

# Planning Committee

Tuesday 4 December 2018

6.30 pm

Ground Floor Meeting Room G01A - 160 Tooley Street, London SE1  
2QH

## Supplemental Agenda No.2

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Date: 4 December 2018

<b>Item No:</b> 5.1 and 5.2	<b>Classification:</b> Open	<b>Date:</b> 4 December 2018	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>		<b>Addendum report</b> Late observations and further information	
<b>Ward(s) or groups affected:</b>		Old Kent Road	
<b>From:</b>		Director of Planning	

## PURPOSE

1. To advise members of observations, consultation responses and further information received in respect of the following planning applications on the main agenda. These were received after the preparation of the report and the matters raised may not therefore have been taken in to account in reaching the recommendation stated.

## RECOMMENDATION

2. That members note and consider the late observations, consultation responses and information received in respect of each item in reaching their decision.

## FACTORS FOR CONSIDERATION

### Item 5.1 – Application 18/AP/1049 for: Full Planning Application – 78-94 Ornside Street, London SE15 1TF

3. The following corrections are to apply to the ‘approved plans’ stated on the Recommendation:

4487/PA/214c - Rev C - ‘Proposed West Elevation’ to be corrected to:

4487/PA/214d - Rev D - ‘Proposed West Elevation’

4487/PA/212 B - Rev B - ‘Proposed North Elevation’ to be corrected to:

4487/PA/212c - Rev C - ‘Proposed North Elevation’

4487/PA/201a - Rev A - ‘Mezzanine Floor & First Floor Proposed Plans’ to be corrected to:

4487/PA/201b - Rev B - ‘Mezzanine Floor & First Floor Proposed Plans’

4487/PA/200a - Rev A - ‘Basement Floor & Ground Floor Proposed Plans’ to be corrected to:

4487/PA/200b - Rev B - ‘Basement Floor & Ground Floor Proposed Plans’

4. Condition 9 (Tree Planting) is to be omitted from the Recommendation. Condition 9 reads as follows:

*Prior to works commencing, full details of all proposed planting of two trees on Manor Grove shall be submitted to and approved in writing by the Local Planning Authority. The details will include: tree pit cross sections; planting and maintenance specifications; use of guards or other protective measures, and; confirmation of location, species, sizes, nursery stock type, supplier and defect period.*

*All tree planting shall be carried out in accordance with those details and at those times. Planting shall comply with BS5837: Trees in relation to demolition, design and construction (2012) and BS: 4428 Code of practice for general landscaping operations.*

*If within a period of five years from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, or becomes in the opinion of the local planning authority seriously damaged or defective, another tree of the same species and size as that originally planted shall be planted at the same place in the first suitable planting season, unless the local planning authority gives its written consent to any variation.*

*Reason:*

*To ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of local biodiversity, in addition to the attenuation of surface water runoff in accordance with: The National Planning Policy Framework 2018: Strategic Policies 11 (Open Spaces and Wildlife), 12 (Design and Conservation) and 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity), 3.12 (Quality in Design), Policy 3.13 (Urban Design) and 3.28 (Biodiversity) of The Southwark Plan 2007.*

5. Instead, the requirements for full details of all tree planting on Manor Grove will become an obligation within the Section 106 Agreements. The transferral of the tree planting details from a condition to an obligation is necessary because the trees in question are on the public highway, outside of the boundary of the application site.
6. The first paragraph of Condition 13 (Hard and Soft Landscaping), which as currently-worded reads:

*Before any above grade work hereby authorised begins (excluding demolition), detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings (including cross sections, surfacing materials of any parking, access, or pathways layouts, materials and edge details), shall be submitted to and approved in writing by the Local Planning Authority. The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use.*

7. Shall be replaced with the following paragraph for reasons of precision:

*Before any above grade work hereby authorised begins (excluding demolition), detailed drawings of a hard and soft landscaping scheme showing the treatment **of those parts of the site that will provide public realm, communal outdoor amenity space and playspace** (including cross sections, surfacing materials of any parking, access, or pathways layouts, materials and edge details), shall be submitted to and approved in writing by the Local Planning Authority. The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use.*

8. The following condition for detailed drawings is to be imposed on the Recommendation:

#### SECTION DETAIL-DRAWINGS

*Section detail-drawings at a scale of 1:5 together with 1:50 scale context drawings through:*

- *the entrance level façade to the commercial premises, to include at least two side-by-side glazed bays and at least one of the street-fronting colonnade columns;*
- *the façade to the refuse store at entrance level;*
- *one of the bays to the upper floor residential units (section to be drawn vertically/in elevation);*
- *the frameless glazed balustrade to be used on the corner balconies;*

*to be constructed in the carrying out of this permission, shall be submitted to the Local Planning Authority and approved in writing before any work in connection with this permission is commenced; the development shall not be carried out otherwise than in accordance with any such approval given.*

*Reason:*

*In order that the Local Planning Authority may be satisfied that the construction details to be used in the construction of the development achieve a quality of design and detailing, are suitable in context and consistent with the consented scheme, in accordance with Part 7 of the NPPF (2018), Strategic Policy SP12 of the Core Strategy (2011) as well as saved Policies: 3.11 Efficient use of land; 3.12 Quality in Design; 3.13 Urban Design; Policy 3.15 Conservation of the historic environment; Policy 3.16 Conservation areas; Policy 3.18 Setting of listed buildings, conservation areas and world heritage sites of The Southwark Plan (2007).*

9. Officers have requested that all commercial floorspace benefits from an integrated sprinkler system similar to that required by Building Regulations in residential accommodation. This would be secured through the S106 legal agreement and through the recommended B1(c) fit out condition (the latter is discussed under Item 6). This is required to improve safety and deliverability within mixed use schemes.
10. Condition 19 (Fit-out of the commercial premises for Class B1 (c) use) will be amended as follows (in bold):

*Before any work above grade hereby approved begins (excluding demolition), full particulars and details of a scheme for the fit-out of the premises to an appropriate level for B1 (c) use shall be submitted to and approved by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any approval given. This should include details of the mechanical and electrical fit-out of the units, showing heating and cooling provision, **sprinklers**, and the provision of kitchen and toilet facilities.*

*The development shall not be carried out otherwise than in accordance with any approval given.*

*Reason:*

*In granting this permission the Local Planning Authority has had regard to the special circumstances of this case, as well as the need to ensure the commercial floorspace is attractive to and suitable for a range of businesses, in accordance with: the National Planning Policy Framework 2018; Strategic Policy 1.2 (Strategic and Local Preferred Industrial Locations) of The Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.*

11. This change corresponds with the abovementioned inclusion within the Section 106 Agreement of the integrated sprinkler system for the commercial floorspace.
12. The applicant has also now agreed to offer a contribution to Transport for London for investment in local bus services. The final figure is still being negotiated but will be a minimum of £30,000, which is proportionate to the bus service contributions secured on other schemes within this part of the Old Kent Road Opportunity Area.

## **Item 5.2 – Application 17/AP/4819 for: Full Planning Application – LAND AT 313-349 ILBERTON ROAD, LONDON SE15**

### **Recommendation update**

13. In paragraph 2 of the main report, 'paragraph 167' should read 'paragraph 235'.



## **Further improvements to the proposed scheme**

### **Dedicated B1(c) workspace**

14. It is recommended that a condition should be added that would restrict all commercial workspace to only B1(c) land use for industrial processes that can cohabit with residential uses. This would equate to 1661sqm of B1(c) floor space and ensure delivery of light industrial use within the Old Kent Road Opportunity Area sub area.
15. As noted the in the main report, a condition is recommended to ensure the fit out of all of the 1661sqm of proposed commercial floorspace to meet B1(c) requirements – so that industrial processes can be carried out in any residential area without causing detriment to the amenity of the area - and particulars to be submitted for approval by the Local Planning Authority.

### **Upgrade to one commercial lift**

16. Following further negotiations, the applicant has upgraded both commercial lifts located within Cores A and B to improve the maximum functionality for moving people and goods between the ground and floor first floor commercial units. The upgraded lifts will be larger to enable larger goods to be carried.
17. The proposed lifts made by Schindler, a brand also used in Ikea, has the following basic specifications:
  - Load capacity 2000kg
  - 26 passengers
  - A car that is 1.5 x 2.7m that is big enough and strong enough to carry a pallet of bricks with room for someone to manoeuvre it in and go up the lift
18. The lifts would provide access to all of the commercial units on the first floor. The layout of the first floor is flexible so the floorspace could be a single or multiple commercial tenants could lease floorspace.

### **Bus stop layby revision**

19. The design of the bus layby proposed on Ilderton Road as been amended in light of TfL's concerns regarding the potential negative impact the use of laybys may have on bus journey times. Our priority is road safety, so a layby provision would be assessed on balance of road safety and bus journey times. (see Appendix 1).
20. The length of the site on Ilderton Road allows for three inset bays, one of which will be considered for an improved bus stop arrangement. As such the final location and type of bus stops and loading bays will be agreed through the Section 278 highways agreement. The Section 278 agreement will also seek to prioritise pedestrian safety.
21. Officers will be reviewing future bus stop locations and provision on the length of Ilderton Road in conjunction with Transport of London, as part of the further preparation of the Old Kent Road Area Action Plan.

### **Commercial sprinklers**

22. Officers have requested that all commercial floorspace benefits from an integrated sprinkler system similar to that required by Building Regulations in residential accommodation. This would be secured through the S106 legal agreement and through the recommended B1(c) fit out condition. This is required to improve safety and deliverability within mixed use schemes.

### **Child play space**

23. In line with the Mayor's Providing for Children and Young People's Play and Informal Recreation SPG the development would be required to provide 429sqm of children's play space.
24. A revised landscape and play space plan has been submitted by the applicant which proposes the delivery of significantly more play space on site. The proposed amount would be at 354sqm, compared to 125sqm previously proposed. This would entirely provide the under 5 play space on site.
25. This would result in a shortfall of 75sqm of child play place when subtracted from the required 429sqm. This shortfall would therefore require a financial contribution of £11,325.00. This contribution will be secured by Section 106 agreement.
26. It is likely that the financial contribution of £11,325.00 would be spent improving the Mixed Use Games Area (MUGA) facilities at the nearby Brimington Park.
27. Further design details of the proposed play space within the scheme will be secured by condition.

### **Density and Exemplary residential design**

28. For clarity, it is recognised that the proposed density for the scheme is significantly higher than the upper limit set by Strategic Policy 5 for the Urban Density Zone, so it is necessary to assess the proposal against the exceptions made for Opportunity Areas.
29. There is a pressing need to optimise the use of land in London, particularly in Opportunity Areas. The proposal would result in a good standard of accommodation, with many of the 'exemplary' requirements of the Southwark Residential Design Standards SPD met. This is summarised in the table below:

<b>Exemplary residential design criteria from Southwark Residential Design Standards SPD</b>	<b>Commentary</b>
Provide for bulk storage	Each of the proposed apartments would have built-in storage broadly in compliance with the Residential Design Standards SPD.  There is also scope, through innovative/flexible design, for the cycle store rooms within both of the residential cores to accommodate larger items such as pushchairs, the details of which will be agreed at the condition stage in collaboration with Southwark Council's Transport Planning team.
Exceed minimum privacy distances	Minimum privacy distances would be exceeded.
Good sunlight and daylight standards	Good sunlight and daylight standards would be achieved throughout the scheme.
Exceed minimum ceiling heights of 2.3 metres	All rooms within all proposed residential units would have floor-to-ceiling heights of 2.50 metres.
Exceed amenity space standards (both private and communal)	Details of the private and communal amenity space proposed re set out in the main report. Overall, the required amount of amenity space would be

	exceeded.
Secure by Design certification	The scheme would be capable of achieving Secure by Design accreditation. Conditions to require this are recommended.
No more than 5% studio flats	None of the proposed units would be studio flats.
Maximise the potential of the site	The potential of the site would be maximised, , delivering full site coverage, improved commercial floorspace, 130 new dwellings achieving an exemplary standard of design and including a large proportion of family-sized units, outdoor amenity space and play space, all without compromising local visual or residential amenity.
Include a minimum 10% of units that are suitable for wheelchair users	10% of the proposed units would be suitable for wheelchair users.
Excellent accessibility within buildings	The accessibility within the building would be excellent.
Exceptional environmental performance	The environmental performance would be fully policy compliant, taking into account a contribution to the Carbon Offset Fund. The potential to connect to a local heat network is designed-in.
Minimised noise nuisance between flats through vertical stacking of similar room types	The proposed development achieves very good vertical stacking. Plant rooms have been located in the basement, two storeys beneath the nearest residential units and thus sufficiently far away not to create undue noise disturbance.
Make a positive contribution to local context, character and communities	The proposed development would make a positive contribution to local context, character and communities in terms of its quality of design and regeneration benefits including affordable housing, affordable workspace, investment in local transport and new public space where there is currently limited open space provision.
Include a predominance of dual aspect units	71% of homes would be dual aspect.
Have natural light and ventilation in all kitchens and bathrooms	This requirement would be achieved in relation to kitchens as a result of the open plan design of the kitchen/living/dining spaces which themselves would benefit from natural light and natural ventilation. However all bathrooms would be internal, but mechanically ventilated. This is considered permissible in the interests of achieving a rational and efficient building layout on the linear nature of the site.
At least 60% of units contain two or more bedrooms	66% of the total number of units across all tenures would have two or more bedrooms.
Significantly exceed the minimum	All units would meet the space standards and some

floor space standards	exceed.
Minimise corridor lengths by having additional cores	The cores have been efficiently designed so that corridor lengths are minimal, having regard to the linear shape of the site.

30. For the reasons detailed in the above table, the higher density proposed would not compromise the quality of accommodation and the impacts of the development would be acceptable. It is therefore considered that the exceedance of the density threshold would not warrant a refusal on these grounds.

