

**Proposed Residential
Development at Former
Cherry Garden School, Macks
Road, Bermondsey
Planning Statement**

Higgins Homes PLC

May 2020

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Appendices

Appendix 1 Adopted and Emerging London Plan Policies

Appendix 2 Heads of Terms

1.0 Introduction

1.1 This Planning Statement has been prepared by Lichfields on behalf of the applicant, Higgins Homes PLC, to accompany a full planning application for the redevelopment of the Former Cherry Garden School.

1.2 The proposed development comprises the following:

Redevelopment of the Former Cherry Garden School to provide 56 dwellings together with car and cycle parking, hard and soft landscaping and other associated works.

1.3 The site is 0.23ha and comprises the former primary school known as the Former Cherry Garden School ('FCGS'). The Cherry Garden School has relocated to a new site in Peckham, which provides a larger, more modern facility, and therefore the application site is now vacant. The site is one of a number of Council-owned sites identified for regeneration through the Southwark Regeneration in Partnership Programme.

1.4 The development of the application site will provide 56 residential dwellings, including 4 houses, together with the provision of amenity space, landscaping, car and cycle parking. The proposed development has been carefully designed to optimise the site's capacity for residential development, whilst ensuring that the development responds to the existing townscape and context. The proposed development will reinstate the street frontage with a high-quality design that sensitively responds to neighbouring buildings.

1.5 The purpose of this Planning Statement is to bring together the necessary information to assess the proposal against prevailing planning policy and having regard to material considerations.

Scope of the Application

1.6 Alongside this Planning Statement, the planning application is accompanied by the following documents:

- 1 Architectural plans;
- 2 Design and Access Statement (including landscaping details);
- 3 Viability Summary;
- 4 Transport Assessment and Travel Plan;
- 5 Noise Impact Assessment;
- 6 Flood Risk Assessment;
- 7 Biodiversity Survey and Report;
- 8 Statement of Community Involvement;
- 9 Development Charter Engagement Summary;
- 10 Daylight and Sunlight Assessment;
- 11 Land Contamination Assessment;
- 12 Arboricultural Impacts Assessment;
- 13 Lighting Assessment;
- 14 Fire Strategy;
- 15 Energy Statement and BREEAM pre-assessment;
- 16 Air Quality Assessment; and

17 Foul Sewage and Utilities Assessment

1.7 The scope of the application has been agreed with LBS officers prior to the submission of the application.

Structure

1.8 The structure of this report is as follows.

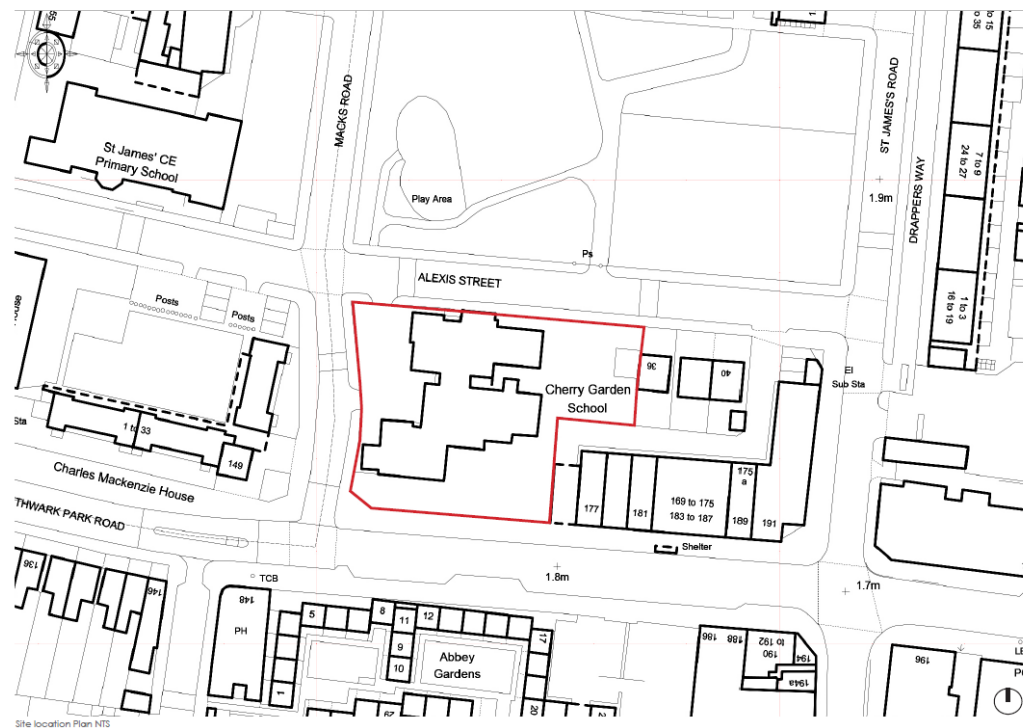
- **Section 2.0** briefly describes the site and its context and summarises the background to this proposal.
- **Section 3.0** sets out the planning and project history.
- **Section 4.0** provides a description of the proposed development.
- **Section 5.0** identifies the planning policy context and key tests relevant to the determination of the planning application.
- **Section 6.0** contains a comprehensive assessment of the proposed development in planning terms; and
- **Section 7.0** sets out the conclusions.

2.0 Site and Surroundings

The Site

- 2.1 The site is located in Bermondsey within the northern part of the Borough. The site comprises 0.23ha of land which includes a former primary school (FCGS) which catered for children aged 2-11 with severe learning difficulties. This facility has now relocated to a new site in Peckham which can provide more modern services to more children. The property is, therefore, now vacant.
- 2.2 The site is bound by Southwark Park Road to the south, Macks Road to the West, Alexis Street to the north and existing residential dwellings and retail units fronting onto Southwark Park Road and Alexis Street to the east.

Figure 2.1 Site Location Plan



- 2.3 The site currently comprises a part 1 and 2 storey school building, with playgrounds in the north east and north west of the site. There are two vehicular entrances to the school, one from Alexis Road and one from Macks Road. A small number of trees are located on the southern boundary of the site.
- 2.4 The site is subject to the following designations:
- 1 Flood Zone 3 (an area benefitting from flood defences)
 - 2 Urban Density Zone
 - 3 Air Quality Management Area
- 2.5 The site is relatively accessible, with a PTAL rating of 3, and is approximately 800m walking distance to the south-west of Bermondsey Tube Station and c.1.2km walking distance to the north-west of South Bermondsey train station. The nearest bus stop to the site is less than 200m

walking distance to the east and has routes towards Surrey Quays and Canada Water. Another bus stop is located 250m to the east of the site and has routes to Tottenham Court Road, Elephant and Castle and Peckham.

The Surrounding Area

- 2.6 The surrounding area is typically residential, with a mix of architectural styles and scale of buildings. Southwark Park Road bounds the site to the south and includes 2-storey low rise terrace residential dwellings. On the corner of Macks Road and Southwark Park Road is Charles Mackenzie House, a 2-5 storey residential building containing distinctive red balconies.
- 2.7 The buildings fronting onto Southwark Park Road include a barber shop and a public house. Further to the east of the site on Southwark Park Road there is a protected shop frontage and includes supermarkets, a pharmacy and cafe.
- 2.8 The site is bound by Alexis Street to the north, with an area of green space adjacent. This is the Lucey Way open space which is designated as protected Open Space within Policy 11 of the Core Strategy. This park contains a variety of trees and an area of children's play space. This park also includes a fenced area for sport.
- 2.9 The Thorburn Square Conservation Area is located to the south east of the site, while the boundary of the Bermondsey Lake Archaeological Priority Zone (APZ) runs along the southern side of Southwark Park Road.

3.0 **Planning and Project History**

Planning History and Site Background

- 3.1 In January 2015, LBS's Cabinet agreed to the development of the Southwark Regeneration in Partnership Programme (SRPP) to assist the Council in identifying sites of varying sizes and development potential which could be brought forward for a range of mixed-use schemes, including housing and education. The key objective of the SRPP is to maximise and enhance the value and quality of council-owned land and buildings.
- 3.2 A planning application was submitted in 2016 to build a new primary school at a site on Bellenden Road, Peckham for the new Cherry Garden School. The relocation of the school would provide much needed additional places for children with special educational needs and disabilities within the Borough, and it would be expanded with more modern learning space. The SRPP identified that the existing site (the application site) was no longer needed for education purposes and it was proposed to use this public land to help tackle the housing crisis and be put forward for tender.
- 3.3 Before the site was tendered, Ash Saluka Architects were appointed to produce a proposal for the site on Macks Road which would be redundant following the move of the school. This proposal was presented to LBS in 2016 and initial pre-application advice was received. The initial scheme proposed delivering residential units (Class C3) together with hard and soft landscaping and other associated works. In summary, it was accepted by officers that the existing site was underutilised and the proposal for residential development on the site was accepted in principle.
- 3.4 Following the competitive tender process, including a number of meetings with LBS Planning and Property team to discuss initial development proposals for the site, Higgins Homes was awarded the contract for the redevelopment of the FCGS (the application site).

