

Planning Committee

Tuesday 6 October 2015

5.30 pm

Ground Floor Meeting Room G01 - 160 Tooley Street, London SE1 2QH

Membership

Councillor Nick Dolezal (Chair)
Councillor Sarah King (Vice-Chair)
Councillor Helen Dennis
Councillor Hamish McCallum
Councillor Michael Mitchell
Councillor Jamille Mohammed
Councillor Adele Morris
Councillor Kieron Williams

Reserves

Councillor Maisie Anderson
Councillor James Barber
Councillor Catherine Dale
Councillor Tom Flynn
Councillor Kath Whittam
Councillor Jane Lyons

INFORMATION FOR MEMBERS OF THE PUBLIC

Access to information

You have the right to request to inspect copies of minutes and reports on this agenda as well as the background documents used in the preparation of these reports.

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Access

The council is committed to making its meetings accessible. Further details on building access, translation, provision of signers etc for this meeting are on the council's web site: www.southwark.gov.uk or please contact the person below.

Contact

Victoria Foreman on 020 7525 5485 or email: victoria.foreman@southwark.gov.uk
Webpage: <http://www.southwark.gov.uk>

Members of the committee are summoned to attend this meeting

Eleanor Kelly

Chief Executive

Date: 28 September 2015



Planning Committee

Tuesday 6 October 2015
5.30 pm
Ground Floor Meeting Room G01A - 160 Tooley Street, London SE1 2QH

Order of Business

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	PART A - OPEN BUSINESS	
	PROCEDURE NOTE	
1.	APOLOGIES	
	To receive any apologies for absence.	
2.	CONFIRMATION OF VOTING MEMBERS	
	A representative of each political group will confirm the voting members of the committee.	
3.	NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT	
	In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.	
4.	DISCLOSURE OF INTERESTS AND DISPENSATIONS	
	Members to declare any personal interests and dispensation in respect of any item of business to be considered at this meeting.	
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ANY OTHER OPEN BUSINESS AS NOTIFIED AT THE START OF THE MEETING AND ACCEPTED BY THE CHAIR AS URGENT.

Date: 28 September 2015



PLANNING COMMITTEE

Guidance on conduct of business for planning applications, enforcement cases and other planning proposals

1. The reports are taken in the order of business on the agenda.
2. The officers present the report and recommendations and answer points raised by members of the committee.
3. Your role as a member of the planning committee is to make planning decisions openly, impartially, with sound judgement and for justifiable reasons in accordance with the statutory planning framework.
4. The following may address the committee (if they are present and wish to speak) for **not more than 3 minutes each**.

(a) One representative (spokesperson) for any objectors. If there is more than one objector wishing to speak, the time is then divided within the 3-minute time slot.

(b) The applicant or applicant's agent.

(c) One representative for any supporters (who live within 100 metres of the development site).

(d) Ward councillor (spokesperson) from where the proposal is located.

(e) The members of the committee will then debate the application and consider the recommendation.

Note: Members of the committee may question those who speak only on matters relevant to the roles and functions of the planning committee that are outlined in the constitution and in accordance with the statutory planning framework.

5. If there are a number of people who are objecting to, or are in support of, an application or an enforcement of action, you are requested to identify a representative to address the committee. If more than one person wishes to speak, the 3-minute time allowance must be divided amongst those who wish to speak. Where you are unable to decide who is to speak in advance of the meeting, you are advised to meet with other objectors in the foyer of the council offices prior to the start of the meeting to identify a representative. If this is not possible, the chair will ask which objector(s) would like to speak at the point the actual item is being considered.

Note: Each speaker should restrict their comments to the planning aspects of the proposal and should avoid repeating what is already in the report.

6. This is a council committee meeting, which is open to the public and there should be no interruptions from the audience.

7. No smoking is allowed at committee and no recording is permitted without the consent of the meeting on the night, or consent in advance from the chair.

The arrangements at the meeting may be varied at the discretion of the chair.

Contacts: General Enquiries
Planning Section, Regeneration Dept
Tel: 020 7525 5403

Planning Committee Clerk, Constitutional Team
Finance and Corporate Services
Tel: 020 7525 5485

Item No. 5.	Classification: Open	Date: 6 October 2015	Meeting Name: Planning Committee
Report title:		Development Management	
Ward(s) or groups affected:		All	
From:		Proper Constitutional Officer	

RECOMMENDATIONS

1. That the determination of planning applications, or formal observations and comments, the instigation of enforcement action and the receipt of the reports included in the attached items be considered.
2. That the decisions made on the planning applications be subject to the conditions and/or made for the reasons set out in the attached reports unless otherwise stated.
3. That where reasons for decisions or conditions are not included or not as included in the reports relating to an individual item, they be clearly specified.

BACKGROUND INFORMATION

4. The council's powers to consider planning business are detailed in Part 3F which describes the role and functions of the planning committee and planning sub-committees. These were agreed by the annual meeting of the council on 23 May 2012. The matters reserved to the planning committee and planning sub-committees exercising planning functions are described in part 3F of the Southwark Council constitution.

KEY ISSUES FOR CONSIDERATION

5. In respect of the attached planning committee items members are asked, where appropriate:
 - a. To determine those applications in respect of site(s) within the borough, subject where applicable, to the consent of the Secretary of State for Communities and Local Government and any directions made by the Mayor of London.
 - b. To give observations on applications in respect of which the council is not the planning authority in planning matters but which relate to site(s) within the borough, or where the site(s) is outside the borough but may affect the amenity of residents within the borough.
 - c. To receive for information any reports on the previous determination of applications, current activities on site, or other information relating to specific planning applications requested by members.

6. Each of the following items are preceded by a map showing the location of the land/property to which the report relates. Following the report, there is a draft decision notice detailing the officer's recommendation indicating approval or refusal. Where a refusal is recommended the draft decision notice will detail the reasons for such refusal.
7. Applicants have the right to appeal to planning inspector against a refusal of planning permission and against any condition imposed as part of permission. Costs are incurred in presenting the council's case at appeal which maybe substantial if the matter is dealt with at a public inquiry.
8. The sanctioning of enforcement action can also involve costs such as process serving, court costs and of legal representation.
9. Where either party is felt to have acted unreasonably in an appeal the inspector can make an award of costs against the offending party.
10. All legal/counsel fees and costs as well as awards of costs against the council are borne by the budget of the relevant department.

Community impact statement

11. Community impact considerations are contained within each item.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Legal Services

12. A resolution to grant planning permission shall mean that the development & building control manager is authorised to grant planning permission. The resolution does not itself constitute the permission and only the formal document authorised by the committee and issued under the signature of the head of development management shall constitute a planning permission. Any additional conditions required by the committee will be recorded in the minutes and the final planning permission issued will reflect the requirements of the planning committee.
13. A resolution to grant planning permission subject to legal agreement shall mean that the head of development management is authorised to issue a planning permission subject to the applicant and any other necessary party entering into a written agreement in a form of words prepared by the director of legal services, and which is satisfactory to the head of development management. Developers meet the council's legal costs of such agreements. Such an agreement shall be entered into under section 106 of the Town and Country Planning Act 1990 or under another appropriate enactment as shall be determined by the director of legal services. The planning permission will not be issued unless such an agreement is completed.
14. Section 70 of the Town and Country Planning Act 1990 as amended requires the council to have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations when dealing with applications for planning permission. Where there is any conflict with any policy contained in the development plan, the conflict must be resolved in favour of the policy which is

contained in the last document to be adopted, approved or published, as the case may be (s38(5) Planning and Compulsory Purchase Act 2004).

15. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The development plan is currently Southwark's Core Strategy adopted by the council in April 2011, saved policies contained in the Southwark Plan 2007, the where there is any conflict with any policy contained in the development plan, the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published, as the case may be (s38(5) Planning and Compulsory Purchase Act 2004).
16. On 15 January 2012 section 143 of the Localism Act 2011 came into force which provides that local finance considerations (such as government grants and other financial assistance such as New Homes Bonus) and monies received through CIL (including the Mayoral CIL) are a material consideration to be taken into account in the determination of planning applications in England. However, the weight to be attached to such matters remains a matter for the decision-maker.
17. "Regulation 122 of the Community Infrastructure Levy regulations (CIL) 2010, provides that "a planning obligation may only constitute a reason for granting planning permission if the obligation is:
 - a. necessary to make the development acceptable in planning terms;
 - b. directly related to the development; and
 - c. fairly and reasonably related to the scale and kind to the development.

A planning obligation may only constitute a reason for granting planning permission if it complies with the above statutory tests."

18. The obligation must also be such as a reasonable planning authority, duly appreciating its statutory duties can properly impose, i.e. it must not be so unreasonable that no reasonable authority could have imposed it. Before resolving to grant planning permission subject to a legal agreement members should therefore satisfy themselves that the subject matter of the proposed agreement will meet these tests.
19. The National Planning Policy Framework (NPPF) came into force on 27 March 2012. The NPPF replaces previous government guidance including all PPGs and PPSs. For the purpose of decision-taking policies in the Core Strategy (and the London Plan) should not be considered out of date simply because they were adopted prior to publication of the NPPF. For 12 months from the day of publication, decision-takers may continue to give full weight to relevant policies adopted in accordance with the Planning and Compulsory Purchase Act (PCPA) 2004 even if there is a limited degree of conflict with the NPPF.
20. In other cases and following and following the 12 month period, due weight should be given to relevant policies in existing plans according to their degree of consistency with the NPPF. This is the approach to be taken when considering saved plan policies under the Southwark Plan 2007. The approach to be taken is that the closer the

policies in the Southwark Plan to the policies in the NPPF, the greater the weight that may be given.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Council assembly agenda 23 May 2012	Constitutional Team 160 Tooley Street London SE1 2QH	Lesley John 020 7525 7228
Each planning committee item has a separate planning case file	Development Management, 160 Tooley Street, London SE1 2QH	The named case officer as listed or Planning general enquiries 0207 525 5403

APPENDICES

No.	Title
None	

AUDIT TRAIL

Lead Officer	Ian Millichap, Constitutional Manager	
Report Author	Everton Roberts, Principal Constitutional Officer Jonathan Gorst, Head of Regeneration and Development	
Version	Final	
Dated	22 May 2015	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments sought	Comments included
Director of Legal Services	Yes	Yes
Head of Development Management	No	No
Cabinet Member	No	No
Date final report sent to Constitutional Team	24 September 2015	

ITEMS ON AGENDA OF THE PLANNING COMMITTEE
on Tuesday 06 October 2015

Appl. Type	Council's Own Development - Reg. 3	Reg. No.	15-AP-2016
Site	FORMER HIGHSHORE SCHOOL SITE, BELLENDEN ROAD, LONDON, SE15 5BB	TP No.	TP/2655-H
		Ward	The Lane
		Officer	Amy Lester

Recommendation GRANT PERMISSION

Item 5.1

Proposal

Redevelopment of the site involving the erection of a new two-storey primary school (special educational needs) with associated landscaping and parking.

Appl. Type	Full Planning Permission	Reg. No.	14-AP-4773
Site	55 SOUTHWARK STREET, LONDON, SE1 1TE	TP No.	TP/1145-53
		Ward	Cathedrals
		Officer	Wing Lau

Recommendation REFUSE PERMISSION

Item 5.2

Proposal

Demolition of existing building at No. 55 Southwark Street and redevelopment of site to erect a 7 storey building and a 30 storey tower (plus basement and roof gardens) to a maximum height of 105.110m AOD to accommodate the following uses: public theatre and rehearsal space (Sui Generis use), art space and museum (Class D1/D2 use), restaurant and cafe (Class A3 use), bar (Class A4 use), offices (Class B1 use) and 9 residential flats.

Appl. Type	Full Planning Permission	Reg. No.	15-AP-3190
Site	CAMBERWELL NEW CEMETERY, BRENCHLEY GARDENS, LONDON, SE23 3RD	TP No.	TP/2339-A
		Ward	Peckham Rye
		Officer	Dipesh Patel

Recommendation GRANT PERMISSION

Item 5.3

Proposal

Localised ground modelling, drainage works; the laying out of new paths and associated landscape works.

Appl. Type	Full Planning Permission	Reg. No.	15-AP-3185
Site	CAMBERWELL OLD CEMETERY, FOREST HILL ROAD, LONDON, SE22 0RU	TP No.	TP/2341-F
		Ward	Peckham Rye
		Officer	Dipesh Patel

Recommendation GRANT PERMISSION

Item 5.4

Proposal

Remediation and remodelling of part of the cemetery close to Underhill Road; drainage works; the laying out of new access paths and associated landscaping.

Appl. Type	Full Planning Permission	Reg. No.	15-AP-3184
Site	CAMBERWELL OLD CEMETERY, UNDERHILL ROAD, LONDON, SE22	TP No.	TP/2341-F
		Ward	Peckham Rye
		Officer	Dipesh Patel

Recommendation GRANT PERMISSION

Item 5.5

Proposal

Replacement of boundary fence along Underhill Road, and the creation of a new pedestrian entrance on Underhill Road.

ITEMS ON AGENDA OF THE PLANNING COMMITTEE**on Tuesday 06 October 2015**

Appl. Type Approval of Reserved Matters**Reg. No.** 15-AP-2572**Site** PLOT H12 WITHIN LAND BOUNDED BY HEYGATE STREET TO THE NORTH,
RODNEY ROAD TO THE EAST, PLOT H10 OF ELEPHANT PARK TO THE
WEST AND PLOT H13 OF ELEPHANT PARK TO THE SOUTH**TP No.** TP/H1064A**Ward** East Walworth**Officer** Michael Glasgow**Recommendation** **GRANT PERMISSION*****Item 5.6*****Proposal**

Application for the approval of reserved matters (access, scale, appearance, layout and landscaping) for Plot H12 within Elephant Park (previously referred to as the Heygate Masterplan), submitted pursuant to Outline Planning Permission 12/AP/1092. The proposals comprise the construction of a development plot of 4 storeys in height (maximum building height 23.53m AOD) comprising an 872sqm (GEA) Energy Hub (sui generis use class), 334sqm (GEA) Retail (A1-A4 use class), 895sqm (GEA) of Nursery floorspace (D1 use class), 65sqm (GEA) of flexible Retail/Community floorspace (A1-A4 & D1 use class), cycle storage, landscaping, new public realm and other associated works.

Item No. 5.1	Classification: Open	Date: 6 October 2015	Meeting Name: Planning Committee
Report title:	Development Management planning application: Council's own development Application 15/AP/2016 for: Council's Own Development - Reg. 3 Address: FORMER HIGHSORE SCHOOL SITE, BELLENDEN ROAD, LONDON SE15 5BB Proposal: Redevelopment of the site involving the erection of a new two-storey primary school (special educational needs) with associated landscaping and parking.		
Ward(s) or groups affected:	The Lane		
From:	Director of Planning		
Application Start Date 20/05/2015		Application Expiry Date 19/08/2015	
Earliest Decision Date 27/06/2015			

RECOMMENDATION

1. That the Planning Committee grant planning permission subject to conditions.

BACKGROUND INFORMATION

2. This application is being reported to planning committee as it is a council's own application and part of the wider borough primary school expansion programme.

Site location and description

3. The subject site relates to the 0.55ha former Highshore School site which is currently unoccupied. Located on a corner plot of land, the site is bounded to the north and west by Bellenden Road, borders Ophir Terrace to the east and has a short frontage to the south on Highshore Road.
4. The former Highshore School buildings which occupy the site were constructed in 1967-69 and are made up of a part single, part two-storey classroom block in the north east of the site and a curved hall in the north west corner. Currently in a poor state of repair the buildings have remained empty since the school relocated to its new purpose built home in Camberwell.
5. The surrounding area is characterised by a mixture of uses with residential, commercial, retail and other education buildings all located within the immediate vicinity of the site. The southern section of the site is in the Holly grove conservation area and is bounded by significant trees and large residential houses. To the east on the opposite side of Ophir Terrace is Lidl supermarket, and opposite to the north is a small nature garden known as Bellenden Road tree nursery which is a designated site of importance of nature conservation. The Harris Academy school buildings face the site to the west.

6. Views of the site are experienced from Peckham High Road to the north, while the busy shopping destination of Rye Lane is approximately 150m to the east. Peckham Rye train station is situated approximately 300m to the south of the site.
- Peckham Major Town Centre
 - Peckham and Nunhead Action Area
 - Public Transport Accessibility Level (PTAL) 6a
 - Flood Risk Zone 1
 - Air Quality Management Area
 - Archaeological Priority Zone
 - Holly Grove Conservation Area

Details of proposal

7. This application seeks the redevelopment of the site involving the demolition of the existing buildings and the erection of a new special educational needs (SEN) primary school. The school would accommodate up to a total of 93 pupils and would involve the relocation of the existing Cherry Gardens SEN School which is currently located in Rotherhithe.
8. The proposed new building would be two-storey in height and would extend along the northern boundary of Bellenden Road with a central classroom block projection to the south, forming a 'T' shaped arrangement. The main entrance to the school would be on the north eastern corner of the site on the junction point of Bellenden Road and Ophir Terrace. The new facility would be a purpose built school to accommodate the specific needs of the pupils at the school.
9. External play areas would be situated to the eastern, western and southern parts of the site with separate nursery, Key State 1 and Key Stage 2 play spaces and a new forest garden at the southern end of the site at its boundary with Highshore Road. A parking and mini-bus drop off zone would be located in the eastern section of the site with vehicular access from Ophir Terrace.
10. The primary elevation materials are brick with feature metal cladding and perforated screening. Large regular and feature windows punctuate the facades with matching reveals and coloured spandrel panels. A glazed area of curtain walling creates a lightweight link between the two blocks.
- Parking: 10
 - Disabled Parking: 2
 - Cycle Parking: 10
 - Mini Bus Parking: 8

11. Planning history

<p>11/AP/1410 Application type: Full Planning Permission (FUL) Erection of a single storey extension facing Ophir Terrace, erection of a new entrance lobby accessed from Bellenden Road, erection of a new plant room facing Bellenden Road, new roof extract and roof condensing units, together with associated alterations to the landscaping including relocation of cycle store and replacement fencing. Decision date 27/06/2011 Decision: Granted (GRA)</p>
<p>14/EQ/0298 Application type: Pre-Application Enquiry (ENQ) Demolition of the existing building and replace with a new special education needs school for 93 pupils</p>

Planning history of adjoining sites

12. None of relevance.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

13. The main issues to be considered in respect of this application are:
- a) Principle in terms of land use;
 - b) Impact of proposed development on amenity of adjoining occupiers and surrounding area;
 - c) Traffic and Transportation;
 - d) Design and Appearance;
 - e) Ecology;
 - f) Planning obligations (S.106 undertaking or agreement) and CIL;
 - g) Sustainable development implications.

Planning policy

14. National Planning Policy Framework (the Framework)
 Section 1 - Building a strong, competitive economy
 Section 4 - Promoting sustainable transport
 Section 7 - Requiring good design
 Section 8 - Promoting healthy communities
 Section 10 - Meeting the challenge of climate change, flooding and coastal change
 Section 11 - Conserving and enhancing the natural environment
15. The London Plan 2015 Consolidated with Alterations since 2011
 Policy 3.16 Protection and enhancement of social infrastructure
 Policy 3.18 Education facilities
 Policy 5.1 Climate change mitigation
 Policy 5.2 Minimising Carbon Dioxide Emissions
 Policy 5.3 Sustainable Design and Construction
 Policy 5.7 Renewable energy
 Policy 5.8 Innovative energy technologies
 Policy 5.11 Green roofs and development site environs
 Policy 6.9 Cycling
 Policy 6.10 Walking
 Policy 6.13 Parking
 Policy 7.2 An inclusive environment
 Policy 7.3 Designing out crime
 Policy 7.4 Local character
 Policy 7.6 Architecture
 Policy 7.14 Improving Air Quality
 Policy 7.21 Trees and Woodland
 Policy 8.2 Planning obligations
 Policy 8.3 Community infrastructure levy
16. Core Strategy 2011
 Strategic policy 1 - Sustainable development
 Strategic policy 2 - Sustainable transport
 Strategic policy 3 - Shopping, leisure and entertainment
 Strategic policy 4 - Places for learning, enjoyment and healthy lifestyles
 Strategic policy 5 - Providing new homes
 Strategic policy 10 - Jobs and businesses

Strategic policy 11 - Open spaces and wildlife
 Strategic policy 12 - Design and conservation
 Strategic policy 13 - High environmental standards
 Strategic policy 14 - Implementation and delivery

17. Southwark Plan 2007 (July) - saved policies

The council's cabinet on 19 March 2013, as required by paragraph 215 of the NPPF, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the council satisfied itself that the policies and proposals in use were in conformity with the NPPF. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF.

2.2 - Provision of new community facilities
 2.4 - Educational deficiency – Provision of new Educational Establishments;
 3.2 - Protection of amenity
 3.3 - Sustainability assessment
 3.4 - Energy efficiency
 3.6 - Air quality
 3.7 - Waste reduction
 3.9 - Water
 3.11 - Efficient use of land
 3.12 - Quality in design
 3.13 - Urban design
 3.14 - Designing out crime
 3.28 - Biodiversity
 4.6 - Loss of residential accommodation
 4.7 - Non self-contained housing for identified user groups,
 5.2 - Transport impacts
 5.3 - Walking and cycling
 5.6 - Car parking
 Policy 5.7 Parking standards for disabled people and the mobility impaired

18. Supplementary Planning Documents

Sustainable design and construction SPD (2009)
 Sustainability assessments SPD (2009)
 Sustainable Transport SPD (2010)
 Residential Design Standards SPD (2011)
 Peckham and Nunhead Area Action Plan (2014)

Principle of development

19. The National Planning Policy Framework (NPPF) was published on 27 March 2012. At the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 72 of the NPPF states that the government attaches great weight to ensuring a sufficient choice of school places and states that local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement. It advises that great weight should be attached to the need to create, expand or alter schools.
20. Policy 3.18 Education facilities of the London Plan 2015 confirms the Mayor would strongly support the provision of new schools. Strategic policy 4 – 'Places to learn and enjoy' of the Core Strategy, supports the building of new schools and improving of existing schools to provide improved education opportunities, and states that schools will be protected where there is a long-term need. Saved policies 2.2 'Provision of

new community facilities' and 2.4 'Educational deficiency – provision of new educational establishments' of the Southwark Plan 2007 support the provision of new and improved educational and community facilities.

21. The Peckham and Nunhead Area Action Plan (Policy 8) refers to schools and states that additional school places would be provided in the action area to meet anticipated demand for pupil places. It also states that schools would be rebuilt to improve educational opportunities.
22. The former use of the site was as a school so there would be no change of use. The existing Cherry Garden School is a nursery and primary school for children with a range of special educational needs (SEN). Over 50% of the children have 'profound and multiple learning disabilities' (PMLD) meaning they have physical and mental impairment which significantly affects their ability to understand and learn. Many pupils with PMLD have additional sensory impairments such as hearing and visual impairment and also complex medical needs.
23. Currently located elsewhere in the borough, Cherry Gardens School is rated 'outstanding' by Ofsted and is highly regarded by other schools, the local authority and the local community. Its existing premises however are too small and completely unsuitable for the complex needs of this expanding and inspirational school. The redevelopment of this existing school site for continued educational purposes, to provide a new purpose built facility for Cherry Gardens School is therefore supported in principle by local, regional and national planning policy.
24. In line with saved policy 2.2 of the Southwark Plan and also Policy 8 of the AAP, which requires that provision is made to enable new facilities to be used by all members of the community, the school has indicated that the hall, games and play areas and hydrotherapy pool will be made available for community uses outside the hours of the school's operation. Further details of this operation would be required by condition.