### **Additional Consultation Responses**

31. One late letter of objection was received since the publication of the main Committee Report. This brings the total number of consultation responses to 11, with 11 objecting to the scheme

The additional objection is from the Southwark Law Centre that can be summarised as:

- *Scheme is contrary to adopted and emerging policy*
- *The Officer's recommendation is undermined by a flawed evidence base.*
- *Affordable Housing offer does not meet the 50% required for industrial land*
- *The design and density of the scheme*
- *Daylight and sunlight assessment*

32. Taking each of these objections in turn:

- *Scheme is contrary to adopted and emerging policy*
- *The Officer's recommendation is undermined by a flawed evidence base.*

### **Policy and evidence base**

33. Southwark Law Centre's raises the shortfall of employment floorspace being contrary to emerging policy and the proposed revisions irrational. The letter states:

*"Because the industrial floorspace proposed is not genuine (see GLAs stage 1 response, paragraph 19), net loss of industrial accommodation is 100%. No replacement is offered for that which is presently on site. This loss is contrary to London Plan ("LP") Policies 2.17 and 4.4, draft London Plan ("DLP") Policies E4, E5 and E7, the adopted local plan and the emerging local plan site allocation – all of which indicate clearly that there should be no net loss. The GLA have stated the scale of loss makes the scheme unacceptable.*

*The original scheme submitted was in principle policy compliant, but the officers encouraged the applicants to reduce the re-provision of non-residential floorspace (see paragraph 16 of the Officers Report ("OR")). This approach is irrational and entirely contrary to the no net loss principle.*

*The OR refers at paragraph 56 to the evidence base used for the preparation of the Southwark Core Strategy, indicating that structural changes in the economy are resulting in a declining need for industrial land in London. This is a misleading approach. The Core Strategy was prepared in 2010 and adopted in 2011. The evidence base used for it is therefore considerably out of date. Furthermore, subsequent evidence (the 2014 GVA Southwark report; and the currently suppressed 2018 GVA/00 Architects Southwark report) tell a different story: there is no shortage of demand for industrial land in this part of London."*

Officer Response:

34. The proposed scheme would deliver 1661sqm of flexible employment floorspace that would be provided at ground floor and first floor in the form of ten workspaces that are capable of use by small to medium sized enterprises, start up and creative type businesses within the B1 use class.
35. Overall, the proposal would result in a shortfall 202sqm in the employment floorspace re-provision which equates to a 9.5% shortfall in comparison with the overall existing commercial floorspace on site that currently consists of building and yard area, as set out in the table below:

	Existing	Proposed	Difference
	338sqm floorspace	1661sqm floorspace	+1323sqm
	1783sqm yard area	260sqm yard area	-1523sqm
Total	2121sqm	1919sqm	-202sqm (9.5%)

36. As noted in paragraph 16 of the main report, the ground floor and elevations of the proposed scheme were revised following a series of negotiations with Officers who reviewed the planning and design merits of the scheme 'in the round', but which specifically focused on the design quality of residential layout and entrances, the proposed commercial workspace and their entrances, the design of new public open space and the safety of footways and the provision of vehicle servicing for the commercial units proposed, in light of the site's existing constraints, its current poor servicing arrangements and its long frontage to Ilderton Road.
37. Officers concluded that the use of a narrow linear strip of the site parallel to Ilderton Road to enable wider pedestrian footways, the provision of two off street loading bays, and an area of new public open space fronting Wagner Street that is visible from the Old Kent Road, would be of significant commercial and public benefit, despite resulting in the small reduction of ground floor commercial floorspace (9.5%), as set out in the table below:

**Submitted scheme**

Showing pedestrian 'pinch points' on footway.

**Revised scheme**

Showing improved pedestrian environment along Ilderton Road footway.



Figure 1: Revised scheme illustrating the proposed colonnade and the extra 1.2m set back to Ilderton Road and proposed loading bay.

38. The full list of design improvements secured include:
- Improved and safer footway widths and public realm to Ilderton Road that mean that pedestrians have more space for walking, pushchairs, wheelchairs and with improved access to the bus stop; whilst still delivering off street loading bays for the commercial and residential units, and helping to deliver Vision Zero.
  - Improved and safer access for residential and commercial servicing from Ilderton Road servicing bays to the residential and commercial entrances.
  - A new public open space fronting Wagner Street and Ilderton Road, in an area of poor public open space provision. The space would be visible from Old Kent Road.
  - Improved design of the ground floor units that allows individual units to have their own defensible inset space in front of the unit and which breaks up the long ground floor frontage.
  - Improved internal ground floor layout for residential cores and foyers, the location of lifts, binstores and bike stores.
  - Provision of three new wheelchair parking spaces.
39. The design amendments that Officers secured improve the *overall* design quality of the scheme, especially in relation to the amount of new public realm and footway improvements which is currently very poor surrounding the site. They also deliver functional off street servicing bays for the commercial units at ground and first floor level.
40. On balance, officers concluded that the benefits of these material design improvements and having had regard to the quantum and quality of the reprovided commercial workspace (90.1% reprovion/1661sqm) that has been specifically designed for B1 use on a constrained site, plus the provision of a 130 new homes, outweigh the small (9.5%) reduction of commercial floor space that is contrary to policy.
41. It should be noted that the proposed scheme significantly covers the site, with any remaining ground floor space that is not covered by a building utilised for wheelchair parking (3x spaces) to the north of the site, public open space to Wagner Street and the required separation between the eastern elevation of the proposed building and the railway.
42. A financial contribution of £1848.09 for the loss of 202sqm of commercial floorspace will be secured through the Section 106 agreement.
43. The GLA's Stage 1 report states that *"...any commercial use must therefore replace the existing B1(c) or B8 floorspace in line with Policies E7 and E4 of the draft London Plan."* (Paragraph 19)
44. The draft Old Kent Road Area Action Plan identifies the application site as appropriate for B1(a) and B1(c) uses as a result of the constrained shape of the site and the servicing challenges this presents. However, as noted above, it is suggested that the proposed commercial floorspace is now restricted to B1(c) only.
45. A condition is also recommended to ensure the fit out of all the proposed B1 space of the proposed development to meet B1(c) requirements – so that industrial processes can be carried out in any residential area without causing detriment to the amenity of the area - and particulars to be submitted for approval by the Local Planning Authority.

46. Based on the varied quality of the existing premises for commercial purposes, it is considered that the delivery of the new workspace, all designed to modern Class B1 (c) specifications is a positive aspect of the proposed development.
47. In response, it is noted that the supporting text of Core Strategy Policy 10, adopted in 2011, does state that industrial land use is declining. However, the draft Old Kent Road Area Action Plan and current and draft London Plan recognises the importance of industrial floorspace within a mixed and diverse economy and require re-provision.
48. The GVA/00 architects report is not being suppressed, officers have been requesting a copy of the draft report from the consultants for the last four months. Officers received the initial draft report this morning and have not had time to review the draft report. Officers will work with the consultants to agree final report and will publish it as soon as possible.

### **SIL release**

49. Southwark Law Centre's raises the issue of phased Strategic Industrial Land release and the agreement between LBS and the GLA. The letter states:

*Even though the GLA and LBS have agreed the phasing of SIL release, and the inclusion of this application site's SIL land in the first phase, the designation has not yet changed, and the land has not yet ceased to be SIL. At paragraph 279, the Officer refers to the Local Plan requirement for the process of SIL consolidation to be 'strategically coordinated'. There has been no such process. At best, the agreement between the GLA and LBS represents the very first stage in the process which will only conclude with the adoption of a sound Old Kent Road Area Action Plan ("OKR AAP") – something that will need significant amendment in this regard because in draft form it shows a 50% reduction of industrial footprint, completely at odds with both adopted and emerging strategic policy. To assume, as the Officer does, that the agreement between the GLA and LBS on SIL release is the final word on strategic coordination, and represents its conclusion, is incorrect, since it ignores the GLA's crucial strategic objective (embodied in the DLP) of 'no net loss' of industrial accommodation. Furthermore, strategic coordination of SIL consolidation/release must go hand-in-hand with the policy objectives for that consolidated land, such as continued industrial accommodation capacity levels, whether in existing form or as part of mixed-use schemes.*

*The Officer's error is to treat the agreement to release SIL in phases as if it represented SIL release itself. But that assumption upsets the whole purpose of having a formal Examination in Public of the New Southwark Plan ("NSP") and OKR AAP, given the central importance of SIL designation or release.*

*If and when the land in the application site is released from SIL designation, strategic policies E4, E5 and E7 in the DLP require development that co-locates industry with residential and other uses to deliver at least as much, preferably more, industrial accommodation.*

*Map 4.1 of the draft London Plan shows Southwark as a limited transfer borough with exceptional planned release. Furthermore, the draft London Plan shows Southwark in the 'retain' category for industrial accommodation capacity – and thus the 'no net loss' principle is of vital importance, or else that categorisation has no force.*

### Officer Response:

50. In response, the main report identifies that the proposal would represent a departure from the adopted development plan. This departure must be weighed against the benefits of the scheme which include:
  - the provision of housing, of which 36% would be affordable;



- substantial reprovision of 1661sqm of B1(c) commercial floorspace, which does represent at a small loss of 202sqm of commercial floorspace;
- the provision of good quality, flexible commercial space that has been designed to include units of varying scale;
- the delivery of 161sqm of affordable workspace;
- improved on street servicing for the commercial and residential space;
- job creation;
- optimised use of the site.

51. The Old Kent Road Area Action Plan is seeking to have no net loss of industrial floorspace over the wider plan area as in the draft London Plan. The main report also identifies that the GLA and LBS agreement is not the final word on this matter and would need to be subject to an Examination in Public process.

### **Phasing**

52. Southwark Law Centre's letter raises the issue of delivering commercial uses prior to residential occupancy in accordance with draft London Plan policy E7. The letter states:

*The OR fails to have regard to DLP Policy E7, paragraph E.3, on SIL intensification that requires industrial replacement to be completed in advance of residential development being occupied (per development, not per phase). In this proposed scheme, there is no attempt to ensure industrial phasing in advance of residential. This aspect of non-compliance is not even acknowledged, let alone addressed, by the Officer. Neither does the officer consider any Grampian, or negative, condition – postponing occupation of residential development pending completion of the industrial development.*

*The legal consequence is that the report is flawed by failure to have regard to a material consideration. The practical consequences of this failing for local businesses are profound. Due to the severe borough-wide shortage of similar space, businesses in the Old Kent Road area are being forced to move a long way for a considerable period of time, if not permanently, because of the kind of approach that is being taken in this, and many other, applications.*

### Officer Response:

53. In response, the proposed scheme is a mixed use building whose vertical mix of commercial and residential uses would be delivered through a single construction phase. It is not possible therefore to split the development into two phases. However, a condition is recommended that the residential accommodation is not occupied until the commercial floor space is fitted out to the approved B1(c) standard.

### **Prematurity**

54. Southwark Law Centre's letter raises the issue of prematurity. The letter states:

*Paragraph 82 of the OR gives the misleading impression that the proposed scheme, whilst being inconsistent with current adopted policy, is nonetheless not 'premature' because it is consistent with emerging policy (both strategic and local). This is untrue. The report simply fails to engage with the ways in which it is inconsistent with emerging policy.*

*Approving the scheme would be flawed for prematurity, as defined at NPPF paragraph 49 (2018 revised version), since the scale of industrial accommodation loss would make the commitment in the NSP to no net loss entirely undeliverable. It would thereby undermine emerging policy.*

Officer Response:

55. In response, the issue of prematurity is addressed in paragraphs 54 and 82 of the main report. It is considered that the small loss of 202sqm or 9.4% of commercial floorspace in comparison to a re-provision of 1661 sqm or 90.1% in this instance would not undermine emerging policy, in light of the material design improvements and regeneration benefits secured in the scheme.

- *Affordable Housing offer does not meet the 50% required for industrial land*

56. Southwark Law Centre's letter raises the issue of an under-provision of affordable housing contrary to emerging London Plan policy.

Officer Response:

57. The proposal provides a minimum of 35% affordable housing units (by habitable room) in accordance with adopted policy.

58. The scheme is not contrary to policy H6 of the draft London Plan. Policy H6 requires schemes that don't achieve a 50% benchmark level of affordable housing on Strategic Industrial Land to be subject of a viability assessment. This scheme has been the subject of a viability assessment that shows it is providing the maximum amount of affordable housing. Any permission would be subject to early stage viability reviews if commencement is delayed beyond 2 years, and a late stage review prior to the occupation of more than 75% of units. This scheme will be subject to those reviews.

- *The design and density of the scheme*

59. Southwark Law Centre's letter raises the issue of high density development and that design quality does not meet exceptional standards due shortfalls of amenity space, playspace and open space.

Officer Response:

60. Paragraph 28 to 30 above provides greater clarity as to where the proposed scheme meets exemplary residential design standards. The small number of factors where the accommodation is not exemplary must be weighted in the balance with the positive aspects of the proposal.

61. Overall, Officers consider the accommodation to be of a good quality and the density of the scheme is acceptable.

- *Daylight and sunlight assessment*

62. The Southwark Law Centre's letter raises the issue of assumption in relation to the type and number of rooms being affected by daylight/sunlight loss. The letter states:

*The OR falls into exactly the same error as that identified by the High Court in R (Rainbird) v London Borough of Tower Hamlets [2018] EWHC 657 (Admin), at paragraph 87 – it fails to identify the number of habitable rooms affected in each property. Paragraphs 154-155 of the OR make unsupported assumptions about the number and type of rooms affected in excess of the BRE guidelines by daylight loss (NSL). This is a failure to adequately advise the committee.*

Officer Response:

63. Paragraphs 154-155 identify the windows that may be affected as a result of the development. None have been assumed as non-habitable and are therefore assessed.

**Location of affordable units**

64. For clarity, the locations of the 46 affordable units that are proposed within the scheme are set out below:

<b>Block with the scheme</b>	<b>Number of Market units</b>	<b>Number of Social Rent units</b>	<b>Number of Intermediate units</b>	<b>Total</b>	<b>Number of wheelchair units</b>
A	26	30	16	72	5
B	58	0	0	58	8

**Communal amenity space**

65. Three communal amenity spaces are proposed within the development that totals 562sqm. Details are set out below:

<b>Communal Amenity Space</b>	<b>Location</b>	<b>Size</b>	<b>Who has access?</b>
Space 1	On the podium between Block A and B, Level 3	288sqm	<u>All of Block A: 72 units</u> 30 Social rented units (floors 2-6) 16 Intermediate units (floors 7-9) 26 Market units (floors 9-14)
Space 2	Block A, Level 13	159sqm	<u>All of Block A: 72 units</u> 30 Social rented units (Floors 2-6) 16 Intermediate units (floors 7-9) 26 Market units (floors 9-14)
Space 3	Block B, Level 11	115sqm	<u>All of Block B – 58 units</u> Market units (floors 2-12)

66. A total communal amenity space of 447sqm is available to the 72 units in Block A. 115sqm is available to Block B.
67. The detailed design and layout of each of these spaces in conjunction with the overall child play space will be secured by condition.