Project History

- 3.5 In accordance with the National Planning Policy Framework, the proposed development has been subject to early engagement with the Council, key stakeholders and the local community prior to the submission of this application. This consultation has influenced the emerging design proposals and informed the scheme now submitted to the Council for its determination.
- 3.6 A number of meetings have been held with LBS planning, design, and housing officers to progress the proposed development both through the tender and pre-application process.
- 3.7 Full details of the consultation undertaken is outlined within the supporting Statement of Community Involvement and summarised below.
- 3.8 The following outlines the principal meetings and events in relation to the project:
- 1 July 2018: Initial meeting with LBS and Higgins Homes to discuss the proposals for the site.
 - 2 October 2018: A second tender presentation by Higgins Homes to show the amended proposals following comments from the previous meeting.
 - 3 January 2019: Higgins Homes awarded contract to redevelop the site.
 - 4 June 2019: A further presentation took place to show any design changes mentioned in the previous meeting.

Pre-Application Meeting (November 2019)

- 3.9 Although it was agreed that the development proposals were largely acceptable through a number of informal meetings with LBS officers throughout the tender process in 2018, it was agreed that a formal pre-application meeting should take place to consider the latest proposals. The pre-application meeting was held on 18 November 2019 where a more detailed design of the scheme was presented to officers for comments. A summary of the scheme development is outlined below:
- 1 An increase from 50 to 56 residential units comprising a series of buildings ranging from 3 to 7 storeys in height;
 - 2 Dwellings in the form of flats, duplexes and houses comprising, 1 studio unit, 14 1-bed units, 29 2-bed units and 12 3-bed units, including 10% wheelchair units;
 - 3 53% affordable housing (all social rent);
 - 4 Communal courtyard on the ground floor;
 - 5 Private gardens for the ground floor units and balconies for units on the upper floors; and
 - 6 Vehicular access and parking for 2 wheelchair units fronting Alexis Street.
- 3.10 Formal written feedback was received on the 6 December 2019. The feedback provided by officers was supportive of the redevelopment of the vacant school site to provide residential accommodation including the provision of 53% affordable housing. A summary of the key points received from LBS include:
- 1 The site is considered an appropriate location for residential development given that the wider area consists of similar residential uses. However demonstration that there is not sufficient demand for a site of this scale to be brought back into other D Class Uses in accordance with policy is required.
 - 2 The site layout successfully results in a communal courtyard to centre of the property which is appropriately separated from the wider public realm, as well as private front and rear gardens to the ground floor units.
 - 3 The proposed access and site layout is considered to make an efficient use of land and create active frontages on a currently vacant site in a prominent location. The scale, height and massing is considered to positively respond to its surroundings.
 - 4 One concern raised in terms of the design was the provision of adjoining balconies which are of different sizes and are considered to take away from the coherency of the overall concept to an extent. It was questioned whether these could be re-arranged to ensure separation and a more successful design.
 - 5 It was acknowledged that the proposal only slightly exceeds the recommended density and on balance, subject to a good quality proposal, the density is considered appropriate.
 - 6 It was encouraged that proposals should ensure that they comply with the Mayors Play and Informal Recreation SPG 2012. It was also advised that an Arboricultural Impact Assessment be submitted to consider the impact the proposed development may have on any existing trees within the site.
- 3.11 In response to the above comments, the following changes were made to the scheme:
- 1 Some amendments were made to ensure that the aspects of the design that were positively received are retained while ensuring the design was structurally sound.
 - 2 The balconies were semi-recessed to simplify the elevations and amended so that they are more uniform.

- 3 The communal amenity space was reviewed to confirm that it could provide sufficient play space to meet the requirements of the Play and Informal Recreation SPG as well as providing sufficient communal amenity space to meet the requirements of LBS's Residential Design Standards SPD.
- 4 An Arboricultural Impact Assessment has been undertaken and submitted as part of this application.

The Local Community

- 3.12 The proposals have also been subject to extensive public engagement, including five days of public consultation events.
- 3.13 Higgins Homes identified the nearby Yalding Centre on Southwark Park Road as a suitable venue for public consultation events. Three days of consultation were held in January 2020. Members from Higgins Homes' project team and officers from LBS were in attendance to hear the views of the public on the proposed development with the aim of influencing the design process of proposals.
- 3.14 The three public consultation events were undertaken on the following dates:
- 1 13 January 2020
 - 2 14 January 2020
 - 3 15 January 2020
- In addition, a further two-day public exhibition was held on 30 January and 1 February 2020.
- 3.15 Invitations to the consultation meetings were sent to all residents and businesses within a 300m radius of the site. This area covers all nearby estates, over 130 businesses and over 3,600 households. Overall, 11 people attended the public consultation events. Although the events were poorly attended the general feedback was positive. The comments received related to the need to deliver more affordable housing, as well as housing for elderly and families. Lack of parking and regeneration of the high street were also raised as key issues for the local area.
- 3.16 Full details of the local community events and responses received and responded to are included within the Statement of Community Involvement.

Summary

- 3.17 The proposed development is the culmination of an extensive and constructive tender process which fed into the pre-application consultation with LBS and the local community. The resultant scheme for the FCGS site comprises a well-conceived and supportable proposition in planning terms and will deliver regeneration benefits in the form of housing, including a high percentage of affordable housing.

4.0 **Proposed Development**

4.1 This section provides a description of the proposed development. A detailed description of the proposal is also set out in the submitted Design and Access Statement.

Land Use

4.2 It is proposed to redevelop the FCGS site for residential use. The proposals involve the provision of 56 new residential dwellings (C3 residential use) in the form of flats, duplexes and houses. The proposed development would deliver 53% affordable housing by habitable room, which would all be for social rent provision, and managed by the Council. The proposed development provides 10% wheelchair adaptable homes, comprising 4 x 2-bed flats and 2 x 2-bed houses (6 units in total).

4.3 The proposed development provides private gardens for all houses and duplexes, while the flats will benefit from private balconies. Communal amenity space will be provided at ground floor along with secure cycle storage spaces, with further communal amenity space provided on the fifth floor.

Layout, Height and Massing

4.4 Through formal discussions with both planning and design officers at LBS, the scheme has been developed to respond to the surrounding area. This has resulted in a scheme comprising a building ranging from two to six storeys in height.

4.5 Two houses are located fronting onto Alexis Street and another two houses fronting onto Macks Road with duplexes occupying ground and first floors with the remainder of the development comprising flats. A courtyard is located at the centre of the development which will provide communal amenity space and play space. This courtyard will also include a cycle store for 106 spaces. A roof terrace will be provided at 5th floor level to provide further communal amenity space.

4.6 The height and massing of the development has been informed by a detailed review of the site's context and setting. The surrounding area has a predominately residential character which is reflected within the design proposals.

4.7 The building steps down to the east of the site in response to the adjacent two storey houses and the two-storey mixed-use retail and residential development. To the west of the site the proposal would reach six storeys, which is consistent with Charles Mackenzie House which adjoins the site to the west.

4.8 The layout, design and setting of the scheme have been revised during the pre-application process and the final design layouts are in keeping with the site's context and respond to the nearby built form.

Quantum, Tenure and Dwelling Mix

4.9 As stated above, the proposed development is for the delivery of 56 residential dwellings of which 53% would be affordable by habitable room and will all be for social rent.

4.10 In terms of residential mix, the scheme comprises:

Table 4.1 Proposed Residential Mix

Unit Type	No.	Percentage
Studio unit	1	2%
1-bed unit	14	25%
2-bed unit	29	52%
3-bed unit	12	21%
Total	56	100%

4.11 The following tenure breakdown is proposed:

Table 4.2 Proposed Tenure

Unit	Private		Affordable Rent	
	No.	Hab room	No.	Hab room
1-bed	8	15	7	14
2-bed	21	64	8	27
3-bed	1	5	11	54
Total	30	84	26	95

4.12 This results in an overall provision of 53% affordable rent (by habitable room), including a high proportion (34%) of family-sized affordable housing (2- and 3-bed). The provision of affordable housing all in affordable rented tenure was agreed with LBS Housing team as meeting local need.