Environmental impact assessment

25. The European SEA Directive is transposed into UK law by the Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2015. The Regulations set out the circumstances under which development needs to be underpinned by an environmental impact assessment (EIA). Schedule 1 of the Regulations set out a range of development, predominantly involving industrial operations, for which an EIA is mandatory. Schedule 2 lists a range of development for which an EIA might be required on the basis that it could give rise to significant environmental impacts. Schedule 3 sets out that the significance of any impact should include consideration of the characteristics of the development, the environmental sensitivity of the location and the nature of the development.
26. The range of developments covered by Schedule 2 includes 'Urban development projects where the area of the development exceeds 1 hectare which is not dwellinghouse development. The application site is 0.55 hectares and therefore does not exceed this threshold.
27. Consideration however should still be given to the scale, location or nature of development, cumulative impacts and whether these or anything else are likely to give rise to significant environmental impacts. The proposed application is the redevelopment of an existing school site for a continued educational purpose. Its scale is appropriate to its urban setting and it is unlikely to give rise to any significant environmental impacts. Therefore an EIA is not required in this instance.

Design and Appearance

Loss of Existing Building

28. The existing buildings on the site are not listed, nor are they located within the Conservation Area which encompasses the southern part of the site. The buildings have recently been reviewed for listing by Historic England in consideration of their architectural and historic significance. The conclusion of this review, carried out in August 2015, was that they do not warrant listing. In consideration of Historic England's recommendation, the Secretary of State for Culture, Media and Sport decided not to add the former Highshore School to the list of buildings of special architectural or historic interest.
29. Whilst the existing building is not listed, nor is it in a conservation area, it should be noted that it is of some architectural and historic importance as a distinctive post-war school built at a time when many new schools were being built in the 1950s and 60s in a more modernist language. However it is not of a sufficient quality of construction nor is it sufficiently unique to warrant the particular protection given by listing.
30. The school has a distinctive modern design with the creative use of rustic brickwork, concrete and timber giving it a materiality that contributes to the interest of the building, while the stepped arrangement of the classrooms and the oval hall with sloped roof gives it a massing that responds creatively to the surrounding street plan.
31. The building is surrounded by the Rye Lane conservation area to the north and east, and by the Holly Grove conservation area to the south, however it is not considered to have a significant impact on the setting of these conservation areas as it is also surrounded by larger buildings that have a greater impact. To the south the open play area which extends to the boundary of the Holly Grove CA would remain undeveloped by the proposal.
32. Concerns have been raised by local residents with regard to the loss of the existing building and the potential for it be incorporated into the proposed development. The applicant has given full consideration to the reuse of the existing building but has concluded that its reuse would be unviable. Existing classrooms are considerably undersized with poor existing ventilation, natural light and layout. WCs, storage, group rooms and direct access to external playspace are required and the existing layout would be unable to meet these needs. The existing corridors are too narrow with limited visibility and there is not sufficient space for the storage of mobility equipment. A large extension would be required to provide the needed accommodation and the existing buildings would need significant upgrading.
33. The existing building therefore would not meet the current identified requirements, needs and desires for this SEN school and it is unlikely that it would do so for a mainstream school either. Therefore whilst it is acknowledged that the building is of interest, it is not sufficiently worthwhile to warrant its protection and the provision of a new purpose built SEN school outweighs its loss. The demolition of the existing building is therefore not resisted subject to the provision of an appropriate replacement.

Layout

34. The proposed building would provide a two-form entry primary school with a nursery, and is arranged in a 'T' shape with purpose designed play spaces on either side and to the south to meet the differing needs of the pupils. The location of the new building has been carefully chosen to maximise the use of the site, whilst creating a strong and welcoming civic presence in the locality.

35. Administration and shared facilities would be provided along the northern Bellenden Road elevation with a teaching block extending to the south. All ground floor classrooms have direct connections to external learning environments and play space. At first floor level the reception and nursery classrooms would open out onto a large external east facing play terrace.
36. The main entrance to the building would be located in the north eastern corner with a dual frontage to both the road for public access, and an equally important entrance for pupils from the vehicle access/car park where children are dropped off via mini-bus and welcomed into the school by staff.
37. Carefully designed and individually tailored outdoor play spaces are arranged around the site to meet the individual needs of the school. Rather than having a large traditional open playground, smaller landscaped areas provide opportunities for outdoor recreation and learning, along with opportunities for sport and activity. Overall, the layout of the site is considered successful and would provide appropriate space for the pupils to learn, interact and play.

Height, Scale and Massing

38. The proposed school is of a height, scale and massing that is considered appropriate for the character of the area. Limited to two storeys across the development, it would not dominate its immediate setting and it helps to define the site boundary. The roof to the block fronting the street is flat in response to the flat or very shallow pitch of roofs in the surrounding buildings. The centre block has a flat roof with a mono-pitch element to the nursery. This is to allow natural light into the back of the first floor classrooms. The linear frontage building creates a prominent and successful frontage to Bellenden Road, which is currently characterised by the backs of buildings such as Lidl and the Harris Academy. At roof level plant areas are disguised behind lightweight perforated metal cladding which creates an upper to the building which will recede from view.
39. The position of the building has been carefully considered, resulting in a positive, unobtrusive presence within the local scene. The two-storey form occupies the edge of the site to the north creating the appearance of a new urban block which would interact with Bellenden Road, bringing animation and activity which is currently lacking.

Detailed Design and Materials

40. The new school building fronts onto Bellenden Road and provides a strong civic frontage with a generous entrance in the north east corner. This entrance will be seen in views down Bellenden Road from Peckham High Street and is extremely successful with a welcoming and open aspect. The linear form of the frontage is animated with cut-outs to create terraces and a central projecting element which emphasises the school hall. The regular repeated facade to the street breaks down to the rear to become more playful and informal the further into the site the building projects. This creates a softer more human scale in those areas where the children will interact with the building more and directly reflects the internal function of the rooms.
41. To the rear the classroom block is simple and well proportioned in brick with large glazed window openings and an east facing play terrace at first floor level. The block joins the main frontage building with a glazed central atrium area which successfully links the two elements of the development.
42. The materials have been carefully chosen to contribute positively to the quality of the

development and to enable the building to reference the existing built context. The main external material will be brick with its robust and durable nature, which responds to the dominant material in the immediate and wider context. The other common material in the locality is metal cladding which is seen on both the neighbouring buildings and on the nearby Peckham Library. The proposed gold metal cladding responds to these buildings but the choice of finish gives the building a strong identity of its own. The quality of the specific materials will be secured by condition.

Heritage

43. The southern part of the application site is situated within the Holly Grove Conservation Area. Opposite the site to the south are Grade II Stucco faced, early 19th Century semi-detached dwelling houses. Further along Highshore Road to the east is the Grade II Listed post office depot and Grade II Listed terraced houses.
44. All of these listed buildings are sufficiently removed from the application site and the area of built development so as to not be affected as a result of the site's redevelopment. The southern section of the site which falls within the Conservation Area would remain undeveloped and would be utilised for a natural play forest area. It is therefore considered that the development would comply with saved policy 3.18 and strategic policy 12 of the Core Strategy.

Design Review Panel

45. The application proposals were presented to the Design Review Panel (DRP) in March 2015. The Panel welcomed the proposal and felt that the scheme had many positive elements including its positive relationship with the street and emphasis on the landscape. However they felt that the following should be resolved:
 - The relationship of the school to the Lidl site should be examined and the school should anticipate the potential development of this adjacent site.
 - Further examination should be given to the boundary of the site with further refinement needed.
 - The landscape design should be developed further to encourage a more direct relationship between the inside and the outside spaces.
 - Care should be taken with the choice of materials, in particular the gold which they felt was an 'adult' material and may be inappropriate.
 - The internal arrangement of the school lacks generosity and fails to respond to the needs of the pupils, in particular with regard to the corridors and large areas of storage in prominent positions.
 - Questioned the architects use of mechanical ventilation.
46. Revisions to the design were made to address to the comments made by the Panel, with a revised elevational approach, the introduction of colour and landscape changes. Contact has been made with Lidl to discuss the adjacent site. The internal arrangement was reassessed and the amount of storage space scrutinised. The use of mechanical ventilation is discussed further in this report under the sustainable development implications section.

Neighbour Amenity

47. Strategic Policy 13 requires new development to be designed to avoid amenity and environmental problems that affect how we enjoy the environment in which we live and work. Saved policy 3.2 of the Southwark Plan states that planning permission for development will not be granted where it would cause the loss of amenity, including disturbance from noise to present and future occupiers in the surrounding area or on the application site. Saved policy 3.1 also states that new development should not

cause material adverse effects on the environment and quality of life.

Daylight and Sunlight

48. A technical daylight and sunlight report has been prepared by GL Hearn in line with guidance drafted by the Building Research Establishment (BRE). The BRE guidelines are a recognised mechanism within Southwark's Residential Design Standards SPD to establish the impact of development on daylight and sunlight. It should be noted however, that the BRE criteria provide guidance only, and that it is important to consider the local context of the area within which the site is located. In such situations the BRE guidelines need to be applied more flexibly and the guidelines state that *"the advice given here is not mandatory and this document should not be seen as an instrument of planning policy...although it gives numerical guidelines, these should be interpreted flexibly because natural lighting is only one of many factors in site layout design."*
49. The report analyses the impact of the proposed development on the levels of daylight and sunlight reaching properties in close proximity to the site. It does this via two methods of analysis:
 - Vertical sky component (VSC)
 - Average probably sunlight hours (APSH).
50. The VSC test considers the angle of unobstructed sky that is visible from the centre of each window in nearby properties. The BRE recommend a figure of 27% as indicating a good level of daylight. The test then models how this amount would be affected by the development. The BRE have determined that daylight can be reduced by 20% before the loss is noticeable.

The APSH method involves analysing the number of hours in which windows facing due south will receive sunlight at different points in the year. The BRE guidance sets out that a dwelling will appear reasonably sunlit if at least one main window falls within 90 degrees of due south and can receive 25% annual probable sunlight hours, including at least 5% during the winter months.
51. The submitted report measures impacts currently experienced by surrounding residential properties and how these impacts would alter following construction of the proposed development. The surrounding residential properties which are in close enough proximity to the site to possibly be impacted are 18 Bellenden Road, Sheffield House - Bellenden Road, 38 and 40 Bellenden Road, 43 Bellenden Road (residential accommodation) and 20, 28 and 30 Highshore Road. All of those windows tested fully comply with the BRE Report guidelines for both sunlight and daylight amenity.
52. Other properties not considered either have no windows in the elevation facing the site or pass the preliminary 25-degree line test recommended by the BRE and as such are a sufficient distance not to be affected by the proposed development.

Conclusion on daylight and sunlight

53. The results of the daylight and sunlight analysis undertaken demonstrate that none of the surrounding residential properties would experience a material loss of amenity. The proposed development would not materially affect the daylight and sunlight to these properties and is therefore in accordance with the guidelines contained within the Residential Design Standards SPG and the guidelines set out within the BRE Report.

Outlook and Privacy

54. The residential design standards SPD advises that the design of new development should not have a negative impact on neighbouring properties. The SPD does not formally define what is meant by 'good' outlook. However it recognises that improvements to outlook can contribute to better internal living conditions. It also advises that new development should achieve a separation distance of 12m at the front of a building and any elevation that fronts on to a highway and a minimum distance of 21 metres between new development and existing properties at the rear. These distances are of most relevance between habitable room windows of different units but have nonetheless been considered here.
55. The closest residential properties are those situated on the opposite side of Bellenden Road at no.38 and 40, the residential accommodation within 43 Bellenden Road to the south west, and no.20, 18 and 16 Highshore Road to the south.
56. The facing elevations of numbers 38 and 40 Bellenden Road are separated from the north facing elevation of the building by approximately 15m across the road. This distance therefore meets the recommended guidelines No.43 Bellenden Road has no facing windows directly overlooking the development and those properties on Highshore Road to the south are well in excess of the recommended 21m. It is therefore not considered that there would be any form of material overlooking experienced which would result in a loss of amenity to these dwellings.

Noise

57. Any noise audible to surrounding properties resulting from the operation of the school would only be during daytime hours, and would not be considered to detrimentally impact on residential amenity to the extent that planning permission should be refused.

Whilst it is proposed that the games and play areas will be available for community use outside of school operation hours, it will not have unrestricted public access. Restrictions on the hours of use and the use of lighting will be required in the event that planning permission is granted, but there are no other significant impacts upon the amenity of adjoining occupiers as a result of the use of these areas.

58. The proposed combination of conditions and relevant noise standards to be achieved are considered sufficient to protect neighbouring occupiers from any potential noise nuisance. The proposal would therefore be in accordance with Saved policy 3.2 (Protection of Amenity) of the Southwark Plan 2007, and Strategic Policy 13 (High Environmental Standards) of the Core Strategy (2011).

43 Bellenden Road - Neighbouring Photographic Studio

59. Concern has been raised by the occupant of the adjacent photography studio located at no.43 Bellenden Road. This is a single storey building with a pitched roof that provides natural daylight to the studio space via rooflights on the north facing slope of the pitched roof. Located to the south of the proposed school building the application site wraps around the north and east boundaries of this property.
60. The closest point of built form would be the southern section of the two-storey classroom wing which extends approximately 8m along the rear section of the studio at a distance of 3m. The occupier of the photographic studio has objected on the ground of loss of light to and overlooking of these windows.
61. There would be no overlooking experienced from the first floor play terrace as this is located on the opposite side of the proposed building and views of the roof windows

could not be appreciated from this point. Three windows serving a science room and a stairwell are located at first floor level on the southern elevation of the classroom wing facing the studio at a distance of 3m. Whilst these windows face towards the rooflights, it is considered that there would be no potential for overlooking. Even if a tall adult were standing directly up against the window looking south the view appreciated would be across the facing rooflights only. You could not see down into the studio. The applicant however has confirmed that they would be amenable to obscure glazing those windows in light of the concerns raised. This can be secured by way of an appropriate condition.

62. The flat roof would also not be used for the purposes of a terrace or area of amenity for either staff or children. Therefore with the expectation of maintenance purposes there would be no access to this area which would result in the overlooking of the neighbouring studio. The imposition of an appropriate condition will ensure that this restriction of access is provided. There would therefore be no overlooking experienced to this neighbouring commercial property.
63. In addition to the potential for overlooking, the occupier of no.43 Bellenden Road has also raised concerns about loss of light and impact on outlook from the ground floor studio. There would be no loss of light resulting from the proposed development experienced. The windows which serve the photographic studio are north facing rooflights and the proposed school building would be sited to the north. The orientation and separation distance therefore would mean that there would be no potential for loss of sunlight or daylight. Whilst at certain points from within the neighbouring studio you are likely to experience views of the upper most section of the proposed school building, when looking up through the rooflights, this is not considered to result in material harm to the operation of this commercial premises.

Traffic and Transportation

64. Saved policy 5.2 of the Southwark Plan seeks to ensure that developments do not result in adverse highway conditions; 5.3 requires the needs of pedestrians and cyclists to be considered and 5.6 establishes maximum parking standards. The site has a high PTAL (public transport accessibility level) of 6a and is located within a controlled parking zone (CPZ).

Car Parking and Trip Generation

65. The new school will be provided with a dedicated on-site mini-bus drop-off and collection areas with separate entrance and exit onto Ophir Terrace. This area can accommodate 8 mini-buses where pupils can safely be helped onto and off the buses and taken into the school buildings. There will be 10 car parking spaces available for use for staff and visitors, these can be accessed when the area is not being used for the morning and afternoon drop-off periods, Whilst a site such as this in an area of excellent access to public transport would normally be expected to be car free, it is considered that the nature of the school and the need for frequent visiting professions, who often travel with vital equipment, justifies the provision of this level of parking.
66. The majority of pupils at the existing Cherry Garden School arrive via LBS mini-buses with only 5 pupils being dropped off/collected via private car. It is anticipated that this pattern of travel will continue and predicted that the number of pupils not arriving by mini-bus could increase to 8. These private vehicles can be accommodated along the Bellenden Road frontage to the site to use the adjacent Lidl car park. The Transport Assessment concludes that the proposed school will result in less vehicle movements than the previous Highshore School which had a higher number of students and a lower proportion of those travelling by mini-bus.

Cycle Parking

67. Cycle parking provision has been determined in order to comply with the London Plan cycle storage standards, which require one space per eight staff and students. Due to the nature of the School the cycle parking provision has been based on staff requirements only which is considered reasonable. Therefore 10 cycle parking spaces would be provided adjacent to the proposed car park/mini-bus drop off zone. This area is sufficient to accommodate the minimum amount required and would be able to cater for expansion if required. The imposition of a condition will ensure these facilities are provided.

Servicing, Refuse Storage and Collection

68. Delivery and refuse vehicles will continue to serve the site as existing from Bellenden Road which is wide enough to allow vehicle to pull over and park for short periods of time. The maintenance, delivery and refuse collection areas would be located in the north western corner of the site. The location of the refuse area next to the kitchen allows easy access for staff and direct refuse collection from Bellenden Road. This is considered an appropriate arrangement which will not result in a material impact on the operation of the surrounding road network.

Ecology and Trees*Landscaping*

69. The outdoor spaces proposed are an important part of the educational environment for this school. Defined by the architectural layout and the conservation area to the south the landscape strategy has developed to provide separate play spaces with different characters suitable for different ages, abilities and levels of play. There are areas of soft planting to provide more sheltered and secluded areas for play and learning and more flexible open play space to allow children to play and move around freely. Within the conservation Area mature trees are retained and provide an opportunity to create an adventure and nature garden encouraging exploration and outside learning.
70. On the ground floor each classroom will open out onto a dedicated play and learning space and these areas will be then directly linked to either the KS1 or KS2 playground enabling children to have direct access to outside play. The first floor roof terrace will provide a shared social space for nursery children with a canopy to allow for outside play in all weathers.
71. Purpose designed and bespoke play and sensory equipment are proposed with wheelchair accessible facilities to give all pupils the opportunity to engage with and enjoy the extremely interesting and diverse outdoor environment proposed.

Trees

72. An arboricultural impact assessment has been submitted with the application and has been reviewed by the council's tree officer. There are a total of 41 individual trees and a further 24 trees within 4 groups across the existing site.
73. As a direct consequence of the development there will be a loss of 32 individual trees and those contained within the 4 groups. This includes 11 individual B category trees (which are considered to be trees of moderate quality), 18 individual and three groups of C category trees (of low quality) and 3 individual and 1 group of U category trees (realistically unsuitable for retention due to their condition).
74. These losses are a result of the proposed building layout, car park layout and

landscaping/play area layout. With the exception of the U category trees, all those trees within the southern section of the site which are located within the Holly Grove Conservation Area, are to be retained. This is in addition to two B category and two C category trees which are located along the rear boundary of no.16-20 Highshore Road.

75. To mitigate the loss of trees across the site 33 new semi-mature trees would be planted across the site along with 90 linear metres of native hedgerow around the sites southern boundaries and 8 small trees on the first floor roof terraces. The planting of street trees to the north and west boundaries was explored by the applicant in response to pre-application consultation undertaken. However due to the abundance of existing underground services along Bellenden Road it is not viable to provide tree planting. In response to these concerns proposed planting around the entrance areas and along the boundaries was increased and maximised.
76. The proposed planting is considered to adequately mitigate against the loss of trees proposed. Conditions requiring the approval of full details of landscaping, tree planting, tree protection and retention are recommended.

Ecology

77. An Ecology Assessment has been submitted with the application, This report concludes that there were no records of any bat activity and that the site had low potential for bat foraging or migration due to the low level of habitats. However it does note that a mitigation strategy should be sought to minimise impacts on birds and bats whilst providing future habitats within the scheme. It is recommended that details of bat and bird boxes be submitted for approval along with details of native planting within the landscaping scheme.
78. The Ecology Assessment also notes that Japanese Knotweed is present on site, the removal of this can again be effectively addressed by way of condition.

Archaeology

79. An Archaeological Desk based Assessment has been submitted in support of the application. It notes that there is a high potential for 19th Century buildings and agricultural features of post medieval remains. It also notes that there is moderate potential for pre-historic and palaeo-environmental remains. The imposition of appropriate conditions to secure excavation and recording should be included.

Planning obligations (S.106 undertaking or agreement)

80. Saved policy 2.5 of the Southwark Plan advises that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. This policy is reinforced by the Supplementary Planning Document (SPD) for Section 106 Planning Obligations, which sets out in detail the type of development that qualifies for planning obligations.
81. Education (D1) use is exempt from the Southwark CIL and Mayoral CIL. Despite this, planning obligations listed can still be necessary if a development, when considered on its merits, would result in negative impacts. In this case, the proposed design and operation of the development would largely ensure that its impacts are internalised to the site or would be of a nature and scale that do not warrant planning obligations and can be appropriately mitigated by way of condition. Therefore it is not proposed to have any s106 agreement or undertaking attached to this application.

Sustainable development implications

82. Policy 5.2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the Mayor's energy hierarchy – “Be lean, Be clean, Be Green”. Residential and non-domestic buildings are required to improve on 2010 Building Regulations by 40% up until 2016 after which the percentage reduction for uses changes. Policies 5.5 and 5.6 require consideration of decentralised energy networks and policy 5.7 requires the use of on-site renewable technologies, where feasible.
83. An Energy Statement has been submitted with the application, which details that the carbon emissions reduction hierarchy, as laid out in the London Plan, has been adhered to. Passive measures such as increasing insulation and daylighting have been addressed, along with efficient measures and renewables. On-site renewable energy generation will be provided through the installation of photovoltaic cells and an air source heat pump.
84. The Design Review Panel (DRP) questioned the architects reliance on mechanical ventilation and felt that more could be done to develop a naturally ventilated solution. The applicant has provided information and justification with regard to their choice of ventilation. There are high levels of external noise in the locality from Bellenden Road, the adjacent Lidl service area and from aeroplanes. Changing noise levels and a constant background hum can have a significant detrimental impact for some of the children at this school. Children with ASD find changes in noise level particularly disturbing.
85. Similarly, many children find changes in temperature problematic and their disability may mean they are unable to verbalise their discomfort, understand it, or are more sensitive to it which can lead to them becoming distressed. As such a stable and controllable environment is required. As such mechanical ventilation is considered most appropriate in this situation.

BREEAM

86. Strategic policy 13 ‘High environmental standards’ of the Core Strategy requires that community facilities, including schools, achieve a minimum BREEAM rating of ‘very good’. A BREEAM Pre-assessment report has been submitted with the application. It states that the predicted rating for the school would be ‘very good’ with a score of 60.72%. This meets the minimum policy requirement and is therefore acceptable.

