

Skipton House, Elephant & Castle

in the London Borough of Southwark

planning application no. 15/AP/5125

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of buildings and creation of two levels of basement (plus mezzanines) and the erection of buildings ranging from eight to forty-stories (maximum building height of 146.3 metres A.O.D.) comprising 421 residential units, office, retail, multifunctional cultural space and new landscaping and public realm (including a publically accessible roof garden).

The applicant

The applicant is **London and Regional Properties Ltd.**, and the architect is **SOM**.

Strategic issues

The proposed redevelopment of this **Opportunity Area** site would **increase housing supply** and deliver an **excellent mix of uses** for the **Central Activities Zone**. Accordingly, the scheme is **strongly supported** in principle.

The applicant and the Council should nevertheless ensure that the issues raised with respect to **mix of uses, housing, inclusive access, sustainable development** and **transport** are addressed prior to the Mayor's decision making stage.

Recommendation

That Southwark Council be advised that whilst the scheme is generally acceptable in strategic planning terms the application does not yet fully comply with the London Plan for the reasons set out in paragraph 77 of this report. However, the resolution of those issues could lead to the application becoming compliant with the London Plan.

Context

1 On 28 January 2016 the Mayor of London received documents from Southwark Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 9 March 2016 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following categories of the Schedule to the Order 2008:

- 1A 1. *“Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats”;*
- 1B 1.(b) *“Development... which comprises or includes the erection of a building or buildings in Central London (other than the City of London) and with a total floorspace of more than 20,000 square metres”;* and,
- 1C 1.(c) *“Development which comprises or includes the erection of a building... more than 30 metres high and is outside the City of London”.*

3 Once Southwark Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) has been taken into account in the consideration of this case.

5 The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

6 The site is 0.87 hectares in size, and is located within the Central Activities Zone (CAZ) and Elephant and Castle Opportunity Area as defined by the London Plan. The site is bound by Keyworth Street and Southwark Bridge Road to the north; Newington Causeway (A3) to the east; Elephant and Castle Northern Roundabout to the south; and, London Road (A201) and Ontario Street to the west.

7 The context to the site is predominately characterised by large-scale commercial/ educational buildings, housing estate blocks and transport infrastructure. The Elephant and Castle Opportunity Area is, nevertheless, undergoing major transformation - with significant investment in housing and new retail provision coming forward, along with plans for significantly enhanced public realm and a more efficient and attractive transport interchange, focussed on the Northern Roundabout/Northern Line Ticket Hall to the south of the site. It is envisaged that this change will deliver a new high density mixed-use neighbourhood and town centre, in conjunction with an emerging cluster of tall buildings.

8 The site is currently occupied by: Skipton House (an office building comprising 20,256 sq.m. of floorspace); the Perry Library (associated with the adjacent London South Bank University); and, a hostel (operated by Southwark Council and providing 35 bed spaces for homeless men). The Bakerloo line London Underground station building (which also provides below ground access to the Northern Line services and has train crew accommodation on the upper floors) abuts the site to the south.

9 The buildings at the site are neither Listed nor within a Conservation Area, however, there are a number of designated heritage assets in the vicinity including Metro Central Heights (Grade II), Michael Faraday Memorial (Grade II), Elliot’s Row Conservation Area and West Square Conservation Area. The Bakerloo Line station building is on Southwark’s draft Local List. The site is also over-sailed (at between 60 and 65 metres A.O.D.) by the background consultation area of London View Management Framework (LVMF) SPG view 23A.1 from Serpentine Bridge to Palace of Westminster.

10 The site is very well served by public transport, with Underground services (Northern and Bakerloo lines), rail services and numerous bus services available at Elephant and Castle. Accordingly the site registers a public transport accessibility level of six(b), on a scale of zero to six(b), where six(b) denotes the most accessible locations in the capital.

Details of the proposal

11 The proposal is for demolition of the existing buildings and creation of two levels of basement (plus mezzanines) and the erection of buildings ranging from eight to forty-stories (maximum building height of 146.3 metres A.O.D.) comprising retail uses (Use Classes A1/A3/A4) at ground floor, multifunctional cultural space (Use Classes D1/D2/Sui Generis) and flexible retail/gym space (Uses Classes A1/A3/A4 & D2) below ground, and office use (Use Class B1) and 421 residential units (Use Class C3) on upper levels, as well as new landscaping and public realm, a publically accessible roof garden, ancillary servicing and plant, cycle parking and associated works.

12 At the time of writing this report it is understood that the applicant is preparing a number of revisions to the scheme in response to discussions with Southwark Council and various statutory consultees. GLA officers understand that such revisions may include a reduction of the proposed basement area, and a revised junction option for Newington Causeway/Southwark Bridge Road.

