

Head of Development Management
attn: Kiran Chauhan

Chief Executive's Department
Planning & Transport [5th Floor Hub 2]
160 Tooley Street
LONDON SE1 2QH

planningstatconsultees@southwark.gov.uk
planning.consultation@southwark.gov.uk

Clizia Deidda
Public Health Policy Officer
Southwark Public Health

Clizia.deidda@southwark.gov.uk

Tel: 0207 525 7707

Date: 18 September 2017

Dear Kiran,

Re: Hybrid application comprising a full planning application for Phase 1 and outline planning permission for subsequent Phases (AP 17/AP/2773):

- **Full planning permission** is sought for the demolition of existing buildings and structures and redevelopment of the central area (Phase 1) for the erection of 3 buildings at 6, 15 and 40 storeys(+137.070m AOD) (+ single basement) to provide 359 new homes and 1,796sqm (GEA) of non-residential floor space within classes A1-A4 (retail), class B1 (business), class D1 (community uses) and class D2 (leisure uses); an energy centre (750sqm), new public open space and public realm, associated car parking (including 4 car club spaces), 563 cycle spaces and other associated works.

- **Outline planning permission** (scale, layout, landscaping, access and appearance reserved) for the demolition of existing buildings and structures and erection of a series of buildings to provide up to 72,400sqm (GEA) of floor space ranging in height from +21.4m AOD to +111.8m AOD, comprising up to 691 residential units and up to 3,704sqm (GEA) of non-residential floor space within classes A1-A4, class B1, class D1 and class D2, with associated public open space, public realm, car parking, cycle parking and associated works.

Location: Malt Street Regeneration Site, Land Bounded By Bianca Road, Latona Road, Haymerle Road, Frensham Street And Malt Street, London SE1

Thank you for your consultation request received on 29th August 2017.

I have reviewed the Planning Application and relative documents. My comments are:

1. I welcome the attention that the Applicant has given to the social sustainability of the development, and support the four indicators selected (Local Identity, Distinctive Character, Ability to influence and Feelings of Safety, p.11 Social Sustainability Report) However, I also note that the Applicant did not submit a Health Impact Assessment (HIA) with their application. I would like to recommend that the Applicant carries out a Health Impact Assessment (HIA) of the proposed development for the following reasons:
 - A Health Impact Assessment will assist the Applicant in identifying important aspects of the masterplan and building design that can have an impact on health, together with future health, education and open space needs. Many of the development features, such as increased and better access to open green space,

play spaces and increased walkability/cycling infrastructure will have a positive effect on health, and a Health Impact Assessment will assist in gathering all these beneficial effects in one single and accessible document

- The emerging New Southwark Plan, now in its Preferred Option version, will require any development over 500 homes or 25,000 sqm of commercial space to submit a HIA as part of the application process

<http://www.southwark.gov.uk/planning-and-building-control/planning-applications/submitting-a-planning-application?chapter=3>

- The size of the development meets the recommended 'size of development' criteria for an HIA as proposed by HUDU and the London Plan in best practice guidance

<http://www.healthyrbandevelopment.nhs.uk/wp-content/uploads/2017/05/Healthy-Urban-Planning-Checklist-3rd-edition-April-2017.pdf>

- This guidance is also referred to in the London Plan

<https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-3/policy-32-improving-health>

Public Health welcomes the opportunity to advise on the scoping for the HIA and would like to refer the applicant to HUDU's rapid Health Impact Assessment tool.

<http://www.healthyrbandevelopment.nhs.uk/wp-content/uploads/2013/12/HUDU-Rapid-HIA-Tool-Jan-2013-Final.pdf>

2. The proposed proportion of Affordable Housing is only 20% across the development. This is 15% below the minimum amount of Affordable Housing required by the Council (35%) in both the emerging New Southwark Plan and the Old Kent Road AAP.
The shortage of affordable housing in the area is a serious issue that has repercussions on health. The lack of truly affordable housing impacts on all aspects of life, including being pushed to move to lower quality housing, or deterred away from places with better jobs and earning prospects, because these are the more expensive places to live. Unaffordable housing increases reliance on housing benefits depresses living standards and can link to overcrowding. The correlation between overcrowding and poor physical and mental health, poor educational attainment and disturbed sleep is well documented. It is therefore essential that the 35% affordable housing requirement is met
3. With regards to the affordable section of the residential development, I could not find any confirmation that the external appearance of the residential blocks will be tenure blind and that there will not be separate entrances for affordable tenants.
Public Health recommends a requirement for development to be tenure blind with equal access to services and facilities and no separate entrances for the affordable section of the development. This will reduce the risk of real and perceived community severance, and will comply with DM 11 of the emerging New Southwark Plan concerning Residential Design

I would also like to take this opportunity to ask the Applicant to further consider their role in supporting the wider determinants of health and wellbeing to include: active design and a healthy food environment. In particular, I would like the Applicant to take into consideration how the development will impact on active design. I would like to signpost the applicant to the Sport England Active Design principles: <https://www.sportengland.org/facilities-planning/active-design/>

I hope the above is helpful,

Yours sincerely

Clizia Deidda
Public Health Policy Officer