Conclusion on planning issues

87. The principle of redevelopment of this site for educational uses is supported and in line with Southwark and London Plan policies. The design and massing of the development has been carefully considered. The height would relate well to the adjoining context, whilst the buildings would create a high quality contemporary response to the site. The setting of the Conservation Area would be preserved and enhanced. The result would be welcoming and inspiring primary school in a prominent position in the local community.
88. Surrounding properties would continue to receive good levels of light and separation distances between residential windows and the proposed development should ensure that there is no direct overlooking experienced.
89. Adequate replacements are provided to compensate for the trees to be removed, with appropriate species.
90. In consideration of all matters as discussed above it is therefore recommended that

planning permission be granted with conditions.

Community impact statement

91. In line with the Council's Community Impact Statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process.

a) The impact on local people is set out above.

Consultations

92. Details of consultation and any re-consultation undertaken in respect of this application are set out in Appendix 1.

Consultation replies

93. Details of consultation responses received are set out in Appendix 2.

Summary of consultation responses

94. The Council has received 24 representations in response to public consultation. These are summarised below.

Neighbour letter responses

95. 19 letters of support including from the NHS Children's Community Occupational Therapy Team, The Head of Cherry Gardens, the Chair of Governors of Cherry Gardens, a paediatrician who currently works with some of the pupils, and local residents citing the following matters:

- This is an excellent proposal - Cherry Garden School is in desperate need of a new school building since their current building is inadequate to meet their basic needs and this proposal will hugely benefit the children attending the school.
- With a rise in the number of children with complex additional needs within Southwark, the demand on this school has increased substantially over the years.
- The proposed new buildings and spaces that will ensure that many more children will benefit from the dedicated and supportive education provided by the school to those with the most severe and complex needs.
- Excellent location in the centre of the borough, which provides good access for pupils, staff and others who regularly visit the school such as specialist teachers, therapists and paediatricians.
- The space and facilities in the new building will give the school the opportunity to do even more with their pupils.
- It will be great for Peckham to have such an inclusive, proactive and enthusiastic school on their doorstep.
- The use of the site right up to the boundary is appropriate providing a quality exterior that maximises the potential of the site. It will be a welcoming and attractive addition to the neighbourhood.
- It will be a great improvement on the existing situation.
- Excellent location with good transport links and access to surrounding facilities such as Peckham Library, swimming pool and local facilities.
- Benefits for the local community including access to the hydropool and

trampoline room.

- Good use of materials, in particular the gold areas.
- The proposed design will achieve this and will be both attractive and functional.
- I highly support this scheme and the design by the Architects, including the use of materials and creation of a strong presence on Bellenden Road.
- The design has maximised the play space for pupils with lots of green space and trees.
- Trees and planning have been used well to soften the building.
- This development will provide much-needed facilities for local families.

96. 5 letters of objection from local residents and businesses raising the following concerns:

- Loss of light, privacy and quality of life to the residential accommodation within no.43 Bellenden Road.
- Overlooking, obstruction of views and loss of light to neighbouring daylight photographic studio at no.43 Bellenden Road.
- Loss of outlook and privacy to neighbouring properties and their gardens.
- Detrimental impact on the setting and character of the adjacent Listed Building and Conservation Area.
- Loss of trees, in particular the former Willow tree which has now been felled and trees on the Bellenden Road frontage.
- The building is too big, too tall, too dense, too bland, and too close to neighbouring properties.
- The buildings location directly on the site boundary on the Bellenden Road frontage involves no mitigating features to soften its appearance, it should be set back to the line of the existing building.
- Out of keeping with the surrounding area, inappropriate use of non traditional materials.
- Inappropriate design for a school, in particular a SEN school, with its two storeys.
- Lack of green space provided for the school.
- Unacceptable lose of the architecturally interesting existing building which blends in with the Conservation Area.
- The existing school is imaginative and quirky, and should be incorporated into the proposal. If it can't the site should not be used to rehouse the school.
- Light pollution.

Internal consultees

Flood and Drainage Team

97. Agree with the conclusions of the FRA, whereas the flood risk is low (flood zone 1) for all flooding mechanisms, with the exception of pluvial (surface water) flooding. Further details of sustainable drainage systems (SuDS) will be required. *This could be dealt with via condition.*

Urban Forester

98. The submitted arboricultural impact assessment provides an acceptable description and reasoning for the number of trees to be removed. Conditions are required in order to ensure adequate protection measures are put in place for retained trees and for replacement planting as part of new landscaping.

Archaeologist

99. Based upon the recommendations of the archaeological assessment an archaeological watching brief should be secured by condition as should the submission of a timely archaeological report.

Highway Development

100. Raise no objections to the granting of permission. Note that the developer must enter in to a S278 highways agreement, that doors for the refuse bin store should open inwards and that visibility splays should be provided at vehicle entrances. *These matters can be covered by way of conditions and informatives.*

Statutory consulteesHistoric England

101. Specialist staff have considered the application and do not wish to offer any comments. The application should be determined in accordance with national and local policy guidance, and on the basis of the Council's specialist conservation advice.

Environment Agency

102. Have no comments to make, as the proposal appears to have a low environmental risk.

Human rights implications

103. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.
104. This application has the legitimate aim of providing a new primary school. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

105. None.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/2655-H Application file: 15/AP/2016 Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5452 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Images
Appendix 4	Recommendation

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Amy Lester, Senior Planning Officer	
Version	Final	
Dated	24 September 2015	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic director, finance & corporate services	No	No
Strategic director, environment and leisure	No	No
Strategic director, housing and community services	No	No
Director of regeneration	No	No
Date final report sent to Constitutional Team		24 September 2015

APPENDIX 1**Consultation undertaken****Site notice date:** 01/06/2015**Press notice date:** 04/06/2015**Case officer site visit date:** n/a**Neighbour consultation letters sent:** 28/05/2015**Internal services consulted:**

Ecology Officer
 Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]
 Flood and Drainage Team
 HIGHWAY LICENSING
 Highway Development Management
 Waste Management

Statutory and non-statutory organisations consulted:

Environment Agency
 Historic England
 Metropolitan Police Service (Designing out Crime)
 Thames Water - Development Planning
 Transport for London (referable & non-referable app notifications and pre-apps)

Neighbour and local groups consulted:

34 Peckham High Street London SE15 5DP	12 Highshore Road London SE15 5AA
36 Peckham High Street London SE15 5DP	13 Highshore Road London SE15 5AA
38 Peckham High Street London SE15 5DP	14 Highshore Road London SE15 5AA
Flat 7 Sheffield House SE15 5BQ	Unit 1 Bellenden Road Retail Park SE15 5BA
Flat 8 Sheffield House SE15 5BQ	Unit 3 Bellenden Road Retail Park SE15 5BA
Flat 9 Sheffield House SE15 5BQ	32a Peckham High Street London SE15 5DP
18 Peckham High Street London SE15 5DT	Unit 5 Bellenden Road Retail Park SE15 5BA
Flat 4 Marcus House SE15 5DU	Highshore School House Bellenden Road SE15 5BB
Flat 5 Marcus House SE15 5DU	Flat 1 2 Collyer Place SE15 5DL
Flat 6 Marcus House SE15 5DU	Harris Primary Free School Peckham 112 Peckham Road SE15 5DZ
Flat 1 Marcus House SE15 5DU	Ephraim Early Years Nursery School Peckham Academy SE15 5DZ
Flat 2 Marcus House SE15 5DU	Flat A 18 Peckham High Street SE15 5DT
Flat 3 Marcus House SE15 5DU	Flat 2 2 Collyer Place SE15 5DL
27b Highshore Road London SE15 5AA	Flat 3 2 Collyer Place SE15 5DL
Flat 1 Sheffield House SE15 5BQ	Flat 4 2 Collyer Place SE15 5DL
Flat 10 Sheffield House SE15 5BQ	37 Highshore Road London SE15 5AF
64 Elm Grove London SE15 5DE	39 Highshore Road London SE15 5AF
28 Peckham High Street London SE15 5DT	41 Highshore Road London SE15 5AF
27a Highshore Road London SE15 5AA	32 Highshore Road London SE15 5AF
Flat 11 Sheffield House SE15 5BQ	33 Highshore Road London SE15 5AF
Flat 4 Sheffield House SE15 5BQ	34 Highshore Road London SE15 5AF
Flat 5 Sheffield House SE15 5BQ	38 Bellenden Road London SE15 5BB
Flat 6 Sheffield House SE15 5BQ	56 Bellenden Road London SE15 5BB
Flat 12 Sheffield House SE15 5BQ	58 Bellenden Road London SE15 5BB
Flat 2 Sheffield House SE15 5BQ	60 Elm Grove London SE15 5DE
Flat 3 Sheffield House SE15 5BQ	40 Bellenden Road London SE15 5BB
34b Peckham High Street London SE15 5DP	52 Bellenden Road London SE15 5BB
The Bakehouse 16a Basing Court SE15 5DX	54 Bellenden Road London SE15 5BB
52a Bellenden Road London SE15 5BB	21 Highshore Road London SE15 5AA

18c Bellenden Road London SE15 5DR
 18d Bellenden Road London SE15 5DR
 34a Peckham High Street London SE15 5DP
 Flat 1 38 Peckham High Street SE15 5DP
 Flat 2 38 Peckham High Street SE15 5DP
 Flat 3 38 Peckham High Street SE15 5DP
 Ground To Second Floors 20-26 Peckham High Street SE15 5DT
 Flat 36 Peckham High Street SE15 5DP
 43 Bellenden Road London SE15 5BB
 1 Collyer Place London SE15 5DL
 Flat 7 Marcus House SE15 5DU
 Flat 8 Marcus House SE15 5DU
 Flat 9 Marcus House SE15 5DU
 32 Peckham High Street London SE15 5DP
 16 Peckham High Street London SE15 5DT
 18b Bellenden Road London SE15 5DR
 Collyer Court Collyer Place SE15 5DL
 18a Bellenden Road London SE15 5DR
 35 Highshore Road London SE15 5AF
 62 Elm Grove London SE15 5DE
 Flat 3 16 Peckham High Street SE15 5DT
 Peckham Delivery Office 2-4 Highshore Road SE15 5AU
 10 Highshore Road London SE15 5AA
 Flat B 18 Peckham High Street SE15 5DT
 Flat 1 16 Peckham High Street SE15 5DT
 Flat 2 16 Peckham High Street SE15 5DT
 11 Highshore Road London SE15 5AA
 15 Highshore Road London SE15 5AA
 16 Highshore Road London SE15 5AA
 17 Highshore Road London SE15 5AA
 23 Highshore Road London SE15 5AA
 25 Highshore Road London SE15 5AA
 18 Highshore Road London SE15 5AA
 19 Highshore Road London SE15 5AA
 20 Highshore Road London SE15 5AA
 27 Highshore Road London SE15 5AA
 28 Highshore Road London SE15 5AF
 30 Highshore Road London SE15 5AF
 31 Highshore Road London SE15 5AF
 7 Highshore Road London SE15 5AA
 8 Highshore Road London SE15 5AA
 9 Highshore Road London SE15 5AA
 43 Grove Park London SE5 8LG
 Flat 1, 24 Fernwood Avenue Streatham SW16 1RD
 18 Highshore Rd Peckham SE15 5AA
 28 Adys Road Peckham SE15 4DZ
 35 Elcot Avenue Peckham SE15 1QB
 1 Bowmead Mottingham SE9 3NL
 17 Hansler Road London SE22 9DJ
 50 Blackheath Park London SE3 9SJ
 31 Elfindale Road Herne Hill/Dulwich SE24 9NN
 37 Gilkes Crescent Dulwich SE217BP
 3 Danecroft Rd London SE24 9PA
 23 Aylward Road London SE23 2JE
 13 Eynella Road London SE22 8XF
 12 Aysgarth Road London SE21 7JR
 Sunshine House 27 Peckham Rd SE5 8UH
 27 Peckham Road London SE5 8UH
 2 Ferris Road London SE22 9ND
 Southwark Council, Children'S & Adults' Services 160 Tooley Street SE1 2QH
 141 Mountview Road London N4 4JH

Re-consultation: n/a

APPENDIX 2**Consultation responses received****Internal services**

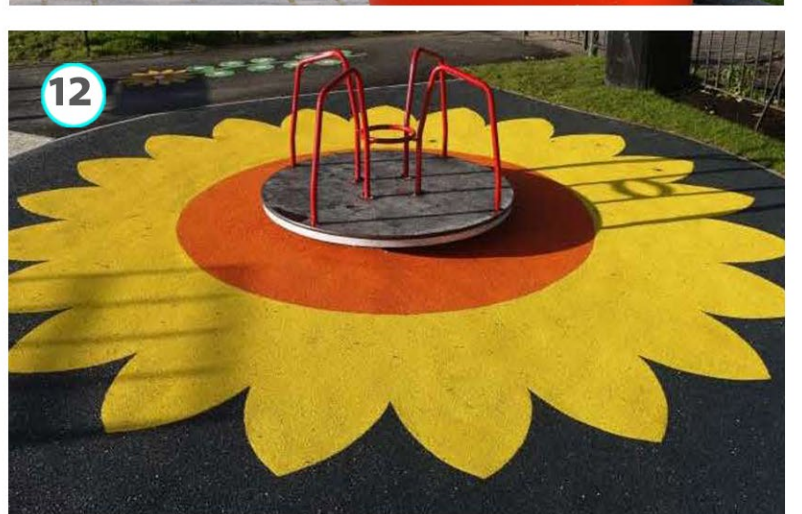
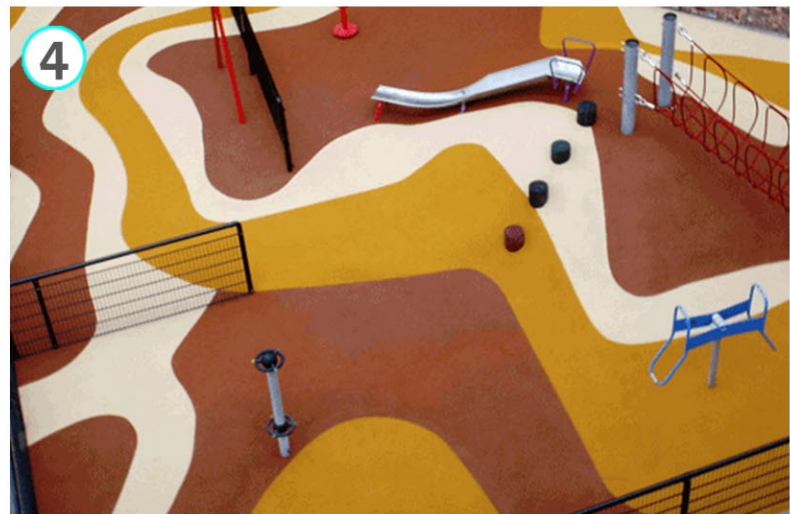
Flood and Drainage Team

Statutory and non-statutory organisations

Historic England

Neighbours and local groups

Flat 1, 24 Fernwood Avenue Streatham SW16 1RD
 Southwark Council, Children'S & Adults' Services 160 Tooley Street SE1 2QH
 Sunshine House 27 Peckham Rd SE5 8UH
 1 Bowmead Mottingham SE9 3NL
 12 Aysgarth Road London SE21 7JR
 13 Eynella Road London SE22 8XF
 141 Mountview Road London N4 4JH
 17 Hansler Road London SE22 9DJ
 18 Highshore Rd Peckham SE15 5AA
 18 Highshore Road London SE15 5AA
 2 Ferris Road London SE22 9ND
 20 Highshore Road London SE15 5AA
 23 Aylward Road London SE23 2JE
 27 Peckham Road London SE5 8UH
 28 Adys Road Peckham SE15 4DZ
 3 Danecroft Rd London SE24 9PA
 31 Elfindale Road Herne Hill/Dulwich SE24 9NN
 35 Elcot Avenue Peckham SE15 1QB
 37 Gilkes Crescent Dulwich SE217BP
 41 Highshore Road London SE15 5AF
 43 Bellenden Road London SE15 5BB
 43 Grove Park London SE5 8LG
 50 Blackheath Park London SE3 9SJ
 52a Bellenden Road London SE15 5BB



RECOMMENDATION

This document shows the case officer's recommended decision for the application referred to below.
This document is not a decision notice for this application.

Applicant	Mr Steve Platts Southwark Council	Reg. Number	15/AP/2016
Application Type	Council's Own Development - Reg. 3	Case	TP/2655-H
Recommendation	Grant permission	Number	

Draft of Decision Notice

Permission was GRANTED, subject to the conditions and reasons stated in the Schedule below, for the following development:

Redevelopment of the site involving the erection of a new two-storey primary school (special educational needs) with associated landscaping and parking.

At: FORMER HIGHSHORE SCHOOL SITE, BELLENDEN ROAD, LONDON SE15 5BB

In accordance with application received on 20/05/2015

and Applicant's Drawing Nos.

Site Location Plan:

1550_DWG_PL_010

Existing Drawings:

1550_DWG_PL_100

1550_DWG_PL_101

1550_DWG_PL_102

1550_DWG_PL_103

1550_DWG_PL_110

1550_DWG_PL_111

1550_DWG_PL_112

Proposed Drawings:

1550_DWG_PL_200

1550_DWG_PL_201

1550_DWG_PL_202

1550_DWG_PL_205

1550_DWG_PL_210

1550_DWG_PL_211

1550_DWG_PL_215

1550_DWG_PL_216

1550_DWG_PL_217

1550_DWG_PL_220

1550_DWG_PL_221

1550_DWG_PL_222

1550_DWG_PL_231

Other Documents:

Planning Statement May 2015, Design & Access Report May 2015, Arboricultural Impact Assessment ref: 300425 0312 AIA V2 003 April 2015, Air Quality Assessment ref: 772171-REP-ENV-010 rev 0 01/05/2015, BREEAM New Construction 2011 Pre-assessment 4_1 21/04/2015, BREEAM 2011 Assessment Appendices 3491 V1.0, Appendix F - Guidance for relating ecologist's report to BREEAM 16/01/2015, Daylight and Sunlight Report 30/04/2015, Ecology Report 18182/INFPLA/R02 January 2011, Energy Strategy Issue 1 08/05/2015, BRUKL Output Document 08/05/2015, Flood Risk Assessment 5016/001/RP13 March 2015, Phase 2 Site Investigation Report 15.8461 March 2014, Baseline Noise Survey Report 07/REP(00)U012 13/03/2015, School Travel Plan 2015, Archaeology Assessment May 2011, Transport Assessment 616235-2014.705 rev Final-V1 April 2015

Subject to the following twenty-seven conditions:

Time limit for implementing this permission and the approved plans

- 1 The development hereby permitted shall be begun before the end of three years from the date of this permission.

Reason

As required by Section 91 of the Town and Country Planning Act 1990 as amended.

- 2 The development hereby permitted shall not be carried out otherwise than in accordance with the following approved plans:

1550_DWG_PL_200
 1550_DWG_PL_201
 1550_DWG_PL_202
 1550_DWG_PL_205
 1550_DWG_PL_210
 1550_DWG_PL_211
 1550_DWG_PL_215
 1550_DWG_PL_216
 1550_DWG_PL_217
 1550_DWG_PL_220
 1550_DWG_PL_221
 1550_DWG_PL_222
 1550_DWG_PL_231

Reason:

For the avoidance of doubt and in the interests of proper planning.

Pre-commencement condition(s) - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before any work in connection with implementing this permission is commenced.

- 3 **Control of invasive plants**
 Prior to the commencement of development, a detailed method statement for the removal or long-term management /eradication of Japanese Knotweed on the site shall be submitted to and approved in writing by the local planning authority. The method statement shall include proposed measures to prevent the spread of (plant name) during any operations such as mowing, strimming or soil movement. It shall also contain measures to ensure that any soils brought to the site are free of the seeds / root / stem of any invasive plant covered under the Wildlife and Countryside Act 1981. Development shall proceed in accordance with the approved method statement.

Reason

Japanese Knotweed is an invasive plant, the spread of which is prohibited under the Wildlife and Countryside Act 1981. Without measures to prevent its spread as a result of the development there would be the risk of an offence being committed and avoidable harm to the environment occurring, contrary to Saved Policy 3.2 Protection of Amenity of The Southwark Plan 2007 and SP13 High environmental standards of the Core Strategy 2011.

- 4 Before any work hereby authorised begins, the applicant shall secure the implementation of a programme of archaeological mitigation works, an archaeological watching brief, in accordance with a written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority.

Reason

In order that the details of the programme of works for the archaeological watching brief are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2012.

- 5 **Site contamination**
 a) Prior to the commencement of any development, a site investigation and risk assessment shall be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The phase 1 site investigation (desk study, site categorisation; sampling strategy etc.) shall be submitted to the Local Planning Authority for approval before the commencement of any intrusive investigations. The subsequent Phase 2 site investigation and risk assessment shall be conducted in accordance with any approved scheme and submitted to the Local Planning Authority for approval prior to the commencement of any remediation that might be required.

b) In the event that contamination is present, a detailed remediation strategy to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment shall be prepared and submitted to the Local Planning Authority for approval in writing. The scheme shall ensure that the site would not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. The approved remediation scheme (if one is required) shall be carried out in accordance with its terms prior to the commencement of development other than that required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority shall be given two weeks written notification of commencement of the remediation scheme works.

c) Following the completion of the measures identified in the approved remediation strategy, a verification report providing evidence that all work required by the remediation strategy has been completed shall be submitted to and approved in writing by the Local Planning Authority.

d) In the event that contamination is found at any time when carrying out the approved development that was not previously identified, it shall be reported in writing immediately to the Local Planning Authority, and a scheme of investigation and risk assessment, a remediation strategy and verification report (if required) shall be submitted to the Local Planning Authority for approval in writing, in accordance with a-c above.

Reason

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with saved policy 3.2 'Protection of amenity' of the Southwark Plan (2007), strategic policy 13' High environmental standards' of the Core Strategy (2011) and the National Planning Policy Framework 2012.

6 Surface Water Drainage

The development permitted by this planning permission shall not commence until a surface water drainage scheme for the site, based on sustainable drainage principles, where possible, and on an assessment of the hydrological and hydrogeological context of the development, has been submitted to, and approved by, the Local Planning Authority. The surface water drainage strategy should strive to implement a Sustainable Drainage System (SuDS) hierarchy that achieves reductions in surface water run-off rates, in line with the Greater London Authority's London Plan (Policy 5.13) and the relevant 'priorities' within the associated Sustainable Design and Construction Supplementary Planning Guidance (SPG) (Section 3.4), as referred to within the submitted Flood Risk Assessment (FRA) by Robert West ref: 5016/001/RP13 dated March 2015.

Reason

To reduce the impact of flooding both to and from the development and third parties, in line with the Greater London Authority's London Plan (Policy 5.13)

Commencement of works above grade - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before any work above grade is commenced. The term 'above grade' here means any works above ground level.

7 Before any above grade work hereby authorised begins, details of the means of enclosure for all site boundaries shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any such approval given.

Reason

In the interests of visual and residential amenity in accordance with The National Planning Policy Framework 2012, Strategic Policy 12 Design and conservation of The Core Strategy 2011 and Saved Policies 3.2 Protection of amenity, 3.12 Quality in Design, and 3.13 Urban design of the Southwark Plan 2007.

8 Prior to above grade works commencing, details of the proposed external materials and a material sample of the 'gold' cladding to be used in the carrying out of this permission shall be submitted to and approved in writing by the Local Planning Authority; the development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order to ensure that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with The National Planning Policy Framework 2012, Strategic Policy 12 - Design and Conservation of The Core Strategy 2011 and Saved Policies: 3.12 Quality in Design and 3.13 Urban Design of The Southwark Plan 2007.