4.13 All flats, duplexes and houses have been designed to comply with the minimum space standards set out in the Mayor's Housing SPG (2016) and are tenure blind.

Materials

4.14 The development seeks to complement the surrounding area and in particular the neighbouring development to the east, south and west and the nearby Conservation Area to the south-west of the site. The materials include a buff brick and a dark brown brick, along with dark grey window fittings. White stone canopies are included above the residential entrances. Further details are included in the Design & Access Statement.

Access, Servicing and Parking

4.15 The scheme includes a number of individual pedestrian access points into the residential blocks along the northern, western and southern elevations at Alexis Street, Macks Road and Southwark Park Road respectively.

4.16 The scheme will deliver a car-free development (with the exception of 2 accessible car parking spaces). These 2 spaces will be provided for the 2 wheelchair adaptable houses which front onto Alexis Street.

4.17 It is also proposed that the scheme will provide 104 secure cycle storage spaces and 6 short stay visitor cycle spaces on the site.

4.18 There are two refuse points on the ground floor inset from Southwark Park Road and Alexis Road.

4.19 It is proposed that the development is served on-street for refuse collection. The site management company will move the refuse containers to make sure they are within the required

distance and that users of the footway are not imposed. For required deliveries, it is proposed that vehicles will stop on-street on Southwark Park Road.

Landscaping, Amenity and Residential Environment

4.20 The development will provide the following amenity space:

- 1,025sqm of private amenity space in the form of balconies and private gardens;
- 362sqm of communal amenity space in the form of a ground floor courtyard and roof terrace (198sqm in the courtyard and 15sqm at the roof terrace); and
- 155sqm of informal play space for under 5s at ground floor courtyard level.

4.21 The proposal will improve the ecology and biodiversity of the site through introducing landscaping proposals in place of the existing buildings and hard surfaced spaces.

4.22 It is proposed that extensive green roofs will be utilised within the scheme to create habitats and increase biodiversity within the site. These will also provide an attractive setting for overlooking apartments. Species will be selected to maximise the biodiversity of the roofs, these will potentially include items such as bird, bat and bee boxes.

4.23 More details of the proposed landscape, amenity space and residential environment are set out in the submitted Design and Access Statement.

5.0 **Planning Policy Context**

5.1 This section identifies the planning policy and guidance at national and local level relevant to this proposal. It then identifies key planning considerations against which the planning application will be determined.

National Planning Policy Framework (2019)

5.2 The National Planning Policy Framework (NPPF, 2019) sets out the Government’s planning policies for England. It is a material planning consideration in decision making. The NPPF requires Local Planning Authorities (LPAs) to adopt a positive approach to decision taking and to apply a presumption in favour of sustainable development

5.3 The aim of the NPPF is to proactively deliver sustainable development to support the Government’s housing and economic growth objectives and meet the needs of the country. Paragraph 8 sets out the three dimensions of sustainable development: ‘economic’ to help build a strong and competitive economy; ‘social’ to support strong communities and ensuring that a sufficient number and range of homes to meet the needs of present and future generations; and ‘environmental’ in protecting and enhancing the environment.

5.4 Paragraph 11 of the NPPF requires LPAs to apply a presumption in favour of sustainable development, and to approve sustainable developments without delay. It states:

“For decision-taking this means:

approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless: The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole....”

5.5 Paragraph 59 supports the objective of significantly boosting the supply of homes and for a sufficient and variety of land comes forward where it is needed. The size, type and tenure of housing needed for different housing groups should be assessed and reflected in policy as well as the need for affordable housing. Paragraph 63 goes on to support the re-use of brownfield land.

5.6 Paragraph 92 requires planning decisions to guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day to day needs. This would include social, recreational and cultural facilities, such as schools.

5.7 Chapter 9 of the NPPF promotes sustainable transport. In paragraph 103, it is stated that ‘significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes’.

5.8 Paragraph 124 states that “good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”. Several key principles are identified for achieving good design, including:

- 1 to function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- 2 be visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

- 3 to be sympathetic to local character and history, including the surrounding built environmental and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- 4 establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- 5 to optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- 6 to create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

5.9 In paragraph 174 of the NPPF, it states that LPAs should aim to conserve and enhance biodiversity when determining applications. Paragraph 175 sets out several principles that should be applied. One of the principles is that ‘opportunities to incorporate biodiversity improvements in and around developments should be encouraged’.

5.10 The effect of development on heritage assets is considered in Chapter 16 of the NPPF. Local planning authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness of the historic environment and the desirability of putting heritage assets to viable use (para 192).

Statutory Development Plan

5.11 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts and that the determination should be made in accordance with the Development Plan unless material considerations indicate otherwise.

5.12 The Statutory Development Plan for this site comprises:

- 1 The London Plan (March 2016);
- 2 Southwark Core Strategy (2011); and
- 3 Saved Southwark Plan Policies (2007).

5.13 Within the Development Plan, the site is subject to the following planning designations:

- 1 Urban Density Zone;
- 2 Air Quality Management Area; and
- 3 Flood Zone 3 (area benefitting from flood defences).

The London Plan (2016)

5.14 The London Plan comprises the strategic component of the development plan and provides London wide policy and guidance. It is expected that this will be replaced by the New London Plan this year. It promotes a sustainable and compact model of development which utilises accessible brownfield urban land efficiently, creates jobs and maximises housing outputs.

5.15 The London Plan sets out housing policy with regards to affordability, tenure, mix and quality. Policy 3.3 identifies the pressing need for homes in London and identifies that boroughs should realise the potential of brownfield land in meeting these needs. Policy 3.11 states that Affordable

Housing should be split 60:40 between social rent and intermediate housing. Policy 3.4 states that given the site is located in a PTAL 3-6a, a density of 300- 650hr/ha and 650-1100 hr/ha applies.

- 5.16 Policy 3.5 states that the design of all new housing developments should enhance the quality of local places, take into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children, disabled and older people.
- 5.17 The Mayor's Housing SPG (2016) provides guidance on the implementation of Policy 3.5 and requires all new housing developments to provide a minimum of 5 sqm of private outdoor space for 1-2 person dwellings and an extra 1 sqm for each individual occupant.
- 5.18 A full list of the adopted London Plan policies relevant to this application are provided within Appendix 1.

Southwark Saved Policies (2007)

- 5.19 A number of policies of the Southwark Plan (2007) [SP] have been saved. The saved policies provided more detailed policies on the control of development within the borough. The relevant policies are as follows:
- Policy 2.3 Enhancement of Educational Facilities
 - Policy 3.2 – Protection of Amenity.
 - Policy 3.3 – Sustainability Assessment.
 - Policy 3.4 – Energy Efficiency.
 - Policy 3.6 – Air Quality.
 - Policy 3.7 – Waste Reduction.
 - Policy 3.9 – Water.
 - Policy 3.11 – Efficient Use of Land.
 - Policy 3.12 – Quality of Design.
 - Policy 3.13 – Urban Design.
 - Policy 3.15 – Conservation of the Historic Environment.
 - Policy 3.18 – Setting of Listed Buildings, Conservation Areas and World Heritage Sites.
 - Policy 4.2 Quality of Residential Accommodation
 - Policy 4.3 Mix of Dwellings
 - Policy 4.4 Affordable Housing
 - Policy 5.1 – Locating Developments.
 - Policy 5.2 – Transport Impacts.
 - Policy 5.3 – Walking and Cycling.
 - Policy 5.6 – Car Parking.

Southwark Core Strategy (2011)

- 5.20 The Core Strategy (LBS CS) forms part of the LBS Local Development Framework and is a strategic level document which sets out Southwark's strategic vision and economic,

environmental and social strategic objectives for the borough. The LBS CS was published pre-NPPF (2012) but is considered to conform with the NPPF following a 2013 review.

