

Canada Water Masterplan – Planning Application Feedback

Version 1.0 FINAL

17-February-2019

Dear Sir

As a local resident, and on behalf of Southwark Green Party, please find below our feedback on planning application 18/AP/1604, known as the Canada Water Masterplan. We have endeavoured to reflect the revisions made to the application in October 2018. Given the volume of documentation, we have focused on the Planning Statement, referencing out to other documents where necessary.

In summary, we believe there are multiple instances of material planning considerations with this planning application, and as such it should be rejected by Southwark Council's Planning Committee. We trust that you will take the specific points we are raising into consideration as part of the assessment of the application.

Regards

Summary Response

Building Heights, Density and Usage

The New London Plan Policy D6 requires development proposals to be developed "at the optimum density". Particular consideration should be given to transport connectivity and the capacity of surrounding infrastructure. The Policy goes on to state that proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused.

It is clear from the developer's own evidence that the developer has sought to maximise (not optimise) density, notably

- In Planning Statement paragraph 7.4.44 where it admits that the Canada Water Area Action Plan (CWAAP) maximum densities are exceeded.
- With regard to retail floor space, the target of up to 88,568 sq. m is excessive given the CWAAP target of 35,000 sq. m
- With regard to office floor space, the target of up to 320,588 sq. m is very excessive given the CWAAP target of 12,000 sq. m

Together this results in far too densely packed development, especially given the density and character of the immediate area. Even after taking account of the welcome reductions in the maximum heights of some of the zone in the October 2018 update, this also results in building heights that are excessive, and that do not integrate well with the surrounding area.

Plot A1

The escalation from less than 30m to 129m is too extreme.

The other tall buildings in that cluster are a maximum of 87m tall. Given this and the scaling issue, this building should be <=87m in height.

Plot A2

Planning Statement paragraph 7.4.35 states that "To address overlooking issues, the massing of the rear building has evolved to create a series of stepped inaccessible planted terraces to help prevent overlooking of adjacent residences...and the planting will be secured in the form of a Landscaping Management Plan."

The developer is admitting that they have not fully addressed local community concerns, and that even this solution is not fully "built-in", but is dependent on ongoing maintenance of the planted terraces. It is not clear that the adjustments made in the October 2018 update are sufficient to alleviate this concern.

Plot K1

The excessive housing density in this plot is achieved by building up to mainly six storeys. This is too high for its location on the edge of Russia Dock Woodland. The height needs to be lowered by at least one storey, both to reduce the density and to respect the Woodland.

Right to Light and Privacy Impacts

The tall buildings will create significant shadowing impacts on multiple residencies, and on the Canada Water basin which will impact wildlife and plant life.

- Plot A1 breaks BRE Guidance on light requirements for residents in Orchard House and Columbia Point, and threatens to put half of Columbia Point into 2.5 hours extra darkness a day. This will impact on local amenities and wildlife. The shadow studies suggest it will impact the Canada Water Basin, encouraging algae growth and kill wildlife in the basin.
- Plot K1 will specifically overshadow and overlook two local schools.

Transport Impacts

Fundamentally, the developer is claiming that despite there being adverse impacts, that these are somehow not material. For example, their modelling is said to indicate that tube journeys to Canada Water and Surrey Quays stations will increase during the morning peak. It is suggested however that this pressure may be relieved by an interchange at New Cross Gate with the Bakerloo Line extension (not even a committed project!) and (much further away) an interchange at Tottenham Court Road with Crossrail.

Additionally, that as a result of this "increased inbound movement" passengers previously travelling to Canada Water and Surrey Quays stations "will seek alternative routes that avoid the area.", yet tens of thousands of additional passengers will simultaneously need to travel into the area for the up to 30,000 proposed new jobs.

Cycle parking is proposed to be provided in line with the minimum London Plan requirements. This is insufficient - cycle parking should be provided based on the standards in the draft New London Plan. The street network should also meet the "Healthy Streets" standards.

Overall, the feedback from Transport for London that "... there will be implications for the transport network from increased demand, and that mitigation is required to deliver transport improvements and, in particular, more capacity on public transport." needs to be addressed before this planning application can proceed.

Other infrastructure Impacts

The development will put extra pressure on other local infrastructure such as schools and health centres, but without any plans on how to increase them. As with transport, these services are already operating at or near full capacity.

Social and Heritage Impacts

Although the Masterplan is supposed to be an example of regeneration it offers no improvements for local residents and no improvement in quality of life. Any changes proposed that are being marketed as improvements (e.g. new leisure centre) are just re-building of what already exists (e.g. we already have a leisure centre in Rotherhithe which this replaces).

Even given the welcome improvements in ratios in the October 2018 update, the proportions of different types of residence still seem to be too biased towards studio and 1-bed flats, with too few 3-beds or larger. Given the lack of sufficient numbers of larger residences in the immediate area, this will prevent people establishing families and will force them to move out of the area, making the community increasingly transitory.

Plot A1

A specific number of affordable housing units by type should be stated and not dependent on grant funding, or at the very least the dependency etc. must be defined. The approach to determining “affordable” should also be stated.

The developer states that there is insufficient amenity space, and the proposed justifications are not acceptable – e.g. the reliance on existing, over-stretched space such as Southwark Park.

Plot K1

Making Plot K1 wholly "social and intermediate affordable housing" is not acceptable in terms of community cohesion and is incompatible with Planning Statement paragraph 7.3.90. This segregation is made worse by the physical distance of the site from the main nodes of the development.

Environmental Impacts

The main energy objective of the draft New London Plan is for London to become a zero-carbon city by 2050. For this reason, the zero-carbon target that the 2016 version set for major residential developments is extended to include major non-residential development upon publication of the document which is expected in 2019. The developer does not even claim to meet the New London Plan requirements, nor is it clear that it meets the existing London Plan Policies. This is further evidenced by the failure to commit to achieving specific targets, and for the lack of ambition in the aspirational goals.

The development will reduce the per capita open space in the area, and put more pressure on other open space in the area, notably Southwark Park, Russia Dock Woodland and Stave Hill Ecology Park. The Southwark Biodiversity Action Plan 2013 - 2019 states: "All major and minor developments should incorporate nesting or roosting sites for relevant species of birds and bats. Preference should always be given to 'built-in' features such as roosting bricks, bat tubes and bat bricks". The current design does not accommodate these features.