9 Before any above grade work hereby authorised begins, 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, and details of native planting, and material samples of hard landscaping), 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.

The planting, seeding and/or turfing shall be carried out in the first planting season following completion of building works and any trees or shrubs that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the same size and species in the first suitable planting season. Planting shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction and BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf).

Reason

So that the Council may be satisfied with the details of the landscaping scheme in accordance with The National Planning Policy Framework 2012 Parts 7, 8, 11 & 12 and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

10 **Tree Planting**

Prior to the above grade works commencing, full details of all proposed tree planting shall be submitted to and approved in writing by the Local Planning Authority. This 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 2012 Parts 7, 8, 11 & 12 and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

Pre-occupation condition(s) - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before the building(s) hereby permitted are occupied or the use hereby permitted is commenced.

11 **Community Use Scheme**

Prior to first occupation, a Community Use Scheme shall be submitted to and approved in writing by the Local Planning Authority. The Scheme shall include details of the following:

- i) A detailed plan and / or schedule of the Community Use Facilities;
- ii) The days and times of availability of the Community Use Facilities;
- iii) The access to and right to use the Community Use Facilities by users from the community (whether groups or individuals) who are not staff, pupils or members of the School;
- iv) The management, maintenance and cost for use of the Community Use Facilities;
- v) A mechanism for review of the Community Use Scheme

The approved Community Use Scheme shall be implemented upon occupation of the development and retained/maintained for the existence of the development.

Reason:

To secure community use of facilities in accordance with Saved Policy 2.3 Enhancement of Educational Establishments of the Southwark Plan 2007 and SP4 Places for learning, enjoyment and healthy lifestyles of the Core Strategy 2011 and to ensure that residential amenity is satisfactorily protected with regards to Saved Policy 3.2 Protection of Amenity of the Southwark Plan 2007.

Compliance condition(s) - the following condition(s) impose restrictions and/or other requirements that must be complied with at all times once the permission has been implemented.

12 Refuse Storage

Before the first occupation of the building hereby permitted, the refuse storage arrangements shown on the approved drawing referenced WWA_1417_LL_101 Rev L shall be provided and made available for use by the occupiers of the premises, and the facilities provided shall thereafter be retained and shall not be used or the space used for any other purpose.

Reason

To ensure that the refuse will be appropriately stored within the site thereby protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance in accordance with The National Planning Policy Framework 2012, Strategic Policy 13 High Environmental Standards of the Core Strategy 201 and Saved Policies 3.2 Protection of Amenity and Policy 3.7 Waste Reduction of The Southwark Plan 2007

13 Highways Details

- Pedestrian visibility splays of 2m x 2m shall be provided at the proposed vehicular egress. There should be no obstruction within the visibility splay area.
- Internal opening or sliding doors shall be provided to the refuse storage area. Doors should not open outwards onto the public footway.

Reason

In order to ensure the safe operation of the surrounding pavements. The National Planning Policy Framework 2012, Strategic Policy 2 - Sustainable Transport of The Core Strategy and Saved Policy 5.3 Walking and Cycling of the Southwark Plan 2007.

14 Bird and Bat Boxes

No less than 6 nesting boxes and 4 bat bricks/tubes shall be installed within the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained.

Reason

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with policies: 5.10 and 7.19 of the London Plan 2011, Policy 3.28 of the Southwark Plan and Strategic Policy 11 of the Southwark Core strategy.

15 Internal Classroom Noise and Vibration

The classrooms hereby permitted shall be designed to ensure that the internal noise levels meets with BB93 as revised and BB101 for ventilation.

Reason

To ensure that occupiers and users of the hereby approved school do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the National Planning Policy Framework 2012, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

16 Cycle Parking

Prior to the first occupation of the building a minimum of 10 cycle parking spaces, using Sheffield stands, shall be installed. Thereafter the cycle parking facilities provided shall be retained and the space used for no other purpose.

Reason

In order to ensure that satisfactory safe and secure cycle parking facilities are provided and retained in order to encourage the use of cycling as an alternative means of transport to the development and to reduce reliance on the use of the private car in accordance with The National Planning Policy Framework 2012, Strategic Policy 2 - Sustainable Transport of The Core Strategy and Saved Policy 5.3 Walking and Cycling of the Southwark Plan 2007.

17 The flat roofed areas of the hereby approved building, with the exception of the approved roof terraces, shall not be used other than as a means of escape or for maintenance purposes and shall not be used for any other purpose including use as a roof terrace or balcony or for the purpose of sitting out.

Reason

In order that the privacy of surrounding properties may be protected from overlooking from use of the roof area in accordance with The National Planning Policy Framework 2012, Strategic Policy 13 High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 'Protection of Amenity' of the Southwark Plan 2007.

- 18 The first floor science room and stairwell windows on the southern elevation of the building shall be obscure glazed to 1.8m from internal floor level and shall not be replaced or repaired otherwise than with obscure glazing.

Reason

In order to protect the privacy and amenity of the occupiers and users of the adjoining premises at 43 Bellenden Road from undue overlooking in accordance with The National Planning Policy Framework 2012, Strategic Policy 13 - High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 'Protection of Amenity' of the Southwark Plan 2007.

- 19 No developer, owner or occupier of any part of the development hereby permitted, with the exception of disabled persons, shall seek, or will be allowed, to obtain a parking permit within the controlled parking zone in Southwark in which the application site is situated.

Reason

To ensure compliance with Strategic Policy 2 - Sustainable Transport of the Core Strategy 2011 and saved policy 5.2 Transport Impacts of the Southwark Plan 2007.

- 20 No meter boxes, flues, vents or pipes [other than rainwater pipes] or other appurtenances not shown on the approved drawings shall be fixed or installed on the street elevation[s] of the building[s].

Reason

To ensure such works do not detract from the appearance of the building (s) in accordance with The National Planning Policy Framework 2012, Strategic Policy 12 - Design and Conservation of The Core Strategy 2011 and Saved Policies 3.12 Quality in Design and 3.13 Urban Design of The Southwark Plan 2007.

- 21 Notwithstanding the provisions of Parts 24 and 25 The Town & Country Planning [General Permitted Development] Order 1995 [as amended or re-enacted] no external telecommunications equipment or structures shall be placed on the roof or any other part of a building hereby permitted.

Reason

In order to ensure that no telecommunications plant or equipment which might be detrimental to the design and appearance of the building and visual amenity of the area is installed on the roof of the building in accordance with The National Planning Policy Framework 2012, Strategic Policy 12 - Design and Conservation of The Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity and 3.13 Urban Design of the Southwark Plan 2007.

- 22 No roof plant, equipment or other structures, other than as shown on the plans hereby approved or approved pursuant to a condition of this permission, shall be placed on the roof or be permitted to project above the roofline of any part of the building[s] as shown on elevational drawings or shall be permitted to extend outside of the roof plant enclosure[s] of any building[s] hereby permitted.

Reason

In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area in accordance with The National Planning Policy Framework 2012, Strategic Policy 12 - Design and Conservation of The Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity and 3.13 Urban Design of the Southwark Plan 2007.

- 23 Plant Noise - standard
The rated noise level from any plant, together with any associated ducting shall be 10 dB(A) or more below the lowest relevant measured LA90 (15min) at the nearest noise sensitive premises.

Reason

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the National Planning Policy Framework 2012, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

- 24 Tree Protection
The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations (including facilitative pruning specifications and supervision schedule) contained in the Arboricultural Method Statement. All tree protection measures shall be installed, carried out and retained throughout the period of the works, unless otherwise agreed in writing by the Local Planning Authority. In any case, all works must adhere to BS5837: (2012) Trees in relation to demolition, design and construction and BS3998: (2010) Tree work - recommendations.

If within the expiration of 5 years from the date of the occupation of the building for its permitted use any retained

tree is removed, uprooted is destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the Local Planning Authority.

Reason

To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with The National Planning Policy Framework 2012 Parts 7, 8, 11 & 12 and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

Other condition(s) - the following condition(s) are to be complied with and discharged in accordance with the individual requirements specified in the condition(s).

- 25 Within six months of the completion of archaeological site works, an assessment report detailing the proposals for post-excavation works, publication of the site and preparation of the archive shall be submitted to and approved in writing by the Local Planning Authority and that the works detailed in this assessment report shall not be carried out otherwise than in accordance with any such approval given.

Reason

In order that the archaeological interests of the site are secured with regard to the details of the post-excavation works, publication and archiving to ensure the preservation of archaeological remains by record in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2012.

- 26 **External lighting**
Details of any external lighting [including design, power and position of luminaries] surrounding the building, shall be submitted to and approved by the Local Planning Authority in writing before any such lighting is installed. The development shall not be carried out otherwise in accordance with any such approval given.

Reason

In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the safety and security of persons using the area and the amenity and privacy of adjoining occupiers in accordance with The National Planning Policy Framework 2012, Strategic Policy 12 Design and Conservation and Strategic Policy 13 High environmental standards of The Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity and 3.14 Designing out crime of the Southwark Plan 2007.

- 27 **BREEAM**
Before any fit out works to the school hereby authorised begins, an independently verified BREEAM 2011 report (detailing performance in each category, overall score, BREEAM rating and a BREEAM certificate of building performance) to achieve a minimum 'very good ' rating shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any such approval given;
Within 6 months of the first occupation of the building hereby permitted, a certified Post Construction Review (or other verification process agreed with the local planning authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed standards at (a) have been met.

Reason

To ensure the proposal complies with The National Planning Policy Framework 2012, Strategic Policy 13 - High Environmental Standards of The Core Strategy 2011 and Saved Policies 3.3 Sustainability and 3.4 Energy Efficiency of the Southwark Plan 2007.

Statement of positive and proactive action in dealing with the application

The Council has published its development plan and core strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

The pre-application service was used for this application and the advice given was followed.

The application was validated promptly.

The Council has published its development plan and core strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

Informatives

Prior to works commencing on site (including any demolition) a joint condition survey should be arranged with Southwark Highway Development Team to catalogue condition of streets and drainage gullies. Please contact Iaan Smuts, Highway Development Manager on 020 7525 2135 to arrange.

The developer is advised that they must enter into a S278 agreement to complete the following works:

1. Resurface the footways fronting the development using granite natural stone paving slabs and granite kerbs.
2. Vehicle crossovers to be constructed to the relevant SSDM standards.
3. Reinstate redundant vehicle crossings on Bellenden Road as footway.
4. Relocate the school Keep Clear road marking to the front of the reception entrance on Bellenden Road.
5. Provide uncontrolled pedestrian crossing facility on Bellenden Road (north of development)
6. Provide dropped kerbs for the access to refuse store

Please contact Iaan Smuts, Highway Development Manager on 020 7525 2135.

Ordnance Survey

Date 24/9/2015



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Item No. 5.2	Classification: Open	Date: 6 October 2015	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 14/AP/4773 for: Full Planning Permission Address: 55 SOUTHWARK STREET, LONDON, SE1 1TE Proposal: Demolition of existing building at No. 55 Southwark Street and redevelopment of site to erect a 7 storey building and a 30 storey tower (plus basement and roof gardens) to a maximum height of 105.110m AOD to accommodate the following uses: public theatre and rehearsal space (Sui Generis use), art space and museum (Class D1/D2 use), restaurant and cafe (Class A3 use), bar (Class A4 use), offices (Class B1 use) and 9 residential flats.		
Ward(s) or groups affected:	Cathedrals		
From:	Director of Planning		
Application Start Date 13/07/2015		Application Expiry Date 12/10/2015	
Earliest Decision Date 19/08/2015			

RECOMMENDATION

1. To refuse planning permission, subject to referral to the Mayor for London.

BACKGROUND INFORMATION

Site location and description

2. The site consists of a surface car park and a 5 storey (plus basement) building fronting onto Southwark Street. With a site area of 1,572sqm (0.157 hectares), it is located on the southern side of Southwark Street and is sandwiched between the road and the railway viaduct. Directly adjacent to the site to the east (and in the same ownership) is the Grade II listed Menier Theatre building at Nos. 51 and 53 Southwark Street and this is 5 storeys in height. The entire site lies within the Thrale Street Conservation Area.
3. The existing commercial building (No. 55) has a curved form dating from the 1930s. The applicant has advised that the building is used as a temporary art studio, which would fall within the D1 class use, though the Council has no planning records to authorise this.
4. To the west of No. 55 and outside of the site boundary is City Bridge House (No. 57 Southwark Street), a later 20th century office building that is 6 storeys in height, but with planning permission, granted in 2013, for an additional 2 storeys at roof level.
5. To the south of the site are the arches of the railway viaduct, some of which are currently undergoing conversion to offices, retail, restaurant and night club use. There is an existing access to the site through these arches from Union Street.

6. To the north of the site (Nos. 48 to 58 Southwark Street) are office and commercial buildings that are between 5 - 6 storeys tall.
7. The site is within the following Core Strategy designations:

Central Activity Zone (CAZ); Bankside and Borough District Town Centre; Bankside, Borough and London Bridge Opportunity Area; Bankside, Borough, London Bridge Strategic Cultural Area; Archaeological Priority Zone (APZ); and the Air Quality Management Area (AQMA).
8. It is also within the Flood Risk Zone 3 and has a Public Transport Accessibility Level (PTAL) rating of 6b, which indicates excellent access to public transport.

Details of proposal

9. It is proposed to demolish the existing building at No. 55 and redevelop the site for a part 7 storey building and a 30 storey tower (plus 2 basements and roof gardens) to accommodate the following uses:

Public theatre and rehearsal space (Sui Generis use) circa 2,585sqm;
Restaurant and Cafe (A3 class use) circa 961sqm;
Bar, drinking establishment (A4 class use) circa 240sqm;
Office (B1 class use) circa 3,328sqm;
Museum, exhibition space and spiritual centre (D1/D2 class use) circa 687sqm and;
9 No. three bedroom residential flats (C3 class use)
10. The proposed building on the site is essentially split into two elements and these are described as the 'north' and 'south' parts in this report.
11. The building would cover most of the site area (within the red line boundary) at ground floor level. The building then essentially splits into two elements at the first floor level to provide a raised central courtyard. The building is 7 storeys (23.85m tall) fronting Southwark Street (north elevation). The south part of the site (the rear) would comprise the 30 storey tower rising from a 7 storey base used primarily for offices and the maximum height of the building would be 105.110m above ordnance datum (AOD).
12. The public uses (theatre, museum, offices and cafe/bar) are to be accessed from Southwark Street and the residential and staff entrances and service vehicle routes are accessed from the rear, off Union Street. In summary the uses are allocated as follows:

Basement and basement mezzanine (2 levels of basement): Theatre auditorium and associated dressing rooms, toilets, kitchen and plant and storage.

The ground floor contains the following uses: The main entrance into the building for the public for the restaurant and bar and theatre reception area. Other associated uses such as toilets, kitchen, and theatre administration is located to the rear.

1st floor: This level provides the public terrace at the centre of the site. The rear building to the south would accommodate a cafe and tea museum and the front building would house the exhibition space.

2nd floor: The front building accommodates rehearsal studio and the rear building comprises B1 class commercial space.

3rd floor: B1 office floor space is proposed within the rear building and a rehearsal

balcony is proposed at the front.

4th and 5th floors: More rehearsal space is proposed at the front and B1 office area is proposed at the rear.

6th floor: This level provides B1 office floorspace in the front and rear buildings.

7th floor: The common area for the residents is located on the seventh floor with access to a green roof, both located within the rear building.

8th floor: This floor is reserved for plant only.

Floors 9 - 26: 9 residential duplex flats at 268sqm each.

27 and 28th floors: The 'spiritual centre' (D1 class) would occupy these two floors.

Finally, on the 29th floor: 15sqm of plant space is located on this top floor.

13. The front building at 7 storeys tall is arranged as a masonry wall with punched openings up to a cornice at the 4th floor and then a sloping facade above that. This sloping facade is constructed of steel and glass.
14. The rear part of the site to the south is also 7 storeys tall with the tower at 30 storeys (in total) rising above that. This tower is conceived as a 'rocket' with a circular plan form, long slim body with metal triangulated exoskeleton and topped with a cone shaped nose.
15. No associated parking spaces are proposed on the site. Cycle parking has been shown within a narrow alley between the proposed building and No. 57 Southwark Street.

Planning history

16. Planning permission granted under ref 95-AP-0446 (June 1995) for: Change of use and conversion of second and third floors to one residential flat.
17. It is not clear whether this permission was ever implemented. The applicant has advised that this space is currently used as temporary art studios.

Planning history of adjoining sites

18. There is substantial planning history on the adjoining sites, but the most recent and relevant are as follows:

City Bridge House at 57 Southwark Street

13-AP-0368 - Planning permission was granted with unilateral undertaking for:

Erection of two additional storeys (plus lift over-run) set back at sixth and seventh floor levels to provide additional office (Class B1) floorspace. Re-cladding of the north, east and west facades and replacement windows on south facade. Extension of north facade forward by one metre from ground to fifth floor level. Ground floor extension with canopy to enlarge the reception area, provision of external and internal cycle parking storage. Part enclosure of rear yard at ground floor level and provision of garden lightwell to basement on southern edge of site. (dated 16.07.2013).

Bridge Court at 73-81 Southwark Bridge Road

11-AP-1631 - Planning permission was granted for:

Change of use of first floor from art gallery (D1 use) to part office and part training (B1 /D1 uses), change of use of third floor from office (B1 use) to part office and part training (B1 / D1 uses) and change of use of fourth and fifth floors from art gallery/ artist workshop (D1 use) to gymnasium (D2 use) (dated 10.08.2011).

06-AP-1903 - Planning permission was granted for:

Change of use from offices, exhibition space and workshop to 3rd and 4th floors art gallery and 5th floor to meeting room and artists workshop (dated 27.11.2006)

06-AP-1131 - Planning permission was granted for:

Conversion of second floor to an art gallery and exhibition space (dated 08.08.2006).

KEY ISSUES FOR CONSIDERATION**Summary of main issues**

19. The main issues to be considered in respect of this application are:
- a) The principle of the development in terms of land use and conformity with strategic policies.
 - b) Environmental Impact Assessment
 - c) Height and design including appropriateness of the site for a tall building
 - d) Impact on character and setting of Listed Buildings and Conservation Areas
 - e) Internal layout and quality of accommodation
 - f) Affordable housing
 - g) Impact on adjoining occupiers
 - h) Transport issues
 - i) Planning obligations
 - j) Sustainability
 - k) Archaeology
 - l) Flood risk

Planning policy

20. National Planning Policy Framework (the Framework)
 Section 1: Building a strong, competitive economy
 Section 2: Ensuring the vitality of town centres
 Section 4: Promoting sustainable transport
 Section 6: Delivering a wide choice of high quality homes
 Section 7: Requiring good design
 Section 8: Promoting healthy communities
 Section 10: Meeting the challenge of climate change, flooding and coastal change
 Section 11: Conserving and enhancing the natural environment
 Section 12: Conserving and enhancing the historic environment
21. Further Alterations to the London Plan (FALP) 2015
 2.10 Central Activities Zone - Strategic Priorities
 2.13 Opportunity Areas and Intensification Areas
 2.15 Town centres
 3.3 Increasing housing supply
 3.4 Optimising housing potential
 3.5 Quality and design of housing developments
 3.6 Children and young people's play and informal recreation facilities
 3.8 Housing choice

- 3.9 Mixed and balanced communities
- 3.11 Affordable housing targets
- 3.12 Negotiating affordable housing on individual and private residential and mixed use schemes
- 3.13 Affordable housing thresholds
- 4.2 Offices
- 4.3 Mixed use development and offices
- 4.6 Support for and enhancement of arts, culture, sport and entertainment
- 4.7 retail and town centre development
- 5.2 Minimising carbon dioxide emissions
- 5.12 Flood risk management
- 6.3 Assessing effects of development on transport capacity
- 6.5 Funding Crossrail and other strategically important transport infrastructure
- 6.9 Cycling
- 6.13 Parking
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.5 Public realm
- 7.6 Architecture
- 7.7 Location and design of tall and large buildings
- 7.8 Heritage assets and archaeology
- 7.11 London view management framework
- 7.12 Implementing the London view management framework
- 8.2 Planning obligations
- 8.3 Community Infrastructure levy

22. Core Strategy 2011

Strategic Policies:

- 1 - Sustainable Development
- 2 - Sustainable transport
- 3 - Shopping, leisure and entertainment
- 4 - Places for learning, enjoyment and healthy lifestyles
- 5 - Providing new homes
- 6 - Homes for people on different incomes
- 7 - Family homes
- 10 - Jobs and businesses
- 12 - Design and conservation
- 13 - High environmental standards
- 14 - Implementation and delivery

Southwark Plan 2007 (July) - saved policies

23. The council's cabinet on 19 March 2013, as required by para 215 of the NPPF, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the Council satisfied itself that the policies and proposals in use were in conformity with the NPPF. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF.