Case history

13 On 6 October 2015 a GLA pre-application meeting was held at City Hall to discuss this proposal. The advice issued after the meeting by GLA officers stated that the principle of the proposed mixed use redevelopment of this Opportunity Area site is strongly supported in strategic planning terms. Nevertheless, the applicant was advised to ensure that the issues raised with respect to mix of uses; housing; urban design; strategic views; inclusive access; sustainable development; and, transport are fully addressed by the future application.

Strategic planning issues and relevant policies and guidance

14 The relevant strategic issues and corresponding policies are as follows:

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|---------------------------|--|
| • Opportunity Area | <i>London Plan</i> |
| • Central Activities Zone | <i>London Plan; draft CAZ SPG;</i> |
| • Mix of uses | <i>London Plan;</i> |
| • Culture | <i>London Plan; draft CAZ SPG;</i> |
| • Housing | <i>London Plan; Housing SPG; draft Interim Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; draft Shaping Neighbourhoods: Character and Context SPG;</i> |
| • Affordable housing | <i>London Plan; Housing SPG; draft Interim Housing SPG; Housing Strategy;</i> |
| • Density | <i>London Plan; Housing SPG; draft Interim Housing SPG;</i> |
| • Urban design | <i>London Plan; draft Shaping Neighbourhoods: Character and Context SPG; Housing SPG; draft Interim Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;</i> |
| • Strategic views | <i>London Plan, London View Management Framework SPG;</i> |
| • Inclusive access | <i>London Plan; Accessible London: achieving an inclusive environment SPG;</i> |

- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy; Mayor's Ambient Noise Strategy;*
- Transport and parking *London Plan; the Mayor's Transport Strategy;*
- Crossrail *London Plan; and, Mayoral Community Infrastructure Levy.*

15 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2011 Southwark Core Strategy; saved policies of the 2007 Southwark Plan; and, the 2015 London Plan (Consolidated with Alterations since 2011).

16 The following are also relevant material considerations:

- National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance;
- Draft Minor Alterations to the London Plan 2015;
- Elephant and Castle Opportunity Area SPD; and,
- New Southwark Plan (Preferred Options consultation stage).

Principle of development

17 The site is located within the CAZ and Elephant and Castle Opportunity Area as defined by the London Plan. Table A1.1 (in support of London Plan Policy 2.13) identifies that the Opportunity Area is undergoing major transformation, and is capable of accommodating a minimum of 5,000 new homes and 5,000 new jobs. Moreover, the Southwark Local Plan identifies Elephant and Castle as a key regeneration area, and includes this site within the boundary of Elephant and Castle (major) town centre.

18 The applicant proposes a comprehensive redevelopment of the site to deliver 421 units of new housing and a rich mix of town centre uses (creating the potential for some 3,375 jobs). Whilst it is noted that a number of the existing uses/occupiers at the site would be displaced in order to facilitate the proposed redevelopment, based on the information available (and subject to the clarification sought in paragraph 21 below), GLA officers are broadly satisfied that this could be achieved without raising strategic planning issues, or causing unreasonable disruption to the occupiers concerned.

19 Accordingly, having regard to the context discussed above (and the consideration of existing and proposed uses set out below), the principle of the proposed comprehensive mixed use redevelopment of this Opportunity Area site is strongly supported in strategic planning terms.

Mix of uses

Existing uses

20 As discussed in paragraph 8, the site currently provides office space (occupied by the Department of Health), a hostel for homeless men (operated by Southwark Council) and the Perry Library (associated with London South Bank University). Based on pre-application discussions it is understood that the Department of Health is already exploring future accommodation options for its existing functions at this site (given that the lease for office space at Skipton House is shortly to expire). With respect to the hostel, Southwark Council has confirmed that it is prepared in principle to relocate the facility to a suitable location elsewhere in the borough, in order to help facilitate the proposed regeneration of this key site.

21 Furthermore, following discussions between the applicant and London South Bank University it is understood that the University is investigating opportunities to relocate the Perry Library elsewhere within its Elephant and Castle estate – as part of its own emerging plans for campus modernisation. GLA officers welcome the applicant’s proactive engagement with London South Bank University in the context of facilitating library relocation, as well as the applicant’s stated commitment to use all reasonable endeavours to assist the University in finding alternative accommodation. Nevertheless, on the basis that the University’s plans are rather less advanced than this scheme, GLA officers seek assurance that an interim solution would be in place to ensure the continuity of the University’s library service. Further joint discussion is taking place on this matter accordingly.

Proposed uses

22 The proposal includes an excellent mix of uses for this part of the CAZ – including high quality office space, housing, retail and a new culture and leisure facility. The proposed mix of uses is strongly supported in accordance with the strategic objectives of London Plan policies 2.10, 2.11, 3.3, 4.2 and 4.3. Further comments with respect to the non-residential uses are provided below.