**Guarding to communal amenity spaces**

68. Part K of the Building Regulations (2013) requires guarding to balconies to protect people from falling. The minimum height required for guarding as detailed in Part K is 1.1 metres.

69. The applicant has updated the proposed guarding from 1.2 to 1.5 metres to the communal amenity areas and this would exceed the minimum height requirement.

### **Residential service charges**

70. All residential units, including social rented units, are likely to be required to pay a 'reasonable' service charge to pay for the upkeep of communal areas and services within the building. The services charges would be limited at a level to cover the costs of providing the services, and would be proportional to the size of the unit and the type of any tenancy.
71. In relation to social rented unit service charges, HCA rent standards guidance (3.213, 2015) states that: *"Service charges are subject to separate legal requirements, including tenancy agreements. They are limited to covering the cost of providing the services ... However, it is expected that registered providers will endeavour to keep increases for Housing Benefit eligible service charges within the Guideline Limit. Registered providers should, therefore, properly distinguish between rents and service charges."*
72. Service charges may include the costs of:
- Communal cleaning and cleaning of communal windows; litter picking; removal of rubbish and fly tipping from communal areas; tidying and cleaning of communal bin store areas; removing graffiti and grounds maintenance (where undertaken by the scheme managers)
  - Inspection and servicing of CCTV equipment
  - Reporting and co-ordinating repairs to communal areas
  - Programming of communal door, car park and gate fobs and cutting of communal keys
  - Management of communal car parks; inspection of car park barriers; dealing with abandoned vehicles; litter picking
  - Management of children's play areas; health and safety checks; litter picking
  - Administration and line management where related to eligible activities.

### **Specialist workspace provider**

73. The commercial floorspace has been designed to be flexible so that it could accommodate a range of different unit sizes and shared workspaces. The applicant has committed to being the specialist workspace provider for the commercial floorspace, the details of which are to be set out in a Commercial Units Management Plan (CUMP). The specialist workspace provider will also be tasked with marketing and managing the affordable workspace. The CUMP will be secured through a section 106 planning obligation.

### **Development viability**

74. The current scheme at 36% affordable housing would produce a 6% profit. However, as a result of the regeneration and improved transport infrastructure within the opportunity area the applicant predicts that values will increase in the future, increasing the profit level to an industry-standard level.

### **Amendments and Corrections**

75. Paragraph 59 – 'merging' should read 'emerging'
76. Paragraph 117 – 13 wheelchair units are provided, but this is a 10% provision, not a 13% provision.
77. Paragraph 133 – Three communal amenity spaces are proposed and not two.

78. Updated plan numbers are as follows:

- 2495\_GA-P-A-L15 P5 updates 2495\_GA-P-A-L15 P3
- 2495\_FT-B-3B5P-01 P4 updates 2495\_FT-B-3B5P-01 P3
- GA-P-A-L07 P2 replaces GA-P-A-L07 P1
- GA-P-A-L08 P0 is a new plan as Level 8 previously matched Level 7
- 17.374-P-200g – revised landscaping plan
- 17.374-P-201j - revised landscaping plan
- 2495\_GA-SP-L00\_P6 – Ground floor to show new lift specification
- 2495\_GA-SP-L01\_P6 – First floor to show new lift specification

### **Conditions**

79. A revision to the B1(c) fit out is proposed to include sprinklers for the commercial space:

*Before any work above grade hereby approved begins on any phase of development, full particulars and details of a scheme for the fit out of the premises to an appropriate level for B1 (c) use shall be submitted to and approved by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any approval given. This should include details of the mechanical and electrical fit out of the units, showing heating and cooling provision, sprinklers, and the provision of kitchen and toilet facilities. The development shall not be carried out otherwise than in accordance with any approval given, and practical completion of the B1 (c) fit out for each phase shall be at the same time, or before the practical completion of the residential component of the same phase.*

#### *Reason*

*In granting this permission the Local Planning Authority has had regard to the special circumstances of this case in accordance with Strategic Policy 1.2 Strategic and local preferred industrial locations of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan 2007 and the National Planning Policy Framework 2018.*

80. It is recommended that a condition to restrict the commercial floorspace B1(c) is included:

*Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order and any associated provisions of the Town and Country Planning General Permitted Development Order (including any future amendment or enactment of those Orders), the Class B1 use hereby permitted shall only be for Class B1(c) uses.*

#### *Reason:*

*In granting this permission the Local Planning Authority has had regard to the special circumstances of this case in accordance with Strategic Policy 1.2 Strategic and local preferred industrial locations of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan 2007 and the National Planning Policy Framework 2018.*

### **Section 106 updates**

81. In light of the revised child play space layout as detailed in the revised roof plan drawing, the increase of child play space would result in a reduced financial contribution of £11,325.00 being secured through the section 106 agreement.
82. A new requirement for a Commercial Units Management Plan (CUMP) is suggested. This would secure a specialist workspace provider who will also be tasked with marketing and managing the affordable workspace.

## REASON FOR URGENCY

83. Applications are required by statute to be considered as speedily as possible. The application has been publicised as being on the agenda for consideration at this meeting of the planning committee and applicants and objectors have been invited to attend the meeting to make their views known. Deferral would delay the processing of the applications and would inconvenience all those who attend the meeting

## REASON FOR LATENESS

84. The new information, comments reported and corrections to the main report and recommendation have been noted and/or received since the committee agenda was printed. They all relate to an item on the agenda and members should be aware of the objections and comments made.

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Individual files	Place and Wellbeing Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403

## APPENDICES

No.	Title
<b>Appendix 1</b>	Revised Ground floor Landscaping Plan
<b>Appendix 2</b>	Revised Landscaping Roof Plan

### Appendix 1: Revised Ground floor Landscaping Plan



### Appendix 2: Revised Landscaping Roof Plan



# Welcome to Southwark Planning Committee

4 December 2018

## MAIN ITEMS OF BUSINESS

Item 5.1 – 18/AP/1049 – 78-94 Ormside Street,  
London SE15 1TF

Item 7.2 - 17/AP/4819 – Land at 313-349 Ilderton  
Road, London SE15



Councillor Martin Seaton (Chair)



Councillor Lorraine Lauder MBE (Vice Chair)



Councillor Cleo Soanes



Councillor Hamish McCallum



Councillor Kath Whittam



Councillor Adele Morris



Councillor James McAsh



Councillor Jason Ochere



**Item 1 – 78-94Ormside Street, London SE15 1TF**  
**Full Planning Application**  
**Application 18/AP/1049**

- Redevelopment of the site, involving the demolition of existing buildings and structures, to deliver a mixed use building of up to nine storeys (ten storeys including the mezzanine at entrance level) plus rooftop plant. The building will comprise 2058 square metres of new and replacement commercial floor space (Class B1) together with 56 residential units (Class C3) and will include the creation of a new basement, hard and soft landscaping, reconfigured servicing arrangements and other associated works.

20





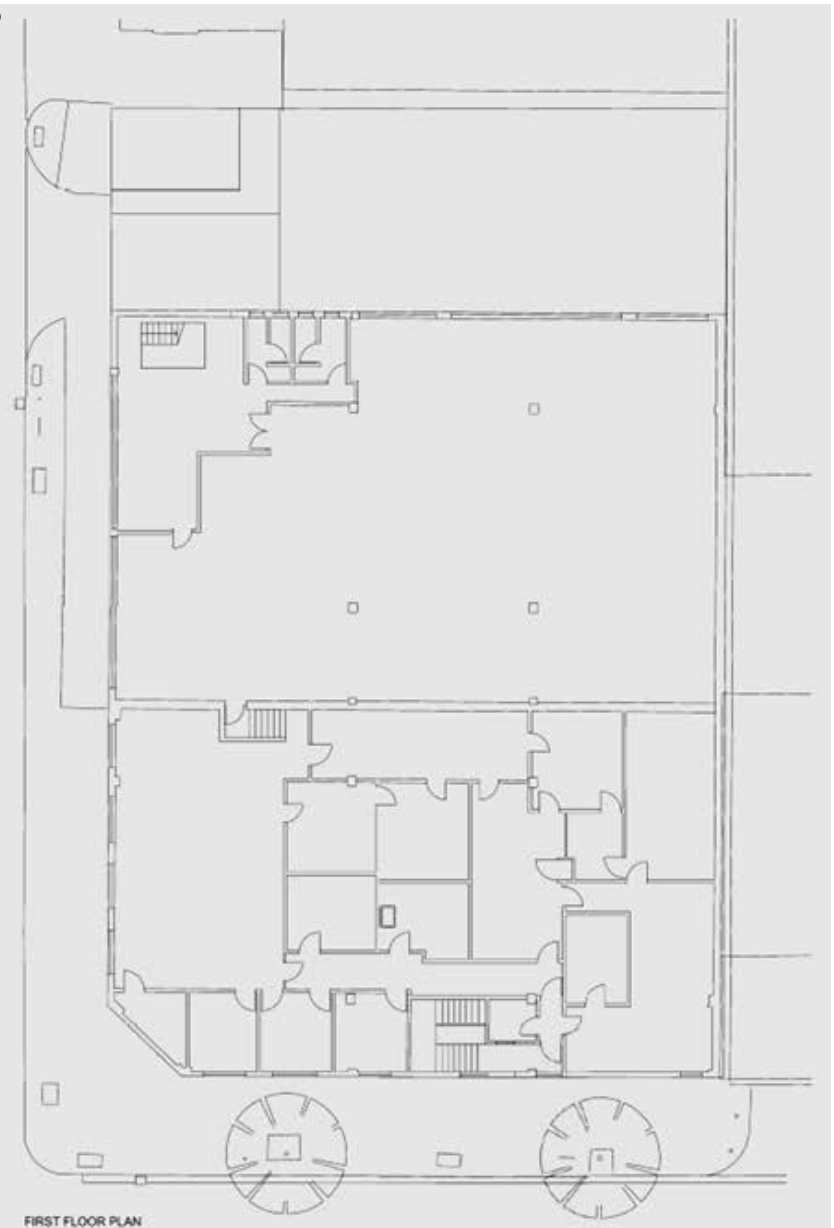
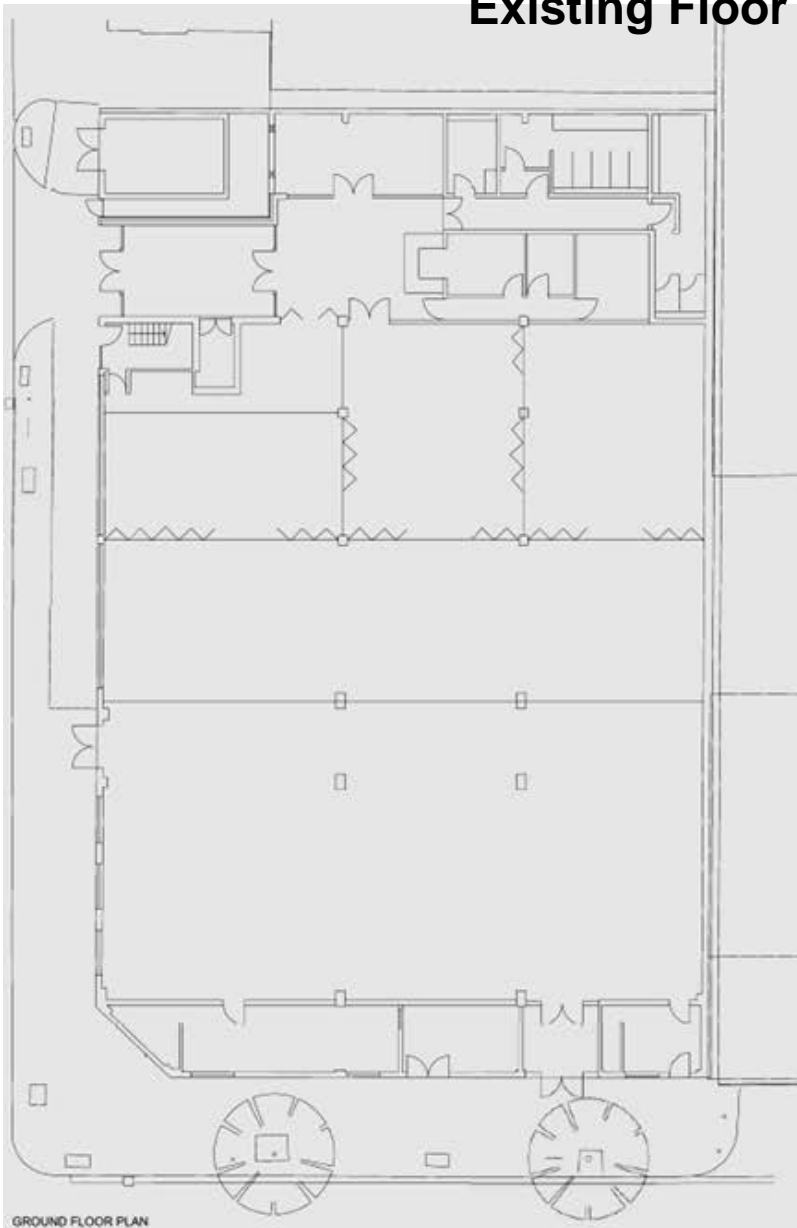