- 1.1 Access to Employment Opportunities
- 1.4 Employment Sites Outside The Preferred Office Locations And Preferred Industrial Locations
- 1.7 Development within Town and Local Centres

- 1.11 Arts, Culture and Tourism Uses
- 2.1 Enhancement of Community Facilities
- 2.2 Provision of new Community Facilities
- 2.5 Planning Obligations
- 3.1 Environmental Effects
- 3.2 Protection of Amenity
- 3.3 Sustainability assessment
- 3.4 Energy efficiency
- 3.6 Air Quality
- 3.7 Waste reduction
- 3.9 Water
- 3.11 Efficient use of land
- 3.12 Quality in Design
- 3.13 Urban Design
- 3.14 Designing out Crime
- 3.15 Conservation of the Historic Environment
- 3.16 Conservation Areas
- 3.18 Setting of Listed buildings, Conservation Areas and world heritage sites
- 3.19 Archaeology Priority Zone
- 3.20 Tall Buildings
- 4.2 Quality of Residential Accommodation
- 4.3 Mix of dwellings
- 4.4 Affordable housing
- 5.1 Locating Developments
- 5.2 Transport impacts
- 5.3 Walking and cycling
- 5.4 Public Transport Improvements
- 5.6 Car parking

Supplementary Planning Documents (SPD and SPG)

Bankside Borough and London Bridge SPD (Draft)

- 24. A draft SPD was produced by the council and consultation was carried out in 2010. However, progression was held in abeyance pending discussions on a neighbourhood plan. The draft SPD should be accorded very little weight in the determination of planning applications.
- 25. Affordable Housing SPD (adopted 2008 and draft 2011)
Section 106 planning obligations and community infrastructure levy (CIL) SPD 2015
Residential design standards SPD 2011

Principle of development

- 26. The existing site includes a surface car park, and a 5 storey building. There is no record of a permanent permission for the car park, although it is known to have been in existence for many years. The car park boundary to Southwark Street contains a number of large format advertising hoardings. The land does not contribute positively to the streetscape of Southwark Street, and in attracting cars into the area has an adverse impact on the wider environment through congestion, noise and pollution. The redevelopment of this car park would, with a high quality and appropriate development, have positive benefits for the local area, and this issue should be given weight in any decision.
- 27. D Class use
The existing building (55 Southwark Street) is not listed, but its design (dating from the 1930s) has an appropriate relationship with the Thrale Street conservation area.
- 28. The building was originally built for office use, but it is clear that over time this building

has become vacant on occasions and other uses have been introduced. The planning history indicates that part of the building had planning permission to change the use of the building to one residential flat on the second and third floors (ref 95-AP-0446). It is not clear whether this permission was ever implemented and the existing floor plans submitted indicates that there is no existing residential use within the building. There are no other planning records on this site. Whilst the lawful use may be B1 class offices, the applicant claims that the existing use in the building is a temporary art studio (of approximately 443sqm) which would be a class D1 use under the Use Classes Order 1987 (as amended). Saved Policy 2.1 of the Southwark Plan states that:

"Planning permission for a change of use from D class community facilities will not be granted unless:

- i. The applicant demonstrates to the satisfaction of the LPA that the community facility is surplus to requirements of the local community and that the replacement development meets an identified need; or*
- ii. The applicant demonstrates that another locally accessible facility with similar or enhanced provision can meet the identified needs of the local community facility users."*

29. The application would demolish the existing building, but the proposal would reprovide for 687sqm of D1 use floorspace in the form of a museum, exhibition space and 'spiritual centre', which exceeds the current 443sqm. The museum and exhibition space and the spiritual centre could be used by all members of the community. This use is appropriate in the town centre and strategic cultural area and the increase in D1 floorspace is welcomed.
30. Offices
The introduction of B1 offices on this site is welcomed as it is located within the CAZ. Saved Policy 1.4 of the Southwark Plan seeks to retain existing and encourage new Class B Uses within certain areas, including the CAZ. There is excellent public transport accessibility and is also within a mixed use building. The quantum of office floorspace proposed (approximately 3,328sqm) would therefore be acceptable. This would more than re-provide the space currently within 55 Southwark Street if the Council were to assume its probable lawful use as offices.
31. Cultural uses
The proposal includes a theatre and rehearsal space and a small museum. The theatre sits adjacent to the Menier Chocolate Factory theatre, which is owned by the applicant. The new theatre would complement and expand the arts and cultural offer in Bankside and the South Bank, and the rehearsal space could support the existing theatres if they lack dedicated rehearsal space. The small museum would also be an appropriate addition to the wider tourist and cultural offer, although its location within the site does not make it immediately obvious to customers and visitors. The application also provides a small space at the upper level of the tower described as a 'spiritual centre'. The applicant has suggested that this would be available to the public although it shares its access with the flats and it is not clear under what terms it could be used. The cultural uses would be appropriate on this site, which sits within the CAZ, the Bankside, Borough and London Bridge Opportunity Area, the Strategic Cultural Area, and the Borough and Bankside town centre. The provision of new cultural uses are a positive aspect of the proposal. However, as this report goes on to consider, these benefits are substantially outweighed by the harm caused to the townscape and heritage assets by the overall development.
32. Residential flats
The tower contains 9 large private residential flats, accessed from Union Street. The inclusion of residential within a mixed use development on this site would be

acceptable, but the scheme makes no contribution to affordable housing, and this issue is discussed further at paragraphs 48-54. The application suggests that the residential flats would act as an 'enabling development' supporting the provision of the new theatre and allowing it to be developed without public subsidy. However, no evidence has been provided to support this assertion, and therefore this issue could be given very little weight in determining the application.

33. Conclusion in relation to principle of development

The National Planning Policy Framework (NPPF) 2012 sets out a presumption in favour of sustainable development, including a focus on supporting economic development and delivering homes. It encourages the effective use of land by reusing land that has been previously developed. The NPPF states that planning permission should be granted for proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. The principle of developing this neglected site for the range of uses being proposed is therefore supported, as each would contribute to the character, vitality and economic well-being of Bankside. The site is very well located for public transport as it has a PTAL rating of 6b (classed as Excellent). The applicant has stressed the benefits of the new theatre for the further regeneration of Southwark Street and the identity of the local area.

34. In recommending that planning permission be refused, officers have had regard to the NPPF as a whole, its emphasis on the importance of high quality and appropriate design, and the protection of heritage assets, and conclude that the very clear harm to the local environment is of such significance that it must outweigh the benefits of bringing an under-used site back into productive use. The application fails to comply with a large number of policies at both local and regional (London Plan) level, in relation to height, design, heritage, servicing, highways, affordable housing and energy. This very prominent site is capable of making a positive contribution to the townscape in Southwark Street, and potentially introducing permeability through from Southwark Street to Union Street, and to the east-west Low Line route. The current proposal is a totally inappropriate form of development and does not maximise the opportunities to make those positive contributions.
35. It should be noted that a pre-application submission was made in 2010/2011 for a scheme of a similar scale, height and design and officers gave clear advice that this form of development would not be acceptable. Since that pre-application advice, the applicant has not engaged in any discussions with the Local Planning Authority and this application has not addressed the concerns raised. This is explained further under the consultations section of this report.

Environmental impact assessment

36. No screening or scoping opinion was sought from the council prior to the submission of this application, and no Environmental Statement was submitted with the application.
37. However, an Environmental Statement would not be required with this application as the development does not fall within Schedule 1 or 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 1999.
38. The site does not exceed 5 hectares and therefore is not classified as a Schedule 2 'urban development project'. The development is unlikely to have a significant effect upon the environment by virtue of its nature, size or location based upon a review of the Schedule 3 selection criteria for screening Schedule 2 Development. The site is located outside a sensitive area as per Regulation 2(1) and the development is unlikely to generate any significant environmental effects of more than local significance. The threshold for considering 'impacts' under the EIA Regulations

means that most large scale developments, even where they have substantial impacts on conservation areas or wider views, will not be required to submit an Environmental Statement.

Design issues

39. Background

The site sits within the background assessment area of London View Management Framework (LVMF) Protected View 1A.2. It is also within the Thrale Street Conservation Area, and close to the boundaries of the Union Street conservation area to the south and the Borough High Street conservation area to the east. There are listed buildings in the vicinity of the site and within the immediate setting of the development would be the Grade II listed Nos. 51-55 Southwark Street, (the Menier Chocolate factory theatre). To the south and behind the railway arches is Nos. 62-64 Union Street which is also Grade II listed.

40. The existing building on the site is an attractive, curved commercial building dating from mid twentieth century (1930's). Despite not being in the best state of repair, it is an attractive building that contributes well to the character and appearance of the conservation area. Its scale, curved geometry and use of brick and stone all successfully echo the listed Menier Building on the other side of the car park.

41. This site is identified as having development potential in the adopted Thrale Street Conservation Area Appraisal. Paragraph 4.8.1 in particular states :

“An opportunity exists for redevelopment of the gap sites adjacent to Nos. 49 Southwark Street and between Nos. 53 and 55 Southwark Street. The introduction a building of four storeys on Southwark Street and no more than seven storeys against the railway on the southern edge of the conservation area. A key consideration is the relationship of the new development to its listed neighbours, both on Southwark Street and on Flat Iron Square (Union Street Conservation Area). Furthermore, historic maps illustrate a Georgian square in this location, before the railway line cut off the south west corner. No. 53 and the former building at No. 55 Southwark Street once bounded each side of Southwark Square and this historic arrangement should be preserved.”

42. This is considered to provide clear guidance for appropriate development on this site. The current proposal appears to have paid no regard to this guidance, either in terms of height, or to the opportunity to reflect the historic arrangement of the site. Indeed, as set out below, they are completely insensitive and cause substantial harm to the local area, including the conservation areas and surrounding listed buildings. This issue was reflected in many of the consultation responses, including those from Conservation Areas Advisory Group and Historic England.

43. Scale, height and tall buildings

In terms of scale and massing on the site, the development represents a clear overdevelopment of the site, with buildings which would appear overbearing in their relationship to the streetscene, and incongruous in their design and detailing.

44. London Plan policy 7.7 states that tall buildings may be appropriate in the CAZ and Opportunity Areas, but goes on to say that they would need particular consideration in sensitive areas such as conservation areas. It also notes that tall buildings should relate well to the form, scale and character of surrounding buildings and the urban grain, and consider impacts on local and strategic views.

45. Strategic Policy 12 of the Southwark Core Strategy identifies suitable locations for tall buildings at the northern end of Blackfriars Road, London Bridge, Elephant and Castle and the action area cores (Canada Water, Aylesbury and Peckham). The site under

consideration here is not identified as being appropriate for a tall building (it is outside the area defined as 'London Bridge'. The core strategy states that *"in other areas tall buildings are not appropriate because they are not very built up... and are covered by conservation areas or have other heritage implications"*.

46. Saved Policy 3.20 of the Southwark Plan states that any building over 30 metres tall is considered a 'tall building'. At just over 105m tall, the proposed tower would fall under this definition. In order for it to be considered acceptable, it would be expected to comply with all of the tests set out in the policy:
- i. It should make a positive contribution to the landscape; and
 - ii. It should be located at a point of landmark significance; and
 - iii. It should be of the highest architectural standard; and
 - iv. It should relates well to its surroundings, particularly at street level; and
 - v. It should contributes positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.
47. The proposals under consideration do not comply with any of the tests set out in Saved Policy 3.20. As such, the site is not an acceptable location for a tall building, and the design proposed is not of the quality that would be expected. The following paragraphs assess the proposals against each of these requirements.
48. *i. It should makes a positive contribution to the landscape*
 A new public amenity space is proposed on a first floor terrace set back from the street between the north and south blocks. This would provide only 332 sqm publicly accessible space and would be accessed via an external stair leading up from Southwark Street, located between the new building and the curved corner of the Menier Theatre Building. This is not considered to make a positive contribution to the landscape of the borough. It would not be visible from the public realm, would be difficult to gain access to, particularly for the disabled or those with young children (although the public lift to the exhibition space is noted) and would not be welcoming or inviting. The design of the space itself is entirely hard landscaped, save for a minimal number of small planters. It would be a narrow and overly enclosed space that would receive very little sunlight and, as suggested by the visualisations submitted, it is unlikely to offer any meaningful amenity value to the wider community. As such, it is far from the positive and generous contribution to landscape that would be considered sufficient to justify a tall building.
49. The other contribution proposed to the local landscape is a new link through the arches, connecting the development site to Flat Iron Square in the Union Street Conservation Area. However, this is already a through-route and is outside the application red line boundary, which means it is outside the remit of the applicant to deliver it. The conversion of the railway arches (Arch No. 33) is already under way. The route would not continue into or through the application site, but would only provide access to the proposed flats, and to a rear entrance to the offices. It is also noted that the layout of this new link, which carries most of the servicing for the development, does not appear to offer any opportunities to support the Low Line ambitions which are being promoted in the draft New Southwark Plan.
50. *ii. It should be located at a point of landmark significance*
 Primarily, the sites considered appropriate for tall buildings are set out in the Core Strategy. This site is not one of them. It does not have the city wide status, urban prominence, recognisable destination, or location at a transport hub to support a claim of landmark status. In short, there is no justification in way finding or navigation terms for a tall landmark structure on this site.
51. The applicant claims that the proposals would meet this requirement by virtue of the

nature of the uses proposed within the new building (i.e. public art and theatre facilities). It is also claimed that these uses would attract visitors south from Bankside and enliven Southwark Street, particularly at weekends. Whilst the proposal for theatre and arts uses would be welcomed, this in itself is not sufficient to create a landmark site that needs to be marked by a tall building. The theatre auditorium proposed would be located at basement level and would be 567sqm and the total usable theatre floor area would be 1,576sqm. . A cursory comparison with truly landmark theatres such as the National Theatre, which has three auditoria, or the Coliseum (home to English National Opera and London's largest theatre) which has a seating capacity of 2,359, suggests that the scale proposed is not of this order. That is not to say that a theatre of this size would be appropriate on this site, but rather that the proposal is not actually of a scale that would be considered a landmark destination.

52. Furthermore, as identified in the submitted material, the neighbouring Menier Theatre is successful, but does not rely on the 'beacon' effect of a tall landmark building in order to achieve this. The argument set out is therefore not considered sufficient to justify a tall building in this location.
53. *iii. It should be of the highest architectural standard*
The proposal has been referred to as 'the Rocket' as the design of the tower has been inspired by the engineering behind Gagarin's first space flight in 1961. The resultant form is unmistakably rocket-like, even featuring a cone shaped nose at the top and a supporting tower structure. The rocket reference is completely alien to the character and identity of Southwark, and indeed London as a whole. This crude and literal depiction, described by CAAG as 'comic', has no basis in its locale. As discussed in further detail below, all design is expected to respond sensitively to its context and to integrate into the place in which it is found and this scheme does not achieve this. Furthermore, it appears that this overriding design concept has been pursued at the expense of any architectural quality, and as such it results in compromises such as uncomfortable circular apartment layouts, inappropriate use of materials and a willfully insensitive insertion on the skyline. Although strong architectural concepts are encouraged, this requires sensitivity and skilled manipulation to result in the high architectural standards expected. This has not been employed here, where the inappropriate design concept has been allowed to dominate the proposals to a harmful degree.
54. *iv. It should relate well to its surroundings, particularly at street level*
The proposals for the street level experience of this building are just as harmful to the conservation area and surrounding listed buildings as the 'rocket' tower element.
55. The applicant claims that the proposals would relate well to their surroundings by virtue of the tower being set back from Southwark Street so as not to interrupt the pattern of buildings along Southwark Street. It is also claimed that in Thrale Street and views of it from next to Menier Building would be limited. Whilst the limited visibility claimed is queried, it is also important to note that not being visible is not the same as relating well to the surroundings. The base building would be entirely visible and, as described, is considered harmful. The contribution to the surroundings of this building is therefore considered entirely inappropriate, not only as a justification for a tall building, but also as the general contribution to townscape, as required under Saved Policy 3.13 (discussed below).
56. The north block fronting onto Southwark Street is inappropriately tall and bulky. This is discussed in greater detail below, under Saved Policy 3.13. The texture masonry base of the equivalent three-to-four storeys in height is gargantuan in scale when compared to the proportions of neighbouring buildings and offers very little human scale to the development. The neighbouring listed Menier Building by contrast, has a subtly expressed single storey base of slightly grander proportions than the upper

floors. This is rightly recognised as a finely proportioned building that contributes well to the street scene and character of the wider area. This overwhelming and inappropriate scale along Southwark Street is heightened by the over scaled windows and main entrance that have no relationship to the finely proportioned openings of the surrounding buildings, but serve only to make a grandiose statement about the sheer scale of the scheme. As a result, the Southwark Street elevation remains defensive and unwelcoming and it does not respond appropriately to the character of the surrounding townscape.

57. *v. It should contribute positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views*

The views submitted in support of the application (discussed in further detail below), show that the proposed tower would not comply with this requirement of Saved Policy 3.20. The tower would form a visually dominant, stand alone object of a scale and form that are inappropriate for this sensitive heritage setting.

58. The proposed tower would neither consolidate an existing (or emerging cluster) nor provide a justifiable key focus within views. It would undoubtedly visually dominate views, but there is a clear difference between the harmful impact that this would have with the justifiable need for a focal point in other locations. It would be an incongruous addition to the skyline, not only in terms of its height, but also in terms of form, materiality and appearance. This would not only cause unacceptable harm to the character of the local area, but also to the skyline of London as a whole (see assessment of LVMF Strategic View 1A.2 below).

59. *Strategic views*

As explained above, the application site falls within the background assessment area of LVMF protected View 1A.2, so the guidance found within the LVMF and Saved Policy 3.21 both apply. Saved Policy 3.21 states that “*The LPA will seek to protect and enhance the strategic views of St. Paul’s Cathedral illustrated on the Proposals Map.*”

60. It is noted that the application material does not contain any verified views or *Accurate Visual Representations* taken from the viewing point in question. It is therefore not possible to fully assess the impact that the proposals would have.

61. The submitted material claims that the proposed tower would be directly behind the dome of St Pauls Cathedral when viewed from this point (and makes the suggestion that this should be controlled by condition). The lack of verified views means that this claim cannot be supported. Furthermore, it would be unacceptable to control such a fundamental principle of this development by condition. The position of the site directly behind St Pauls in this view means that it is in one of the most sensitive locations in the background consultation area. Even a relatively small protrusion beyond the dome would cause substantial harm to the protected silhouette of arguably London’s most important landmark.

62. Notwithstanding all of the above, the LVMF and London Plan Policy 7.12 are explicit that “*where there is a Protected Vista: a development that exceeds the threshold height of a Landmark Viewing Corridor should be refused*”. The threshold height established for protected vista 1A.2 is 52.1m AOD in the Background Wider Setting Consultation Area. At over 105m, the tower proposed would far exceed this.

63. Historic England has commented that the small scale sketches and associated table provided within the Design and Access Statement are insufficient to assess the potential impact of a tall building and associated development on the immediate and wider historic environment. Given the significance of the heritage assets identified above, the potential impact of a tall building in this area and the absence of any convincing justification or analysis, including visually verified images, Historic England

concludes that the harm would be substantial.

64. It is also worth noting that, although it is possible that the proposed tower would be obscured from the specific viewing point identified, it is assumed that it would have a significant impact on the skyline from other adjacent locations. Given the incongruous form proposed, this impact would inevitably be of substantial harm, reiterating as set out above that the proposals would fail to comply with Part (v) of Saved Policy 3.20.
65. Urban Design
The NPPF stresses the importance of good design and states in paragraph 56 that: *“Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.”*
66. Strategic Policy 12 of the Core strategy states that *“Development will achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in.”*
67. Saved Policy 3.13 asserts that the principles of good urban design must be taken into account in all developments. This includes height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape.
68. In terms of the proposed height, scale and massing the major concern is of course the objection to a tall building in this location. However, there are also significant concerns about the street level massing of the scheme. Fronting onto Southwark Street, a 7 storey (23.85m) block is proposed with the intention of contributing to the established street scene. However, this is considered too tall and bulky to achieve this successfully. This far exceeds the design guidance set out for this site in the Thrale Street Conservation Area Appraisal, which clearly states that *“a building of four storeys on Southwark Street and no more than seven storeys against the railway on the southern edge of the conservation area”* would be acceptable in principle. At 23.85m tall, even with a generous floor to floor height of 3m the proposed street block would be the equivalent of almost 8 storeys. This is completely unacceptable and would result in substantial harm to the townscape character of the area.
69. The street façade would be broken down into a 3-4 storey (or the equivalent thereof) ‘textured base’ with a glass and steel ‘mansard’ structure above. The scale of the ‘base’ is gargantuan and would compromise the attractive and well mannered human scale of the existing townscape.
70. The top of the base would be defined by a cornice feature, above which would be a sloping façade that is intended to be reminiscent of a traditional mansard roof. However, it could not reasonably be described as a mansard roof since it takes up effectively half of the height of the street facing block and extends over 4 storeys. It is designed with a striking triangular motif that would visually dominate the street scene in a manner that is completely at odds with the recessive, set back nature of traditional mansards. It would also dominate and attract attention away from the finely detailed neighbouring listed building.
71. Saved Policy 3.16 ‘Conservation Areas’ of The Southwark Plan also requires proposals to deliver appropriate site layouts that respond to the existing urban structure, allow for connectivity and movement where desirable and result in active frontages.
72. Whilst the principle of having a restaurant and the theatre box office/lobby fronting onto the street is sound, the detailed design of the interface between inside and

outside is inappropriate. The hugely over scaled windows with deep fluted reveals proposed along this street elevation would be harmfully incongruous in the street scene; despite the size of these openings, the street elevation would remain defensive and unwelcoming and it is not considered that this would create the sort of active and well animated street frontage that is expected.

73. Whilst the illustrative material is indicative, it would also appear that this frontage would rely heavily on the presence of excessively large advertisements to provide animation and visual interest. The size and visual prominence of the advertisements shown in the application material (including the proliferation of advertisements shown on other facades) would be unacceptable.
74. The applicant claims that the new connection with Flat Iron Square via the railway arch 33 will enhance the use of the Flat Iron Square space by increasing footfall encouraging greater use of its amenities. However, the red line boundary does not include the areas to the rear of the site used for access and servicing, and there is no blue line to indicate that the applicant has any land ownership interest in that land.
75. The area between the building and the railway arches is designated in the draft New Southwark Plan as part of a pedestrian route (the 'Low-Line') between London Bridge and Waterloo along the line of the viaduct. The development concentrates its servicing at the rear of the building, thus turning its back on the proposed 'Low-Line' scheme for a pedestrian route. Although the Low-Line proposal could be given limited weight due to its early stage of progression, it is reasonable to expect applications to support the broad aspiration, for instance by creating active frontages along its route.
76. In terms of the building fabric, the palette of materials proposed (stone, brick, steel and glass) is not necessarily inappropriate or harmful in this context. However, the articulation proposed and the ways in which these materials would be applied is considered insensitive and unresponsive. This is discussed further below in terms of the impact on the heritage assets.
77. Impact on the character and setting of listed buildings and conservation areas
Saved Policy 3.15 requires development to preserve or enhance the special interest or historic character or appearance of buildings or areas of historical or architectural significance. It goes on to state that planning proposals that have an adverse effect on the historic environment will not be permitted and that the character and appearance of conservation areas should be recognised and respected in any new development within these areas.
78. Saved Policy 3.16 states that, within conservation areas, development should preserve or enhance the character or appearance of the area.
79. Historic England has highlighted that without representational material of an appropriate scope, quality, clarity and detail, it is not possible to assess the architectural quality of a tall building on the immediate and wider context.
80. As set out above, the proposals do not follow the guidance set out in the conservation area appraisal and make no attempt to justify why this advice has not been followed.
81. The Conservation Area Appraisal also identifies Lambert House at No. 55 Southwark Street (the existing building on the site) as an unaltered example of a 1930's commercial building. Although it is not formally identified as a key unlisted building it is of value to the conservation area, particularly in terms of the way its curved façade mirrors that of the Menier Building and its position marking the former extent of the Georgian Square. The 'Key Unlisted Buildings' are identified in the appraisal as being of "*particular note*", but it is not considered that this list is exhaustive of all those that

contribute positively. As the appraisal statement makes clear, the *“replacement of unlisted structures will normally only be entertained where existing buildings do not make a positive contribution to the character and appearance of the conservation area and the proposal can be shown to positively preserve or enhance that character and appearance.”* No 55 Southwark Street is considered to contribute positively to the conservation area and therefore its demolition would be resisted unless, as set out in Saved Policy 3.16, all of the following requirements can be demonstrated to be met:

*“i. Costs of repairs and maintenance would not be justified, when assessed against the importance of the building and the value derived from its continued use, providing that the building has not been deliberately neglected; and
 ii. Real efforts have been made to continue the current use or find a viable alternative use for the building; and
 iii. There will be substantial planning benefits for the community from redevelopment which would decisively outweigh loss from the resulting demolition; and
 iv. The replacement development will preserve or enhance the character or appearance of the conservation area and has been granted planning permission.”*

82. The submitted material fails to demonstrate compliance with any of the requirements set out above. Furthermore, it is not considered that the proposed replacement would preserve or enhance the character or appearance of the conservation area. The demolition of the existing building therefore cannot be supported.
83. In reviewing the replacement building, Saved Policy 3.16 also sets out the following requirements for new development within conservation areas:
- “ i. Respect the context of the conservation area, having regard to the content of Conservation Area Appraisals and other adopted Supplementary Planning Guidance / Documents; and
 ii. Use high quality materials that complement and enhance the conservation area; and
 iii. Do not involve the loss of existing traditional features of interest which make a positive contribution to the character or appearance of the Conservation Area; and
 iv. Do not introduce design details or features that are out of character with the area, such as the use of windows and doors made of aluminium, uPVC or other non-traditional materials.”*
84. The development would fail to comply with these policy requirements and it is therefore considered that it would result in unjustifiable harm to the character and appearance of the conservation area. The proposals completely fail to pick up on any of the strong and successful references of the fine neighbouring buildings. Instead they willfully dominate the area and react against these fine London buildings.
85. The submitted documents make explicit references to various iconic Russian buildings. This overtly Russian aesthetic is not considered appropriate for this context as it would completely fail to respond to the unique character of the conservation area, or even wider London context.
86. The expanse of glass and steel in this building is considered completely inappropriate given the surrounding context of finely detailed brick and stone buildings. As discussed above, the space rocket form and geometry is considered alien to the surrounding townscape and to lack any clear or convincing design justification relating to the all important principles of place making.
87. The east and west elevations are considered inappropriately austere, particularly when viewed from the existing roof terrace on the Menier Building. Given the visibility of the northern façade a greater degree of articulation and visual interest would be required.