- 5.21 Strategic Policy 1 of the CS sets out the Council’s commitment to a sustainable development approach which will improve the places we live and work in and enable a better quality of life for Southwark’s diverse population. This involves allowing more intense development in a mix of growth areas to make the most of a site’s potential.
- 5.22 Strategic Policy 2 encourages sustainable transport such as walking, cycling and the use of public transport. This will be achieved by planning places and development that have a priority of walking and minimising the use of the car.
- 5.23 Strategic Policy 5 seeks to “*meet the housing needs of people who want to live in Southwark and London by providing high quality new homes in attractive environments*”, particularly within growth areas. To support this vision, LBS sets a housing target for a minimum of 24,450 net new homes across the Borough between 2011 and 2026, equivalent to 1,630 unit per year.
- 5.24 Strategic Policy 6 seeks as much affordable housing on developments of 10 or more units as financially viable, with a minimum of 35% units. Strategic Policy 6 requires a 70:30 split between social/affordable rent and intermediate housing. Strategic Policy 7 requires a range of family housing to be provided, stating that at least 60% of all units must comprise 2 or more bedrooms on sites delivering 10 or more units.
- 5.25 Strategy Strategic Policy 11 requires new development to help meet the needs of a growing population through the provision of open space, requiring new development to help meet the needs of a growing population by providing space for children’s play, gardens and other green areas and helping to improve the quality of and access to open spaces and trees, particularly in areas deficient in open space.

Emerging Planning Policy

New London Plan

- 5.26 The Mayor of London is in the process of adopting a New London Plan (NLP). The Mayor published an ‘Intend to Publish’ version of the London Plan on 9 December 2019 which was sent to the Secretary of State alongside a schedule of the Panel’s recommendations and the Mayor’s response to them.
- 5.27 The Housing Secretary, Rt Hon Robert Jenrick MP, issued his letter to the Mayor of London on his ‘Intend to Publish’ London Plan in March 2020. The letter sets out eleven directions and ‘remedies’, which must be incorporated into the plan before it can be published. These directions are not in relation to the key the policies relevant to this case therefore, the emerging London Plan carries significant weight.
- 5.28 The NLP (Dec 2019) identifies a ten-year housing target for Southwark of 23,550 dwellings for the period of 2019/20-2028/29. Policy H1 requires boroughs to optimise the potential for housing delivery on brownfield sites through their planning decisions, especially for sites with PTALs between 3 and 6 or where considered a ‘small site’ (below 0.25 hectares in size).
- 5.29 Policy H2 requires Boroughs to pro-actively support well-designed new homes on small sites and sets a ten-year housing target for Southwark of 6,010 new homes to be delivered in such areas. Policy H4 sets out the strategic target of 50% of all new homes delivered across London to be genuinely affordable. All schemes are required to make the most efficient use of resources, which will be critical to London meeting its housing needs and supporting the function of the city.

- 5.30 Policy H6 sets out that the split between tenure products should ensure that a minimum of 30% of dwellings should be low cost rented homes, 30% should be intermediate, while the final 40% should be determined by the borough.
- 5.31 Policy H10 sets out the requirements for housing size mix in London. Schemes should generally consist of a range of unit sizes which is determined by having regard for local evidence such as the 2017 London Strategic Housing Market Assessment. This policy aims to optimise housing potential on sites, stating that a higher proportion of one and two beds generally should be in locations which are closer to the town centre, which higher public transport access and capacity.
- 5.32 Policy GG2 promotes higher density development, particularly on sites that are well-connected by public transport, walking and cycling to other infrastructure and services, applying a designed approach. Policy D1B also seeks to optimise density (with consideration being given to site context, connectivity and accessibility, and the capacity of surrounding infrastructure).
- 5.33 Policy D6 also confirms development proposals must make the most efficient use of land and be designed at the optimum density. Proposals that do not demonstrably optimise the housing density of a site should be refused and greater scrutiny of design is required the greater the level of density. The policy also discourages an overly mechanistic approach to density based on the matrix.
- 5.34 Policy S2 Part C requires that development proposals should ensure that there is no net loss of education or childcare facilities, unless it can be demonstrated that there is no ongoing or future need.
- 5.35 Policy S4 encourages residential development proposals to incorporate good quality accessible play provision for all ages. At least 10 square metres of playspace should be provided per child that:
- provides a stimulating environment
 - can be accessed safely from the street by children and young people independently
 - forms an integral part of the surrounding neighbourhood
 - incorporates trees and/or other forms of greenery
 - is overlooked to enable passive surveillance
 - is not segregated by tenure
- 5.36 Policy T1 applies a strategic approach to transport. The Mayor is encouraging 80% of all trips in London to be made by foot, cycle or public transport by 2041. All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated. Policy T2 supports development proposals that will reduce the dominance of vehicles of London's Streets and that they are permeable by foot and cycle opportunities as well as public transport.
- 5.37 A full list of the new London Plan policies relevant to this application are provided within Appendix 1.

New Southwark Plan

- 5.38 LBS are currently working towards adopting the New Southwark Plan (NSP), a new borough-wide planning and regeneration strategy to cover the period up to 2033. LBS submitted the NSP to the Secretary of State on 16 January 2020. Once finalised and adopted, it will replace the current Local Plan, comprising the Saved Southwark Plan policies (2007) and the Core Strategy

(2011). For the time being, it can only be given limited weight. However, we outline the key policies of relevance below.

- 5.39 Draft Strategic Policy 1 sets out the target of 50% for all new homes as social rented and intermediate homes. LBS housing requirements will be calculated in habitable rooms. Good quality houses will be provided to ensure that you will not know whether you are visiting homes in private, housing association or council ownership. This Policy also requires that a viability appraisal and review is required for all developments.
- 5.40 Draft DM Policy 1 sets out the affordable housing requirement of a minimum provision of 35% on sites delivering 11 homes or more. Of this 35%, 25% should be affordable rent and 10% should be intermediate. LBS's strategic housing market assessment (SHMA) identified a need for 2,077 social rented and intermediate homes per annum, which is approximately 71% of Southwark's total housing need.
- 5.41 Draft Policy P2 seeks to ensure family homes are provided throughout the borough. A minimum of 25% of homes should have 3+ rooms in the Urban Zone where the site is located. A number of objections were raised during consultation in response to this policy for not allowing enough flexibility. It also requires a minimum of 60% of dwellings to be 2+bedrooms and a maximum of 5% private studio dwellings. Policy P2 also states that the maximum number of bed spaces for the number of bedrooms should be provided (where social rented) and that family homes should be on lower floors. Family homes in apartment blocks should have direct access to outdoor amenity space.
- 5.42 Draft Policy P9 requires development to achieve an exemplary standard of residential design. To achieve this the proposal must take into consideration the site context, impact on amenity of adjoining occupiers and quality of accommodation. (density requirements removed). This is supported by Policy P11 which requires schemes to have consideration for height, scale, massing, local distinctiveness, urban grain, high quality public realm and respond positively to townscape.
- 5.43 Draft Policy P13 requires schemes to meet or exceed national space standards and provide a useable amount of private amenity space. Development should also be tenure blind and there should be shared entrances in apartment blocks for all tenures. Development should have consideration for current guidance on natural daylight for habitable rooms
- 5.44 Draft Policy P26 which requires development to not lead to the loss of existing educational facilities unless there is re-provision in an area of identified need. Policy P46 requires developments to retain community facilities unless there are exceptional circumstances where community uses can be replaced by another use where they are surplus to requirements.
- 5.45 Draft Policy P48 requires developments to demonstrate that the public transport network has sufficient capacity to support and increase in the number of journeys by the users of the development and to improve accessibility to public transport by creating and improving walking and cycling connections to public transport.
- 5.46 Draft Policy P52 sets out the cycle parking requirements. Cycle parking must be secure, accessible. As the site has a PTAL of 3, it is required to have one space per one bed dwellings, two spaces per two or more bedrooms and one visitor space per ten units. Policy P54 sets out the parking standards for disabled people and mobility impaired people. Developments must provide accessible car parking spaces up to a maximum of one car parking space per wheelchair accessible unit.
- 5.47 Draft Policy P59 requires development to contribute to net gains in biodiversity through, including features such as green and brown roofs, green walls, soft landscaping and nest boxes.

- 5.48 Draft Policy P69 proposes that developments should minimise carbon emission on site in accordance with the following energy hierarchy: Be lean (energy efficient design and construction); then be clean (low carbon energy supply) and then be green (on site renewable energy generation and storage).