A minimum of 20% of parking spaces is proposed to be equipped with electric vehicle charging facilities with a further 20% with passive provision. This is insufficient - good practice would be for more parking spaces to be equipped initially, and all parking spaces to at least have passive provision.

Additionally, we support the response by the Friends of Stave Hill and Friends of Russia Dock Woodland response to the Environmental Impact Assessment for Plot K1.

Leeway to change plans going forward

The application seeks to reserve all matters for the Outline Proposals. It then states that "the Development comprises a true mix of uses which will be built out over a prolonged period of time and will encounter market fluctuations, full economic cycles and demand pressures. The need for flexibility is therefore paramount to allow the Development to respond to changing needs and patterns as future phases come forward for development."

The degree of flexibility requested is far too great to allow any reasonable judgement on the merits of anything except the detailed proposals for plots A1, A2 and K1. The application should therefore not be allowed to reserve all matters for the Outline Proposals. Due consideration, in consultation with the community, the council and other relevant parties (such as TfL), of these "...market

fluctuations, full economic cycles and demand pressures” should take place through submission of future detailed planning applications for specific sites.

Cumulative Impacts

The developer undertakes little consideration of the numerous other recent or planned developments that will have a cumulative impact on the viability of their proposal. The Convoys Wharf, New Bermondsey, Timberyard, and Biscuit Factory Bermondsey all have the potential to significantly impact the viability of this development - especially with regard to transportation, but also with regard to the balance of usage types (office vs. leisure vs. residential). This further undermines confidence in the sustainability of this development.

Specific Responses

Our specific responses are in *blue bold italics*.

Overall Development Objectives

Planning Statement para 7.4.22

“The design of the Development and the resulting maximum parameters are the result of extensive review and refinement having been well considered and developed over a number of years, in consultation with Southwark Council, the GLA, the local community and other relevant stakeholders. The Development relates well to the Site’s existing context and the overarching ambitions for the wider opportunity area. It is considered to accord with planning policy for the following reasons:

- The Development is legible, permeable and strongly connected to the surrounding context and wider area.”

The lack of sufficient transport infrastructure, especially given the cumulative development in the area, means that the development is not strongly connected to the wider area.

- “It has been designed to an appropriate scale and density for its location and in the context of the policy drivers for the Site, including the Major Town Centre, Opportunity Area and Housing Zone designations.”

The development is clearly over-scaled for the location and for the policy drivers.

- “The Development will create a genuinely mixed-use, major town centre and neighbourhood, with a range of uses proposed to support a successful, safe and vibrant place.
- The Design Guidelines secure a clear hierarchy of high quality public realm, focussed on three principal public spaces: the Town Square, the Park and the Dock which will create a regional and local destination.
- It will create a network of safe and navigable pedestrian and cycle routes.”

With the outline planning permission leaving so much leeway to future stages, it is impossible at this stage to be confident these will be achieved.

- “It will provide significant new areas of public open space with green amenity for all to enjoy, joined by green and linkages and routes”

It will provide a relatively small amount of additional open space, and will reduce the per-capita amount of open space in the local area

- “Responding sensitively to and enhancing the existing natural and built context and the existing heritage assets and their settings.
- The sensitive siting of land uses across the Site, with particular regard to their impact on neighbouring residential communities.”

With the outline planning permission leaving so much leeway to future stages, it is impossible at this stage to be confident these will be achieved.

- “Delivering a sustainable masterplan which encourages healthy and active lifestyles.”

The focus on active travel supported should contribute to the achievement of this, but this is at least partially offset by the reduction in per-capita leisure centre resources through the closing of Seven Islands means that this is not achieved, and the outline planning permission leaving

so much leeway to future stages, it is impossible at this stage to be confident this will be achieved.

- “Delivering varied building typologies and responding to tall building opportunities as well as having regard to the LVMF viewing corridor.
- Securing the highest quality of design through the Design Guidelines.
- Creating strong entrance and access points into the Site and new vistas and views.
- Setting an overall framework for development and design to be delivered through a phased approach, ensuring the long-term aims and policy objectives for the Site can be realised.”

With the outline planning permission leaving so much leeway to future stages, it is impossible at this stage to be confident these will be achieved.

Planning Statement 7.4.23 ‘In addition to the above, the design of the public realm and the built environment will contribute towards social regeneration creating a “place to belong”, which is one of the four focus areas of the Social Regeneration Charter. A key aspiration of the design of the Development is to create places which encourage social interaction and cohesion, both to the benefit of the existing community and future residents, workers and visitors, aiming to ensure that over time they become indistinguishable from one another. Moreover, improving connectivity and linkages as part of the street network as well as curating a programme of activities and events within the key public spaces to promote activity and vibrancy, thereby creating “a place to be happy and healthy”, another focus area of the Charter.’

The relative lack of family housing and the focus on studio, 1 and 2 bed residential units (many of which will be rented out) will result in a transitory community, where couples and young families move out to get more space. The Social Regeneration Charter will therefore not be achieved.

Building height, density and usage

Overall

Planning Statement 7.3.6 'Southwark's Core Strategy Strategic Policy 3 identifies Canada Water as a Major Town Centre and states that "Through the Canada Water area action plan, we will enable the provision of around 35,000sqm of additional shopping space and increased leisure space at Canada Water to create a range of retail opportunities and improve choice, particularly for non-food shopping. Canada Water will become a major town centre".'

Planning Statement para 7.3.11 "The Development will provide up to 88,568 sq. m (GEA) of retail floor space, Use Classes A1-A5. The Detailed Proposals provide approximately 2,000 sq. m GEA of retail floor space. The provision of new retail floor space is strongly supported by planning policy, given the site's capacity to be a Major Town Centre and aspirations for significant retail growth."

This is significant over-development. The amount of additional retail space should be reduced to be in line with Southwark's Core Strategy Strategic Policy 3.

Planning Statement 7.3.24 "Policy 25 of the CWAAP promotes a business cluster in the Core Area, requiring the provision of around 12,000 sq. m of new office and light industrial space (Use Class B1) to meet local office needs and additional space where there is demand from specific end users. The Site is identified as a key site within which business space will be provided."