Office

23 The scheme includes a 49,567 sq.m. office component. This would represent an uplift of 29,311 sq.m. over the existing Class B1 floorspace at the site, and has the potential to support approximately 1,461 additional office jobs. The proposed renewal and uplift of CAZ office floorspace (as part of a wider mixed use proposal including housing) is strongly supported in line with London Plan policies 4.2 and 4.3, and responds well to the strategic objective to create new employment opportunities within the Elephant and Castle Opportunity Area.

Retail

24 The scheme includes 1,550 sq.m. of flexible retail floorspace at the ground and mezzanine level (this is below the threshold at which the NPPF requires the submission of a retail impact assessment). Envisaged principally as a food and beverage offer, this retail provision would play a key role in activating the ground floor of the scheme. GLA officers are of the view that such provision would work well in conjunction with the other proposed uses (particularly the offices and cultural facility), and would also complement the comparison goods-led retail scheme coming forward as part of wider plans for the redevelopment of Elephant and Castle shopping centre, opposite the site. Accordingly, GLA officers support the proposed retail provision in accordance with London Plan Policy 4.7.

Cultural and leisure uses

25 The applicant proposes 4,005 sq.m. of flexible cultural space (in two levels of basement) which would incorporate a performance venue of up to 500 seats and associated cultural, leisure and retail uses. The current proposal has been developed without an end user in place, but has nevertheless been informed by extensive market research undertaken by the applicant. This indicates that a flexible, mid-scale music and/or performance venue would have the best chance of success in this location. In addition, the applicant has stated its commitment to introduce associated community and educational outreach programmes in line with Southwark Council’s local initiatives. GLA officers welcome the proposal to provide a destination cultural facility at this site (potentially including a theatre / auditorium / music hall / art-house cinema), and note that this would have genuine potential to deliver a significant boost to the local night-time economy. The principle of providing related outreach programmes is also strongly supported. Such provision would be in line with the Council’s aspirations for Elephant and Castle, would

support the emergence of a new cultural cluster in this part of Southwark in accordance with London Plan Policy 4.6, and guidance within the draft CAZ SPG.

26 Whilst an occupier for this facility is still to be established, it appears that the scale and specification of the venue could attract interest from a variety of cultural institutions. Nevertheless, in the absence of an end user at this point (and with a view to activating this facility as soon as possible), the applicant is strongly encouraged to engage in early discussions with a range of potential cultural occupiers. Moreover (and notwithstanding the anticipated scheme revisions discussed in paragraph 12 above), GLA officers encourage the Council to secure a cultural strategy by way of Section 106 agreement - to specify a range of measures to support the sustainable function of this space (including community and educational outreach programmes), and to include an obligation on the applicant/owner to use all reasonable endeavours to enter into a lease for this space with one or more suitable cultural occupiers.

Housing

27 The proposal includes 421 residential units - which is broadly equivalent to 16% of Southwark's annual housing monitoring target. The proposed delivery of these new homes is strongly supported in accordance with London Plan policies 2.11 (CAZ strategic functions), 2.13 (Opportunity Areas) and 3.3 (increasing housing supply). The proposed residential schedule is as set out in table 1 below.

Dwelling type	Private market	Proportion
Studio	18	4%
One-bedroom	142	34%
Two-bedroom	216	51%
Three-bedroom	45	11%
Total	421	100%

Table 1: Proposed residential schedule

Affordable housing and scheme viability

28 London Plan Policy 3.12 seeks the maximum reasonable amount of affordable housing, and requires that such provision is made on-site - unless exceptional circumstances justify otherwise.

29 The applicant has not declared an affordable housing offer for the scheme as yet, and defers instead to the outcome of an independent viability review that is being undertaken on behalf of Southwark Council. Whilst it is accepted that the affordable housing offer will be subject to scheme viability, GLA officers wish to emphasise that the applicant is required to prioritise on-site delivery as a first principle. Accordingly, once the viability position is established, the applicant should explore all feasible opportunities for the provision of affordable housing tenures within the proposed residential blocks of the scheme.

30 GLA officers anticipate that the proposed cultural facility is likely to represent a significant financial burden on the scheme (effectively constraining the amount of affordable housing that the development could deliver). However, depending on the eventual end user(s) of this space, it is understood that there may be additional potential funding streams to assist with delivering the cultural facility. Accordingly, GLA officers encourage the Council to design a review/clawback mechanism within the Section 106 agreement so that (under a windfall funding scenario) a reasonable proportion of the scheme's enabling funding for the culture facility would be redirected towards the provision of additional affordable housing units.

Residential quality and standards

31 Notwithstanding the current absence of affordable tenures, GLA officers are satisfied that the proposed housing schedule provides an acceptable mix of units for this location in terms of housing choice (London Plan Policy 3.8). Based on the submitted plans it is noted that all dwellings would exceed the minimum space standards established by London Plan Policy 3.5, and that the residential quality of the scheme would be high – with the scheme generally responding well to the design quality benchmarks established within the Mayor’s Housing SPG. In particular, GLA officers welcome the provision of two residential cores in blocks A and B (in response to pre-application advice) which allows for typical core to units ratios of 1:7. The applicant is nevertheless encouraged to delete the proposed doorways between cores (for example by enlarging adjacent units) in order to maximise the sense of core ownership for residents.