Other Material Considerations

- 5.49 In addition to the Statutory Development Plan and emerging draft policy, the following documents are considered relevant and material in determining its application:

- 1 National Planning Policy
 - a National Planning Policy Framework
 - b Planning Practice Guidance ('PPG') (CLG; 2014, 2017, 2018 and 2019); and
 - c Nationally Described Standards.
- 2 Strategic Guidance (GLA)
 - a Affordable Housing and Viability SPG (2017);
 - b Housing SPG (2016);
 - c Shaping Neighbourhoods: Play and Informal Recreation SPG (2012); and
 - d Sustainable Design and Construction SPG (2014);
- 3 Local Guidance (LBS)
 - a Affordable Housing SPD (2008);
 - b Development Viability SPD (2016);
 - c Section 106 and CIL SPD (2015);
 - d Residential Design Standards SPD (2011 with 2015 technical update);
 - e Sustainable Design and Construction SPD;
 - f Design and Access Statements SPD; and
 - g Section 106 and CIL SPD Addendum (2017).

6.0 **Assessment of the Proposed Development**

6.1 This section provides an assessment of the proposed development having regard to the Development Plan policies outlined above. From analysis of the statutory development plan, national policy and the statutory tests it is considered that the following planning considerations represent the key policy issues against which the planning application should be considered:

- 1 Principle of development
- 2 Loss of the school
- 3 Dwelling Mix, Affordable Housing and Density
- 4 Accessibility and Inclusive Design
- 5 Residential Amenity and Open Space
- 6 Urban Design
- 7 Heritage impacts
- 8 Transport and Parking
- 9 Sustainability

Principle of Development

6.2 The proposed residential development comprises 56 new homes in the form of flats and houses. This will help assist in meeting the housing requirement and provide new residential accommodation, which is meeting the needs of the community by providing 53% affordable housing.

6.3 The site has been vacant since 2019 when the primary school relocated to another site in the Borough. As such, it is a vacant brownfield site. The proposed land use is supported in NPPF (2019) which outlines the importance of planning policy in promoting the effective use of land in meeting housing need, this includes giving substantial weight to the value of using suitable brownfield land within existing settlements for homes.

6.4 Paragraphs 59-66 of the NPPF set out the policies seeking to boost housing supply and ensure delivery of a wide choice of high-quality homes. This further supports the proposed residential land use on the site.

6.5 The draft London Plan Policy H1 requires boroughs to optimise the potential for housing delivery on brownfield sites through their planning decisions, especially for sites with PTALs between 3 and 6. The NLP sets out a ten-year housing target of 23,550 homes between 2019-2029. The pressing need for homes in Southwark means that the redevelopment of this site for the provision of housing (including a mix of tenures) is a key priority.

6.6 On this basis, officers from LBS have confirmed through pre-application discussions that the principle of a residential development is supported in land use terms.

6.7 On this basis, it is considered that the principle of a residential development is consistent with the NPPF, the development plan and pre-application guidance from officers.

Loss of the school

6.8 The proposed development would result in the loss of an educational site (Use Class D1). Saved Policy 2.3 of the Southwark Plan states that planning permission for a change of use from D class educational establishments will not be granted unless:

- 1 Similar or enhanced provision within the catchment area is secured; and
- 2 Opportunities are taken wherever possible to ensure that provision is made to enable the facility to be used by all members of the community.

- 6.9 This policy has been carried forward to the emerging NSP Policy P26 which requires development to not lead to the loss of existing educational facilities unless there is re-provision in an area of identified need. Similarly, Policy S3 of the NLP (December 2019) states that development proposals should ensure that there is no net loss of education facilities, unless it can be demonstrated that there is no ongoing or future need.
- 6.10 In December 2012 it was agreed at an LBS Cabinet meeting that the Cherry Garden Primary School would be enlarged from 1 September 2015. It was noted that the Cherry Garden School was a very effective special school, however the school building had serious condition and suitability issues and was therefore identified as a priority in the Primary Capital Programme for relocation.
- 6.11 The expansion of the school from 46 to 66 places would also enable more pupils with learning difficulties to be educated in a much-improved environment through the school relocating to a new building which would provide state of the art new learning spaces.
- 6.12 In 2015 a planning application was submitted for the new Cherry Garden School. The application was for a site on Bellenden Road, Peckham, within LBS. The planning application was approved and once complete, would therefore leave the site on Macks Road (the application site) vacant.
- 6.13 In a Cabinet meeting in 2017 it was confirmed through the planning of LBS's future school places requirements that the FCGS site was not needed for educational purposes and this public land could be used to help tackle the housing crisis. Together with the fact that the building is not fit for purpose this, therefore, confirms that the educational use of the site is no longer needed and its redevelopment for residential is considered to be the best use of the site.
- 6.14 The location of the site is considered to be appropriate for housing due to the wider surrounding area consisting of predominately residential development. The principle of residential development in this location was supported at the pre-application meeting and no concerns were raised in relation to it through the public consultation process.
- 6.15 On this basis, it is considered that the proposed development will not lead to loss of existing education development in the Borough, as an improved facility has been relocated and enhanced in a new location within Southwark. It has also been demonstrated the current site is not suitable for continued education use. As such, the proposal is in accordance with adopted and emerging policy.

Dwelling Mix, Affordable Housing and Density

Dwelling Mix

- 6.16 The London Plan and LBS CS promote developments that offer genuine housing choice. London Plan Policy 3.8 indicates that new developments should offer a range of housing choices in terms of the mix of housing sizes and types, having regard to local housing need.
- 6.17 In respect of Borough-wide policies, the LBS CS and the NSP both require the provision of at least 60% two or more bedrooms. The CS also requires at least 20% of units in the urban zone to be three bedrooms or more.
- 6.18 Higgins Homes has actively liaised with LBS to determine the appropriate housing mix for the site.

6.19 In light of the above, the development proposed the below housing mix:

Table 6.1 Proposed Housing Mix

Unit Type	No.	Percentage
Studio unit	1	2%
1-bed unit	14	25%
2-bed unit	29	52%
3-bed unit	12	21%
Total	56	100%

6.20 The proposed development therefore proposes a higher amount of two and three-bed dwellings (73.2%), meeting the policy requirement of Strategic Policy 7 of the Core Strategy and Policy P2 of the NSL for over 60% two or more bedrooms. In addition, the proposed mix provides 21% of units with 3 beds. This exceeds the requirement of the CS. It was agreed that the housing mix was acceptable in the Pre-Application response received from LBS on the 6th December 2019.

6.21 Consequently, the proposed units reflect and respond to local and strategic housing need and will contribute towards the creation of a mixed and balanced community in Southwark. The proposed dwelling mix is therefore consistent with the objectives and requirements of planning policy.

Affordable Housing

6.22 Both the new and adopted London Plan policies and LBS policies seek to ensure the provision of affordable housing is maximised. Policy 3.12 of the adopted London Plan (2016) requires new developments to provide the 'maximum reasonable amount' of affordable housing on sites which have the capacity to provide 10 or more units. Policy 3.11 encourages a diverse housing sector comprising a tenure split of 60% social and affordable rent and 40% intermediate rent or sale.

6.23 The NLP Policy H6 sets out that the split between tenure products should ensure that a minimum of 30% of dwellings should be low cost rented homes, 30% should be intermediate, while the final 40% should be determined by the borough.

6.24 The LBS CS Policy 6 seeks as much affordable housing on developments of 10 or more units as financially viable, with a minimum of 35% units. Strategic Policy 6 requires a 70:30 split between social/affordable rent and intermediate housing. The NSP Policy P1 'Affordable Homes' requires minimum 35% affordable housing with a minimum 25% social rent and 10% intermediate tenures.

6.25 The proposed mix comprises the following tenure split by number of units:

Table 6.2 Proposed Tenure

Unit	Private		Affordable Rent		Total	
	Units	Hab rooms	Units	Hab rooms	Units	Hab rooms
1-bed	8	15	7	14	15	29
2-bed	21	64	8	27	29	91
3-bed	1	5	11	54	12	59
Total	30	84	26	95	56	179
%	54%	47%	46%	53%	~	

6.26 This results in an overall provision of 53% affordable rent (by habitable room), including a high proportion of family-sized affordable housing. This amount of affordable housing complies with

Policy 6 of the CS which requires a minimum of 35% affordable housing units on site. This provision also exceeds the requirements of the NLP and NSP. The application is also accompanied by a viability assessment as required by LBS.

6.27 The proposal does not meet the requirement of 10% intermediate tenure. However, the provision of affordable housing all in affordable rented tenure was agreed with the LBS Property team.

6.28 Overall, the development of 56 new homes would make an important contribution towards these local and strategic housing objectives. The development will provide a range of residential units of varying size and type, including a good level of family accommodation. It will make a valuable contribution towards local housing need and responds directly to the residential land use objectives outlined in the London Plan and adopted and emerging local policy.