Planning Statement 7.3.25 "The Development comprises up to 320,588 sq. m (GEA) of new office (B1) floor space. (GEA). The majority of the office floor space will be focussed within the new town centre."

This is significant over-development. The amount of additional office space should be reduced to be in line with Southwark's Core Strategy Strategic Policy 25.

Planning Statement 7.3.27 "The London Plan estimates an employment capacity for Canada Water of approximately 2,000 workers. The draft New London Plan significantly increases the employment capacity of Canada Water Opportunity Area, within a minimum of 16,000 new jobs projected. The CWAAP recognises the potential to provide new office floor space as part of a wider residential and retail/leisure mixed use development and that there is scope for a substantial increase in employment capacity under Policy 25. The Development could provide for an estimated 20,000 people employed on site (depending on the mix of commercial and residential uses that come forward). subject to the mix of uses brought forward as well as other associated roles including estate management, which will significantly contribute to the aims of the New London Plan."

Again more evidence of significant over-development. The amount of new jobs should be reduced to be in line with the draft New London Plan.

Planning Statement para 7.3.64 "The Development will comprise up to 367,828 sq. m (GEA) of residential floor space. It is envisaged that this could accommodate approximately 3,000 residential units. This will be dependent on scheme viability, grant availability as well as the mix of uses, the level of student housing and assisted living that could be provided and the precise mix of unit sizes. The Applicant is committing to a minimum of 1,500 residential units (including affordable housing) in order to ensure policy objectives for the Site are met."

Planning Statement para 7.3.62 "Southwark Council's Core Strategy Policy 5 sets a target of 2,500 net new homes in the Canada Water Action Area."

Again more evidence of significant over-development. The amount of new residential units should be reduced to be in line with the Southwark Council's Core Strategy Policy 5.

Planning Statement para 7.3.62 "Strategic Policy 7 requires new developments to provide at least 60% 2 or more bedrooms with at least 20% of these with 3, 4 or 5 bedroom homes. Policy 7 also sets a maximum of 5% studio units and only for private housing."

No evidence that Southwark Council's Core Strategy Policy 7 will be met.

Planning Statement 7.4.7 "London Plan Policy 7.7 requires that tall buildings relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level and they should make a significant contribution to local regeneration. Policy 7.7 further states that tall buildings should not impact on local or strategic views adversely."

Planning Statement 7.4.9 "Saved Southwark Plan Policy 3.13 requires developments to consider height, scale and massing of buildings, urban structure, space and movement, townscape, local character and context, site layout, streetscape, landscaping and inclusive design."

Planning Statement 7.4.11 "Saved Southwark Plan Policy 3.20 requires tall buildings to be located at a point of landmark significance and states that they should contribute positively to the London skyline as a whole, consolidating a cluster within that skyline or providing key focus within views."

Planning Statement 7.4.12 "Policy 17 of the CWAAP that all tall buildings over 30 metres must have due regard to the London View Management Framework (LVMF), including the strategic views of St Paul's Cathedral from Greenwich and Blackheath and river prospect views from London Bridge."

Planning Statement 7.4.42 "Whilst the CWAAP Policy 24 sets a density range of 200-700 habitable rooms per hectare for developments in the core area this is increased in the draft new Southwark Plan to be consistent with the adopted London Plan with densities within the Core Area of up to 1,100 habitable rooms per hectare."

Planning Statement 7.4.43 "Emerging London Plan Policy D6 removes the density matrix and requires development proposals to make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to: the site context, its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL) and the capacity of surrounding infrastructure. The Policy goes on to state that proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused."

Planning Statement 7.4.44 "Adopting the Southwark measure for density of mixed-use schemes, the Illustrative Masterplan would deliver a density of 917 habitable rooms/hectare. This density level is within the range of the London Plan density matrix and emerging Southwark Plan and is considered appropriate given the site's central location, its high level of accessibility and the exemplary quality of design. Whilst the density level exceeds the density range set out in the CWAAP, Policy 24 of the CWAAP allows development to exceed the density range where development has an exemplary design standard. The 2015 CWAAP does not reflect emerging guidance in the draft Southwark Plan or adopted guidance in the London Plan. The quality of design is secured through the Design Guidelines for the Outline Proposals and is demonstrated in the Design and Access Statements for the Detailed Proposals."

The planning application is in breach of multiple planning policies regarding density.

- *The CWAAP limits;*
- *The New London Plan requiring optimisation (not maximisation) of density. In the absence of sufficient transport and other infrastructure, especially given the cumulative development in the local area, this planning application requests approval of far too much housing.*

Together this results in far too densely packed development, especially given the density and character of the immediate area. Even after taking account of the welcome reductions in the maximum heights of some of the zone in the October 2018 update, this also results in building heights that are excessive, and that do not integrate well with the surrounding area.

Plot A1

Planning Statement

- 7.4.29 “Plot A1 proposes to create a building both prominent in its local context and within the wider London skyline. The mixed-use development will offer residential accommodation within three articulated ‘towers’ designed to be at different heights to further emphasise the impression of a family of individual, yet complementary, buildings. Lower levels will offer flexible, accessible and adaptable workspace with good levels of natural light and access to external terraces. Retail frontage is maximised at ground floor to activate a dynamic public realm and form the first part of the emerging High Street.”
- 7.4.30 “Plot A1 forms part of an existing tall building cluster and its height is considered appropriate given prevailing planning policy and its proximity to a transport hub at Canada Water Station, its adjacency to a key public space, the Canada Water Dock, and the neighbouring taller buildings which form part of the existing context. Materials and details have been carefully chosen to reflect the local context but have been interpreted to form a distinctly new aesthetic.”

The escalation from <30m to 129m is too extreme.

The other tall buildings in that cluster are a maximum of 87m tall. Given this and the scaling issue, this building should be <=87m in height.