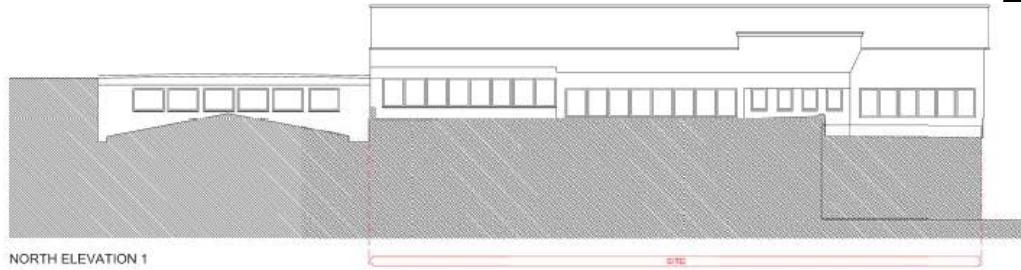
23

# Existing Floor Plans

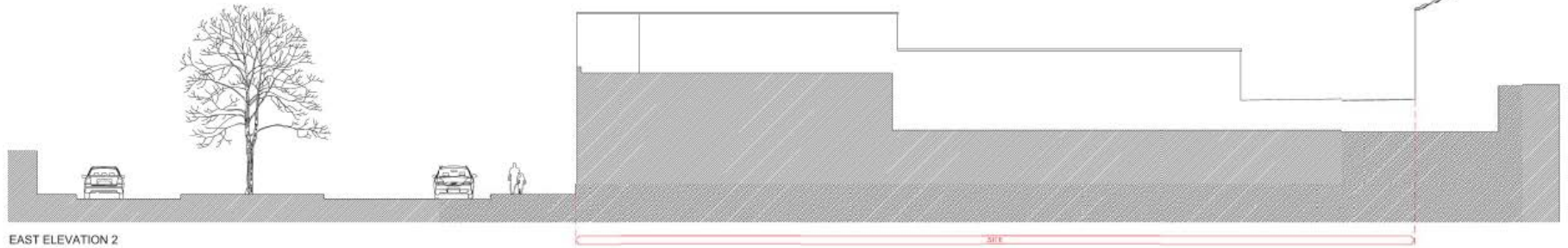
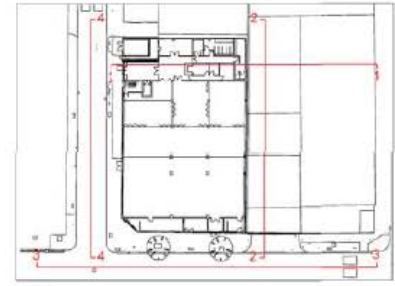




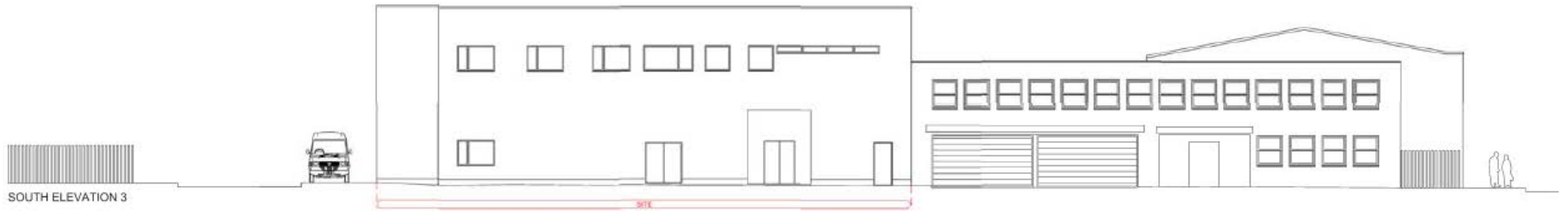
# Existing Elevations



NORTH ELEVATION 1



EAST ELEVATION 2

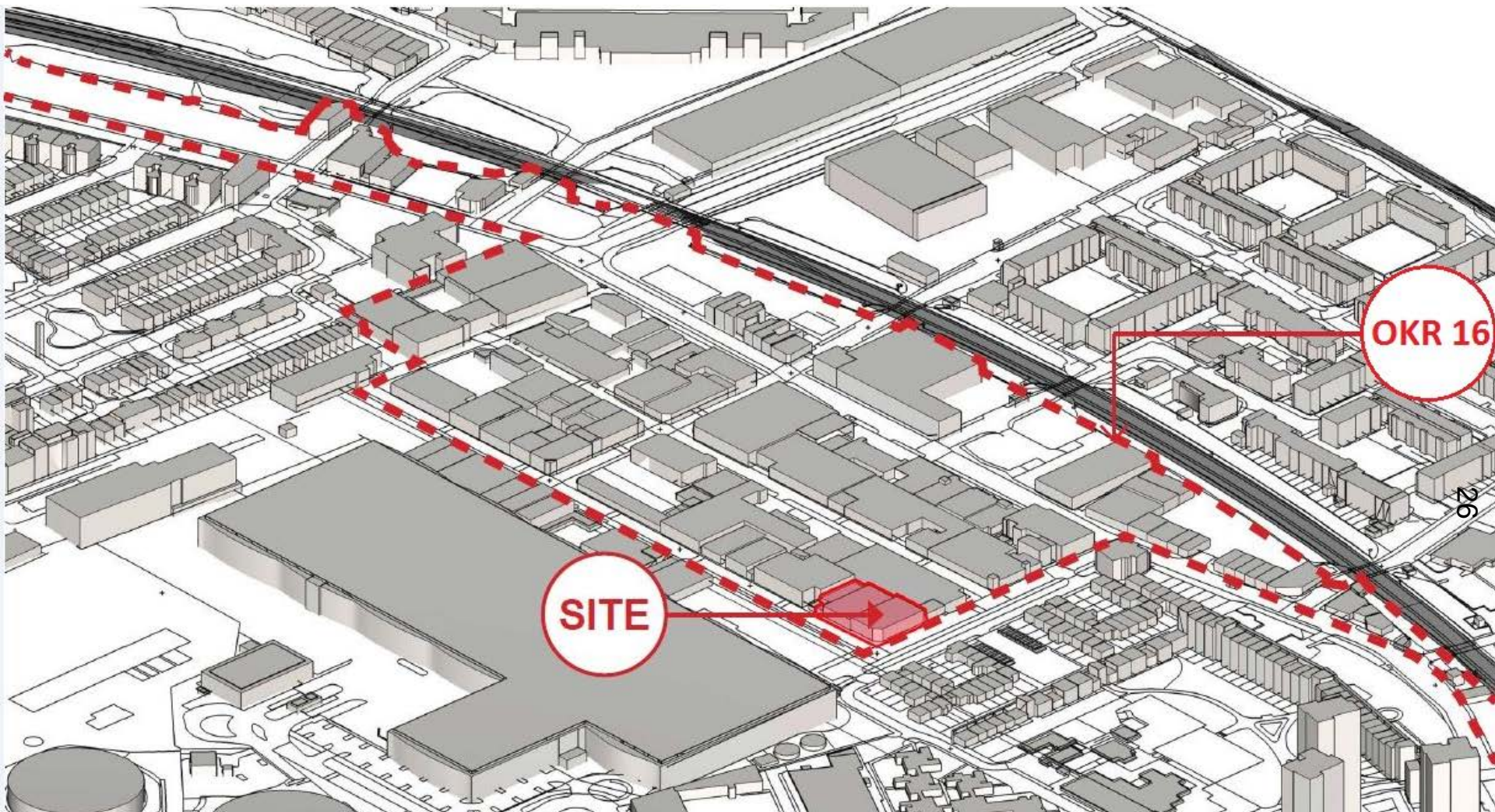


SOUTH ELEVATION 3



WEST ELEVATION 4

25





# DRAFT OLD KENT ROAD AAP

## Indicative masterplan and land use for the Hatcham and Ilderton Road sub area



(Emerging policy, limited weight)





# DRAFT OLD KENT ROAD AAP

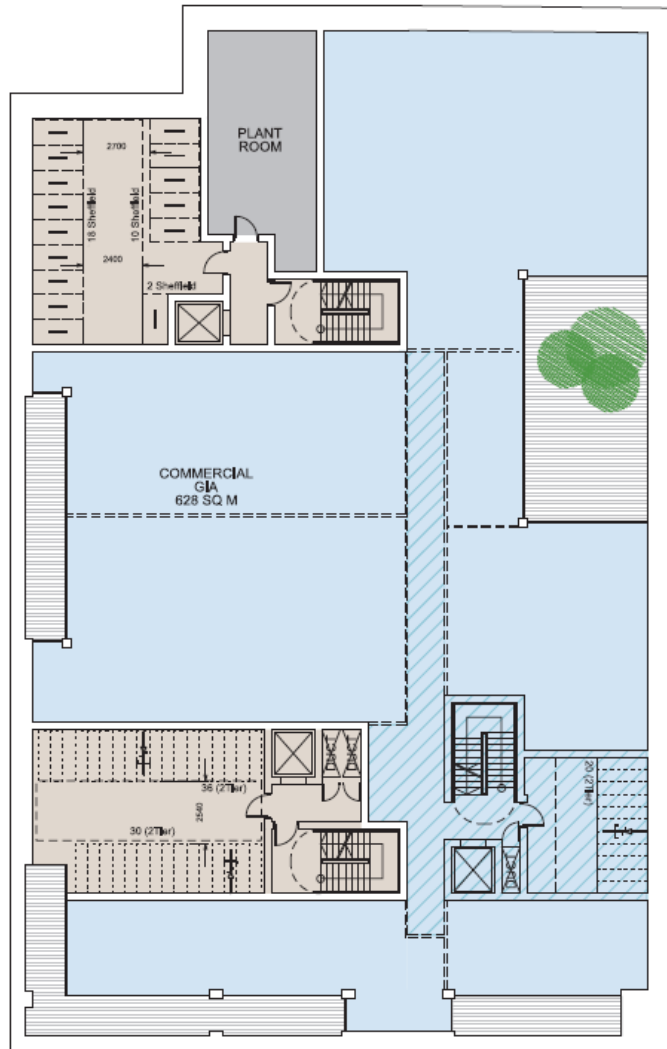
## Indicative servicing strategy for the Hatcham and Ilderton Road sub area



(Emerging policy, limited weight)