Urban Design

6.29 Policy at all levels requires high quality design and the protection of amenity. Paragraph 124 of the NPPF sets out the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

6.30 LBS CS Strategic Policy 3.13 and NSP Policy P11 confirms that developments should have consideration for height, scale, massing, local distinctiveness, urban grain, high quality public realm and respond positively to townscape.

6.31 The detailed design has been developed considerably throughout the pre-application process with LBS. The architecture of the proposal is typical 'new London vernacular' in style. The proposed scheme consists of duplexes on the ground floor to activate the street frontages. The proposed design would produce a smart and elegant building that successfully responds to the small scale of adjacent retail units and houses to the east and residential blocks at larger six storey scale to the west.

6.32 LBS has confirmed in the pre-application response that this is a strong concept that works well in townscape terms.

6.33 The Design and Access Statement provides further detail demonstrating the high design quality of the proposals.

Density

6.34 The London Plan (2016) and the NLP both promote the efficient use of urban land and the optimisation of housing potential in new developments to help meet the strategic challenges of population growth and the pressing need for new homes. The London Plan (Policy 3.4) aims to optimise housing delivery whilst taking into account local context and character, design principles and public transport capacity.

6.35 NLP Policy GG2 promotes higher density development, particularly on sites that are well-connected by public transport, walking and cycling to other infrastructure and services. NLP Policy D6 also confirms development proposals must make the most efficient use of land and be designed at the optimum density

6.36 LBS CS Strategic Policy 5 sets out that within an Urban Density Zone, a density of between 200 and 700 habitable rooms per hectare is supported. This is maintained in the NSP Policy P9.

- 6.37 The calculated density of the proposed development is 720 habitable rooms per hectare which exceeds the expected density range of 200 to 700 habitable rooms per hectare for the Urban Zone within which the site is located.
- 6.38 As part of the pre-application process, LBS has acknowledged that the proposal only slightly exceeds the recommended density and on balance, subject to the proposal delivering a high quality design, the density is considered appropriate. As demonstrated earlier in this Statement and within the submitted Design and Access Statement, it is considered that the design of the proposed development is high quality and the therefore the density is appropriate and accords with development plan policies.

Accessibility and Inclusive Design

- 6.39 London Plan Policy 3.8(B)(d) and LBS Core Strategy Policy 4.3 require developments to provide a minimum of 10% provision of wheelchair accessible homes and encourage the creation of inclusive and equitable environments.
- 6.40 The proposed development has been designed in accordance with these objectives. The proposed development provides 10% wheelchair adaptable homes, comprising 4 x 2-bed flats and 2 x 2-bed houses (6 units in total). These units have also been designed to meet the South East London Housing Partnership Wheelchair Housing Design Guide space standards as set out in the LBS Residential Design Standards SPD.
- 6.41 The development will be car free, apart from two accessible car parking spaces for residents of the two accessible homes accessed from Alexis Street. The communal amenity space proposed as part of the development will have level access to ensure they are accessible to all. The proposed development is, therefore, acceptable in terms of accessibility and will provide an equitable and inclusive environment for all occupants.

Residential Amenity and Open Space

Design Standards

- 6.42 NSP Draft Policy P12 requires development to achieve an exemplary standard of residential design and policy P14 also requires schemes to meet or exceed national space standards and provide a useable amount of private amenity space.
- 6.43 In line with the GLA Housing SPG (2016), LBS's Design Standards SPD (2015) adopts the Nationally Described Space Standards (2015) in relation to the minimum internal space standards required in new dwellings. Developers are encouraged to exceed these standards where feasible.
- 6.44 The accompanying Design and Access Statement demonstrates that all residential units meet or exceed the requirements of the Nationally Described Space Standards (2015), and therefore the GLA Housing SPG and LBS Residential Design Standards.
- 6.45 NSP Policy P14 also sets out that residential development be predominately dual aspect and demonstrate good levels of privacy and ventilation for single aspect flats. It also sets out that single aspect dwellings will not be acceptable where they have two or more bedrooms, are north facing or the façade is exposed to high noise levels. In addition, NSP Policy P54 sets out that development should be permitted where it does not cause an unacceptable loss of amenity to present or future occupiers or users.
- 6.46 The proposed development does not include any single aspect north-facing units and all family units are dual-aspect. This is in accordance with Housing SPG Standard 29. Overall 84% of units

are dual aspect, and those that are single-aspect are east-facing. Of these 9 east-facing units, only two are 2-bed units and these are duplexes which are two storeys to allow for more windows and light.

- 6.47 The scheme has been designed to ensure that adequate privacy distances of 18m or more are maintained between the proposed development and neighbouring buildings. Within the development itself, the 18m distance is also maintained between units across from each other at ground floor level, however at upper floors this is slightly reduced to 17m. However, the flats have been designed so that no habitable rooms face towards the block on the other side, limiting the opportunity for overlooking. This is in accordance with the GLA Housing SPG.

Daylight and Sunlight

- 6.48 The Daylight and Sunlight assessment submitted with this application considers the daylight and sunlight implications of the proposed new development at the FCGS, including the impact to neighbouring properties and the provision of daylight and sunlight amenity within the proposed development in accordance with London Plan Policy 7.6 and NLP Policy D6.
- 6.49 The assessment of daylight amenity within the proposed apartments has been assessed and 97% rooms are shown to achieve levels of daylight commensurate with their predominant use. The rooms that fall below the target values, do so only marginally.
- 6.50 The sunlight assessment has shown that 60% of the relevant rooms achieve the recommended level of 25% total and 5% winter sunlight. The high percentage of rooms that fall below this, do so because of the balconies which inevitably cause some sunlight obstruction. The balconies are required for external amenity space. It has been noted that the south-facing rooms with no balconies will retain good levels of both annual and winter sunlight.
- 6.51 The assessment has considered all of the closest neighbouring residential properties with windows overlooking the proposed development and it has demonstrated that the development's impact upon the neighbouring properties is considered to be entirely consistent with the BRE guidance and relevant planning policy in terms of daylight and sunlight.

External Amenity Space and Play Space

- 6.52 The proposal includes houses and dwellings which would benefit from private gardens at ground level. At ground level, the proposals also include a communal courtyard which is 198sqm. On the fifth floor, the proposal includes a terrace area of external communal space.
- 6.53 The duplexes benefit from private gardens, while the flats benefit from balconies. The supporting text of CS Policy 7 seeks that developments accord with the Residential Design Standards SPD for amenity space. This requires any shortfall in private amenity space against the target of 10sqm per dwelling to be provided as communal amenity space. To this end, 207sqm of communal amenity space is provided in the scheme (not including playspace provision). This communal amenity space provides for the shortfall of private amenity space (120sqm) as well as the requirement for 50sqm of communal amenity space to be provided for flatted developments included within the Residential Design Standards SPD. As such it is considered that this level of external amenity space is appropriate.
- 6.54 The proposal includes the provision of 155sqm of play space which is split between the communal courtyard area (100sqm) and fifth floor roof space (55sqm), against a requirement of 154sqm (as calculated using the GLA Population Yield calculator V3.2). This play space meets the requirement for doorstep play provision for 15 children aged 0-4 years old, in accordance with the Mayor's Play and Informal Recreation SPG.

- 6.55 Play space for older children is catered for in local parks, including the Alexis Street open space which adjoins the site to the north, Paterson Park and Shuttleworth Park which are under 350m walking distance from the site and Bermondsey Spa Gardens and Southwark Park are also 650m and 850m from the site respectively. As such, there is sufficient play space within suitable walking distances as required by the Play and Informal Recreation SPG.
- 6.56 Further detail is included in the Design and Access Statement. Overall, the proposed scheme accords with the development plan and guidance in terms of private and communal amenity space and play space provision.

Heritage Impacts

- 6.57 The application sites lies adjacent to the Thorburn Square Conservation Area, though it does not itself contain any heritage assets.
- 6.58 Chapter 16 of the NPPF requires that, in determining planning applications, local planning authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness of the historic environment and the desirability of putting heritage assets to viable use (para 192).
- 6.59 LBS CS Strategic Policy 12 sets out that the expectation for development to conserve or enhance the significance of Southwark's heritage assets, their settings and wider historic environment, including conservation areas.
- 6.60 The design proposals have been carefully considered to ensure that the context is respected and the façade treatment and materials proposed would complement the existing buildings and the character of the area. In addition, the height and massing of the proposed building is in-keeping with the surrounding area. As such it is considered that the site does not impact on the setting of the Conservation Area in accordance with the Development Plan.