88. This scheme has been presented to Southwark's Conservation Area Advisory Group (CAAG). The minutes of their meeting record an objection to this scheme and their view is also that the proposal of such prominent site on Southwark Street is insensitive and has no regard to the adjoining listed building and the scheme shows no appreciation of the history, architecture and character of Southwark Street and is alien to the architecture of London.
89. CAAG also echoes Officers' view that the tower is wholly inappropriate in character and scale and lies outside the area designated for high buildings in the London and Southwark plans.
90. In addition to the harm that would be caused to the Thrale Street Conservation Area within which the development would sit, the proposals would also fail to preserve or enhance the setting of the designated heritage assets, mostly notably the Menier Building Nos 51 and 53 Southwark Street and the nearby Borough High Street and Union Street Conservation Areas. The proposal would also impact on the wider setting of other heritage assets that are in the vicinity of the site.
91. It has already been noted above that most significantly harmful impacts would be on the setting of the Menier Building. Fundamentally, the proposals would dominate the setting of this fine Victorian Building, the heritage significance of which would be substantially harmed. The poor quality design of the street fronting block would disrupt the well established scale of the street, detract from the curve and fine detailing of the listed building.
92. Section 12 of the NPPF sets out national requirements relating the impact of development proposals on designated and undesignated heritage assets. Given the sensitive heritage setting of this site, it is not considered that sufficient information has been submitted to satisfy this requirement. Based on the assessment set out above, it is considered that the proposals would result in substantial harm to the designated heritage assets surrounding the site. The NPPF therefore states that consent should be refused unless it can be demonstrated that the harm is necessary to achieve substantial public benefits that outweigh that harm or loss. The public benefit of bringing a vacant site back into appropriate use does not outweigh the harm that this building would cause to the character of the area and the special architectural and historic interest of the surrounding designated heritage assets.
93. Design and heritage summary:
The location is not appropriate for a tall building, as defined in the Southwark Plan, Core Strategy and London Plan; Core Strategy policy CS12 notes that in the wrong location tall buildings can be overbearing and out of character. This is the case here, and the literal depiction of a space rocket is an alien and entirely inappropriate response to the heritage context. The NPPF states, at para 64, that permission should be refused for 'development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions'. The submitted scheme in its totality would, through its insensitive design and overbearing form, fail to preserve or enhance the conservation area and the settings of adjoining and nearby listed buildings and other conservation areas. This unacceptable development would result in substantial harm to the townscape character of the area and would fail to meet the planning policies set out in the national, regional and local plans.

Archaeology

94. The site is within the Borough, Bermondsey and Rivers Archaeological Priority Zone. The site stands at an important location within the Roman town. The site is also

adjacent to a known large-scale Roman stone building located and reported at the time of its construction.

95. The applicant has undertaken an archaeological evaluation on site, and submitted a written scheme of investigation which details the archaeological approach to the site. Should any planning permission be granted, the archaeological works would be undertaken as detailed in the written scheme of investigation by Pre-Construct Archaeology version dated May 2014.
96. The Council's Archaeologist has reviewed the submission and raises no objection but has recommended that the details of foundation design and the submission of a timely archaeological report should also be secured via conditions should the application be granted permission.

Affordable Housing

97. The application provides 9 duplex flats. The total approximate floor area for each flat would be 268sqm and whilst the Council would normally encourage units to exceed the minimum standards, the decision to arrange the tower as 9 very large private flats raises a number of policy issues relating to efficient use of land, and affordable housing.
98. As discussed earlier in the report, the scale and massing represents an unacceptable and inappropriate form of development. However, the inclusion of 2,621sqm of residential floorspace on the site arranged as just 9 flats would in itself be considered an inefficient use of that land, contrary to saved policy 3.11 'Efficient Use of Land' which states that all developments should ensure that they maximise the efficient use of land. In a more conventional arrangement, with a mix of generously sized but more conventional flats, a development could expect to reasonably accommodate around 30 flats within this floor area. In the current arrangement, each flat is 3 times the size of a conventionally sized 3 bedroom flat as required by the council's minimum floorspace standard.
99. The site is within the CAZ and has the highest PTAL rating. The density sought in this location would be between 700-1100 Habitable rooms/hectare (HR/Ha). Officers have calculated the residential density to be approximately 991HR/Ha, which does fall within the range in this central location. The calculation of density would assume more conventionally sized rooms; nevertheless, density *per se* should not be the sole determining factor. A key concern is the assumption by the applicant that by providing 9 flats the development avoids the obligation to provide affordable housing.
100. London Plan policy 3.13 'Affordable Housing Thresholds' states that boroughs should normally require affordable housing provision on sites which have the capacity to provide 10 or more homes. It goes on to explain that the affordable housing policy should be applied where a site would normally provide capacity for 10 or more homes, but a proposal provide less because it provides larger homes. It expects boroughs to ensure that such proposals make an equitable contribution to meeting affordable housing needs.
101. London Plan policy 3.13 'Affordable Housing Thresholds' states that boroughs should normally require affordable housing provision on sites which have the capacity to provide 10 or more homes. It goes on to explain that the affordable housing policy should be applied where a site would normally provide capacity for 10 or more homes, but a proposal provide less because it provides larger homes. It expects boroughs to ensure that such proposals make an equitable contribution to meeting affordable housing needs.

102. Strategic Policy 6 'Homes for People on Different Incomes' requires development of 10 or more units to provide affordable housing. The draft Affordable Housing SPD (2011) provides further clarity on this point by explaining that developments which appear to be designed to avoid the threshold at which affordable housing is required may need to be revised following an assessment of site capacity. The application gives no explanation for the size or mix, only describing these as 'luxury' flats. The application assumes that the 10 units threshold is absolute, and so gives no justification for the lack of affordable housing provision. Since the development is fundamentally unacceptable in terms of its form and height, officers have not sought any changes to the flat layouts to address London Plan policy 3.13. It is recommended that the application be refused due to its failure to make any provision for affordable housing, contrary to London Plan policy 3.13, Core Strategy policy SP6 and SP7, and saved Southwark Plan policy 4.4, together with the further guidance in the Affordable Housing SPD's.

Housing Quality

103. Saved Policy 4.2 'Quality of Residential Accommodation' states that planning permission will be granted for residential development where it achieves good quality living conditions, including outlook, privacy, and natural daylight.
104. The residential flats are designed to be duplex apartments over 2 floors and have two layout designs. Flats 1, 3, 5, 7 and 9 have the same flat layout and have 2 dedicated bedrooms (although the study room could be counted as an additional bedroom). Apartments 1, 3, 5, 7 and 9 will have access to the 7th floor green roof space but no private amenity space. Flats 2, 4, 6 and 8 share the same layout and have 3 bedrooms with 3 separate private balconies per flat.
105. The residential design standards SPD (2011) states that for units containing three or more bedrooms (and in this case the large studies in some flats equate to a third bedroom), 10 sqm of private amenity space is required and this scheme does not achieve this. Private balconies of over 12sqm are proposed for Flats 2, 4, 6 and 8, but none are provided for units 1, 3, 5, 7 and 9.
106. Daylight and sunlight
No daylight and sunlight report has been submitted to indicate the levels of natural light for the future occupants in the flats, but as this has a circular plan form and is completely glazed and there are no other structures of this height in close proximity, it is expected that the units would have good levels of daylight. All of the proposed units would have dual aspect and good outlook.
107. Privacy
There are no immediate adjoining residential properties to the site and given the height of the tower, it is unlikely to have any privacy issues for both nearby residents and the future occupants of the scheme.
108. Noise
A noise report has not been submitted by the applicant and for a site that is on a busy road and close to a railway line a formal noise assessment would be expected. It is not clear how the residential internal noise levels could be achieved and whilst conditions could be imposed to ensure compliance with the standards, Officers would need at least a baseline assessment. If the Council were to approve this application, further discussion would be required about the means by which future residents would be protected from noise and vibration. It is expected that a technical solution could be designed to create an acceptable residential environment. Since this issue would be likely to be capable of being overcome by design or conditions, it is recommended that the issue is recorded in an informative note on the decision notice, rather than forming

a reason for refusal is recommended that this issue be raised as an informative on the decision notice in order that the applicant could address the issue in any subsequent application.

109. Air quality for residents

The development is in an Air Quality Management Area (AQMA). The applicant has not prepared an Air Quality assessment. For this central London location on a main bus route, it is anticipated that there will be a need for mitigation as the pollutants concentrations are predicted to be above the air quality objectives.

110. Mechanical ventilation in the form of mechanical heat recovery systems are proposed as no windows are openable to the flats above and this would at least protect indoor air quality. The Environmental Protection Team (EPT) considers that for such a large scheme to be submitted without any relevant reports considering EPT matters is unacceptable, and this issue is raised as a suggested reason for refusal.

Impact of proposed development on amenity of adjoining occupiers and surrounding area

111. The site is located in an area which already contains similar uses, including the Menier Theatre, and a range of office and residential uses. It is not considered that any of the proposed uses, if controlled by appropriate conditions for instance in relation to hours of opening, would have a significant adverse impact on neighbouring uses.
112. In terms of the height and form of the development, the applicant has submitted very limited information to assess the micro climate and daylight and sunlight impacts.
113. Whilst the neighbouring properties are mainly in commercial use, it is still considered that the application should provide a proper and thorough daylight and sunlight assessment. There are certainly a number of residential units scattered around in the vicinity of the site, particularly on Thrale Street to the north and Union Street to the south. The applicant has only provided a basic illustrative shadow diagram analysis and does not go on to detail the effect of the shadowing. Developments of this height and scale would be expected to submit an assessment by a suitably qualified professional using the British Research Establishment (BRE) guidelines 'Site Layout Planning and Daylight and Sunlight' (2011). In the absence of such supporting document, it is not considered that any reliable conclusions can be reached on the daylight and sunlight impact of the development upon neighbouring properties.
114. The development could potentially have a significant adverse impact on the neighbouring occupants' amenity in terms of daylight and sunlight and fails to comply with Strategic Policy 13 'High Environmental Standards' and Saved Policy 3.2 'Protection of Amenity'.
115. London Plan Policy 7.6 'Architecture' and Policy 7.7 'Location and Design of Tall and Large Buildings' seeks to ensure that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and micro climate. This is particularly important for tall buildings.
116. The applicant has carried out very limited assessment on the potential wind tunnel effect that will result from this new tall building and any increased ground wind speeds. The applicant has merely explained that as the tall building is circular, any wind hitting it will not be deflected down but dispersed. The applicant also claims that as the tower is situated on a lower building, any deflected wind patterns would not affect pedestrians at ground floor level.

117. Without a detailed and evidence-based assessment, Officers cannot carry out a thorough analysis on the micro climate effects. As such, the development would potentially have a significant adverse impact on the micro climate and fails to comply with London Plan policies 7.6 and 7.7 and Strategic Policy 13 of The Core Strategy.

Transport issues

118. The transport planning group has reviewed the submitted documents, but concluded that it is not possible to properly assess the application as insufficient information has been provided. Given the size of development and the mix of uses including a theatre, a Transport assessment should have been submitted.
119. The applicant has submitted within their design and access statement a brief explanation of the accessibility of the site and an account of the access arrangements. The site is within an area that has excellent access to public transport with a PTAL rating of 6b. Notwithstanding the lack of information for a full assessment and the site's good public transport links, the site would provide for over 10,000sqm of mixed use floorspace. The number of visitors, staff and residents would generate a significant increase in trips to the site and this has not been assessed by the applicant. Furthermore, the scale of the development would be expected to have a significant impact on the local highway network. Mitigation measures would be required to deal with the impacts of the development on the highway and the immediate public realm. The applicant has not proposed any transport site-specific measures and no S106 financial contributions have been offered to allow the Council to secure these improvements.
120. The application shows servicing to the rear (south side) of the site, via Union Street. The vehicles would use a shared access routes alongside the railways arches, on land owned by Network Rail. The applicant has stated that they have existing rights over this land, although it has not been possible to verify this with Network Rail or the applicant. The use of this land to service a large development (which would require large scale deliveries such a sets and scenery) would potentially inhibit the operation of other uses in the arches, and compromise pedestrian access to the proposed flats. The applicant should provide further information to explain how its servicing will be managed with the other users of this access and that sufficient space is provided to ensure the other uses can undertake their business/servicing without blocking the route and causing vehicles to wait on the highway. The lack of detailed analysis and explanation in the submitted documents means that officers cannot be confident that a long term, sustainable and workable servicing strategy could be secured, and therefore the risk remains that the development would cause harm to the highway network, and to the amenities of other occupiers.
121. There is no car parking proposed and in this area a car-free scheme would normally be acceptable. However the submitted plans show a car lift in the basement, ground, first and second floors, but the applicant has not indicated what this car lift would be for. Provision for disabled parking may be required in view of the uses being proposed; the application states that no wheelchair flats would be provided, but not how disabled visitors to the theatre or other uses would be accommodated.
122. The proposed development would provide some cycle parking at the southern side of the building off Southwark Bridge Road. The plans indicate that these would be within a narrow gap between the proposed building and the adjoining building to the west (City Bridge House). There is no indication as to the number of cycle spaces and the location along a narrow alley way means that these would not be convenient or safe. The applicant has indicated that public cycle provision (for visitors) is available on the public highway, which is unacceptable and this scale of development would be expected to make additional provision within the site boundary for its visitors.

123. The lack of cycle parking for staff, residents and visitors would be contrary to Saved Policy 5.3 of The Southwark Plan as no effort has been made to encourage other sustainable forms of transport to and from the site. Furthermore, no Travel Plan has been submitted.
124. Likewise, there is insufficient information on the use of car clubs (such as Zipcar). The applicant merely states that the new residents would have access to car-share opportunities, but makes no provision to expand the car club provision or provide membership for its new residents.
125. The lack of information and proper provision for servicing, cycle parking and disabled parking is contrary to Southwark Plan and London Plan policies and as such the application cannot demonstrate that it would provide a sustainable form of development.

Impact on trees

126. There are no existing trees on the site as it is currently used as a surface car park. The applicant has proposed a 'public' courtyard on the first floor, sandwiched between the north and south block. The plans indicate that some planting would be proposed within this courtyard, but there is no indication as to the size, number, height and species of the trees/plants. The trees/plants would not be visible from the street and therefore no enhancement or benefit to the streetscape or townscape is evident.

Planning obligations (S.106 undertaking or agreement)

127. Saved policy 2.5 'Planning Obligations' of the Southwark Plan, Strategic Policy 14 'Implementation and Delivery' of the Core Strategy and Policy 8.2 of the London Plan advise that planning obligations should be secured to overcome the negative impacts of a generally acceptable proposal. Saved policy 2.5 is reinforced by the Supplementary Planning Document (SPD) on Section 106 planning obligations and community infrastructure levy (2015).
128. The applicant has argued that as this scheme provides public good, in terms of new jobs and regeneration through a new theatre attracting tourists and local people, no S106 payment is required.
129. Since the submission of the application, the Southwark CIL SPD was adopted in April 2015. The intention of the CIL Regulations is that S106 planning obligations should mainly be used to secure site specific infrastructure which is needed to directly address the impact of development. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:
- necessary to make the development acceptable in planning terms;
 - directly related to the development; and
 - fairly and reasonably related in scale and kind to the development
130. Only defined site specific mitigation that meets the tests in regulation 122 can be given weight. In this instance, there are a number of potential impacts of the scheme that would need to be mitigated through s106 contributions to make the development acceptable in planning terms.
131. Amenity space
The scheme does not provide the required private amenity space for all of the flats.
132. Officers consider that there should be mitigation measures for the shortfall of private

amenity space. The council's adopted S106 SPD 2015 seeks a S106 planning obligation to help improve open space elsewhere near to the development site and any shortfall in the required provision of amenity space will be charged at a specific rate.

133. Heritage

Given that the site is within an archaeological priority zone (APZ), the SPD seeks S106 planning obligations to support Southwark's effective monitoring of archaeological matters. This will make sure that this archaeology is properly managed and preserved. The applicant has not offered any contribution towards future monitoring of archaeology matters.

134. Car clubs

Given the car-free development, it is expected that future residents should have access to car clubs in the area. The Council would normally seek 3 years of free car club membership for each eligible resident and this would be secured under a s106 agreement and paid for by the developer.

135. Transport and public realm

The applicant has not provided adequate information for Officers to consider whether site-specific transport or public realm works would be required. It is expected for a development of this size and scale that some form of contribution to improvements and enhancements to the immediate local area surrounding the development is required such as to the paving works, enhancement of routes to public transport hubs and works to provide the 'Low-Line'.

136. Employment

One of Southwark's Economic Well-being Strategy objectives is for regeneration and development to provide lasting jobs for residents in both construction and related industries and jobs in completed developments. This can be supported through the funding of skills and training programmes for unemployed residents.

137. The council seeks to secure a S106 planning obligation to help place unemployed jobseekers from the local area into jobs within the construction stage of a development. This would be through the agreement of targets and an obligation for developers to provide their own programme and/or work with council programmes to achieve them. In addition no mechanism has been offered to support local people to access the estimated 328 jobs in the completed development.

138. The applicant has not indicated whether they would provide their own construction workplace co-ordinator and arrange the required training. There are targets set out in the SPD and the applicant has not agreed to meet these. Furthermore, in the event that these targets are not met, there will be a charge for the missed output and the Council reserves the right to request such sum as the council considers may reasonably be required. This would normally be drafted in the S106 agreement but in the absence of such an agreement the 'under performance' charge cannot be secured.

139. In the absence of a signed Section 106 Agreement, there is no mechanism in place to avoid or mitigate the impact of the proposed development on employment, public open space, the transport network, the public realm and affordable housing, and the proposal would therefore be contrary to saved policy 2.5 of the Southwark Plan (2007), strategic policy 14 of the Core Strategy (2011) and Policy 8.2 of the London Plan (2011)

140. Mayoral Community Infrastructure Levy (CIL)

Section 143 of the Localism Act states that any financial contribution received in terms of community infrastructure levy (CIL) is a material "local financial consideration" in

planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration, however the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, primarily Crossrail, while Southwark's CIL will provide for infrastructure that supports growth in Southwark.

141. In Southwark the Mayoral CIL (MCIL) was established at a rate of £35 per sqm of new development, although this is an index linked payment. The Southwark CIL (SCIL) rate is based on the type and location of the development.
142. If an application is refused, no CIL payment is liable. If planning permission was to be granted, the SCIL would total **£1,370,638** and MCIL equates to **£399,384**.

Sustainable development implications

143. London Plan Policy 5.2 outlines that development proposals should make the fullest contribution to minimising carbon dioxide emissions in line with the Mayor's energy hierarchy. Strategic Policy 13 'High Environmental Standards' of the Core Strategy also stipulate that development should be designed of the highest environmental standards.
144. The applicant has submitted within their design and access statement an energy strategy in the appendices and demonstrates how the scheme would comply with the London Plan energy hierarchy, which should be as follows:
 - Be lean - use less energy;
 - Be clean - Supply energy efficiently;
 - Be green - use renewable energy.
145. The energy strategy report, which is appended to the design and access statement states that the measures shall provide 36.4% reduction in carbon emissions due to use of on-site renewable and low carbon technologies. The statement also states that the measures shall provide 46% of building regulated energy use through the use of on-site renewables and low carbon technologies.
146. Nevertheless, the applicant has not demonstrated fully how the energy hierarchy has been followed. As outlined in the Mayor's Sustainable, Design and Construction SPG, since 6 April 2014 the Mayor has applied a 35% carbon reduction target beyond Part L 2013 of the Building Regulations. There is no confirmation from the submitted document that the energy savings have been based on Part L 2013.
147. The regulated CO2 savings from energy efficiency alone should be determined relative to the Target Emissions Rate (TER) or a Part L 2013 Building Regulations compliant development. The submitted document however, does not provide the detailed calculations and it also does not show the reduction to carbon emissions through energy efficiency measures alone (be lean).
148. Furthermore, the Mayor's advice is that after calculating the regulated emissions at each stage of the energy hierarchy, the percentage savings in regulated emissions over a Part L 2013 of the Building Regulations compliant development must be provided.
149. The submitted energy strategy lacks sufficient evidence and information on how the energy savings would be achieved in accordance with the GLA's guidance on preparing energy assessments (April 2015).
150. At the time of writing, the GLA has not provided the council with their Stage 1 report,

but it is expected that the GLA may raise further detailed comments in relation to energy.

Other matters

Flood Risk

151. The site is within a Flood Zone 3 and the applicant has submitted a flood risk assessment (FRA) and the Environment Agency (EA) raises no objection to the scheme overall.
152. There are a number of points raised however. The EA notes that a theatre and associated uses will be located at the lower ground floor levels and the preference is that basement levels are not incorporated within developments within areas at risk of flooding.
153. In terms of the flooding information referred to within the submitted FRA by RPS namely, the information obtained from the EA relating to modelled flood extents and levels has been superseded, because the EA's tidal River Thames flood modelling has been updated since the information was obtained. The EA has stated that they expect to review an up-to-date FRA for any planning application. However, on this occasion, the EA are adopting a pragmatic approach by not objecting to this planning application, as it is believed that the production of an updated FRA would not materially alter their stance on the proposed development.
154. The council's own flood and drainage team has also reviewed the application and whilst no drainage strategy is currently provided, this could be dealt with via condition. Notwithstanding this, the team has requested further clarifications be made on the groundwater levels and groundwater flows and the runoff rates for the site. Again, the lack of information does not allow for full assessment and would not meet Strategic Policy 13, where developments are required to help reduce flood risk by reducing water run-off, using sustainable urban drainage systems. The target is that major development must reduce surface water run-off by more than 50%

Contamination

155. The site is currently being used as a surface car park and the existing building is a temporary art studio. It is likely that given the uses some form of contamination is possible but no site investigation has been carried out. Whilst conditions could be imposed to secure further information such as remediation strategies, there should at least be a desk-top site contamination and preliminary risk assessment to identify any associated long term risks. EPT do not consider it acceptable for such a large application to be submitted without any relevant reports considering contamination. EPT has therefore recommended this application to be refused.