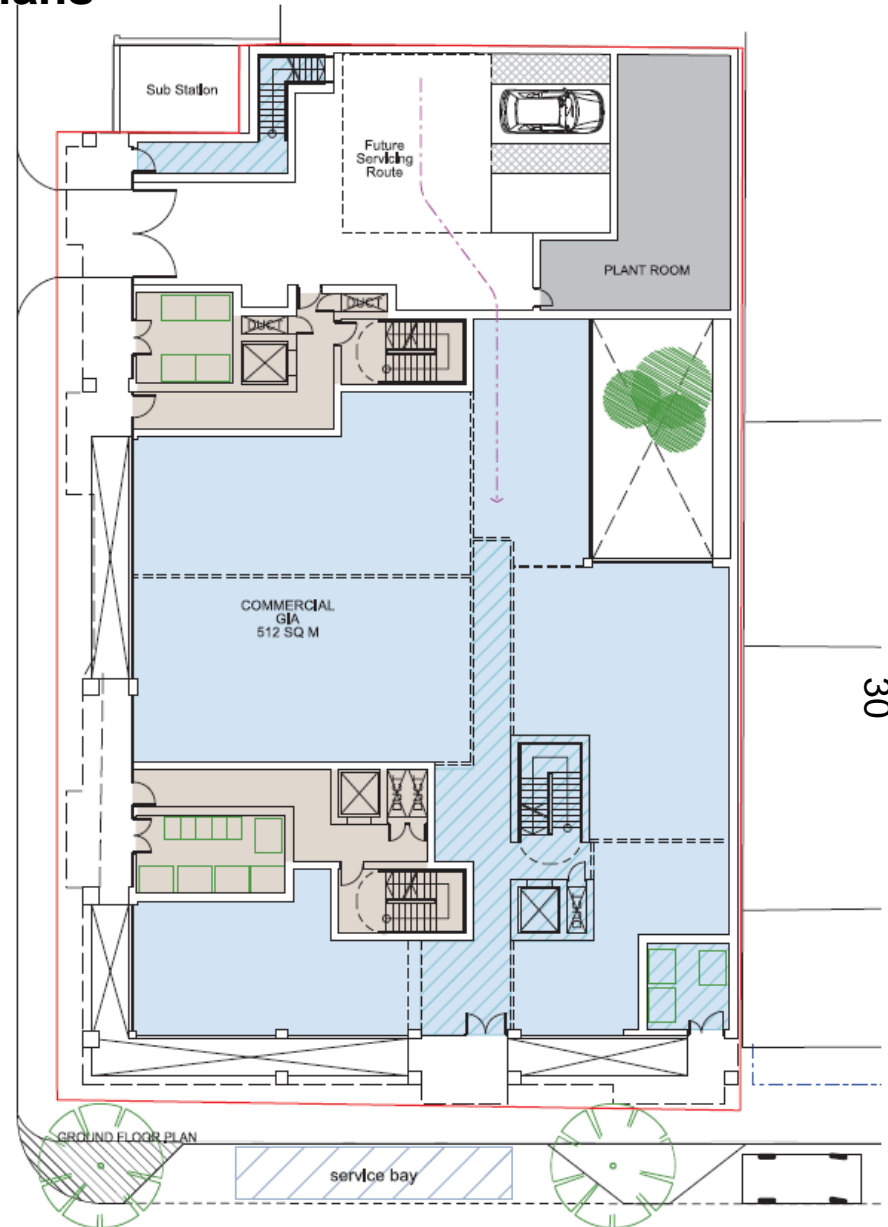


# Proposed Basement & Ground Floor Plans



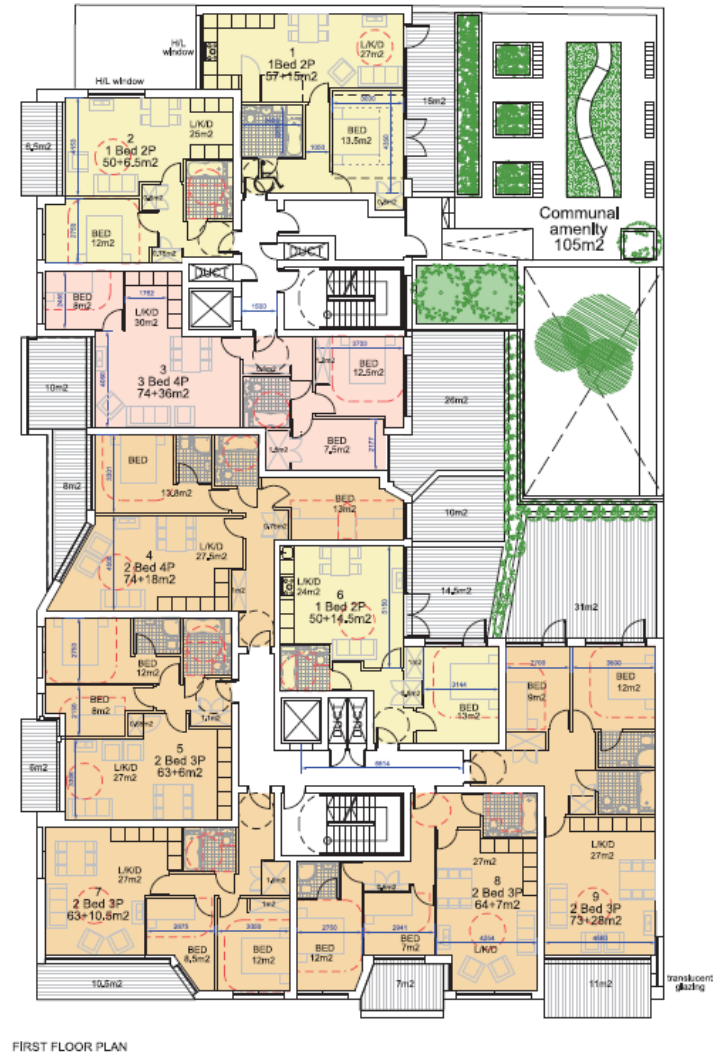
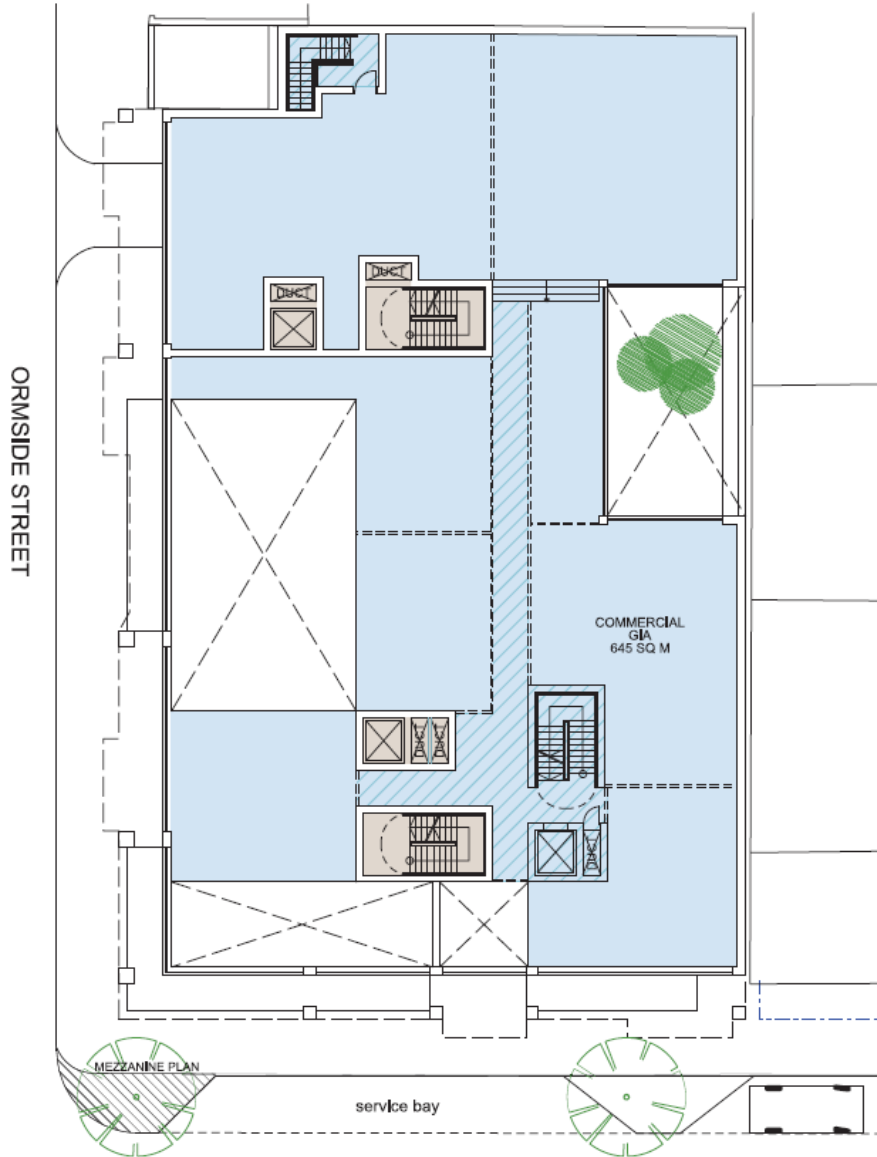
BASEMENT PLAN

ORMSIDE STREET



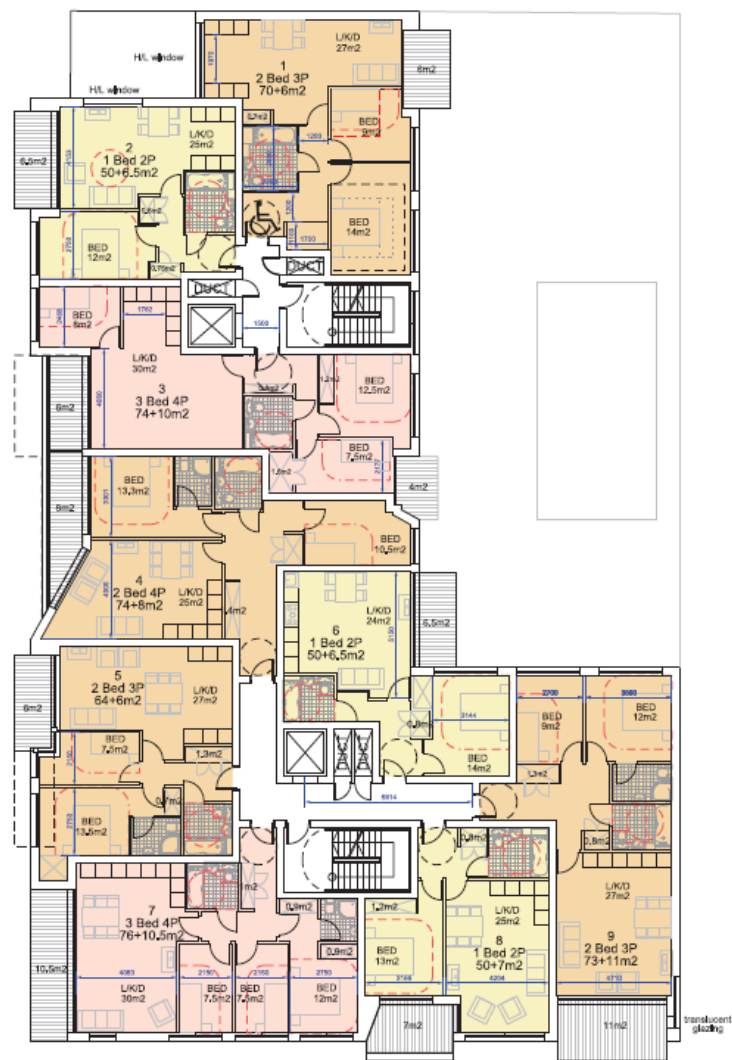
GROUND FLOOR PLAN

# Mezzanine Floor & First Floor Proposed Plans





# Fourth Floor & Fifth Floor Proposed Plans

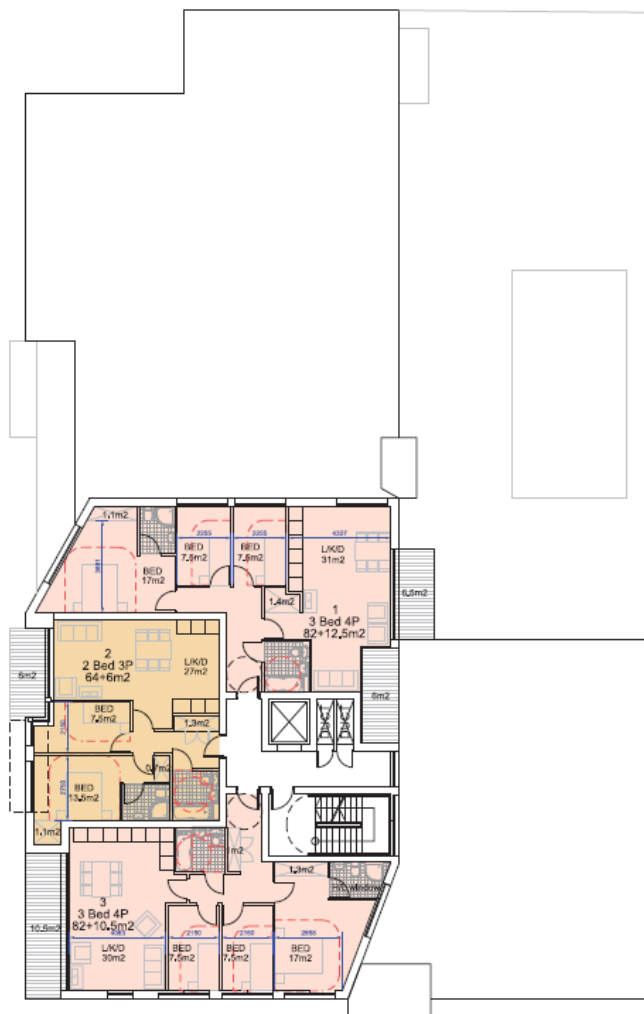


FOURTH FLOOR PLAN

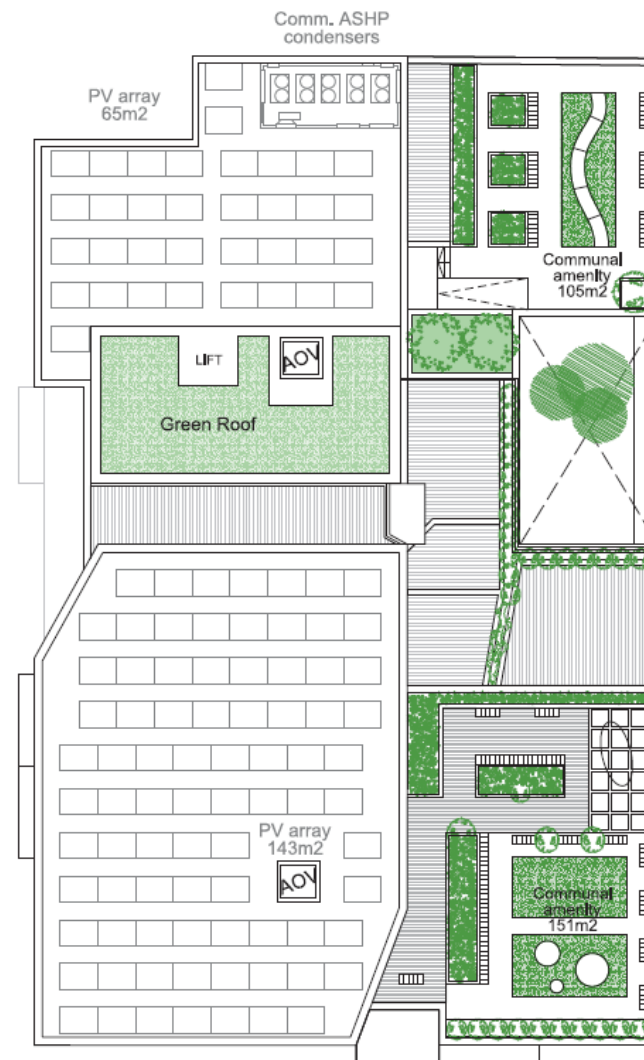


FIFTH FLOOR PLAN

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EIGHTH FLOOR PLAN



ROOF PLAN

# Proposed South Elevation

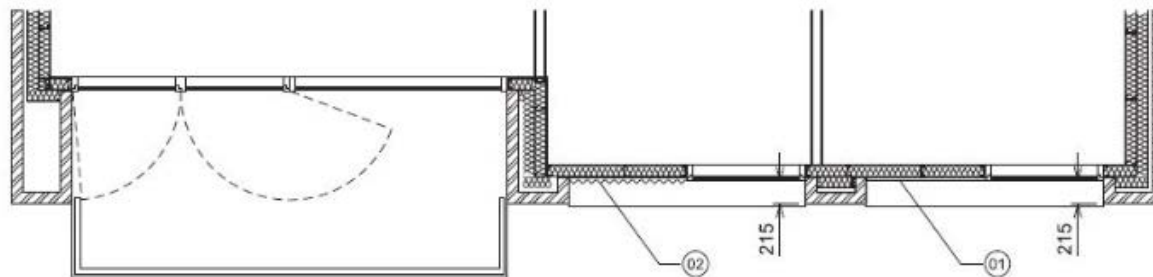


# Proposed West Elevation





# Detailed Bay Study



TYPICAL PLAN (FLAT 2 ON 2ND, 4TH & 6TH FLOORS)



## Looking From The West and With The Future Context Illustrated



37

## Looking Southwards Along Ormside Street



38



## Looking Westwards Along Manor Grove



39

# ROCA SME Business Space

- Roca have experience in delivering flexible business floorspace for SMEs and start-ups such as the M25 Business Centre in Essex.