Parking and Highways

- 6.61 The site is accessible, with a PTAL rating of 3, and is approximately 800m walking distance from Bermondsey Tube Station and c.1.2km walking distance from South Bermondsey train station. The nearest bus stop to the site is less than 200m walking distance and has routes towards Surrey Quays. Another bus stop is located 250m from the site and has routes to Elephant and Castle and Peckham.
- 6.62 On this basis, the development adopts a restraint-based approach to car parking and would be car free (with the exception of 2 accessible spaces). These 2 spaces will be provided for the 2 wheelchair adaptable houses which front onto Alexis Street. In total the development will provide space for 104 long-stay cycle parking spaces. It is also proposed to provide 6 short stay spaces at the corner of Southwark Park Road with Macks Road. The scheme will therefore provide a high level of cycle parking (110 cycle spaces) and will also significantly enhance pedestrian environment. This approach accords with CS Strategic Policy 2 to prioritise sustainable transport methods such as walking, cycling and public transport.
- 6.63 The submitted Transport Statement provides a review of the vehicle trip generation for the previous use as a primary school and also for the proposed residential development. It is predicted to generate a net reduction in vehicles trips when compared to the previous school use. This will therefore have an overall positive impact on the surrounding highway network.
- 6.64 The development is therefore acceptable with regard to transport, accessible transport, cycle parking, servicing and refuse collection in the context of the London Plan and local policy. Transport matters are discussed in greater detail in the submitted Transport Assessment.

Energy and sustainability

- 6.65 The proposed development is inherently sustainable, embodying the principles of environmental, social and economic sustainability which are central to the NPPF. It makes optimal use of an accessible brownfield urban site and has been designed in accordance with local and strategic sustainability objectives and will be car-free (with the exception of the provision of 2 accessible spaces).
- 6.66 The development has been designed in accordance with local and strategic sustainability objectives and will incorporate energy efficient design measures. An Energy Statement has been submitted for the proposed development and it sets out that the proposed development complies with CS Strategic Policy 13 which requires developments to minimise greenhouse gases across its lifetime, and NLP Policy SI2: Minimising Greenhouse Gas Emissions, which states that major development should be net zero-carbon. This means reducing carbon dioxide emissions from construction and operation, and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
- Be lean: use less energy and manage demand during construction and operation.
 - Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly. Development in Heat Network Priority Areas should follow the heating hierarchy in Policy SI3 Energy infrastructure.
 - Be green: generate, store and use renewable energy on-site.
- 6.67 This will be achieved via methods such as mechanical ventilation with heat recovery and using an on-site heat network. In-line with emerging SAP 10 guidance, the communal plant is to be split between Gas Boilers and ASHPs. In meeting the zero-carbon target a minimum on-site reduction of at least 35 per cent beyond Building Regulations, a Carbon Offset payment is proposed.
- 6.68 The development therefore embraces local and strategic sustainability and energy objectives and is consistent with the requirements of policy in this regard. Further details are provided in the submitted energy assessment.

Ecology

- 6.69 LBS CS Strategic Policy 11 and NLP Policy G6 seeks to ensure that habitats are protected and improved for a variety of wildlife. A Preliminary Ecological Appraisal prepared by Liz Lake Associates accompanies this application. The survey was conducted to identify any ecological constraints that should be considered when carrying out works in the area. The findings are summarised below.
- 6.70 Extended Phase 1 Habitat Surveys of the Site were undertaken by Liz Lake Associates in November 2019. This survey confirmed that the existing protected species within 1km of the site consist of bats, common toad, and stag beetles. Some birds of conservation concern were also identified. It was noted that the site does not provide large amounts of suitable habitat for these species.
- 6.71 The survey found a medium probability of birds nesting on site during the nesting season (1st March to 31st August). As such, clearance of vegetation or trees with potential to contain nesting birds should be carried out outside this period.
- 6.72 It was advised that care should be taken when removing vegetation in case animals are present. If a hedgehog or a toad is found during clearance, they should be moved away from the site and placed in some suitable habitat nearby.

Noise and Air Quality

- 6.73 NLP Policy SI 1 requires that developments should not worsen air quality levels while Policy D14 requires development proposals to avoid significant noise impacts on health and quality of life and mitigate and minimise existing and potential noise impacts. CS Strategic Policy 13 that the Council will support measures to reduce air and noise pollution.
- 6.74 The air quality and noise analyses submitted with the application demonstrate that a good quality residential environment can be achieved within the development in terms of air quality and noise, subject to appropriate mitigation measures being employed.

Contamination

- 6.75 CS Strategic Policy 13 supports measures to reduce land pollution and avoiding amenity and environmental problems that affect how we enjoy the environment. A Land Contamination Assessment has been submitted as part of this application. This concludes that in terms of contamination risks to the site, the only possible one is lead in one area of the site. The Assessment details that further testing will be required and how this can be remediated. No other sources of contamination were identified. As such it is considered that the one potential source of contamination can be mitigated and therefore the proposed development meets the requirements of the development plan.

Flooding

- 6.76 NLP Policy GC6 sets out that buildings must be designed to adapt to climate change and reducing impacts from natural hazards such as flooding. CS Strategic Policy 13 sets out that development will be allowed within the protected Thames flood zone as long as it is designed to be safe and resilient to flooding and meets the Exceptions test.
- 6.77 A Flood Risk Assessment has been submitted as part of this application. It confirms that there remains a residual risk of flooding at the site as a result of defences being breached or overtopped. The majority of the site is at a low risk from surface water flooding, while no other sources of flood risk are considered significant here. The Assessment recommends that floor levels be raised by 150mm above the existing floor levels. The proposed development does not include any sleeping accommodation at ground floor level. It is recommended that flood resilience measures are provided at ground floor level.
- 6.78 As a result of the measures proposed it is concluded that the development will be safe for its lifetime, without increasing flood risk elsewhere. The sustainability benefits provided by the development include the energy strategy adopted for the scheme as set out above and the reduced reliance on the private car which the proposed development includes. It is considered that the Exception Test is met here and as such the requirements of the development plan are met.

Trees

- 6.79 CS Strategic Policy 11 sets out that the Council will seek to protect woodland and trees and improve the overall greenness of places, including through green corridors and gardens.
- 6.80 The submitted Arboricultural Impact Assessment sets out that the trees within the site are of low quality and the loss of those will be negligible. The proposed development includes the planting of 13 new trees on the site. A healthy poplar tree on the street will need to be heavily pruned in order for the development to come forward. It is noted that although the impact of this will be large, the tree has been pruned before and the species is resilient. Discussions will be had with the tree officer at LBS to agree the extent of the pruning ahead of commencement of

development and works near other trees on the street will be supervised by an arboriculturist and reported to LBS, subject to a more detailed arboricultural method statement to be provided following the planning application.

- 6.81 As such it is considered that where there is loss or harm to trees on or near to the site, this can be suitably mitigated. The proposed development includes increased tree planting on the site in accordance with local policy.

7.0 Conclusion

- 7.1 This Planning Statement provides a detailed assessment of the application proposed at the application site in relation to national, strategic and local planning policy and guidance. This Statement concludes that the proposed development is high-quality, makes efficient use of brownfield land and is acceptable at this location.
- 7.2 The Planning Application proposes to deliver a high-quality development that will result in significant regeneration of the Site. As a direct result of the development proposals, the application will deliver a number of planning benefits for LBS and the local community. These are material benefits which weigh in favour of a grant of planning permission and are set out below:
- 1 The principle of a residential development proposed at the site is firmly supported by the NPPF, the development plan and emerging policy. The development principle has been established throughout the tender process, which confirmed that residential development was acceptable for this site. This has also been endorsed during pre-application discussions the LBS officers.
 - 2 The function of the site has come to the end of its usable life as a community use. It was noted that the FCGS building has serious suitability and condition issues and it could not be continued for educational purposes. In contrast, the proposed development will provide a sustainable option to contribute to the boroughs housing needs.
 - 3 The proposed development will deliver 56 high quality homes. This accommodation will make an important contribution towards local and strategic housing objectives.
 - 4 The proposed development will provide a range of homes of varying size and type including a good level of family accommodation for affordable rent, alongside smaller units. The proposed dwelling mix responds to local need and will contribute towards the creation of a mixed and balanced community in Southwark including 53% affordable housing for social rent.
 - 5 All of the proposed units have been designed to comply with the London Plan floorspace standards and the requirements of the GLA's Housing SPG. All will experience good standards of amenity and will provide a good residential environment.
 - 6 The development adopts a restraint-based approach to car parking It will maximise cycle parking and enhance the pedestrian environment; promoting sustainable travel behaviour amongst residents and visitors.
 - 7 The proposed scheme is inherently sustainable, making optimal use of an accessible brownfield urban site within Bermondsey. Energy efficient design measures, district heating connectivity and on-site renewable technology will be implemented.
 - 8 The proposals offer no net harm to heritage assets, embrace design and placemaking principles and will knit together the surrounding existing urban fabric.
- 7.3 The development will, therefore, deliver a range of significant planning and regeneration benefits in terms of maximising the delivery of high-quality homes; dwelling mix and sustainable community objectives; its design quality and townscape response; local environmental enhancement. These substantive, wide-ranging benefits militate strongly in support of the grant of planning permission.
- 7.4 It is concluded that the proposed development embodies the principles of sustainable development promoted through the NPPF and complies with the objectives and requirements of

the development plan. We respectfully submit that planning permission should be granted for the development.