32 Officers also note that the scheme has been designed in accordance with the ‘Lifetime Homes’ criteria, and that 10% of the housing provision would meet wheelchair accessible standards. This is supported, and the Council is advised to include planning conditions to secure Building Regulation standards M4(2) and M4(3) as per the Mayor’s proposed minor alterations to London Plan Policy 3.8.

Children’s play space

33 Based on the residential mix above, and the methodology within the Mayor’s Play and Informal Recreation SPG, the scheme would generate a play space requirement of 389 sq.m. The scheme proposes a 410 sq.m. provision of on-site doorstep space for children’s play within communal residential terraces. However, this provision would only address the needs of children under five years old. Whilst the public realm strategy for the scheme would provide other more general opportunities for recreation (through the inclusion of playable landscaping features) the applicant essentially proposes that the needs for children over five are principally addressed off site. Noting that there are various local playable spaces within the vicinity of the site, GLA officers are satisfied that this approach is acceptable in principle. The Council is, nevertheless, encouraged to seek an additional open space contribution by way of planning obligation, in order to mitigate the proposed intensified use of local spaces.

Residential density

34 The characteristics of this site (discussed in paragraphs 6 to 10) suggest a residential proposal at the upper end of the density range within Table 3.2 in support of London Plan Policy 3.4 (i.e. 650 to 1,100 habitable rooms per hectare). Indeed, mindful of the central London Opportunity Area context (and related London Plan objectives), GLA officers strongly support the principle of a high quality high density residential component to this scheme. The submitted planning statement confirms that, on a site-wide basis, the residential density equates to 1,299 habitable rooms per hectare. Using a net residential area methodology this figure would be higher. Therefore, in any event the proposed density would exceed the range within Table 3.2 of the London Plan. However, noting the Opportunity Area context, this does not raise an objection in principle. Moreover, having regard to the particular characteristics of the setting (including the PTAL); the proposed residential quality; and, the design response to context (refer to the urban design section below), GLA officers support the proposal to deliver higher residential density at this site as part of a well-designed scheme that would optimise development potential and increase housing supply in accordance with London Plan policies 3.3 and 3.4.

Social infrastructure

35 London Plan Policy 3.7 states that large residential developments should, where necessary, coordinate the provision of social, environmental and other infrastructure. Given the residential density proposed in this case, it will be important that the scheme appropriately contributes towards the infrastructure necessary to support sustainable communities. Southwark Council is ultimately best placed to identify the relevant response in this regard, and GLA officers expect an appropriate contribution to be secured through the Southwark Community Infrastructure Levy (and by way of planning obligation, in addition, as required).

Urban design

Layout

36 The development is laid out in two linear blocks, creating a north-south pedestrian route (known as Skipton Street) through centre of the site, effectively allowing for a continuation of Southwark Bridge Road to Elephant and Castle. This would positively contribute to the permeability and public realm network of the area, and is strongly supported. The new route is proposed to be covered by a glazed canopy as part of a wind mitigation strategy. This approach is supported in the interests of ensuring wind comfort for users of this space, and, noting the proposed materials and height of the canopy (at four to five commercial storeys above ground), GLA are satisfied that this new route would be perceived as a genuinely open and inviting public connection. GLA officers also particularly welcome the proposed provision of a 620 sq.m. rooftop public garden at the fifteenth floor of block B (accessed via public lifts from Skipton Street) which would represent the area's first publically accessible roof garden and viewing platform.

37 Furthermore, in response to GLA pre-application advice it is noted that the applicant has sought to optimise the arrangement of uses and functions at the ground floor of the scheme in order to ensure that the development would provide a good level of activity at the existing street edges, as well as along Skipton Street. GLA officers particularly welcome the relocation of the vehicular ramp from block A to block B - given that its impact can be more successfully mitigated in this location. Overall, noting the arrangement of ground floor uses and entrances, and the proposed approach to the landscaping strategy more generally, GLA officers are satisfied that the development would ensure that the surrounding public realm would feel safe and well-animated during both day and night.