40

# M25 Business Centre, Essex

The M25 Centre has approx. 55,000sqft of floorspace and is home to large number of companies:

## Current Tenants

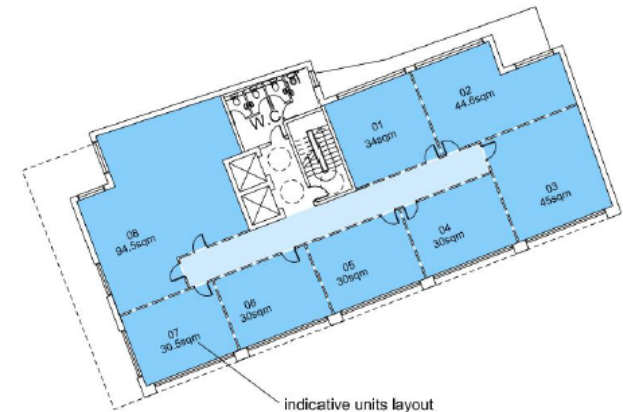
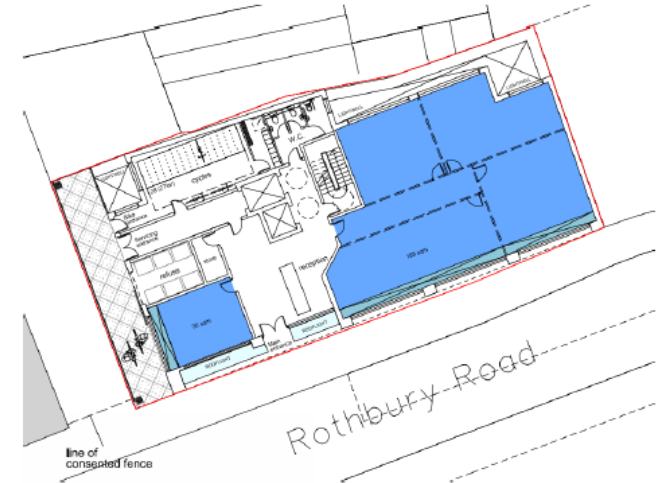
- United Drains - Drain/ Plumbing
- BR Hodgson - Construction Company
- Abbey Lift Care - Lift Installation/ Maintenance
- Dumitrel Rada Photography - Photography Studio
- RCM Electrical Installations – Electricians
- JT Marketing PR - Marketing Company
- We Want Any Car - Car Buying Company
- ABVK – Accountants
- Dare Salon Apprenticeships - Hair Stylist academy
- Aim High Fostering Services - Independent Fostering Provider
- Fiesta Crafts - Toy Manufacturers
- Quality Inspection Services Japan - Vehicle Inspection Company
- Regional Building Control - Building Control Surveyors
- Canvas It Up - Framed canvas/Wall Art Printers
- Beat Theory Fitness – Gym
- Mallet Footwear - Premium Footwear Company
- Cluster Repairs UK - Instrumental Cluster Repairs
- Essex Heating & Electrical Services - Heating Contractors
- PPC Tiling - Tile Contractors
- Cayres Cleaning - Commercial Cleaners
- BlackHall – Payroll
- Christopher Marks - Estate Agents
- T&D Glazing& Installation - Window Fixers/ Façade Installation.
- RedRock Recruitment - Construction Recruitment
- JPM Contractors - Plant Hire
- FMCG Executive Network/Pertemps - UK's Largest Recruitment Company
- Harmans Costs - Cost Lawyers
- Solartek Films - Window Manifestation
- JP Law Solicitors – Solicitors
- Fibre Solutions - Telecommunication Service Provider
- Freedom - Party Planners
- Skin Brands/ABC Lasers - Cosmetic Laser Solutions



# ROCA SME Space – Hackney



- Provision of 2630 sqm (GIA) of high quality flexible commercial (Use Class B1a-c) floorspace
- Including 5% affordable workspace
- Located in Hackney Central
- Scheme approved in 2018



1F-3F PLANS  
(typical floor plan)





## Item 2 – Land at 313-349 Ilderton Road, London SE15

### Full Planning Application

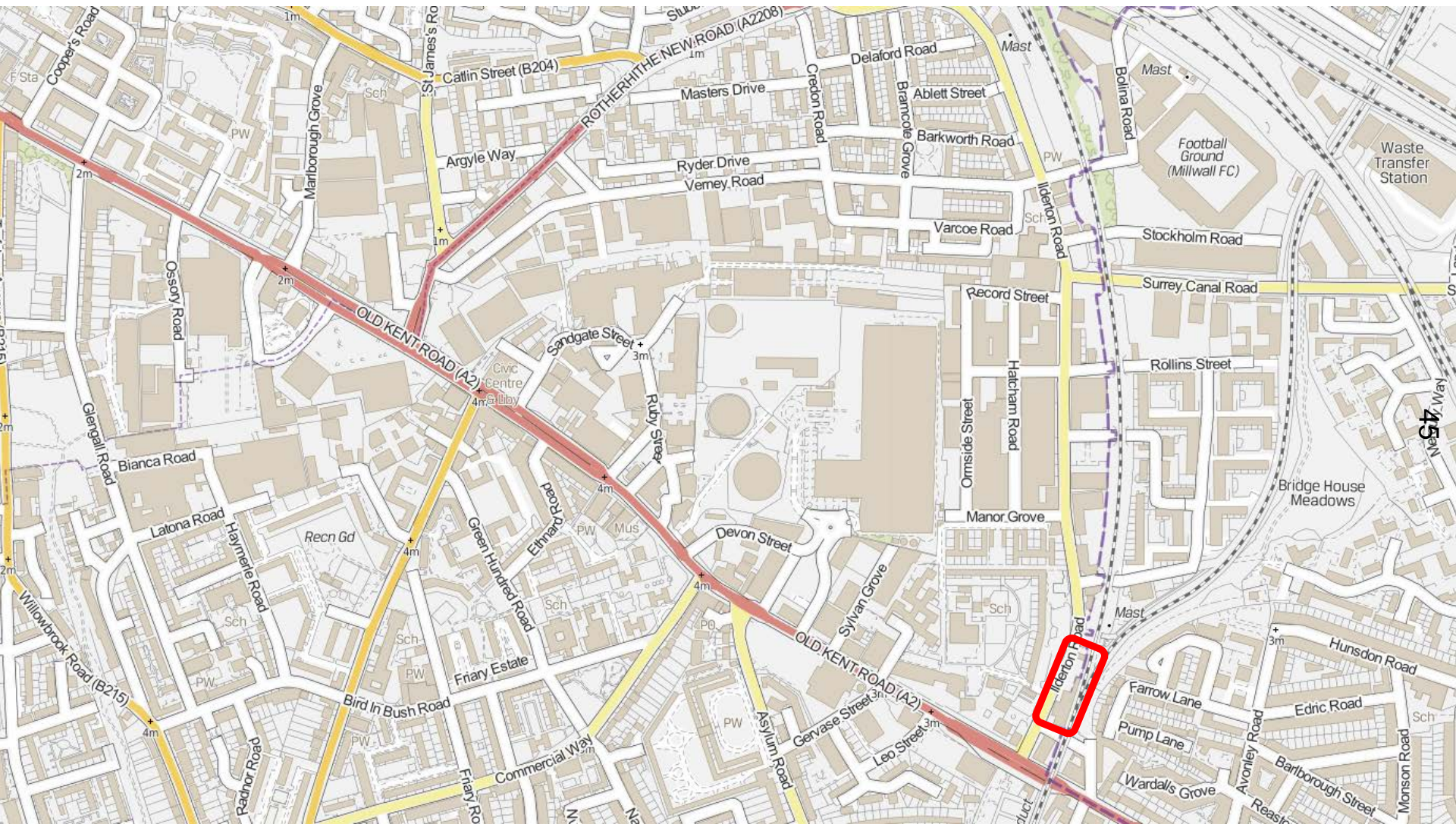
### Application 17/AP/4819

- Revised description: Full application for full planning permission for mixed use redevelopment comprising: Demolition of existing buildings and construction of two buildings one of part 11 & 13 storeys and one of part 13 and 15 storeys to provide 1,661sqm (GIA) of commercial floorspace (use class B1) at part basement, ground and first floors, 130 residential dwellings above (44 x 1 bed, 59 x 2 bed and 27 x 3 bed), with associated access and highway works, amenity areas, cycle, disabled & commercial car parking and refuse/recycling stores.

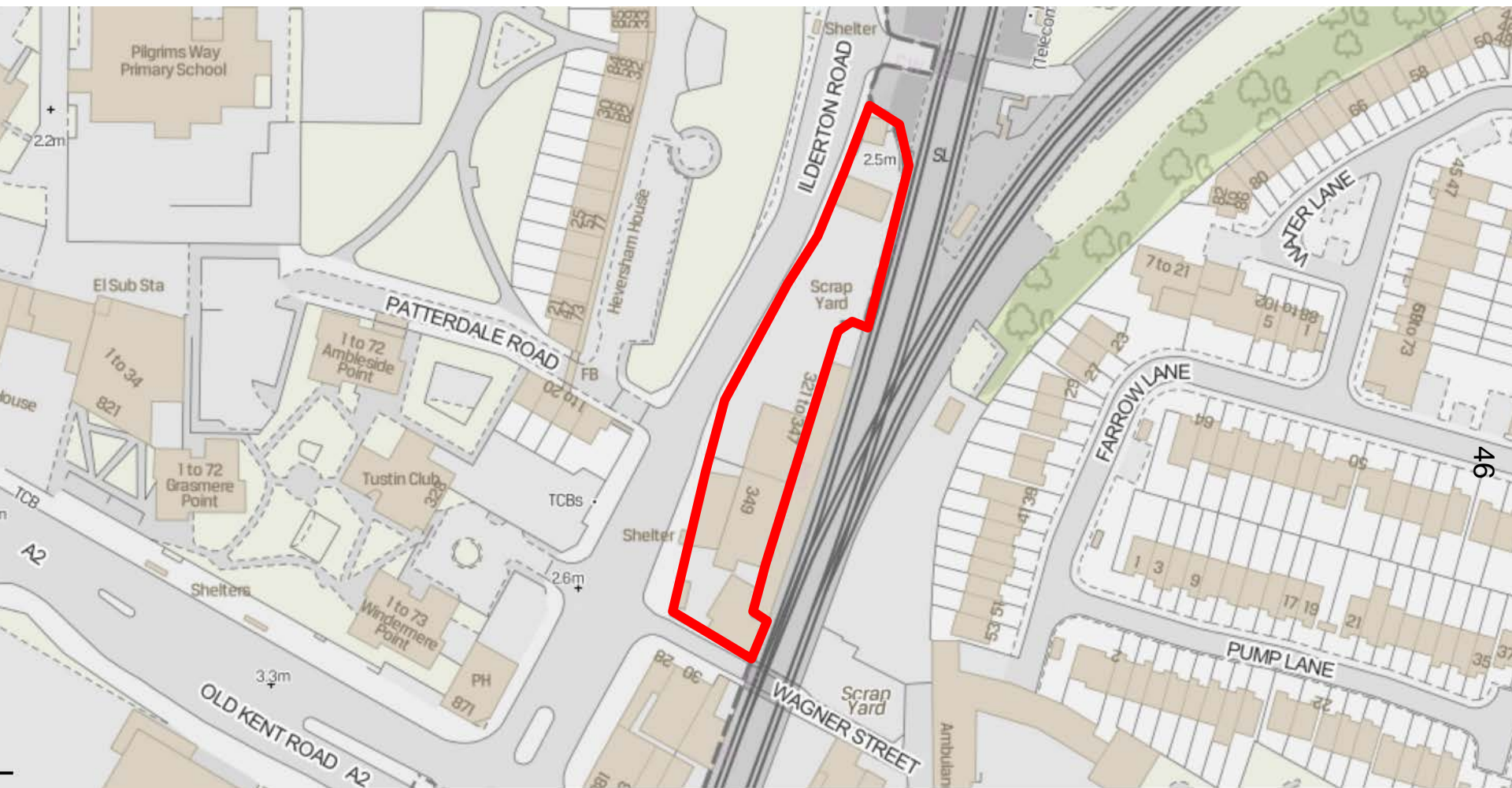
(This application represents a departure from strategic policy 10 'Jobs and businesses' of the Core Strategy (2011) and saved policy 1.2 'strategic and local preferred industrial locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location).

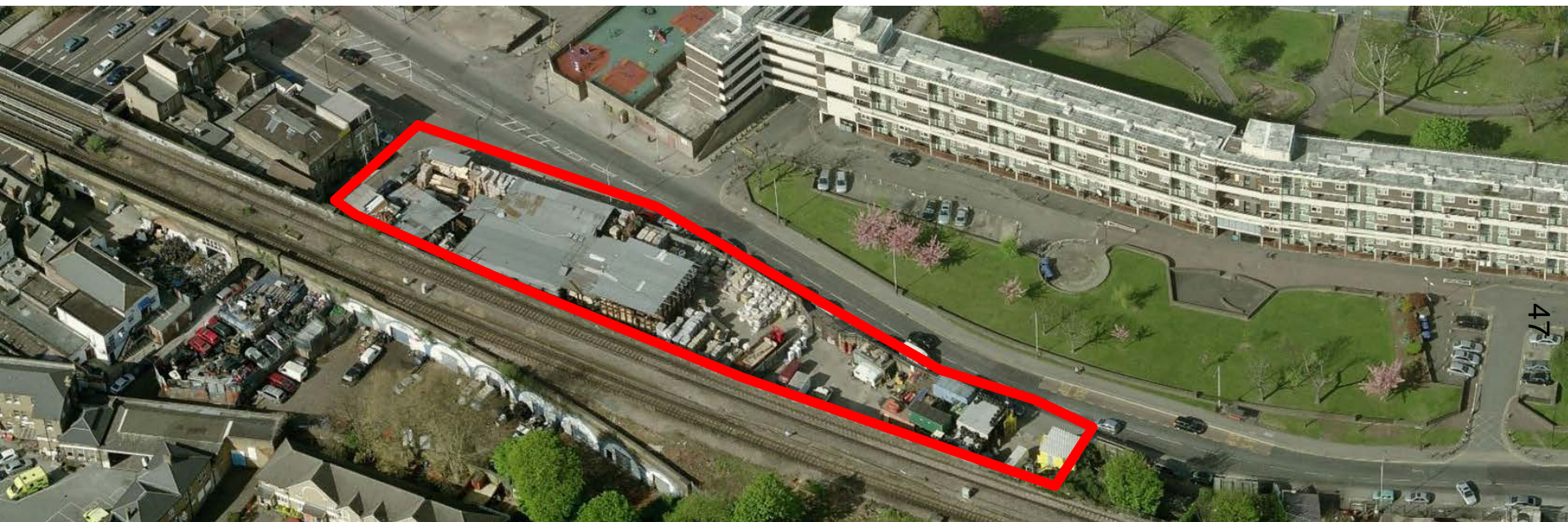
Original description: Mixed use redevelopment comprising, demolition of existing buildings and construction of two buildings: one of part 11 and 13 storeys and one of part 13 and 15 storeys to provide 1,888sqm (GIA) of commercial floorspace (use class B1) at part basement, ground and first floors, 130 residential dwellings above (51 x 1 bed, 52 x 2 bed and 27 x 3 bed), with associated access and highway works, amenity areas, cycle, disabled and commercial car parking and refuse/recycling stores.