Planning Statement 7.4.32 “The relationship between the clock tower of the listed former Dock Offices and Plot A1 was a key design driver throughout the design process, and great care was taken to ensure that the profile of the clock tower remains a distinctive townscape element. Whilst Plot A1 is taller than the clock tower, it is set back on Deal Porters Way which not only allows for the retention of the existing street trees, another important townscape feature, but it also allows for the profile of the clock tower to remain the visual focus. The heights of the shoulder buildings of Plot A1 were also considered in relation to the heights of the Dock Offices, acting as mediation between the scales of the Dock Offices and the tower element of Plot A1, visually separating them, to enable the clock tower to be clearly distinguished. Beyond the clock tower, the relationship to the adjacent residential properties has also been a consideration, with the taller element anchored on the corner of the High Street, at a further distance from these properties. The stepping down of the office blocks provide a transition in scale, aiming to address some of the concerns raised.”

British Land is admitting that they have not fully addressed local community concerns.

Plot A2

Planning Statement 7.4.35 “The building is six storeys to Canada Water Dock and 4 storeys to the rear; the rear block has a stepped rear elevation to Hothfield Place, to minimise overlooking and to reduce daylight/sunlight impacts. The relationship of the building to its neighbours on Hothfield Place has been a key design driver and an important consideration in developing the massing for the building. The design of Plot A2 has been an iterative process, with a number of massing studies undertaken to optimise daylight/sunlight and respond to comments from stakeholders. To address

overlooking issues, the massing of the rear building has evolved to create a series of stepped inaccessible planted terraces to **help prevent overlooking of adjacent residences**. The appearance of the building has developed to create opportunities to integrate planting into the design, resulting in a softer building edge and the planting will be secured in the form of a Landscaping Management Plan.”

British Land is admitting that they have not fully addressed local community concerns, and that even this solution is not fully “built-in”, but is materially dependent on ongoing maintenance of the planted terraces.

Plot K1

Planning Statement

- 7.4.36 “Plot K1 is a masonry building, influenced by the historical and contemporary context of the area which relies heavily on brick as the predominant building material.. Visual interest and differentiation is subtly achieved through a careful approach to detailing and use of material, openings, string courses and balconies. The two main entrances have balconies above; an architectural device which both relieves the frontage and provides a hierarchy to the entrance. The street elevations are robust and masonry with lighter, colonnaded bays to the inner courtyard. All the flats are dual aspect, with private and communal amenity space.”
- 7.4.37 “The building is six storeys at its maximum height, reflecting the heights of the recent adjacent developments but steps down to five storeys towards Russia Dock Woodland, creating a contextual response to the surrounding natural environment and ensuring that”

The excessive housing density is achieved by building up to mainly six storeys. This is too high for its location on the edge of RDW. The height needs to be lowered by a storey all round, both to reduce the density and to respect the Woodland.

Right to Light Impacts

Overall

Planning Statement 7.6.50 “As such, the ES concludes therefore, that 16% of all windows assessed may experience a moderate, moderate to major or major adverse impact.”

This is not acceptable.

Plot A1

This development’s shadow breaks BRE Guidance on light requirements for residents in Orchard House and Columbia Point, and threatens to put half of Columbia Point into 2.5 hours extra darkness a day. This will impact on local amenities and wildlife. The shadow studies suggest it will impact the Canada Water Basin, encouraging algae growth and kill wildlife in the basin.

Plot K1

There will be a significant reduction in the sunlight for

- *Quebec Quarter (Hornbeam House), Alfred Salter School and St John's School as a result K1. For example, those in the north facing flats of Hornbeam House will experience a clear reduction of their direct sunlight if the proposed 6 storey building is built.*
- *Alfred Salter: 5 - 40%*
- *St Elmos Church: 5 - 60%*
- *St John's Primary School: 5 - 88%*

Whilst the Mayor of London does allow certain flexibility "Policy 1.3.45 and 1.3.46" of March 2016 Housing Supplementary Planning Guidance@ on BRE guidelines, Plot K1 is a sensitive location due to it being adjacent to two Primary Schools and a Church. A healthy active child cannot remain as

one by playing in the shadows of an overbearing development. And deep in winter, a child would hardly get any sunlight at all (as school hours are close to the daylight timings) due to the overshadowing of the playing field in Alfred Salter.

Transport Impacts

Overall

As public transport access levels (PTALs) are exceptionally high in the area and are intended to improve. The PTAL map (<https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat>) gives a current PTAL level of 6a which rises to 6b by 2021. It is also the case that other planned transport improvements such as the proposed bridge to Canary Wharf and CS4 along Lower Road will improve access to the area by non-vehicular means.

Therefore public transport and active travel should be prioritised and car parking should not be provided in a way that hampers other transport aims such as improving air quality, developing Healthy Streets and reducing car dependency as is being set out in now adopted Mayor's Transport Strategy and in the evolving New London Plan. The point that TfL are making appears valid that when it comes to the future reserved matters applications the quantum of car parking will need to reflect the far lower numbers that will be required for an area with such a high PTAL rating under the (then) adopted London Plan.

London Plan – Providing a transport network enabling easy access to jobs, opportunities and facilities while mitigating adverse environmental and other impacts;

Planning Statement para 3.3.45 “For residential parking, a minimum of 20% of the overall number of parking spaces will be equipped with electric vehicle charging facilities with a further 20% with passive provision.”

This is insufficient. Good practice would be for all parking spaces to at least have passive provision.

Planning Statement 3.3.48 “Cycle parking for the Detailed Proposals is provided in line with the minimum London Plan (2016) requirements.”

This is insufficient. Cycle parking should be provided based on the standards in the draft new London Plan.

Planning Statement 7.5.2 “The Mayor’s Transport Strategy (March 2018) places emphasis on walking, cycling and healthy streets. The key target is for 80% of Londoners’ trips to be on foot, by cycle or public transport by 2040.”

There is no evidence that the development will materially meet these targets.

Planning Statement 7.5.25 “Draft New London Plan Policy T4 states that “development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity”, and where “the ability to absorb increased travel demand through active travel modes has been exhausted, existing public transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans and funding exist for an increase in capacity to cater for the increased demand, planning permission may be contingent on the provision of necessary public transport and active travel infrastructure”.”

The developer’s own evidence shows that the development will not provide the necessary public transport and active travel infrastructure. This is backed up by the response from Transport for London.