Response to adjacent sites

38 The Bakerloo line station building (opened in 1907, and abutting the site to the south) is a rare remnant of the historic urban fabric of the area. Designed by Leslie Green, the red brick building displays distinctive ox-blood faience at ground and first floor, with characteristic arches, semi-circular windows and neoclassical detailing. Whilst the building is an undesignated heritage asset for the purposes of the NPPF, the building is of merit in townscape terms as a good quality (and well-maintained) example of Edwardian architecture. GLA officers support the retention of this building, and note that the alignment of the scheme generally responds well to the orientation of this existing block. However, the fact that the station building has a blank flank wall and poor quality rear elevation presents some challenges in terms of delivering a coherent and well activated piece of townscape in this location. The development configuration proposed by the applicant would allow pedestrian movement all the way around the station building. This approach has benefits in terms of yielding additional public realm, however, careful attention would need to be given to the quality and function of the space to the rear of the station building - to ensure it would feel inviting. The applicant proposes to address this issue through a

public art/living wall strategy. However, as discussed with the applicant, GLA officers strongly encourage the adoption of a revised approach that would be more embracing of the station building, i.e. a physical connection from block B that would integrate the building more comprehensively with the scheme, and simultaneously wrap and screen the inactive/poor quality flanks. The applicant is encouraged to incorporate such an approach (developed in discussion with TfL and London Underground) within the package of emerging revisions discussed in paragraph 12.

Scale, massing and response to context

39 The proposed buildings would be extensively glazed, and are designed to rise northwards across the site in a stepped arrangement from 8 to 40-storeys. The approach to scale has been informed by the existing and emerging context of the Elephant and Castle Opportunity Area; mid to long-range townscape views; and, the LVMF viewing corridor which over-sails the site. The stepped and sloped profile of the roofline, and the high quality (and visually light) material treatment of elevations is carefully considered, and generally allows the scheme to respond well to the various townscape scales at which it would be perceived. Having considered the submitted townscape and visual impact assessment GLA officers support the response of the scheme to its immediate Opportunity Area setting, where it would relate well to other largescale development (such as Eileen House and Metro Central Heights (Grade II)), and help to provide definition to the enhanced public realm coming forward at 'Elephant Square'. The visual impact assessment also demonstrates that the scheme would be visible in various longer townscape views (including from positions within the Trinity Square and West Square conservation areas). However, having considered the proposed views (as well as cumulative scenarios including other large scale development such as Eileen House), GLA officers are of the view that the proposal would provide an appropriate response in townscape terms, and would not cause harm to designated heritage assets (refer also below). Moreover, having regard also to the consideration of impact on strategic views (set out within the corresponding section of this report), GLA officers are satisfied that the application accords with London Plan Policy 7.7.

Response to historic environment

40 As discussed in paragraph 9 there are numerous heritage assets within the vicinity of the site (including Metro Central Heights (Grade II), Michael Faraday Memorial (Grade II), Elliot's Row Conservation Area and West Square Conservation Area). The proposal would also feature in the context of various other heritage assets within mid to long range townscape views.

41 Further to the related consideration of urban design and townscape views within this report, and having had special regard to the desirability of preserving Listed Buildings, their settings and any features of special architectural or historic interest which they possess, GLA officers are of the view that the proposal would provide an appropriate response to context and would not harm the character or setting of the conservation areas or listed buildings identified within the applicant's townscape and visual impact assessment. Moreover (as discussed below), GLA officers are satisfied that the proposal would not harm the Outstanding Universal Value of the Palace of Westminster World Heritage Site when viewed from Serpentine Bridge. Accordingly GLA officers are of the view that the application accords with London Plan policies 7.8 and 7.10.

Strategic views

42 As discussed in paragraph 9, the site is over-sailed by the background consultation area of LVMF SPG view 23A.1 from Serpentine Bridge to the Palace of Westminster. GLA officers note that the Mayor's consideration of the Eileen House scheme is relevant with respect to this viewpoint. In that case, notwithstanding an officer recommendation that the impact of Eileen House (at 44-

storeys) was acceptable, the Mayor expressed the view that *“the proposed tower should sit below the tree line”* (refer to GLA decision letter of 16 April 2009, reference PDU/1100aMC05).

43 The submitted townscape and visual impact assessment includes a number of accurate visualisations of the proposal from Serpentine Bridge in this view. These comprise a fully rendered view from LVMF viewpoint 23A.1, and a number of kinetic views moving north and south of this point (where the proposal is identified by a wire outline). With an apex of 147 metres A.O.D., the 40-storey element of the proposal would be clearly visible on the horizon of the LVMF view, above the tree line to the left of the Palace of Westminster World Heritage Site (WHS). Whilst falling outside the protected landmark viewing corridor, the proposal would represent the most prominent modern building seen in the centre of this view, to the left of the WHS. The proposal would, nevertheless, feature within the context of Eileen House (scarcely visible at the tree line) and, further away from the WHS, the Park Lane InterContinental Hotel (which appears to be generally consistent with the scale of Eileen House, but is more visible due to a drop in the tree line). It is also noted that other existing and approved buildings of a similar perceived scale to the proposal feature to the right of the WHS in the centre of this view.