Consultations and pre-application advice

156. For all large-scale major application, a Statement of Community of Involvement is necessary from the applicant to record outcomes from consultation with the local community.
157. The applicant has submitted within their design and access statement a summary of their consultation exercise, which according to the applicant involved local people, local organisations, Southwark council and the Commission for Architecture and the Built Environment (CABE). Nevertheless, there is no clear summary of all the responses given. It also appears that most of the responses relate to the success of the existing Menier theatre rather than the proposed development itself.

158. The applicant has not provided clear information detailing when and where community meetings took place, what points the community raised and how the design has been revised to take account of the community response or if it has not, the reasons why.
159. The applicant did engage with the Local Planning Authority in 2010/2011 and the council gave advice based on an earlier iteration of this scheme. The pre-application advice was whilst the council would support the enhancement of arts or cultural facilities, the serious concerns about the form and design of the overall scheme meant that the scheme would not be acceptable. The advice provided by CABE at that time also raised serious concerns.
160. Since the advice in 2011, the applicant has not engaged further with the council (or the GLA) and no pre-application enquiry was submitted for this current scheme. It is expected that for a scheme of this scale, early engagement should have been made by the applicant as encouraged by the NPPF. The submitted scheme has not addressed those concerns highlighted in 2011 and the fundamental amendments which would be required to make the scheme acceptable would need to come forward under a fresh application.
161. Furthermore, the GLA would have expected to be engaged early in the process, but it is apparent that the applicant has not involved them in their design process. The GLA are not able to provide their Stage 1 comments prior to this report due to the timing of the meetings and will issue a combined Stage 1 and 2 once the committee makes a resolution on this application.

Conclusion on planning issues

162. The Council would welcome the beneficial redevelopment of this under-utilised site, which the conservation area appraisal notes could make a positive contribution to the local area. A development providing a mix of mix of cultural, arts, office and residential use would be appropriate in the CAZ and Strategic Cultural Area and would bring the neglected site back into use, contributing to the character, vitality and economic well-being of Bankside.
163. However, the applicant has not engaged with the council to agree an appropriate form for the development, and the scheme as submitted is wholly unacceptable. Para 58 of the NPPF expects planning authorities to approve sustainable development, but notes that developments should respond to local character and reflect the identity of local surroundings and materials.
164. The quality of the submitted documents, relative to the scale and impact of the development, is inadequate, and does not enable a rigorous and proper assessment of the impacts. No verified views, or proper townscape analysis was submitted, and no clear evidence base underpins the brief transport, daylight, amenity or microclimate reports.
165. The location is not appropriate for a tall building, and at 30 storeys the 'rocket' tower would stand as an isolated and incongruous feature in the townscape, whose design references and literal interpretation are completely alien to Southwark. This would cause significant harm not just to the local area, but to the skyline of London as a whole. The building does not meet the stringent tests for new tall buildings as set out in the London Plan and local policies, and this issue is reflected in many of the consultation responses.
166. The strong objections from Historic England, in terms of the quality of the documentation and the impact of the overall scheme are noted, as is the objection

from the conservation areas advisory group. Clear harm is caused to the heritage significance of the Thrale Street, Union Street and Borough High Street conservation areas, as well as to the setting of nearby listed buildings, most notably the adjacent Menier building.

167. The loss of the building at 55 Southwark Street has not been justified; it is considered to contribute positively to the conservation area, and its demolition would be resisted in the absence of a very high quality replacement building.
168. The application makes no provision for affordable housing despite the site having the capacity to accommodate many more than the 9 flats being proposed. In accordance with the London Plan and the affordable housing SPD, this scheme should make an equitable contribution to meeting affordable housing needs.
169. Servicing details have not demonstrated that the buildings could be serviced without compromising other users, and the development does not have regard to the "Low-Line" initiative which suggests a pedestrian route in this area. Whilst the Low-Line can be accorded little weight pending further progress on the New Southwark Plan, any future applications should expect to create a more positive active frontage to this south side of the site.
170. The submitted Energy Strategy lacks sufficient evidence and information on how the energy savings would be achieved in accordance with the GLA's Guidance and fails to demonstrate how the development would be sustainable.
171. The scale of the development would require a number of mitigation measures that would need to be secured via a Section 106 Agreement and in the absence of this, there is no mechanism in place to secure the required mitigation.
172. The NPPF makes it clear that sustainable development should be supported, and that this means approving development proposals which accord with the development plan. In this case, the merits of the development, in terms of economic growth and reuse of brown field land, are significantly and demonstrably outweighed by the harm to the local townscape and its heritage assets, and its failure to provide for affordable housing and mitigation of its impacts. As such, it is recommended that the application be refused subject to the response of the GLA.

Community impact statement

173. In line with the council's community impact statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process. The impact on local people is set out above, the following issues relevant to particular communities/groups likely to be affected by the proposal have been identified as none and the likely adverse or less good implications for any particular communities/groups have been also been discussed above.

Consultations

174. Details of consultation and any re-consultation undertaken in respect of this application are set out in Appendix 1.

Consultation replies

175. Details of consultation responses received are set out in Appendix 2. Statutory and non-statutory consultation responses from Historic England and CAAG are also listed

in Appendix 2.

176. Summary of consultation responses

A total of 24 letters/emails have been received from neighbour consultation. 19 of those are objections and these comments are summarised below.

177. Objections to height, design and scale

The height of the proposed development is significantly higher than anything else in the area, it is not appropriate to have such a high rise building in an area with no other building of a similar height; This development will have an overbearing appearance on the small-scale buildings currently adjoining the site; this development is not with in keeping within the Conservation Zone that it sits with in; the local area has period warehouses, listed building as well as low level residential spaces; this tower would look severely out of place; it is of little design merit to mitigate it's opposing size and will negatively impact on the local conservation area; its appearance would be incongruous within the local scene and would not enhance the skyline; object to the demolition of another historical Southwark street property as Southwark Street historical properties need conserving; the proposed 30 storey tower will compromise the local amenity by initiating further ' unacceptable proposals for buildings of a 'similar' height as it would set a precedent; it provides no local amenity within the proposal as a whole; A 30 storey tower will significantly impede the local 'visual enjoyment' currently afforded to the residents and visitors of flat Iron Square /Southwark Bridge Road Southwark Street, Thrale Street and Union street; fail to deliver any significant improvements to the public realm; there is not enough detail about the tower.

Officers' response: The comments have been noted and Officers agree that this development is of an unacceptable scale, height and design and would harm the conservation area and the nearby heritage assets.

178. Amenity impacts

The height of the building could block out light to residents' flat, and also reduce privacy; air quality would be reduced; the planned 30-storey tower will overshadow the low-rise buildings of Union Street; and by the considerable noise which will be generated by the construction works and by the increased number of delivery and refuse removal vehicles in the area; the tower could create wind effects that might negatively affect residents of the surrounding low-rise building; the access strategy and the site waste strategy can not justify a development of this size.

Officers' response: In the absence of detailed information, Officers have not been able to fully assess the amenity impacts on neighbouring occupants. This is one of the reasons for refusal.

179. Principle of uses

There is no good housing mix in this development; suspects the developers will market this building overseas to investment purchasers, bringing in little by way of community involvement; the UK has an affordable housing crisis and sadly, this proposal does nothing to address this issue; also concerned about the cynicism of so few flats being included, thus negating the obligation to contribute to the community through section 106 payments; development is a property which contains little residential opportunity and certainly no social housing a Sui generis use would imply that there is no guarantee that the proposed planning proposal will actually deliver the proposed occupancy of a theatre/rehearsal space/ art space and museum centre; the current use of the property at 55 Southwark street is a well respected art academy. Southwark cannot be permitted to offer any planning approval without strict assurances/ conditions that ensure proposal would be delivered as they are proposed; this application would appear to be a strategic attempt to manipulate the borders of planning guideline- to provide increased site value- as it could now have the attributed planning consent; questions over what research or figures there are to demonstrate

the impact on the existing Menier theatre.

Officers' response: it is acknowledged that the development would fail to make most efficient use of the land and provide the necessary affordable housing. The lack of s106 contributions to mitigate the impacts of the development is also noted and is discussed above.

180. Sui generis class uses are unique and any planning permission that may be granted would ensure that only these uses would be permitted.

181. Consultation matters

No local notices appear to have been posted at any boundary wall of this site; No proposal of a demolition application has been posted outside the Building at 55 Southwark Street; no other local residents had received written notification that this application was being considered; the date of notification of this application has allowed only a minimum of 15 working days during the known summer vacation period.

Officers' response: Letters were sent out to neighbouring properties and two site notices were placed in front of the site on Southwark Street and Southwark Bridge Road on 23 July 2015. The consultation obligations have therefore been fulfilled.

182. Support

4 representations to support the scheme have been received:

The project will attract visitors to the Borough of Southwark bringing more business to the area, creating more employment for local people and enhancing the look with the raising of the standard of the architectural appearance of Southwark Street; this development represents a huge investment from Russia into Southwark and is enthusiastically received as a commercial project by the Russian Embassy; Southwark needs this type of commercial and cultural mix development; the current occupiers of this building have been kept informed by the applicants during the past three years and have been consulted regularly about the exterior design operations and is of the opinion that the exterior design is imaginative, bold and ideal for showcasing already successful Bankside theatres such as the adjacent Menier Chocolate Factory and the GLOBE; Southwark street is an interesting mix of Victorian and modern architecture and this new theatre design with its inspiring day and evening facade and rocket will be a beacon for the area; it will lure London residents and visitors with a promise of entertainment and good food and then further enchant them by providing a quiet, reflective terrace away from the roar and fumes of Southwark street traffic; the slim and unique Gagarin rocket, will become as loved and admired as the OXO tower or Tate chimney; it is certainly out of this world and what better place than Southwark for a monument to the Russian Space race; the incredible subtlety of the main booster pod is a welcome addition to the low scale Victorian architecture adjacent and certainly goes to show how far society has progressed in terms of elegance and sophistication; the pencil slim rocket a lighthouse to illuminate dull Southwark Street will provide 9 duplex apartments and the capital from these will provide London with a rare unsubsidized producing theatre; it is a wonderful offer to residents and visitors and in future a big attraction away from the Thames path which would also beckon visitors towards the renewed Elephant.

Human rights implications

183. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.
184. This application has the legitimate aim of providing mixed use development. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered

with by this proposal.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/1145-53 Application file: 14/AP/4773 Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5729 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Images
Appendix 4	Recommendation

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Wing Lau, Senior Planning Officer	
Version	Final	
Dated	17 September 2015	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic director, finance & corporate services	No	No
Strategic director, environment and leisure	No	No
Strategic director, housing and community services	No	No
Director of regeneration	No	No
Date final report sent to Constitutional Team		24 September 2015

APPENDIX 1**Consultation undertaken****Site notice date:** 23/07/2015**Press notice date:** 23/07/2015**Case officer site visit date:** 23/07/2015**Neighbour consultation letters sent:** 20/07/2015**Internal services consulted:**

Ecology Officer
 Economic Development Team
 Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]
 Flood and Drainage Team
 Highway Licensing
 Highway Development Management
 Housing Regeneration Initiatives
 Waste Management

Statutory and non-statutory organisations consulted:

English Heritage
 Environment Agency
 Greater London Authority
 Historic England
 London Fire & Emergency Planning Authority
 London Underground Limited
 Metropolitan Police Service (Designing out Crime)
 Network Rail (Planning)
 Thames Water - Development Planning
 Transport for London (referable & non-referable app notifications and pre-apps)

Neighbour and local groups consulted:

58 Thrale Street London SE1 9HW	Part Third Floor Thames House SE1 9EL
59 Thrale Street London SE1 9HW	Room Adj The North Antrium Suite The Hop Exchange SE1 1TY
55 Thrale Street London SE1 9HW	Unit 10 16-48 Great Guildford Street SE1 0HS
56 Thrale Street London SE1 9HW	16 Keppel Row London SE1 0FB
57 Thrale Street London SE1 9HW	17 Keppel Row London SE1 0FB
35 Southwark Bridge Road London SE1 9HH	18 Keppel Row London SE1 0FB
Flat E 17 Southwark Bridge Road SE1 9HH	13 Keppel Row London SE1 0FB
33 Park Street London SE1 9EA	14 Keppel Row London SE1 0FB
35 Park Street London SE1 9EA	15 Keppel Row London SE1 0FB
Flat B 17 Southwark Bridge Road SE1 9HH	22 Keppel Row London SE1 0FB
Flat C 17 Southwark Bridge Road SE1 9HH	90a Southwark Street London SE1 0SW
Flat D 17 Southwark Bridge Road SE1 9HH	90b Southwark Street London SE1 1RQ
4 Gatehouse Square London SE1 9HN	19 Keppel Row London SE1 0FB
5 Gatehouse Square London SE1 9HN	20 Keppel Row London SE1 0FB
6 Gatehouse Square London SE1 9HN	21 Keppel Row London SE1 0FB
1 Gatehouse Square London SE1 9HN	12 Keppel Row London SE1 0FB
2 Gatehouse Square London SE1 9HN	3 Keppel Row London SE1 0FB
3 Gatehouse Square London SE1 9HN	4 Keppel Row London SE1 0FB
Flat A 17 Southwark Bridge Road SE1 9HH	5 Keppel Row London SE1 0FB
Flat 38 27 Park Street SE1 9EG	Part Third Floor North Thames House SE1 9EL

Flat 39 27 Park Street SE1 9EG
 Flat 4 27 Park Street SE1 9EG
 Flat 35 27 Park Street SE1 9EG
 Flat 36 27 Park Street SE1 9EG
 Flat 37 27 Park Street SE1 9EG
 Flat 8 27 Park Street SE1 9EG
 Flat 9 27 Park Street SE1 9EG
 Intel House 24 Southwark Bridge Road SE1 9HF
 Flat 5 27 Park Street SE1 9EG
 Flat 6 27 Park Street SE1 9EG
 Flat 7 27 Park Street SE1 9EG
 15 Perkins Square London SE1 9HU
 9 Perkins Square London SE1 9HU
 11 Perkins Square London SE1 9HU
 13 Perkins Square London SE1 9HU
 7 Perkins Square London SE1 9HU
 10 Gatehouse Square London SE1 9HN
 11 Gatehouse Square London SE1 9HN
 12 Gatehouse Square London SE1 9HN
 7 Gatehouse Square London SE1 9HN
 8 Gatehouse Square London SE1 9HN
 9 Gatehouse Square London SE1 9HN
 1 Perkins Square London SE1 9HU
 3 Perkins Square London SE1 9HU
 5 Perkins Square London SE1 9HU
 13 Gatehouse Square London SE1 9HN
 14 Gatehouse Square London SE1 9HN
 15 Gatehouse Square London SE1 9HN
 Flat 34 27 Park Street SE1 9EG
 Flat D Cromwell Flats SE1 9HP
 Flat E Cromwell Flats SE1 9HP
 Flat F Cromwell Flats SE1 9HP
 Flat A Cromwell Flats SE1 9HP
 Flat B Cromwell Flats SE1 9HP
 Flat C Cromwell Flats SE1 9HP
 Flat K Cromwell Flats SE1 9HP
 Flat 10 27 Park Street SE1 9EG
 Flat 11 27 Park Street SE1 9EG
 Flat G Cromwell Flats SE1 9HP

 Flat H Cromwell Flats SE1 9HP
 Flat J Cromwell Flats SE1 9HP
 Flat G 33 Southwark Bridge Road SE1 9HH
 Flat D 33 Southwark Bridge Road SE1 9HH
 Flat E 33 Southwark Bridge Road SE1 9HH

 Flat F 33 Southwark Bridge Road SE1 9HH
 Flat A 33 Southwark Bridge Road SE1 9HH
 Flat B 33 Southwark Bridge Road SE1 9HH
 Flat C 33 Southwark Bridge Road SE1 9HH
 Flat 26 27 Park Street SE1 9EG
 Flat 27 27 Park Street SE1 9EG
 Flat 28 27 Park Street SE1 9EG
 Flat 23 27 Park Street SE1 9EG

 Flat 24 27 Park Street SE1 9EG
 Flat 25 27 Park Street SE1 9EG
 Flat 32 27 Park Street SE1 9EG
 Flat 3 27 Park Street SE1 9EG
 Flat 33 27 Park Street SE1 9EG
 Flat 29 27 Park Street SE1 9EG
 Flat 30 27 Park Street SE1 9EG
 Flat 31 27 Park Street SE1 9EG
 Flat 2 27 Park Street SE1 9EG
 Flat 14 27 Park Street SE1 9EG
 Flat 15 27 Park Street SE1 9EG
 Flat 16 27 Park Street SE1 9EG
 Flat 12 27 Park Street SE1 9EG

 Flat 1 27 Park Street SE1 9EG
 Flat 13 27 Park Street SE1 9EG
 Flat 20 27 Park Street SE1 9EG
 Flat 21 27 Park Street SE1 9EG
 Flat 22 27 Park Street SE1 9EG
 Flat 17 27 Park Street SE1 9EG
 Flat 18 27 Park Street SE1 9EG
 Flat 19 27 Park Street SE1 9EG
 77-79 Union Street London SE1 1SG
 83-87 Union Street London SE1 1SG

 1 Keppel Row London SE1 0FB
 2 Keppel Row London SE1 0FB
 9 Keppel Row London SE1 0FB
 10 Keppel Row London SE1 0FB
 11 Keppel Row London SE1 0FB
 6 Keppel Row London SE1 0FB
 7 Keppel Row London SE1 0FB
 8 Keppel Row London SE1 0FB
 Part Basement And Third Floor 61 Southwark Street SE1 1SA
 Room 19 Third Floor Tulip House SE1 1XF
 Room 23 Third Floor Tulip House SE1 1XF
 Room 26 Fourth Floor Tulip House SE1 1XF
 Room 14 Second Floor Tulip House SE1 1XF
 Room 15 Second Floor Tulip House SE1 1XF
 Room 18 Second Floor Tulip House SE1 1XF
 Room 8 First Floor Tulip House SE1 1XF
 Room 9 First Floor Tulip House SE1 1XF
 Room 17 Second Floor Tulip House SE1 1XF
 Units 402 To 403 16-48 Great Guildford Street SE1 0HS
 Basement Cunchos SE1 1RQ
 Room 3 Ground Floor Tulip House SE1 1XF
 Part Basement Peer Group The Hop Exchange SE1 1TY
 Ground Floor Rear Tulip House SE1 1XF
 First Floor Rear Tulip House SE1 1XF
 Part Lower Ground Floor The Hop Exchange SE1 1TY
 Unit 03 16-48 Great Guildford Street SE1 0ES
 Unit 04 16-48 Great Guildford Street SE1 0ES
 Second Floor Front 61 Southwark Street SE1 0HL
 Room 22 Third Floor Tulip House SE1 1XF
 Room 20 Third Floor Tulip House SE1 1XF
 Room 21 Third Floor Tulip House SE1 1XF
 Room 16 Second Floor Tulip House SE1 1XF
 Room 24 Fourth Floor Tulip House SE1 1XF
 Room 25 Fourth Floor Tulip House SE1 1XF
 7 Triangle Court 10-18 Redcross Way SE1 1TA
 Room 5 Ground Floor Tulip House SE1 1XF
 Room 4 Ground Floor Tulip House SE1 1XF
 18 Great Guildford Street London SE1 0FD
 Lower Ground And Mezzanine And Third Floor And Fourth
 Floor 36 Southwark Bridge Road SE1 9EU
 Workshop Peabody Buildings SE1 0TW
 Living Accommodation 9 Stoney Street SE1 9AA
 Unit 202 Great Guildford Business Square SE1 0HS
 Unit 15 100 Southwark Street SE1 0SW
 Basement And Ground Floor And Second Floor To Fifth Floor
 76-80 Southwark Street SE1 0PN
 Second Floor 81 Southwark Bridge Road SE1 0NQ
 Unit 301 16-48 Great Guildford Street SE1 0HS
 Unit 302 16-48 Great Guildford Street SE1 0HS
 Second Floor 82 Borough High Street SE1 1LL
 Third Floor 82 Borough High Street SE1 1LL
 First Floor Great Guildford Business Square SE1 0HS
 Third Floor Evans Lombe House SE1 1XW
 Basement And Ground Floor Great Guildford Business Square
 SE1 0HS
 Unit 7 And Unit 7a Great Guildford Business Square SE1 0HS
 Fifth Floor Intel House SE1 9HF
 Sixth Floor Intel House SE1 9HF
 Fourth Floor Intel House SE1 9HF
 Basement The Ragged School SE1 1SG
 Second Floor Intel House SE1 9HF
 Third Floor Intel House SE1 9HF
 Basement Intel House SE1 9HF
 Ground Floor Intel House SE1 9HF
 First Floor Intel House SE1 9HF
 Apartment 4 Penthouse 1 Playhouse Court SE1 0AT
 The Wheatsheaf The Hop Exchange SE1 1TY
 Basement And Ground Floor 44-48 Borough High Street SE1
 1XB
 First Floor To Third Floor 44-48 Borough High Street SE1 1XB
 First Floor 1 Playhouse Court SE1 0AT
 Bankside 2 And 3 90-100 Southwark Street SE1 0SW
 Church Of The Most Precious Blood Omeara Street SE1 1TE
 29 Great Guildford Street London SE1 0ES
 Unit 1 88 Union Street SE1 0NW
 Unit 3 The Ragged School SE1 1SG
 Basement And Ground Floor 4 Park Street SE1 9AB
 Third Floor Flat 54 Borough High Street SE1 1XL
 Flat 5 88 Union Street SE1 0NW

60 Southwark Street SE1 1UN
 57-61 Union Street London SE1 1SG
 69-71 Union Street London SE1 1SG
 48 Union Street London SE1 1TD
 50-52 Union Street London SE1 1TD
 George Bell House 8a Ayres Street SE1 1ES
 Flat 3 79-81 Union Street SE1 1SG
 Sixth Floor Pentagon House SE1 1UN
 1 Red Cross Cottages Ayres Street SE1 1EX
 2 Red Cross Cottages Ayres Street SE1 1EX
 3 Red Cross Cottages Ayres Street SE1 1EX
 4 Whitecross Cottages Ayres Street SE1 1ET
 5 Whitecross Cottages Ayres Street SE1 1ET
 6 Whitecross Cottages Ayres Street SE1 1ET
 Saxon House 48 Southwark Street SE1 1UN
 4 Red Cross Cottages Ayres Street SE1 1EX
 5 Red Cross Cottages Ayres Street SE1 1EX
 6 Red Cross Cottages Ayres Street SE1 1EX
 42 Southwark Street London SE1 1UN
 10-18 Union Street London SE1 1SZ
 Suite 83 To 84 The Hop Exchange SE1 1TY
 30 Southwark Street London SE1 1TU
 28 Southwark Street London SE1 1TU
 First Floor Pentagon House SE1 1UN
 Coffee House 63 Union Street SE1 1SG
 8 Union Street London SE1 1SZ
 56a Ayres Street London SE1 1EU
 37a Union Street London SE1 1SD
 Guild House 52d Borough High Street SE1 1XN
 The Hop Exchange 24 Southwark Street SE1 1TY
 3 Whitecross Cottages Ayres Street SE1 1ET
 Flat 39 Pattison House Marshalsea Estate SE1 1EY
 Flat 4 Pattison House Marshalsea Estate SE1 1EY
 Flat 40 Pattison House Marshalsea Estate SE1 1EY
 Flat 36 Pattison House Marshalsea Estate SE1 1EY
 Flat 37 Pattison House Marshalsea Estate SE1 1EY
 Flat 38 Pattison House Marshalsea Estate SE1 1EY
 Flat 44 Pattison House Marshalsea Estate SE1 1EY
 Flat 45 Pattison House Marshalsea Estate SE1 1EY
 Flat 46 Pattison House Marshalsea Estate SE1 1EY