Planning Statement 7.5.28 “Draft New Southwark Plan Policy P47 addresses the highway impact of new developments with the key focus on minimising car trips and ensuring safe and efficient servicing.”

The developer's own evidence shows that the development will not minimise car trips. This is backed up by the response from Transport for London.

Planning Statement 7.5.30 "CWAAP Policy 8 states that "proposals must make sure that developments can be adequately and safely serviced and through a transport assessment, must demonstrate that they can mitigate their impact on the highway network'."

The developer's own evidence shows that they have not mitigated the impact on the highway network. This is backed up by the response from Transport for London.

Planning Statement 7.5.34 "However, the result of this increased inbound movement is that passengers who were previously using Canada Water or Surrey Quays choose to seek alternative routes."

The Developer is admitting that the overcrowding will get so bad that it will deter people from using Canada Water station!

Planning Statement 7.5.38 "As part of the Strategic Transport Study (STS), TfL are currently undertaking studies into potential future station improvements at both Surrey Quays and Canada Water. British Land has provided input into these studies, and a bid to the £1.6bn Housing Infrastructure Fund (HIF) has been made by the GLA to help bring forward any interventions that may be recommended as a result of these studies, with the bid being shortlisted in March 2018 for potential funding. Discussions between British Land and TfL are ongoing as to how the Development may best facilitate any station improvements that are identified as being needed as part of this work."

Planning Statement 7.5.43 "Proposals for bus mitigation will be discussed further with TfL in light of the Southeast Riverside bus strategy and the ongoing bus mitigation tests being developed through the STS. The wider area's bus needs are currently under review by TfL."

The developer is admitting that the planning application has not resolved the delivery of the necessary improvements to the affected stations and bus routes.

Planning Statement 7.5.56 "Circa 1,850 town centre car parking spaces are currently available for public use. The Development will provide a maximum of 1,000 town centre car parking spaces, including disabled car parking provision. The town centre parking could be located beneath a new Tesco superstore in Zone G, which would be accessed from Redriff Road; and within a purpose built multi-storey car park, to be located at the southern end of the proposed High Street, close to its junction with Redriff Road in either Zone C or E."

The developer is admitting that the planning application has not resolved the delivery of the car parking infrastructure that the developer believes is needed.

Planning Statement 7.5.58 "The Development Specification allows for a maximum of 147,262 sq. m GEA retail and leisure floor space, including the Outline and Detailed Proposals. This equates to a ratio of one space per 147 sq. m of floor space, which is considerably less than the ratio of one space per 75 sqm of floor space that is set out in the saved Southwark Plan, current London Plan and draft New Southwark Plan. Application of the 1:75 sq. m ratio would allow up to 1,963 town centre car parking spaces for the Development."

Planning Statement 7.5.62 "The Development will provide an average of 0.2 private car parking spaces per residential unit (including disabled parking), which is below the 0.3 maximum level set out in the CWAAP and significantly below the adopted London Plan and Core Strategy maximum

standards. Car club spaces will be provided and local streets will be monitored to address displacement parking off-site.”

Planning Statement 7.5.63 “The Development will adopt zero standard car parking spaces for offices, with limited provision for disabled users only at a maximum ratio of one space per 3,500m² Gross Internal Area (GIA). This is in line with current and emerging policy.”

We support these elements of the proposal, but would prefer that the number of spaces should be further reduced now, rather than hoping to reduce it later.

Planning Statement 7.5.64 “Cycle parking for the Outline Proposals will be provided in line with the minimum standards set out in Appendix 2 of the Development Specification, which is in accordance with the adopted London Plan standards.”

Cycle parking should be provided in accordance with the standards in the new London Plan – these are insufficient.

Plot K1

The site is, as the Design and Access Statement says on page 28, a ten minute walk from CW station and 12 minutes from Surrey Quays (SQ) station. It is admittedly closer to bus stops in Salter Road and SQ Road. It is still far from the centre. It could hardly be further.

Other infrastructure Impacts

Overall

Planning Statement para 3.2.3 allows for a maximum of 45,650 sq. m of Community Facilities, which is only 6.2% of the maximum 731,488 sq. m across all uses. Assuming this ratio is maintained, then only 40,951 sq. m will be available for Community Facilities. These are defined as to include health and educational facilities.

We do not believe this to be sufficient.

Social and Heritage Impacts

Overall

Section 5 of the Design and Access Statement offers ingenuous justifications for the towers in terms of helping to define the site, creating a visual identity for CW when viewed from a distance and enhancing the skyline. They are also justified in part because they "cluster" with existing tall blocks.

We contend that these justifications are spurious. There is no need whatsoever for buildings of this height to define the site. The presence of existing towers is no argument for adding to them to form a cluster. In the case of the two towers next to SQ station, the case that this is a "cluster" is unfounded as the third component being stubby John Kennedy House, some way away along Old Rotherhithe Road. As for tall buildings defining the site from afar, the Design and Access Statement on page 407 cites as an example the towers around the Gherkin. But they don't define a place. They don't improve the skyline. They are merely a haphazard collection of arbitrary monstrosities.

Towers of the disproportionate height proposed have an oppressive and dehumanising impact. They are not a necessary component of the redevelopment. It is not in keeping with the local area around the Rotherhithe Peninsula which is largely comprised of low level housing and green spaces. This heritage is not respected in these plans.

Planning Statement para 7.3.86 "Strategic Policy 6 of the Core Strategy targets a minimum provision of 8,558 net affordable housing units between 2011 and 2026, with a minimum of 875 affordable housing units in Canada Water Action Area between 2011 and 2026. Policy 22 of the CWAAP expands further on this, requiring a minimum of 1,000 new affordable homes between 2011-2026 in AAP area."

Planning Statement para 7.4.69 'Section 12 of the NPPF relates to "conserving and enhancing the historic environment". The NPPF states that applications should describe the heritage assets affected and that when considering a proposed development and its impact on the significance of a designated heritage asset, great weight should be given to the assets conservation. Paragraphs 132 – 134 NPPF identify the manner in which the proposed development of a designated heritage asset should be assessed and the weighing of the public benefits against any perceived harm.'