44 GLA officers note that the apex of the 40-storey element of the proposal would match the height of Victoria Tower. Albeit, the roof profile of the proposal slopes down by 10.5 metres to 136.5 metres A.O.D. towards the strategic landmark. Therefore, whilst the proposal would represent a relatively prominent new element on the horizon, the effect of the roof profile would be to lead the eye towards the WHS. The proposed use of glazing and other visually light materials also supports an overall appearance that would essentially defer to the strategic landmark in this view. These principles apply across all the assessed kinetic views from Serpentine Bridge (in which the proposal would be visible). Accordingly, mindful of LVMF guidance and the statutory duty under Section 66 (and noting the public benefits of the scheme identified in paragraph 69), GLA officers conclude that the proposal: would not cause harm to the setting of the Palace of Westminster (Grade I); would preserve the viewer’s ability to recognise and appreciate the strategic landmark in this LVMF view; and, would not compromise the Outstanding Universal Value of the World Heritage Site. Accordingly GLA officers are of the view that the application accords with London Plan policies 7.8, 7.10 and 7.12.

Inclusive access

45 The applicant has set out its response to access and inclusion within a dedicated access statement. GLA officers note that this scheme is an important opportunity to deliver inclusive access to new employment opportunities for the area. The proposed culture/leisure facility (and associated outreach programme) is also likely to be a valuable asset for the scheme and the wider community.

46 Based on the submitted plans it is evident that the principles of access and inclusion have been generally well considered: accessible routes are provided throughout the buildings and public realm; entrances are legible and accessible (with power-assisted pass doors provided as an alternative to revolving doors where necessary); floorplate layouts are efficient whilst providing suitably generous circulation space; and, all commercial, cultural and retail areas have been designed to meet Building Regulations, Part M (2015). GLA officers also particularly support the inclusion of accessible public WCs in the ground floor office lobbies, as well as the proposed provision of a changing places WC (associated with the cultural facility) at the basement mezzanine.

47 However, it is not currently clear how the scheme would respond to the need for Blue Badge parking (for the residential and employment uses in particular). Whilst GLA officers acknowledge that no conventional car parking is being proposed, and that the basement space

within the scheme is proposed to be used highly intensively (including for the cultural facility), the apparent absence of disabled parking provision is not in line with London Plan Policy 6.13 and associated guidance within the Mayor's Housing SPG. As discussed in the transport section of this report further discussion is sought on this matter.

Sustainable development

Energy strategy

48 For the purposes of assessing applications against the carbon dioxide savings target within London Plan Policy 5.2, the Mayor now applies a 35% reduction target beyond Part L 2013 of Building Regulations. In accordance with the principles of Policy 5.2 the applicant has submitted an energy statement for the scheme, setting out how the development proposes to reduce carbon dioxide emissions. In summary the proposed strategy comprises: energy efficiency measures (comprising a range of passive design features and demand reduction measures); a site-wide network driven by gas fired CHP; and, roof mounted photovoltaic panels (and ground source cooling for office space). Based on the strategy proposed the scheme would achieve the 35% carbon dioxide saving target. This is supported in principle, however, GLA officers are seeking a number of detailed clarifications from the applicant team (with respect to district networking opportunities in particular). Officers will provide an update at the Mayor's decision making stage, following the conclusion of these discussions.

Climate change adaptation

49 The proposed roofscape strategy for the scheme includes biodiverse green and brown roof areas as a contribution towards the enhancement of green infrastructure within the CAZ, and in the interests of assisting with rainwater attenuation. This provision is supported and the detailed approval of these measures (in conjunction with the applicant's various other sustainable urban drainage proposals) should be secured by way of planning condition in accordance with London Plan policies 5.10, 5.11 and 5.13. The Council is also encouraged to include a planning condition to secure water efficiency (105l/p/d plus 5l/p/d for external use) in line with the relevant Building Regulations Approved Document.

50 Notwithstanding the provision of various new areas of green infrastructure on-site (and the retention of existing high quality mature trees wherever possible), it is proposed to remove twelve existing trees in order to facilitate the redevelopment. Two of these trees are of 'moderate' quality, nine are of 'low' quality, and one tree is identified as 'unsuitable for retention'. The applicant proposes to mitigate the loss of these trees through the replacement planting of 24 new trees along Skipton Street, Newington Causeway, Ontario Street and Keyworth Street. Having regard to the quality of the existing trees, and the nature of the proposed re-provision, GLA officers are satisfied that the application accords with London Plan Policy 7.21.

Transport

Access and car parking

51 The development is proposed to be free of conventional car parking. Given the high public transport accessibility level this is strongly supported. However, TfL seeks clarification on how the requirement for disabled parking is proposed to be addressed. Further discussion is sought on this matter accordingly.

52 The proposed on-site servicing of the development is supported. The proposed access off Southwark Bridge Road, with consequent changes to the Newington Causeway and Keyworth Street junctions will, nevertheless, require both TfL and Southwark Council approval.

The design of the Southwark Bridge Road/Newington Causeway junction should take into account potential for bus priority measures, which TfL is currently investigating. TfL would welcome the opportunity to discuss this further with the applicant.