44











































56











# Design improvements

- Improved and safer footway widths and public realm to Ilderton Road that mean that pedestrians have more space for walking, pushchairs, wheelchairs and with improved access to the bus stop; whilst still delivering off street loading bays for the commercial and residential units, and helping to deliver Vision Zero.
- Improved and safer access for residential and commercial servicing from Ilderton Road servicing bays to the residential and commercial entrances.
- A new public open space fronting Wagner Street and Ilderton Road, in an area of poor public open space provision. The space would be visible from Old Kent Road.
- Improved design of the ground floor units that allows individual units to have their own defensible inset space in front of the unit and which breaks up the long ground floor frontage.
- Improved internal ground floor layout for residential cores and foyers, the location of lifts, bin stores and bike stores.
- Provision of three new wheelchair parking spaces.

8

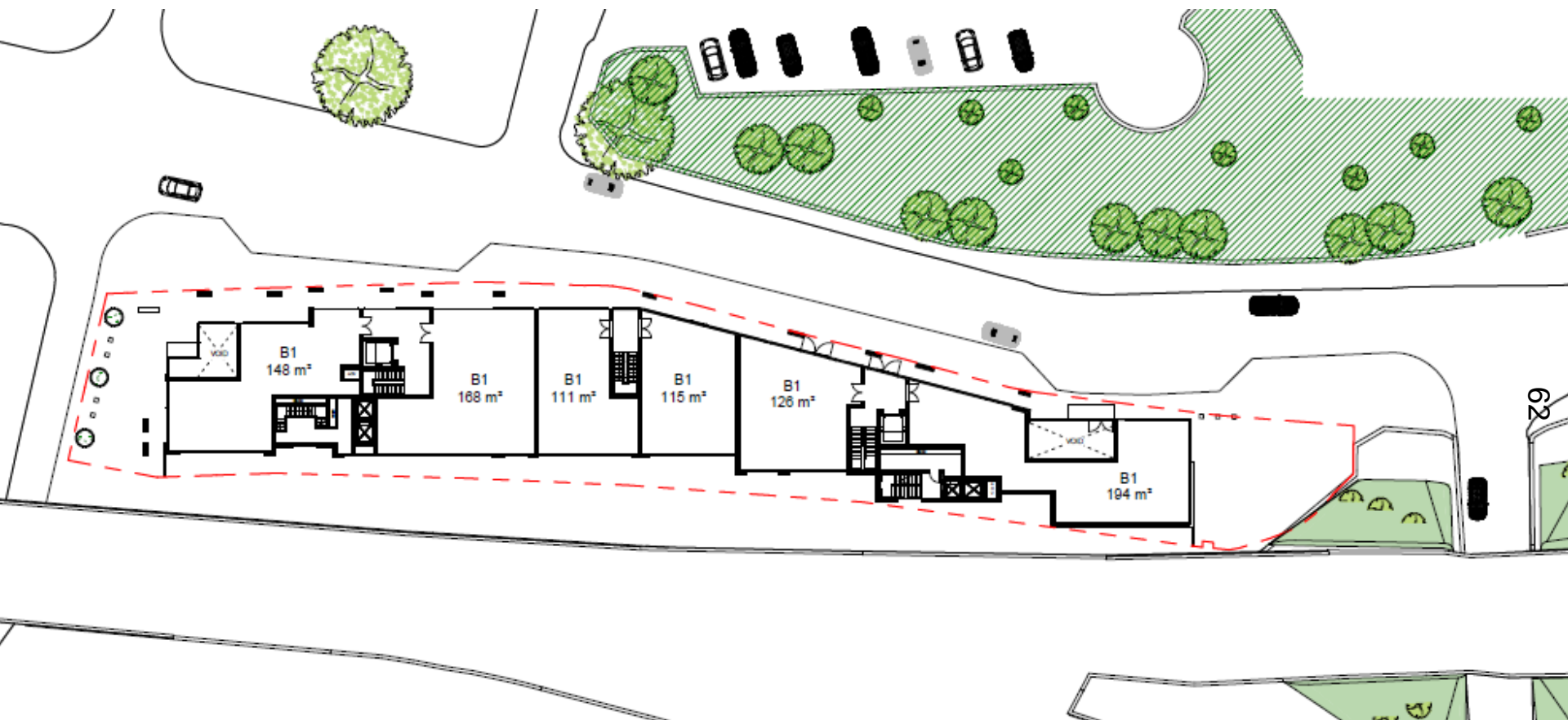


## Design improvements – Ground floor





## Design improvements – First floor

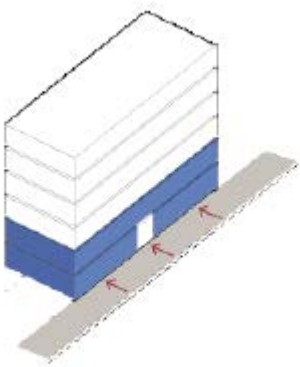


# DRAFT OLD KENT ROAD AAP

## Indicative masterplan and land use for the Hatcham and Ilderton Road sub area

**VERTICAL MIX: Small office and studio**  
Workspace will be provided at ground and first floor. Ground floor ceiling heights should be a minimum of 4m. Basement levels should be utilised to accommodate residential servicing, storage or commercial uses where appropriate

**Suitable uses:** *Artists' studios, galleries, maker spaces and office space (Class B1a and/or B1c use).*



(Emerging policy, limited weight)



63



### **Communal amenity space**

Block A = 477sqm (Split between 72 units: Social Rent, Intermediate, Private)

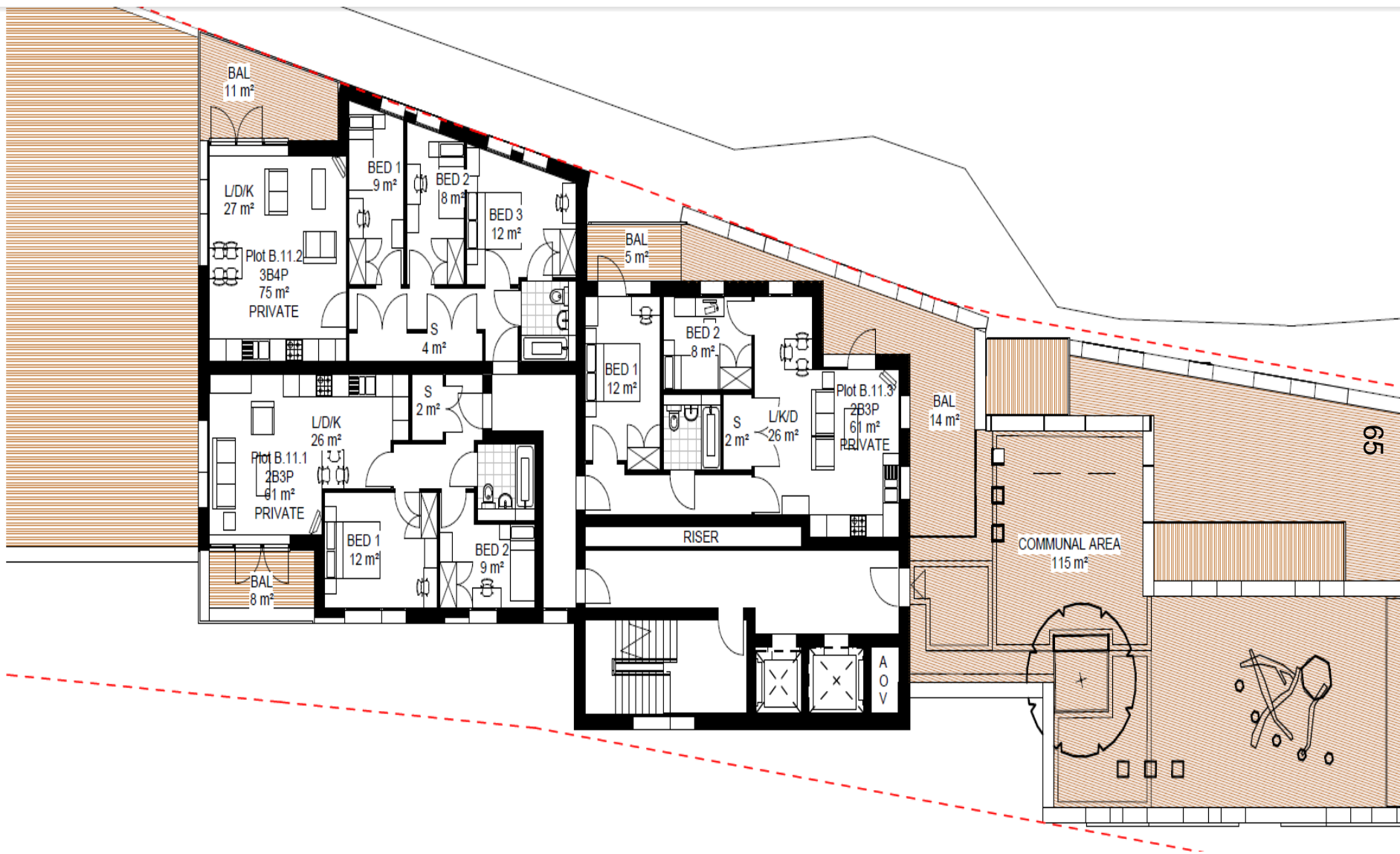
Block B = 115sqm (58 Private units)

### **Child playspace**

354 sqm in total.

Improved from 125sqm originally proposed





Exemplary residential design criteria from Southwark Residential Design Standards SPD	Commentary
Provide for bulk storage	Each of the proposed apartments would have built-in storage broadly in compliance with the Residential Design Standards SPD. There is also scope, through innovative/flexible design, for the cycle store rooms within both of the residential cores to accommodate larger items such as pushchairs, the details of which will be agreed at the condition stage in collaboration with Southwark Council's Transport Planning team.
Exceed minimum privacy distances	Minimum privacy distances would be exceeded.
Good sunlight and daylight standards	Good sunlight and daylight standards would be achieved throughout the scheme.
Exceed minimum ceiling heights of 2.3 metres	All rooms within all proposed residential units would have floor-to-ceiling heights of 2.50 metres.
Exceed amenity space standards (both private and communal)	Details of the private and communal amenity space proposed re set out in the main report. Overall, the required amount of amenity space would be exceeded.
Secure by Design certification	The scheme would be capable of achieving Secure by Design accreditation. Conditions to require this are recommended.
No more than 5% studio flats	None of the proposed units would be studio flats.
Maximise the potential of the site	The potential of the site would be maximised, , delivering full site coverage, improved commercial floorspace, 130 new dwellings achieving an exemplary standard of design and including a large proportion of family-sized units, outdoor amenity space and play space, all without compromising local visual or residential amenity.
Include a minimum 10% of units that are suitable for wheelchair users	10% of the proposed units would be suitable for wheelchair users.

Exemplary residential design criteria from Southwark Residential Design Standards SPD	Commentary
Excellent accessibility within buildings	The accessibility within the building would be excellent.
Exceptional environmental performance	The environmental performance would be fully policy compliant, taking into account a contribution to the Carbon Offset Fund. The potential to connect to a local heat network is designed-in.
Minimised noise nuisance between flats through vertical stacking of similar room types	The proposed development achieves very good vertical stacking. Plant rooms have been located in the basement, two storeys beneath the nearest residential units and thus sufficiently far away not to create undue noise disturbance.
Make a positive contribution to local context, character and communities	The proposed development would make a positive contribution to local context, character and communities in terms of its quality of design and regeneration benefits including affordable housing, affordable workspace, investment in local transport and new public space where there is currently limited open space provision.
Include a predominance of dual aspect units	71% of homes would be dual aspect.
Have natural light and ventilation in all kitchens and bathrooms	This requirement would be achieved in relation to kitchens as a result of the open plan design of the kitchen/living/dining spaces which themselves would benefit from natural light and natural ventilation. However all bathrooms would be internal, but mechanically ventilated. This is considered permissible in the interests of achieving a rational and efficient building layout on the linear nature of the site.
At least 60% of units contain two or more bedrooms	66% of the total number of units across all tenures would have two or more bedrooms.
Significantly exceed the minimum floor space standards	All units would meet the space standards and some exceed.
Minimise corridor lengths by having additional cores	The cores have been efficiently designed so that corridor lengths are minimal, having regard to the linear shape of the site.