Planning Statement para "7.4.76 The Built Heritage Assessment has assessed the likely long-term significant effects of the completed Development on the settings of listed structures and identified undesignated heritage assets in the local area, and Grade I and II* assets within the wider area, where it is judged that through their location or setting they may be sensitive to the impact of the Development. The Development has no or insignificant impacts on the majority of the heritage assets, other than the following: 1) minor harm in two views of Tower Bridge although overall the setting is preserved and the development has a neutral impact, 2) the Development creates a new backdrop to the St Mary's Conservation Area in long views across the Thames although the character and appearance of the Conservation Area is preserved and no harm is caused, 3) Plot A1 will enhance the setting of the former Dock Offices and 4) the Development will provide a direct link to the Bascule Bridge (which is locally listed) and therefore enhancing its significance."

We disagree with the assessment that the changes to the Tower Bridge views, the backdrop to the St Mary's Conservation Area, and especially the impact on the former Dock Offices are insignificant.

Planning Statement 7.6.11 “The Chapter estimates that the Detailed Proposals would generate £3.8million per annum in additional spending from the new homes and between £5.4million-£7.1million in additional spending per annum as a result of spending by additional employees.”
No evidence provided as to what proportion of this would be retained within the local area.

Plot A1

Planning Statement para 3.4.2 “Plot A1 will provide 186 residential units with a mix of studio, 1-bed, 2-bed and 3-bed units comprising both market and affordable housing subject to grant funding”.

- A specific number of affordable housing units by type should be stated and not dependent on grant funding, or at the very least the dependency etc. must be defined;
- The approach to determining “affordable” should be stated.

The proportions are too skewed towards studio and 1-bed flats, with too few 3-beds and nothing larger. This will prevent people establishing families and will force them to move out of the area, making the community increasingly transitory. In conclusion, the Detailed Proposals do not comply with the NPPF, London Plan policies 3.3 and 3.8 and Southwark Core Strategy Policy 5.

Planning Statement para 7.3.90 “The Development will deliver a range of affordable housing products including social rented and intermediate housing. The affordable housing will be ‘tenure blind’, meaning that there will be no outward difference between market and affordable units and will be distributed throughout the residential areas within the Development and throughout the phases of delivery.”

Plot A1 is not consistent with this.

Planning Statement para 7.4.103 “In terms of private and communal amenity, Plot A1 is required to provide 1,860 sq. m of private amenity space and 50 sq. m of communal amenity space under Southwark Council minimum standards. Plot A1 provides 736 sq. m of private amenity space in the form of loggias and balconies. In line with Southwark’s Residential SPD, the shortfall in private amenity space is offset by the provision of 767 sq. m of communal amenity space, in the form of outdoor terraces at sixth, twenty-ninth and thirty-second floor level.”

It is not acceptable that there is insufficient amenity space, and the proposed justifications are not acceptable – e.g. the reliance on existing, over-stretched space such as Southwark Park.

We would question the principle of having a very tall tower as a gateway to the new town centre. We would prefer the Dock Management Offices and the Canada Water Library (a genuinely landmark building) to provide a human-scale entry point.

Plot K1

Planning Statement para 3.4.9. “Plot K1 will provide a residential development formed of 84 residential units. The residential units will be social and intermediate affordable housing, with a mix of 1-bed, 2-bed and 3-bed units provided.”

Planning Statement para 7.3.90 “The Development will deliver a range of affordable housing products including social rented and intermediate housing. The affordable housing will be ‘tenure blind’, meaning that there will be no outward difference between market and affordable units and will be distributed throughout the residential areas within the Development and throughout the phases of delivery.”

Plot K1 is not acceptable in terms of community cohesion. It is incompatible with Planning Statement para 7.3.90. This segregation is made worse by the physical distance of the site from the main nodes of the development.

Planning Statement para 7.3.72 “The Detailed Proposals will provide 270 new residential units. Plot K1 provides solely residential use, with a focus on delivering family housing which is appropriate and desirable given the location of the Plot adjacent to Russia Dock Woodland and other new residential schemes along Quebec Way.”

The proportions are too skewed towards 1-bed and 2-bed flats, with too few 3-beds and nothing larger. This will prevent people establishing families and will force them to move out of the area, making the community increasingly transitory.

Planning Statement para 3.4.12 “Affordable housing is calculated using a number of measures. Subject to grant funding...”.

- The specific number of affordable housing units by type should not be dependent on grant funding, or at the very least the dependency should be defined;
- The approach to determining “affordable” should be stated;
- The amount should be at least 50%.

Planning Statement para 7.3.90 “The Development will deliver a range of affordable housing products including social rented and intermediate housing. The affordable housing will be ‘tenure blind’, meaning that there will be no outward difference between market and affordable units and will be distributed throughout the residential areas within the Development and throughout the phases of delivery.”

Plot K1 is not consistent with this.

We also object to the Facade Colour and lack of consideration for the visual impact of building next to the woodlands. There are no historical warehouses in the area that are red bricked. These are usually London Stock Bricks. That said, bricks are not the most sustainable material to be used and does not reference the local context. A facade clad in wood interspersed with green walls would blend in visually to the adjacent Russia dock woodlands.

Environmental Impacts

Overall

Residents that have installed solar panels will lose power generation (and income) from shading.

There is no indication of the carbon emissions of, or waste generated by, the construction activity and the associated materials, and so it is impossible to ascertain to what extent this is a sustainable proposal.

Planning Statement para 3.3.39 “In addition to the built floor space set out above, the Outline Proposals will include areas of open space. These areas include the following:

- Minimum of 49,500 sq. m of accessible public realm (this figure does not include public realm within the Development Zones and excludes the Detailed Proposals Zones A and K);
- A new public Park, which will include a minimum area of 13,000 sq. m of public realm;
- A new Town Square, which will include a minimum area of 4,500 sq. m of public realm (as measured from building face to building face).”

This will reduce the per capita open space in the area, and put more pressure on other open space in the area, notably Southwark Park, Russia Dock Woodland and Stave Hill Ecology Park.

Planning Statement para 7.4.109 “London Plan Policy 5.2 states the Development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

- 1) Be lean: use less energy
- 2) Be clean: supply energy efficiently
- 3) Be green: use renewable energy”

There is no explanation as to how this will be achieved.

