semi rural / village feel;

- Lack of provision of several housing types - the planning policy asks for a full range of housing choice, the current proposal does not include any detached, semi-detached or terraced houses;
- The documentation showing views for the part are all with full tree foliage - would like to see winter views (which cover half the year), which would show that the six storey blocks are more visible.

Support the following aspects:

- Ecological impact, especially the 'green fingers' and the SUDS system;
- Emphasis on controlling the impact of car traffic;
- Attempt to provide some employment;
- Nursery;
- Residential development.

20 8 Farrow Place

Object to the development:

1. The proposed plan changes the use of the land from an industrial estate to a residential estate;

2. The number of units that the application proposes to build is excessive. The introduction of so many new families into this small area will stretch resources already loaded beyond capacity. Southwark does not have enough schools, doctors are full, too many cars on the road;

3. The units will be built too high so as to change the character of the area and be extremely unsightly;

4. The new route through Russia Dock Woodlands will impact negatively on wildlife and the natural environment.

21 15 Cookham Crescent

Objects to the proposed development:

- The Government's Planning Inspector is currently considering the whole area plan and to consider this outside the scope of that is inappropriate;

- It is becoming clear to residents that Russia Dock Woodlands is already too small to accommodate the recent influx of residents to the Rotherhithe Peninsula in the new builds by Canada Water tube and those attracted by the much improved public transport links and Barclays bikes from further afield in London;

- The land at Quebec Way adjoins Russia Dock Woodland and is therefore instrumental in being part of the required natural extension of Russia Dock Woodland. It is prejudicial to give any permission for any building project on it until a full, impeccable, rigorous and impartial assessment of the green space needs of the Rotherhithe Peninsula and London have been completed.

22 No address given

Object to the proposal:

- Letters were sent to 'occupiers' and tenants have short term interests in the area and will be unconcerned about the proposed development impacts;

- Being the owner of two leasehold properties on your consultation list and a Director of a Company which owns the freehold of these properties I believe the consultation to be flawed.

- 23 Friends of Russia Dock Woodlands  
Neither in objection or support of the application, but wish to make the following comments:

The Russia Dock Woodland is not a park, but a wildlife oasis in the middle of London; The application site lies outside the area identified as 'The Core Area' and on this basis the emerging CWAAP identifies the site as a suburban density zone. The boundary was examined at the Examination in Public in August 2011 but, at the time of writing this consultation response, the inspectors report is awaiting publication; Expect all potential development around the entire boundary of Russia Dock Woodland to be in the suburban range with a substantial ecological buffer strip / zone between the two sites;

Would ultimately want to see suburban densities for any development site which either adjoins or has an effect on Russia Dock Woodland. However, do not want to see an inferior, ill thought out development which fails to provide the high standard housing plus the environmental and ecological benefits proposed by the applicants;

Want to see all the changes stipulated by the GLA Director of planning in his report to the planning authority;

Welcome the scheme's intention to attempt to minimize the impact of the development on the edges of the woodland by massing the taller parts of the development at the front of the site along Quebec Way;

Welcome the natural habitat fencing that is proposed along the woodlands edge to delineate the boarder between the site and the woodland;

Welcome the provision of underground car-parking which means a more secure and natural look tot he development rather than parking at street level or the unacceptable undercroft car parking which will restrict active living frontages and its passive surveillance, reducing crime;

Welcome the high sustainable homes (BREEAM) standard of the units themselves as well as their dual aspect;

The Applicants have agreed at our request to introduce Sustainable Urban Drainage (SUDS) which would feed from their development into Russia Dock Woodlands southern ponds and waterways section which runs parallel with the applicant's site along its entire length;

Welcome the inclusion of allotment spaces, would like to see a reasonable percentage of the allotment space allocated tot he wider community, the elderly and disabled;

Find it hard to believe that a full EIA is not required for this application due to its close proximity to Russia Dock Woodlands diverse wildlife and its habitat.

### **1 letter in support of the application**

- 24 51 Howland Way  
Strongly support the application because the development would:
- Improve the area by replaying industrial units with residential accommodation;
  - Provide decent sized housing, including a large number of homes suitable families (98 3-bed and some 4-bed units);

- Improve the Russia Dock Woodland by improving the views from the park, increasing the sense of security (because the park would be overlooked) and creating a new route through to the park from Quebec Way;

- Provide space for a small shop, which would be very welcome.

A lot of this part of Rotherhithe has low-density housing (little brick 1980s houses) and some residents seem very attached to this instinctively oppose new flats being built. This is very misguided - many of these flats will in fact provide more space than most of the houses, so will bring more families to the area; the development respects the suburban nature of the area and is not overbearing; more homes in the area are needed, and will help to increase demand for services (e.g. cafes, restaurants and higher-quality shops) which the area currently lacks.