Appendix 1 Adopted and Emerging London Plan Policies

London Plan (2016)

- Policy 3.3 Increasing Housing Supply
 - Policy 3.4 Optimising Housing Potential
 - Policy 3.5 Quality and Design of Housing Developments.
 - Policy 3.6 Children and Young People
 - Policy 3.7 Large Residential Developments
 - Policy 3.8 Housing Choice
 - Policy 3.9 Mixed and Balanced Communities
 - Policy 3.11 Affordable Housing Targets
 - Policy 3.12 Negotiating Affordable Housing
 - Policy 3.13 Affordable Housing Thresholds
 - Policy 3.16 Protection and enhancement of social infrastructure
 - Policy 3.17 Health and Social Care Facilities
 - Policy 3.18 Education Facilities
 - Policy 4.12 Improving Opportunities for All
 - Policy 5.2 Minimising Carbon Dioxide Emissions
 - Policy 5.3 Sustainable Design and Construction
 - Policy 5.4A Electricity and Gas Supply
 - Policy 5.5 Decentralised Energy Networks
 - Policy 5.6 Decentralised Energy in Development Proposals
 - Policy 5.7 Renewable Energy
 - Policy 5.9 Overheating and Cooling
 - Policy 5.10 Urban Greening
 - Policy 5.11 Green Roof and Development Site Environs
 - Policy 5.12 Flood Risk Management
 - Policy 5.13 Sustainable Drainage
 - Policy 5.14 Water Quality and Wastewater Infrastructure
 - Policy 5.15 Water Use and Supplies
 - Policy 5.17 Waste Capacity
 - Policy 6.3 Assessing Effects of Development on Transport Capacity
 - Policy 6.9 Cycling
 - Policy 6.10 Walking
 - Policy 6.12 Road Network Capacity
 - Policy 6.13 Parking
-

- Policy 7.1 Lifetime Neighbourhoods
- Policy 7.2 An Inclusive Environment
- Policy 7.3 Designing out Crime
- Policy 7.4 Local Character
- Policy 7.5 Public Realm
- Policy 7.6 Architecture
- Policy 7.7 Location and Design of Tall and Large Buildings
- Policy 7.8 Heritage Assets and Archaeology
- Policy 7.12 Implementing the London View Management Framework
- Policy 7.14 Improving Air Quality
- Policy 7.15 Reducing and Managing Noise
- Policy 7.19 Biodiversity and Access to Nature
- Policy 7.21 Trees and Woodlands

Emerging London Plan (2018)

- Policy GG1 Building Strong and Inclusive Communities
 - Policy GG2 Making the Best Use of Land
 - Policy GG3 Creating a Health City
 - Policy GG4 Delivering the Homes Londoners Need
 - Policy SD10 Strategic and Local Regeneration
 - Policy D1 London's Form, Character and Capacity for Growth
 - Policy D2: Infrastructure Requirements for Sustainable Densities
 - Policy D3: Optimising Site Capacity through the Design-Led Approach
 - Policy D4 Delivering Good Design
 - Policy D5 Inclusive Design
 - Policy D6 Housing Quality and Standards
 - Policy D7 Accessible Housing
 - Policy D8 Public Realm
 - Policy D9 Tall Buildings
 - Policy D14 Noise
 - Policy H1 Increasing Housing Supply
 - Policy H2 Small Sites
 - Policy H4 Delivering Affordable Housing
 - Policy H5 Threshold Approach to Applications
 - Policy H6 Affordable Housing Tenure
 - Policy H10 Housing Size Mix
 - Policy H12 Supported and specialised accommodation
 - Policy S2 Health and Social Care Facilities
-

- Policy S3 Education and Childcare Facilities
 - Policy S4 Play and Informal Recreation
 - Policy HC1 Heritage Conservation and Growth
 - Policy G4 Open Space
 - Policy G5 Urban Greening
 - Policy G6 Biodiversity and Access to Nature
 - Policy G7 Trees and Woodlands
 - Policy SI1 Improving Air Quality
 - Policy SI2 Minimising greenhouse gas emissions
 - Policy SI3 Energy Infrastructure
 - Policy SI4 Managing Heat Risk
 - Policy SI5 Water Infrastructure
 - Policy SI12 Flood Risk Management
 - Policy SI13 Sustainable Drainage
 - Policy T2 Healthy Streets
 - Policy T3 Transport Capacity, Connectivity and Safeguarding
 - Policy T4 Assessing and Mitigating Transport Impacts
 - Policy T5 Cycling
 - Policy T6 Car Parking
 - Policy T7 Deliveries, Servicing and Construction
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Appendix 2 Heads of Terms

The below has been prepared in accordance with LB Southwark's S106 Planning Obligations and CIL SPD (April 2015) for discussion with the Council in relation to the likely S106 contributions for the site.

Item	Financial Contribution (£)	Note
Carbon Offset	The Energy Statement sets out that a contribution of £79,922 in relation to carbon offsetting will be made.	The shortfall in CO2 reduction will be charged £60 for every tonne of CO2 emitted per year over a period of 30 years (or £1,800 per tonne of annual residual CO2 emissions).
Childs play space	n/a – doorstep play for 0-4 year olds is provided on-site in accordance with the Mayor's Play and Informal Recreation SPG	Mitigation will be sought where schemes do not meet the on-site children's play space provision standards which are included in the Mayor's Supplementary Planning Guidance on Shaping Neighbourhoods Play and Informal Recreation (2012).
Employment and enterprise	Based on a GEA of 5,630sqm, 11 jobs for an unemployed Southwark resident would need to be provided, 11 Southwark residents would need to be trained in pre or post employment short course and 2 new apprenticeships start or in work NVQ would be required. If this could not be provided a contribution of up to £51,950 would be required.	The targets for jobs are: <ul style="list-style-type: none"> - One job lasting a minimum 26 weeks for an unemployed Southwark resident per 500sqm GEA. - One Southwark resident trained in pre or post employment short courses per 500sqm GEA. - One new apprenticeship start or inwork NVQ per 2000sqm If this cannot be provided the contributions are: <ul style="list-style-type: none"> - Shortfall against target number of jobs lasting minimum 26 weeks for an unemployed Southwark resident x £4,300 (the average cost of supporting an unemployed Southwark resident into sustained employment) - Shortfall against target number of Southwark residents trained in short courses x £150 (the approximate cost of a typical construction sector short course) - Shortfall against target number of apprenticeship starts x £1,500 (the approximate cost of a typical construction sector Level 2 qualification)
Outdoor Amenity Space	n/a – the scheme provides all	Mitigation will be sought where schemes

	required communal amenity space on-site.	do not meet the on-site amenity space standards identified in Southwark Council's Residential Design Standards SPD.
Public Realm measurements	TBC	Public realm improvements that may be necessary to make development acceptable include, but are not limited to, the provision of: Site specific contributions for carriageway surfacing, new or improved footways and/or hard or soft landscaping improvements, replacing paving or landscape material on existing public realm including carriageway and footways, Street furniture, bins, bollards, street lighting etc.
Transport Measures	TBC	The calculation is based on a list of site specific items for which the costs are regularly updated to reflect changes in build costs. We will also seek to secure non-financial planning obligations to address the impact of a development proposal. Non-financial planning obligations may include: Car club initiatives, electric vehicle charging bays and Travel Plan.

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