53 The proposed service access would also require the removal of a (two-bus) bus stand on Southwark Bridge Road. Bus standing in this area is changing due to the public realm works associated with the redevelopment of the adjacent Eileen House site. However, the 'final' phase two public realm works (which would see the southern end of Southwark Bridge Road pedestrianised) cannot go ahead without a bus stand relocation solution. To date no suitable bus standing alternative has been identified. TfL and Southwark Council are nevertheless working together to determine an appropriate solution, and seek further discussion with the applicant on this matter.

54 The applicant is advised that moving bus stands may have potentially significant implications for bus operating costs. Accordingly, TfL is not in a position to support the proposed displacement of a bus stand as part of this scheme until a suitable alternative bus stand location is identified (having regard to operational requirements, impacts on bus operating costs and potential benefits for passengers). Accordingly, TfL expects a bus stand relocation solution/strategy to be secured by way of planning condition/obligation, as appropriate.

Public realm

55 The applicant is proposing to significantly improve Ontario Street in terms of street function, pedestrian/cycle safety and public realm, which is welcomed. However TfL seeks further discussion on the detail of the proposed arrangements.

56 A taxi rank in Ontario Street is proposed to serve the cultural facility in the development. However, TfL's concerns with respect to limited turning facilities and potential conflicts with cyclists using Cycle Superhighway 7 need to be addressed to ensure that this location would be suitable. TfL is of the view that a wider discussion (including the Council) will be required to consider how taxis/private hire demand can be accommodated together with drop off/pick up of disabled people at this site.

Walking and cycling

57 The proposal includes 1,260 secure cycle parking spaces - which the applicant states is in line with London Plan and local standards. However, TfL seeks a breakdown of spaces by land use so that this can be verified. In addition clarification should be provided as to the nature and location of these spaces. Short stay provision should be in the public realm close to permitted cycle routes and the uses that it is proposed to serve.

58 The application material states that funding for a new 30 docking point cycle hire docking station to serve the development will be secured through the Section 106 agreement. This is supported, and TfL also expects the Section 106 agreement to identify a suitable location for the docking station.

59 'Legible London' signage is already planned for this general area. However, in the interests of enhancing legibility as much as possible (and supporting the sustainable use of Skipton Street) TfL would support a review of planned provision in the area, and a Section 106 commitment for further provision to support this development where appropriate.

Interaction with the Bakerloo Line station

60 As discussed with the applicant team, TfL is concerned that the design of the scheme does not fully respond to the potential for a future below ground connection between the Bakerloo Line station and this site. Such a connection (and a new station entrance) could better serve the development, and help to mitigate the increasing pressures on the station due to rising passenger numbers from this and other developments in the area.

61 TfL continues to work to identify options for accommodating the proposed Bakerloo Line extension, and remains keen to work with the applicant to assess options for incorporating the Bakerloo Line station into the development.

62 TfL also echoes the comments set out in the urban design section above with respect to the relationship between the development and the Bakerloo line station building. Moreover, the applicant is advised that any proposals to screen and repave around this building (and/or the alternative approach discussed in paragraph 38) should be discussed with TfL and London Underground prior to determination of the application. In any case a separate property agreement with TfL/ London Underground would be needed.

Public transport capacity impacts

63 The transport assessment concludes that there would be no adverse impact on public transport capacity. However, it is noted that a significant number of arrivals by National Rail are anticipated, particularly in connection with the proposed office use. TfL is of the view that these visitors are likely to use Northern line services from London Bridge to reach the site (which has not been taken into account). Moreover, the development would also change the street presence of the Bakerloo line ticket hall (including any impact on the surface pedestrian crossings) and this has not been considered in the transport assessment.

64 TfL also has a concern with respect to the capacity of the current Bakerloo line ticket hall - which is likely to be attractive to people travelling to or from the scheme (on either the Bakerloo line or Northern line) due to its proximity to the site. This issue is not addressed by the current proposed improvements to Elephant and Castle's Northern line ticket hall. Equally, there are constraints on capacity at surface level for people crossing between the site and the Northern line ticket hall. Accordingly, TfL seeks further discussion on how site-specific mitigation of these impacts can be secured.

Travel plan, demolition/construction impacts, deliveries and service plan

65 In line with London Plan Policy 6.3, the travel plan, demolition and construction logistics plan and deliveries and service plan should be secured by way of condition and/or the Section 106 agreement, with the final versions to be submitted for approval by the Council, in consultation with TfL.

66 London Underground's Infrastructure Protection team should be consulted at an early stage to ensure that nearby assets (e.g. underground infrastructure and a GPS receiver mounted on the Bakerloo Line station building) would not be impacted. TfL seeks an associated planning condition to ensure this.

67 There are street trees on the Transport for London Road Network adjacent to the site. These form part of the TfL 'green estate', and are within the application 'red line'. The trees concerned are proposed to be retained, which is supported. However, TfL expects these trees to be suitably protected, if necessary, during construction.