# DRAFT OLD KENT ROAD AAP

## Design guidance for Hatcham and Ilderton Road

ELEVATION EXAMPLE



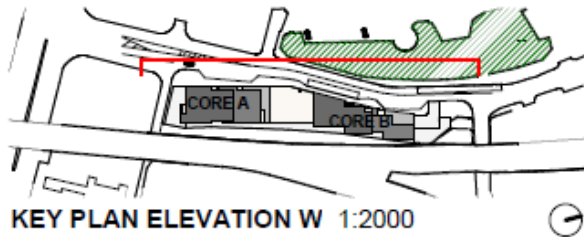
68

(Emerging policy, limited weight)

job:	ILDERTON ROAD	drawn:	TR	date:	FEB 2018
location:	347 Ilderton Rd, SE15 1NW	scale:	1:500 @ A3	job no:	2495
drawing:	General Arrangement Core A-B, West Elevation	drawing no:	GA-A-B-W	rev:	4

note: all dimensions to be checked on site before commencement of the work. If this drawing exceeds the quantities in any way the architect is to be informed before the work is commenced. This drawing's copyright remains with the architect.

rev	date	description	drawn by	checked
1	12.12.17	ISSUED FOR PLANNING	TR	AG
2	11.12.17	ISSUED FOR PLANNING	TR	AG
3	25.02.18	REVISED TO COMBINES	TR	AG
4	08.03.18	REVISED TO PLANNERS COMMENTS	TR	AG



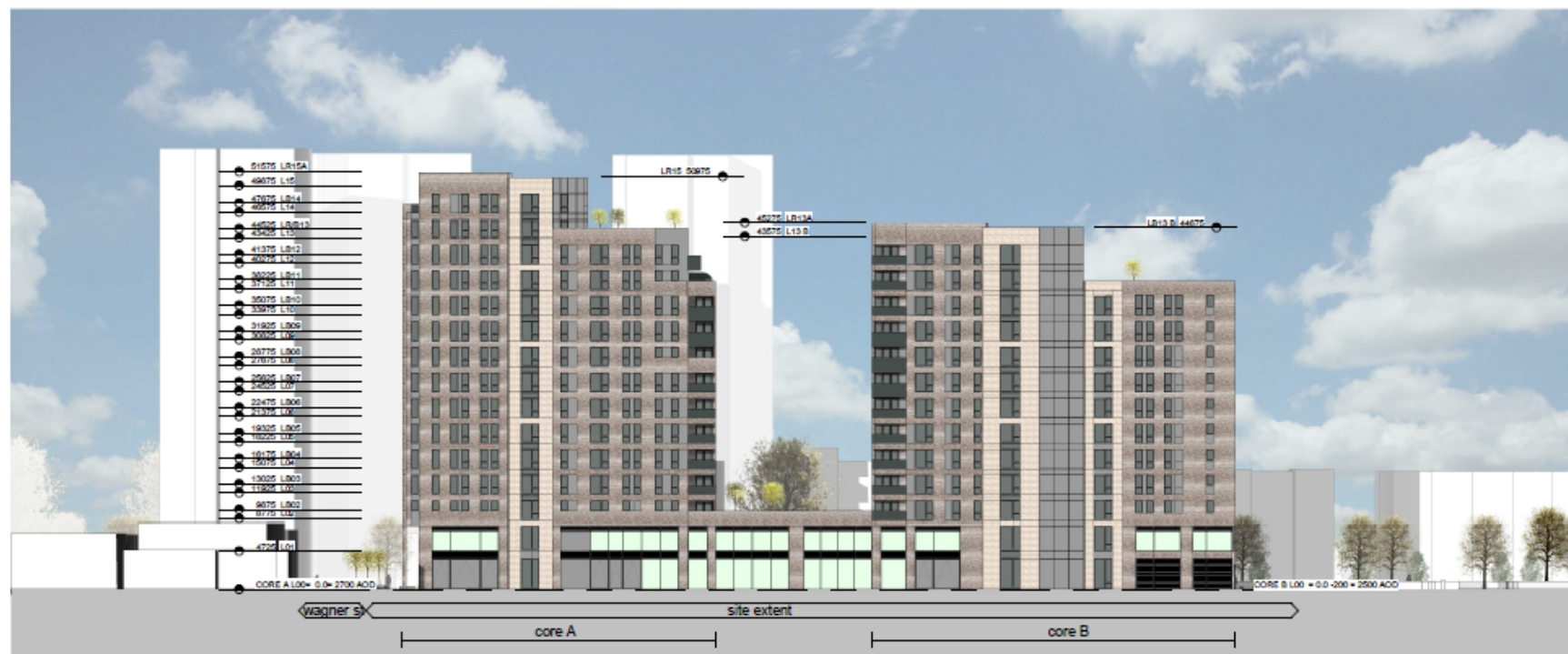
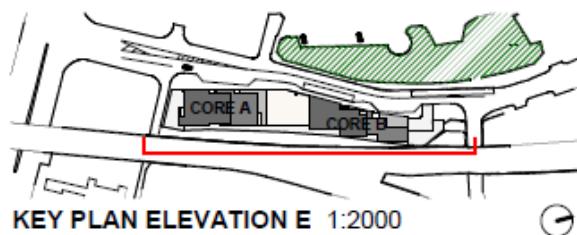
KEY PLAN ELEVATION W 1:2000



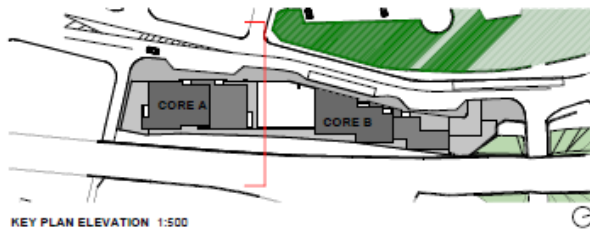
Core A-B\_West Elevation  
1 : 500

job:	ILBERTON ROAD	drawn:	TR	date:	FEB 2018
	349 Ilberton Rd, SE15 1NW				
drawing:	General Arrangement Core A-B_Just Beyond	scale:	1:500 @ A3	job no:	2475
note: all dimensions to be checked on site before commencement of the work. If this drawing exceeds the quantities in any way the architects are to be informed before the work is commenced. This drawing is copyright Alan Camp Architects LLP.				drawing no:	GA-S-A5-E
revisions				rev:	4

rev	date	description	drawn by	checked
1	07.12.17	ISSUED FOR PLANNING	TR	AG
2	11.12.17	ISSUED FOR PLANNING	TR	AG
3	22.02.18	REVISED TO COMMENTS	TR	AG
4	08.03.18	REVISED TO PLANNERS COMMENTS	TR	AG



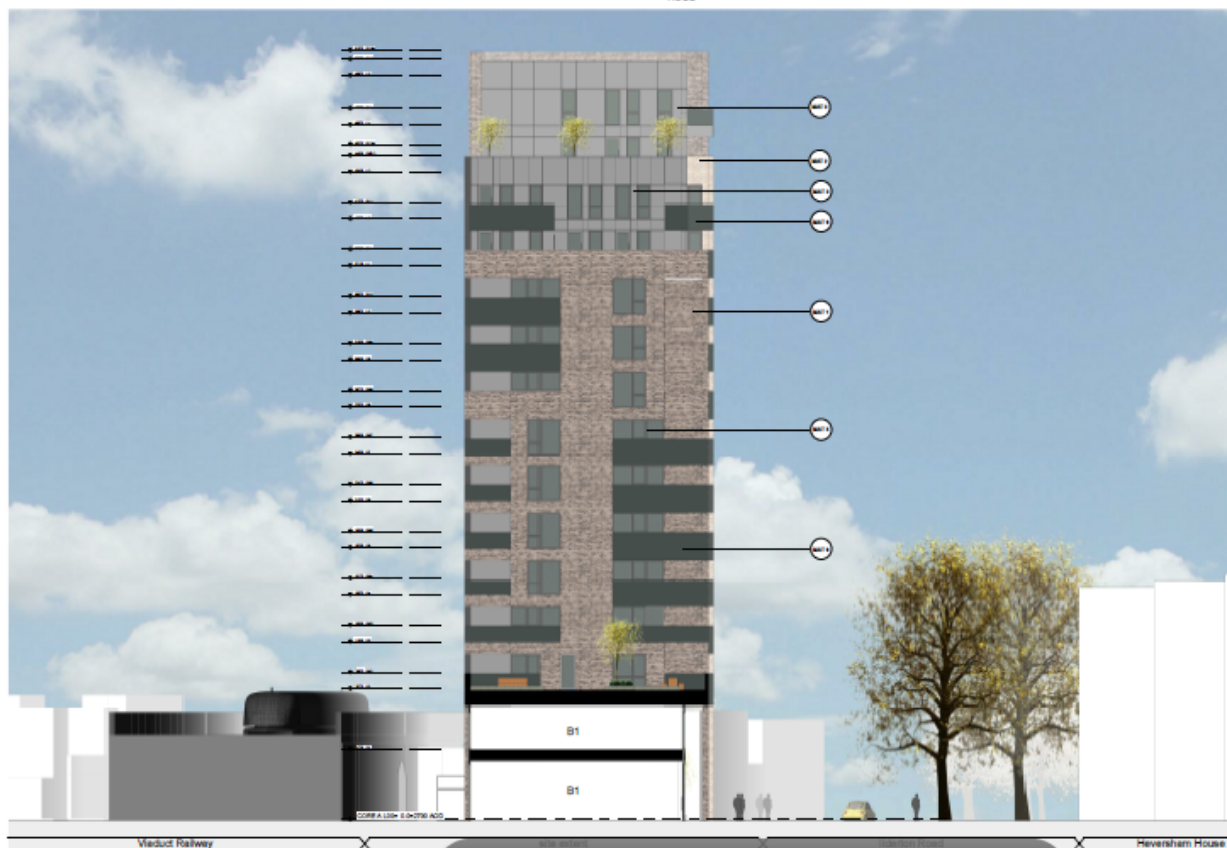




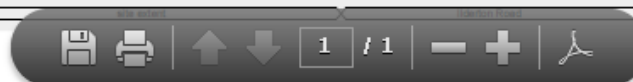
ALAN CAMP ARCHITECTS

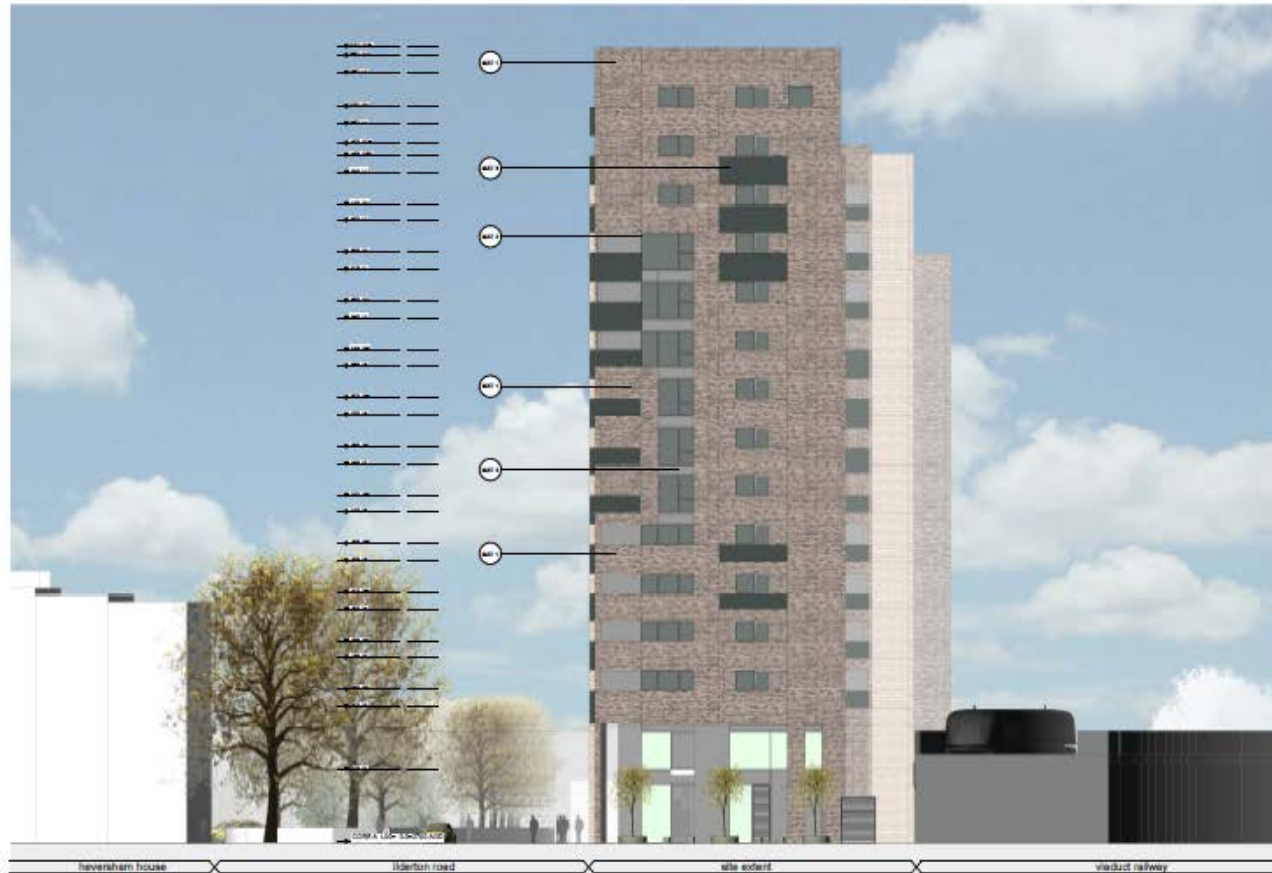
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Project Description: [REDACTED]		Scale: [REDACTED]	
Project Status: [REDACTED]		Project Manager: [REDACTED]	
Project Budget: [REDACTED]		Project Cost: [REDACTED]	
Project Risk: [REDACTED]		Project Impact: [REDACTED]	
Project Timeline: [REDACTED]		Project Milestones: [REDACTED]	
Project Deliverables: [REDACTED]		Project Outputs: [REDACTED]	
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Project Constraints: [REDACTED]		Project Assumptions: [REDACTED]	
Project Risks: [REDACTED]		Project Opportunities: [REDACTED]	
Project Challenges: [REDACTED]		Project Success Factors: [REDACTED]	
Project Objectives: [REDACTED]		Project Outcomes: [REDACTED]	
Project Results: [REDACTED]		Project Feedback: [REDACTED]	
Project Lessons Learned: [REDACTED]		Project Recommendations: [REDACTED]	
Project Next Steps: [REDACTED]		Project Contact Information: [REDACTED]	

Item	Description	Quantity	Unit	Value
1	Concrete	100	m³	100
2	Steel	100	kg	100
3	Brick	100	m²	100
4	Window	100	unit	100
5	Door	100	unit	100
6	Roof	100	m²	100
7	Foundation	100	m³	100
8	Structure	100	m³	100
9	Interior	100	m³	100
10	Exterior	100	m³	100



Core A\_North Elevation  
GA-E-A-N



[illegible][illegible]Core A\_South Elevation  
GA-E-A-S

SCALE BAR

0 1 2 3 4 5 6 7 8 9 10

NOT FOR CONSTRUCTION

## LAND AT 313-349 ILBERTON ROAD, LONDON, SE15



- 130 new residential units
- 46 affordable units (30 social rent, 16 intermediate, 36% by hab room)
- B1(c) commercial workspace (1,661 sqm), including 10% affordable workspace. Small under- provision (202sqm) mitigated by improved design and financial contribution
- Significant uplift in jobs
- Improved public realm and servicing
- Mixed use site that delivers the master-planning and aspirations of the draft Old Kent Road Area Action Plan: New housing, workspace, car free

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