Planning Statement para 7.4.110 “London Plan Policy 5.3 requires major development proposals to minimise carbon dioxide emissions across the site, avoid internal overheating, make efficient use of natural resources, minimising pollution (including noise, air and urban runoff), minimising the generation of waste, avoiding impacts from natural hazards (including flooding), ensuring developments are comfortable and secure for users, securing sustainable procurement of materials, using local supplies where feasible, and promoting and protecting biodiversity and green infrastructure.”

There is no explanation as to how this will be achieved.

Planning Statement para 7.4.113 “The main energy objective of the draft New London Plan is for London to become a zero-carbon city by 2050. For this reason, the zero-carbon target that the 2016 version set for major residential developments is extended to include major non-residential development upon publication of the document which is expected in 2019.”

There is no explanation as to how this will be achieved.

Planning Statement para 7.4.130 “The Sustainability Strategy prepared by Arup confirms that commercial buildings across the masterplan will be assessed against the current version of BREEAM at the time of an reserved matters application, with office targeting BREEAM ‘Excellent’ and retail and leisure uses targeting BREEAM ‘very good’. Residential developments will target Home Quality Mark assessment level 3, with aspirations to exceed this where possible.”

To achieve the London Plan Policies, office, retail and leisure uses must achieve (not target) BREEAM ‘Excellent’, and residential developments must achieve (not target) a minimum Home Quality Mark assessment level 4, and must exceed this where possible.

Planning Statement para 7.4.140 “In summary, the Development accords with London Plan Policies 5.2, 5.3, 5.5, 5.6 and 5.7, Core Strategy Policy 13 and CWAAP Policy 20.”

We note that the Development does not even claim to meet the New London Plan requirements, nor do we believe it meets the London Plan Policies.

Planning Statement 7.6.11 “The Chapter estimates that the Detailed Proposals would generate £3.8million per annum in additional spending from the new homes and between £5.4million-£7.1million in additional spending per annum as a result of spending by additional employees.”

No evidence provided as to what proportion of this spending would be on sustainable goods and services.

Planning Statement 7.6.31 “The air quality within the administrative borough of Southwark exceeds national air pollution objectives and, as a result, Southwark Council have designated the entire northern part its Borough as an Air Quality Management Area (AQMA). The Site is located within this AQMA. Lower Road is also designated by the GLA as an Air Quality Focus Area. An assessment was undertaken to determine the likely effects of the Development on local air quality.”

Planning Statement 7.6.32 “Current and future air quality conditions at the Site and in the local area have been considered in the Air Quality chapter of the ES. The results of the assessment demonstrate that the Development would not give rise to a significant adverse air quality effect on occupants of existing sensitive locations surrounding the Site or future residential users of the Development.”

Given that air quality is already failing national air pollution objectives, and that the development does not contribute to the achievement of those objectives, the development should be rejected. The Annual Pollution Maps (<https://www.londonair.org.uk/london/asp/annualmaps.asp>) show illegal levels of pollution at exactly the point around Surrey Quays Station where vehicular access to the site is currently at its greatest.

Planning Statement 7.6.87 “Higher quality trees, Category ‘A’ or ‘B’ trees, form 32% of the existing trees and tree groups. A significant amount of work has been undertaken by the Design Team to retain as many of the higher value trees as possible whilst also facilitating the Development to deliver the wider policy aspirations of this Opportunity Area and Major Town Centre location. Retention of existing trees needs to take into account existing buried services, proposed buried services and proposed vehicular access points to service the Development and it is considered that an appropriate balance has been struck. A collaborative approach with Southwark Council towards the management of existing higher value trees and tree groups within the Site has been taken to best inform the masterplan and the reinforcement of the long-term tree stock. Consequently, 32% of the higher category trees will be retained as part of the Development.”

This is an unacceptably low percentage of retention.

This development is close to areas where swifts (on the RSPB amber list due to rapidly declining numbers) are currently nesting and will potentially nest, so we request that a significant number of integrated swifts nesting bricks/ blocks are installed near the highest level of new masonry which would provide an aesthetically acceptable and zero maintenance way to provide a long-term resource to protect this species and improve the local biodiversity;

- *in line with clause 7.3 Create and Enhance Habitat (pages 26-27) of the Southwark Sustainable Design and Construction Supplementary Planning Document (February 2009), which states: "Even where little biodiversity interest has been identified on a site, developers should aim to create features that will provide habitat for wildlife... including through... installing bat bricks, bird boxes... Swift Bricks are an example of bird bricks";*

- *and table 3.10 Actions for the Built Environment item SOBE4 (page 33) of the Southwark Biodiversity Action Plan 2013 - 2019 (Final Draft 2013), which states: "ALL major and minor developments should incorporate nesting or roosting sites for relevant species of birds and bats. Preference should always be given to 'built-in' features such as roosting bricks, bat tubes and bat bricks. The priority species for bird nesting and habitat features is swifts, black redstarts and house sparrows".*

Plot A1

Planning Statement para 7.4.135 "Plot A1 has the potential to achieve a 35.1% reduction in regulated CO2 emissions over the baseline for the commercial uses and 35.3% for the residential component."

This is not compliant with the New London Plan nor with the London Plan Policies, especially as it is only a "potential".

Plot A2

Planning Statement para 7.4.137 "Plot A2 has the potential to achieve total of 29% reduction in regulated CO2 emissions over the baseline; this corresponds to 35% reduction for the office/retail areas, and 20% reduction for the leisure centre."

This is not compliant with the New London Plan nor with the London Plan Policies, especially as it is only a "potential".

Plot K1

Planning Statement para 7.4.139 "Plot K1 has the potential to achieve a reduction of 35.5% in regulated CO2 emissions over the baseline. In accordance with the Mayor's energy hierarchy, the combination of optimised passive design measures, energy efficient plant selection and operation, application of efficient air sourced heat pumps result in an overall annual carbon reduction aspiration in excess of 35% relative to the current 2013 Part-L target emission rate (TER) for both the building."

This is not compliant with the New London Plan nor with the London Plan Policies, especially as it is only a "potential".