Community Infrastructure Levy (CIL) and Section 106

68 In addition to the mitigation measures mentioned above (to be secured through the Section 106 agreement), the development will also be liable for both borough and Mayoral CIL. The borough CIL receipts contribute towards the Elephant and Castle northern roundabout and Northern Line station improvements.

Summary of public benefits

69 Having regard to the consideration above, and noting the regenerative potential of the scheme, GLA officers are of the view that this proposal has the potential to deliver the following public benefits:

- regeneration of a prominent site in a sustainable location;
- excellent mix of uses (office, retail, culture/leisure and housing) to support the vibrancy and vitality of the CAZ, as well as the regeneration of Elephant and Castle;
- 3,375 full time jobs across a varied range of employers;
- approximately £5.1 million in new household spending (a proportion of which may be spent locally) as well as additional local spending by employees at the site, and visitors to the cultural facility (benefiting local businesses and boosting the night time economy);
- tailored community and educational outreach programmes (associated with the cultural facility) targeting diverse communities and different age groups;
- enhancement of green infrastructure in the CAZ (through tree planting and green roofs);
- an architecturally high quality landmark for the area; and,
- new high quality public realm - including the introduction of Skipton Street and a 620 sq.m. publicly accessible roof garden and viewing platform.

Local planning authority's position

70 Southwark Council is expected to formally consider the application at a planning committee meeting in May 2016.

Legal considerations

71 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

72 In accordance with his statutory duty in section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 the Mayor shall have special regard to the desirability of preserving Listed Buildings, their settings and any features of special architectural or historic interest which they possess.

73 The Equality Act 2010 provides that in exercising its functions (which includes the functions exercised by the Mayor as Local Planning Authority), that the Mayor as a public authority shall amongst other duties have due regard to the need to a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act; b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and, c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

74 The protected characteristics set out in the Equality Act are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Equality Act acknowledges that compliance with the duties set out may involve treating some persons more favourably than others, but that this does not permit conduct that would otherwise be prohibited under the Act.

75 With regard to age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation there are no identified equality considerations which arise in respect of the proposed development.

Financial considerations

76 There are no financial considerations at this stage.

Conclusion

77 London Plan policies on CAZ, Opportunity Area, mix of uses, housing, urban design, strategic views, inclusive access, sustainable development and transport are relevant to this application. Whilst the scheme is generally acceptable in strategic planning terms the application does not yet fully comply with the London Plan as set out below:

- **CAZ and Opportunity Area:** The principle of the proposed comprehensive mixed use redevelopment is strongly supported in accordance with London Plan policies 2.11 and 2.13.
- **Mix of uses:** The proposal includes an excellent mix of CAZ uses in accordance with London Plan policies 2.10, 2.11, 3.3, 4.2 and 4.3. GLA officers nevertheless seek assurance with respect to a confirmed relocation solution for Perry Library.
- **Housing:** The proposal to provide a high quality high density residential component to this scheme would increase housing supply and is strongly supported in accordance with London Plan Policy 3.3. However, the position on scheme viability must be independently verified so that the maximum reasonable amount of affordable housing may be secured in line with London Plan Policy 3.12.
- **Urban design:** The proposed design is well considered and would successfully accommodate the proposed uses within a scheme which would optimise development potential and deliver a high quality public realm. Furthermore, GLA officers are of the view that the proposal would provide an appropriate response in townscape terms, and would not cause harm to designated heritage assets. Notwithstanding this, GLA officers strongly encourage the adoption of a revised approach to the interface between block B and the retained Bakerloo line station building.
- **Strategic views:** The scheme would preserve the viewer's ability to recognise and appreciate the Palace of Westminster in views from Serpentine Bridge; and, would not compromise the Outstanding Universal Value of the World Heritage Site. The application therefore accords with London Plan policies 7.10 and 7.12.

- **Inclusive access:** The response to access and inclusion is broadly supported in line with London Plan Policy 7.2. However, further discussion is sought with respect to the approach to disabled parking provision.
- **Sustainable development:** The proposed energy strategy and climate change adaptation measures are broadly supported in strategic planning terms. Following the conclusion of discussions on the energy strategy, the Council is encouraged to secure associated energy and adaptation details by way of planning condition in accordance with London Plan policies 5.2, 5.10, 5.11, 5.13, 7.19 and 7.21.
- **Transport:** The applicant should address the matters raised in the transport section of this report with respect to: access and car parking; public realm; walking and cycling; interaction with the Bakerloo Line station; public transport capacity impacts; and, travel plan, demolition/construction impacts, deliveries and service plan in line with London Plan policies 6.3, 6.7, 6.9, 6.10 and 6.14.

78 The resolution of the outstanding issues above may lead to the application becoming compliant with the London Plan.

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