There is no proper assessment of the impact on Stave Hill Ecology Park of this development, as per the enclosed documents:

- *Response to K1 Environmental Impact Assessment sections 12*
- *Response to K1 Environmental Impact Assessment section 3*

Leeway to change plans going forward

Overall

Planning Statement para 3.1.4 “The application seeks to reserve all matters for the Outline Proposals, however, a sufficient level of detail has been provided in accordance with the Town and Country Planning (Development Management Procedure) Order 2015 and Planning Practice Guidance (PPG) Paragraph 006 Reference 14-006-20140306.”

Planning Statement para 3.1.6 “The form of the application reflects the nature of the scheme. The Development comprises a true mix of uses which will be built out over a prolonged period of time and will encounter market fluctuations, full economic cycles and demand pressures. The need for flexibility is therefore paramount to allow the Development to respond to changing needs and patterns as future phases come forward for development.”

We believe this precisely why the application should not be allowed to reserve all matters for the Outline Proposals. Due consideration, in consultation with the community, the council and other relevant parties (such as TfL), of these “...market fluctuations, full economic cycles and demand pressures” should take place through submission of future detailed planning applications for specific sites.

Planning Statement paras

- 7.3.96 “The Outline Proposals could provide up to 50,300 sq. m GEA of student accommodation depending on ongoing and future discussions with higher education providers.”
- 7.3.97 “The principle of student housing is supported on this Site, given its town centre location and subject to the requirements of CWAAP Policy 30 being addressed as future phases are developed.”
- 7.3.101 “The Outline Proposals could provide up to 35,700 sq. m GEA of assisted living for elderly people. The assisted living units would be in a town centre location, with excellent public transport accessibility and close to amenities for elderly residents. The assisted units would be designed to the highest standards and would provide communal amenity facilities for residents, this would be secured as part of future Reserved Matters Applications.”

Again, this is far too much leeway to leave at this stage.

Planning Statement 7.4.24 “The Design Guidelines (which also include a specific Tall Buildings Chapter) contain the key guiding principles for the Outline Proposals and a series of site-wide, individual plot, and tall buildings design guidelines. The Design Guidelines will instruct the future physical development of the Site when determined through subsequent reserved matters applications.”

We contend that this the Design Guidelines leave too much leeway at this stage.

Planning Statement para 7.4.55 “London Plan Policy 7.7 states that tall buildings should, inter alia, generally be limited to sites opportunity areas and town centres that have good access to public transport. Further, tall buildings should relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level.”

We contend that this is not possible to judge due to there being too much leeway at this stage.

Planning Statement para 7.4.84 “Emerging Draft London Plan Policy D4 includes standards for private outdoor space. This states that a minimum of 5 sqm of private outdoor space should be

provided for 1 – 2 person dwellings and an extra 1 sqm per each additional occupant. Private external spaces, including balconies, should be at least 1.5 m deep and wide.”

Planning Statement para 7.4.100 “The precise level of playspace and amenity space will be determined as Reserved Matters applications come forward however Section 12 of Volume II of the Design and Access Statement (Masterplan Public Realm Strategy) outlines the play strategy for the Development and shows spatially how the amount of playspace required could be accommodated within the Development. The play strategy allocates doorstep play space, local and neighbourhood play and youth play. A central aim of the strategy is not to restrict play to isolated areas but instead allow for playful features to be threaded throughout the Public Realm, including distinctive focus points such as play equipment set in engaging landscaping, water features and open space including facilities for informal play, and incidental features that encourage children to play. Additional play space may be provided in off-site locations subject to on-going discussions with the public and Southwark Council.”

We contend that this is not possible to judge due to there being too much leeway at this stage.

Planning Statement 7.6.54 “The Outline Proposals have not been included within the Solar Glare assessment as their façade details are not defined at this stage. Once the detailed design of these elements is developed, the Solar Glare effects could range from negligible to major adverse. Any potential Solar Glare impact can be mitigated at Reserved Matters stage.”

Planning Statement 7.6.56 “The Outline Proposals have not been included within the Light Pollution assessment as their internal layouts, façade details and lighting design are not defined at this stage. Once the detailed design of these elements is developed, the Light Pollution effects could range from negligible to major adverse. Where residential properties are located at a distance greater than 20 metres from the proposed commercial elements, they are unlikely to experience significant Light Pollution impacts. Any potential Light Pollution impact can be mitigated at Reserved Matters stage”

We contend that this leaves too much leeway at this stage.

We are unable to draw a conclusion on the extent to which existing residences will in fact receive less daylight or sunlight, or will be overshadowed by the Proposed Development. The applicant should provide more information to enable the impacts to be understood. At the moment the report reads as though impacts from the Proposed Development would be significant but the conclusion is that they would not be. Given this lack of clarity, we contend that this leaves too much leeway at this stage.

Cumulative impacts

Overall

We estimate that up to 15,000 new residences and 40,000 new jobs have either recently been provided, or are earmarked for provision over the next decade, in a 1.5 miles radius of this development. There are numerous instances in the Planning Statement where the developers state that the impact of their development are immaterial, but it is not clear that this is being assessed in the context of the full cumulative impact of these developments on local infrastructure. For example:

- The Strategic Model Development set out in volume 7 of the Transport Statement seems only to use forecasting scenarios of developments on the Rotherhithe peninsula itself. It appears to take no account of the cumulative impact on road and public transport of developments in Deptford or Bermondsey, or elsewhere on the Jubilee line route and the Overground route.*
- Were this development to be consented with 1,000 car parking spaces in addition to the car parking already associated with other new developments (e.g. the Decathlon and other residential developments) much of the otherwise good work that is proposed will be negated and steps to reduce the impact of car based journeys in and around the congested peninsula and Rotherhithe Tunnel and Jamaica Road and Lower Road will be negatively impacted by this volume of car parking and car based journeys that it will inevitably lock in for a long time to come.*

Planning Statement para 7.3.52 “The Detailed Proposals include a new leisure centre on Plot A2. It is anticipated that this leisure centre will be operated by Southwark Council as a replacement to the Seven Islands Leisure Centre.”

The direct replacement of Seven Islands Leisure Centre by the new Leisure Centre means that there is not materially greater capacity for the area as a whole, and hence is insufficient for the area.