 Flat 41 Pattison House Marshalsea Estate SE1 1EY
 Flat 42 Pattison House Marshalsea Estate SE1 1EY
 Flat 43 Pattison House Marshalsea Estate SE1 1EY
 Flat 35 Pattison House Marshalsea Estate SE1 1EY
 Flat 27 Pattison House Marshalsea Estate SE1 1EY
 Flat 28 Pattison House Marshalsea Estate SE1 1EY
 Flat 29 Pattison House Marshalsea Estate SE1 1EY
 Flat 24 Pattison House Marshalsea Estate SE1 1EY
 Flat 25 Pattison House Marshalsea Estate SE1 1EY
 Flat 26 Pattison House Marshalsea Estate SE1 1EY
 Flat 32 Pattison House Marshalsea Estate SE1 1EY
 Flat 33 Pattison House Marshalsea Estate SE1 1EY
 Flat 34 Pattison House Marshalsea Estate SE1 1EY
 Flat 3 Pattison House Marshalsea Estate SE1 1EY
 Flat 30 Pattison House Marshalsea Estate SE1 1EY
 Flat 31 Pattison House Marshalsea Estate SE1 1EY
 Southwark Tavern 22-22a Southwark Street SE1 1TU
 25-33 Southwark Street London SE1 1RQ
 Boot And Flogger 10-20 Redcross Way SE1 1TA
 58 Borough High Street London SE1 1XF
 62 Borough High Street London SE1 1XF
 Art House Redcross Way SE1 1TA
 Bishops Hall 8 Ayres Street SE1 1ES
 1 Whitecross Cottages Ayres Street SE1 1ET
 2 Whitecross Cottages Ayres Street SE1 1ET
 Suite 10 To 11 The Hop Exchange SE1 1TY
 Suite 7 To 9 The Hop Exchange SE1 1TY
 56 Borough High Street London SE1 1XF

 Flat 5 Pattison House Marshalsea Estate SE1 1EY
 Flat 50 Pattison House Marshalsea Estate SE1 1EY
 Flat 6 Pattison House Marshalsea Estate SE1 1EY
 Flat 47 Pattison House Marshalsea Estate SE1 1EY
 Flat 48 Pattison House Marshalsea Estate SE1 1EY
 Flat 49 Pattison House Marshalsea Estate SE1 1EY
 90 Borough High Street London SE1 1LL
 69a Union Street London SE1 1SG
 71a Union Street London SE1 1SG

 Flat 6 88 Union Street SE1 0NW
 Flat 7 88 Union Street SE1 0NW
 Unit 2 88 Union Street SE1 0NW
 Flat 3 88 Union Street SE1 0NW
 Flat 4 88 Union Street SE1 0NW
 Second To Fourth Floor 72-76 Borough High Street SE1 1XF
 Flat 1 Shoemaker House SE1 0ES
 Flat 2 Shoemaker House SE1 0ES
 20 Great Guildford Street London SE1 0FD
 22 Great Guildford Street London SE1 0FD
 Room 77 The Hop Exchange SE1 1TY
 Room 78 The Hop Exchange SE1 1TY
 49 Southwark Bridge Road London SE1 9HH
 Flat 3 Shoemaker House SE1 0ES
 Flat 4 Shoemaker House SE1 0ES
 39 Great Guildford Street London SE1 0ES
 Flat 4 28 Park Street SE1 9EQ
 Flat 5 28 Park Street SE1 9EQ
 Flat 6 28 Park Street SE1 9EQ
 Flat 1 28 Park Street SE1 9EQ
 Flat 2 28 Park Street SE1 9EQ
 Flat 3 28 Park Street SE1 9EQ
 Unit 16 100 Southwark Street SE1 0SW
 Flat 7 28 Park Street SE1 9EQ
 Flat 8 28 Park Street SE1 9EQ
 Third Floor South Wigglesworth House SE1 9HH
 Fourth Floor And Fifth Floor 30 Park Street SE1 9EQ
 Ground Floor Right 30 Park Street SE1 9EQ
 Third Floor 30 Park Street SE1 9EQ
 Flat 8 88 Union Street SE1 0NW
 Flat 9 88 Union Street SE1 0NW
 Flat 10 88 Union Street SE1 0NW
 First Floor 9 Park Street SE1 9AB
 Ground Floor 38-40 Southwark Street SE1 1UN
 Living Accommodation Rose And Crown SE1 1SG
 Flat 2 31 Union Street SE1 1SD
 Flat 3 31 Union Street SE1 1SD
 First Floor 56 Ayres Street SE1 1EU
 Basement Front Ground Floor Front And First Floor Rear 42
 Borough High Street SE1 1XW
 First Floor Front 42 Borough High Street SE1 1XW
 Basement And Ground Floor 56 Ayres Street SE1 1EU
 Sixth Floor Rear 61 Southwark Street SE1 0HL
 Basement And Ground Floor 12 Stoney Street SE1 9AD
 First Floor 12 Stoney Street SE1 9AD
 First Floor Rear 61 Southwark Street SE1 0HL
 Fourth Floor Rear 61 Southwark Street SE1 0HR
 Second Floor Rear 61 Southwark Street SE1 1SA
 84-88 Union Street London SE1 0NW
 Suite 11 100-112 Union Street SE1 0NL
 Suite 13 100-112 Union Street SE1 0NL
 Basement Thrale House SE1 9HW
 Basement And Ground Floor 6 Union Street SE1 1SZ
 52b Union Street London SE1 1TD
 Basement 50 Southwark Street SE1 1UN
 Rooms 80 To 82 The Hop Exchange SE1 1TY
 4 Playhouse Court London SE1 0AT
 Second Floor 50 Southwark Street SE1 1UN
 First Floor 50 Southwark Street SE1 1UN
 Ground Floor Rear 50 Southwark Street SE1 1UN
 9 Playhouse Court London SE1 0AT
 Ground Floor 64 Borough High Street SE1 1XF
 First Floor 64 Borough High Street SE1 1XF
 5-6 Playhouse Court London SE1 0AT
 1 Playhouse Court London SE1 0AT
 8 Playhouse Court London SE1 0AT
 Third Floor 50 Southwark Street SE1 1UN
 Second Floor Rear And Third Floor 42 Borough High Street
 SE1 1XW
 Unit 231 16-48 Great Guildford Street SE1 0HS
 Ground Floor Rear 42 Borough High Street SE1 1XW
 Second Floor Front 42 Borough High Street SE1 1XW
 Fifth Floor 50 Southwark Street SE1 1UN
 Fourth Floor 50 Southwark Street SE1 1UN
 Units 406 To 408 16-48 Great Guildford Street SE1 0HS
 First Floor Notcutt House SE1 9EU
 53-61 Southwark Bridge Road London SE1 9HH
 Part Basement Right 61 Southwark Street SE1 0HL

Flat 7 Pattison House Marshalsea Estate SE1 1EY
 Flat 8 Pattison House Marshalsea Estate SE1 1EY
 Flat 9 Pattison House Marshalsea Estate SE1 1EY
 46 Redcross Way London SE1 1HA
 Flat 5 Norfolk House SE1 1GJ
 Flat 6 Norfolk House SE1 1GJ
 Flat 7 Norfolk House SE1 1GJ
 Flat 2 Norfolk House SE1 1GJ
 Flat 3 Norfolk House SE1 1GJ
 Flat 4 Norfolk House SE1 1GJ
 Railway Arch 24 Redcross Way SE1 1TA
 77a Union Street London SE1 1SG

 Flat 8 Norfolk House SE1 1GJ

 Flat 9 Norfolk House SE1 1GJ

 Flat 10 Norfolk House SE1 1GJ

 Flat 1 Norfolk House SE1 1GJ

 20 Park Street London SE1 9EQ

 21 Park Street London SE1 9EQ
 10 Stoney Street London SE1 9AD
 25 Park Street London SE1 9EQ

 26 Park Street London SE1 9EQ
 53 Thrale Street London SE1 9HW
 22 Park Street London SE1 9EQ
 23 Park Street London SE1 9EQ
 24 Park Street London SE1 9EQ
 Bridge Studios 13 Park Street SE1 9AB
 Suite 60 To 63 The Hop Exchange SE1 1TY
 Fifth Floor Pentagon House SE1 1UN
 Suite 64 To 66 The Hop Exchange SE1 1TY
 Suite 45 To 47 The Hop Exchange SE1 1TY
 Suite 49 To 50 The Hop Exchange SE1 1TY
 2 Stoney Street London SE1 9AA

 5 Stoney Street London SE1 9AA
 6 Stoney Street London SE1 9AA
 First Floor North Thames House SE1 9EL

 Ground Floor Thames House SE1 9ER
 1 Stoney Street London SE1 9AA
 62 Union Street London SE1 1TD
 52a Borough High Street London SE1 1XN
 Suite 85 To 86 The Hop Exchange SE1 1TY
 55 Southwark Street London SE1 1RU
 58 Ayres Street London SE1 1EU
 50 Borough High Street London SE1 1XW
 St Saviours House 39-41 Union Street SE1 1SD
 Suite 87 To 89 The Hop Exchange SE1 1TY
 Suite 51 To 52 The Hop Exchange SE1 1TY
 39 Redcross Way London SE1 1HG
 35 Union Street London SE1 1SD
 City Bridge House 57 Southwark Street SE1 1RU
 88 Borough High Street London SE1 1LL
 40 Borough High Street London SE1 1XW
 Second Floor Crowne House SE1 1UN
 76 Borough High Street London SE1 1LL
 Suite 73 To 74 The Hop Exchange SE1 1TY
 17 Porter Street London SE1 9HD
 Units 325 And 326 16-48 Great Guildford Street SE1 0HS
 Basement And Ground Floor 5 Park Street SE1 9AB
 Basement And Ground Floor 9 Park Street SE1 9AB
 Unit 307 16-48 Great Guildford Street SE1 0HS
 Unit 308 16-48 Great Guildford Street SE1 0HS
 Units 322 And 323 16-48 Great Guildford Street SE1 0HS
 First Floor South Thames House SE1 9EL
 Second Floor Front Right Thames House SE1 9EL
 Second Floor Rear Right Thames House SE1 9EL
 Ground Floor 13 Park Street SE1 9AB
 17 Park Street London SE1 9AB
 Basement Thames House SE1 9EL
 Unit 306 16-48 Great Guildford Street SE1 0HS
 Units 328 And 329 16-48 Great Guildford Street SE1 0ES
 Unit 330 16-48 Great Guildford Street SE1 0HS

 Unit 206 16-48 Great Guildford Street SE1 0HS
 Units 05 16-48 Great Guildford Street SE1 0HS
 Units 102 To 104 16-48 Great Guildford Street SE1 0ES
 Unit 205 16-48 Great Guildford Street SE1 0HS
 Units 1 And 2 19-19a Great Guildford Street SE1 9EZ
 Unit 3 23 Great Guildford Street SE1 9EZ
 Unit 4 23a Great Guildford Street SE1 9EP
 Units 122 To 124 16-48 Great Guildford Street SE1 0ES
 Units 125 To 127 16-48 Great Guildford Street SE1 0ES
 Units 317 To 320 16-48 Great Guildford Street SE1 0ES
 First Floor 82 Borough High Street SE1 1LL
 Part Basement Room B3 16-48 Great Guildford Street SE1 0ES
 Part Basement Room B7 16-48 Great Guildford Street SE1 0ES
 Part Basement Rooms B1 To B2 16-48 Great Guildford Street SE1 0ES
 Part Basement Room B4 16-48 Great Guildford Street SE1 0ES
 Part Basement Room B5 16-48 Great Guildford Street SE1 0ES
 Part Basement Room B6 16-48 Great Guildford Street SE1 0ES
 Store 8 Warehouse Yard The Hop Exchange SE1 1TY
 The Atrium Suite The Hop Exchange SE1 1TY
 Workshop 3 And 4 Warehouse Yard The Hop Exchange SE1 1TY
 North Atrium Suite The Hop Exchange SE1 1TY
 Rooms 4 To 6 The Hop Exchange SE1 1TY
 Store 7 Warehouse Yard The Hop Exchange SE1 1TY
 Castle Corner Rear Of SE1 1TE
 Part Basement 61 Southwark Street SE1 0HL
 First Floor Left Thrale House SE1 1UN
 Ground Floor Left Thrale House SE1 1UN
 Ground Floor And Kitchen Unit The Hop Exchange SE1 1TY
 Basement 32 Southwark Bridge Road SE1 9EU
 First Floor 32 Southwark Bridge Road SE1 9EU
 Ground Floor 32 Southwark Bridge Road SE1 9EU
 Basement And Ground Floor 41 Great Guildford Street SE1 0ES
 Second Floor Flat 4 Omeara Street SE1 1TE
 Third Floor Flat 4 Omeara Street SE1 1TE
 Basement And Ground Floor 60 Southwark Bridge Road SE1 0AS
 Second Floor Left Wigglesworth House SE1 9HH
 Second Floor Right Wigglesworth House SE1 9HH
 Third Floor 32 Southwark Bridge Road SE1 9EU
 43-47 Southwark Bridge Road London SE1 9HH
 Basement 64 Borough High Street SE1 1XF
 Flat A 73-75 Union Street SE1 1SG
 Flat B 73-75 Union Street SE1 1SG
 Flat C 73-75 Union Street SE1 1SG
 Rooms 36 And 37 The Hop Exchange SE1 1TY
 Rooms 38 And 39 The Hop Exchange SE1 1TY
 Room 79 The Hop Exchange SE1 1TY
 First Floor Room 12 Tulip House SE1 1XF
 First Floor Room 11 Tulip House SE1 1XF
 First Floor Room 10 Tulip House SE1 1XF
 Rooms 34 And 35 The Hop Exchange SE1 1TY
 Unit 401 16-48 Great Guildford Street SE1 0HS
 Unit 404 16-48 Great Guildford Street SE1 0HS
 Unit 405 16-48 Great Guildford Street SE1 0HS
 9 Triangle Court 10-18 Redcross Way SE1 1TA
 3 Calverts Building 52 Borough High Street SE1 1XN
 81 Southwark Bridge Road London SE1 0NQ
 1-3 The Hop Exchange 24 Southwark Street SE1 1TY
 23-26 The Hop Exchange 24 Southwark Street SE1 1TY
 Unit 409 16-48 Great Guildford Street SE1 0HS
 Unit 410 16-48 Great Guildford Street SE1 0HS
 Second Floor Notcutt House SE1 9EU
 72-74 Borough High Street London SE1 1XF
 Second Floor Front 32 Southwark Bridge Road SE1 9EU
 First Floor 76-80 Southwark Street SE1 0PN
 Concierges Office Maidstone Buildings Mews SE1 1GD
 First Floor Flat 4 Omeara Street SE1 1TE
 Third Floor Flat 6 Union Street SE1 1SZ
 Second Floor Rear 32 Southwark Bridge Road SE1 9EU
 12 Triangle Court 10-18 Redcross Way SE1 1TA
 Basement And First Floor 51 Southwark Street SE1 1RU

Units 331 To Unit 333 16-48 Great Guildford Street SE1 OHS
 Units 315 And 316 16-48 Great Guildford Street SE1 OHS
 Unit 324 16-48 Great Guildford Street SE1 OHS
 Unit 327 16-48 Great Guildford Street SE1 OHS
 Units 129 To 131 16-48 Great Guildford Street SE1 OHS
 Unit 303 16-48 Great Guildford Street SE1 OHS
 Unit 305 16-48 Great Guildford Street SE1 OHS
 Unit 334 16-48 Great Guildford Street SE1 OHS
 Unit 08 16-48 Great Guildford Street SE1 OHS
 Unit 09 16-48 Great Guildford Street SE1 OHS
 Petrol Filling Station 97-113 Southwark Bridge Road SE1 0AX
 Ground Floor 3 Southwark Street SE1 1RQ
 First Floor 3 Southwark Street SE1 1RQ
 Basement And Ground Floor 64 Southwark Bridge Road SE1 0AS
 Basement 66 Southwark Bridge Road SE1 0AS
 Third Floor North Wigglesworth House SE1 9HH
 Basement 5-7 Southwark Street SE1 1RQ
 First Floor 5-7 Southwark Street SE1 1RQ
 Second Floor 5-7 Southwark Street SE1 1RQ
 Second Floor 3 Southwark Street SE1 1RQ
 Third Floor 3 Southwark Street SE1 1RQ
 Fourth Floor 3 Southwark Street SE1 1RQ
 Third Floor 62 Southwark Bridge Road SE1 0AS
 Ground Floor 34 Southwark Bridge Road SE1 9EU
 First Floor 34 Southwark Bridge Road SE1 9EU
 Second Floor 34 Southwark Bridge Road SE1 9EU
 Railway Arch 22 Redcross Way SE1 1TA
 Railway Arch 23 Redcross Way SE1 1TA

 5-6 Redcross Way London SE1 9HR
 Second Floor 58 Southwark Bridge Road SE1 0AS
 Third Floor 58 Southwark Bridge Road SE1 0AS
 Ground Floor 62 Southwark Bridge Road SE1 0AS
 Third Floor 34 Southwark Bridge Road SE1 9EU
 Basement And Ground Floor 58 Southwark Bridge Road SE1 0AS
 First Floor 58 Southwark Bridge Road SE1 0AS
 Unit 314 16-48 Great Guildford Street SE1 OHS
 Ground Floor 106-114 Borough High Street SE1 1LB
 First Floor 106-114 Borough High Street SE1 1LB
 Second Floor 106-114 Borough High Street SE1 1LB
 Fourth Floor 78-80 Borough High Street SE1 1LL
 Fifth Floor 78-80 Borough High Street SE1 1LL
 Basement And Ground Floor 82 Borough High Street SE1 1LL
 First Floor Warehouse Corner Of Stoney Street SE1 9DG
 Units 01 And 02 16-48 Great Guildford Street SE1 0ES
 Units 06 16-48 Great Guildford Street SE1 0ES
 Third Floor 106-114 Borough High Street SE1 1LB
 Fourth Floor 106-114 Borough High Street SE1 1LB
 Ground Floor Warehouse Corner Of Stoney Street SE1 9DG
 Third Floor 78-80 Borough High Street SE1 1LL
 First Floor And Second Floor Calverts Buildings SE1 1XN
 Basement Ground Floor And First Floor Evans Lombe House SE1 1XW
 Second Floor Evans Lombe House SE1 1XW
 Flat G 37 Southwark Bridge Road SE1 9HH
 Part Basement Part Ground Floor And First Floor To Fourth Floor 1 America Street SE1 0NE
 Fifth Floor 1 America Street SE1 0NE
 Ground Floor 78-80 Borough High Street SE1 1LL
 First Floor 78-80 Borough High Street SE1 1LL
 Second Floor 78-80 Borough High Street SE1 1LL
 Ground Floor 52b Borough High Street SE1 1XN
 Basement And Ground Floor 60 Borough High Street SE1 1XF
 Basement 78-80 Borough High Street SE1 1LL
 Unit 220 16-48 Great Guildford Street SE1 OHS
 Units 222 And 223 16-48 Great Guildford Street SE1 OHS
 Unit 226 16-48 Great Guildford Street SE1 OHS
 Units 213 To 216 16-48 Great Guildford Street SE1 OHS
 Unit 218 16-48 Great Guildford Street SE1 OHS
 Unit 219 16-48 Great Guildford Street SE1 OHS
 Units 309 And 310 16-48 Great Guildford Street SE1 0ES
 Units 311 And 312 16-48 Great Guildford Street SE1 0ES
 Unit 313 16-48 Great Guildford Street SE1 OHS
 Units 227 And 228 16-48 Great Guildford Street SE1 OHS

 Ground Floor Right 5-7 Southwark Street SE1 1RQ
 Ground Floor Left 5-7 Southwark Street SE1 1RQ
 Basement 4 Emerson Street SE1 9DU
 Second Floor And Third Floor Flat 11 Stoney Street SE1 9AD
 First Floor Flat 11 Stoney Street SE1 9AD
 Second Floor Rear 8 Playhouse Court SE1 0AT
 8 Triangle Court 10-18 Redcross Way SE1 1TA
 Ground Floor 84-88 Union Street SE1 0NW
 Basement And Ground Floor 103 Union Street SE1 0LA
 Basement Offices 2 Redcross Way SE1 9HR
 Third Floor 64 Borough High Street SE1 1XF

 Second Floor 64 Borough High Street SE1 1XF
 1 Triangle Court 10-18 Redcross Way SE1 1TA
 2 Triangle Court 10-18 Redcross Way SE1 1TA

 20 Triangle Court 10-18 Redcross Way SE1 1TA
 25a Sumner Street London SE1 9JZ
 18 Triangle Court 10-18 Redcross Way SE1 1TA
 10 Triangle Court 10-18 Redcross Way SE1 1TA
 11 Triangle Court 10-18 Redcross Way SE1 1TA
 3 Triangle Court 10-18 Redcross Way SE1 1TA
 4 Triangle Court 10-18 Redcross Way SE1 1TA
 5 Triangle Court 10-18 Redcross Way SE1 1TA
 6 Triangle Court 10-18 Redcross Way SE1 1TA
 11-17 Great Guildford Street London SE1 0ES
 Flat 3 41 Great Guildford Street SE1 0ES
 Flat 2 43 Great Guildford Street SE1 0ES
 Fourth Floor Flat 60 Southwark Bridge Road SE1 0AS
 First Floor Front Second Floor And Third Floor Flat 50-52 Borough High Street SE1 1XW
 Flat 1 41 Great Guildford Street SE1 0ES
 Flat 2 41 Great Guildford Street SE1 0ES
 Flat 7 Peabody Buildings SE1 0TL
 16 Peabody Buildings Southwark Street SE1 0TR
 Second Floor Flat 60 Southwark Bridge Road SE1 0AS
 Third Floor Flat 60 Southwark Bridge Road SE1 0AS

 Railway Arch 219-221 18 Stoney Street SE1 9BU
 Block B Flat 13 Peabody Estate SE1 0TP
 Block B Flat 14 Peabody Estate SE1 0TP
 Block F Flat 2 Peabody Estate SE1 0TQ
 Block B Flat 10 Peabody Estate SE1 0TP
 Block B Flat 11 Peabody Estate SE1 0TP
 Block B Flat 12 Peabody Estate SE1 0TP
 Block F Flat 6 Peabody Estate SE1 0TQ

 Block F Flat 7 Peabody Estate SE1 0TQ
 Block F Flat 8 Peabody Estate SE1 0TQ
 Block F Flat 3 Peabody Estate SE1 0TQ
 Block F Flat 4 Peabody Estate SE1 0TQ
 Block F Flat 5 Peabody Estate SE1 0TQ
 Block B Flat 9 Peabody Estate SE1 0TP
 Block K Flat 17 Peabody Estate SE1 0TN
 Block K Flat 18 Peabody Estate SE1 0TN
 Block B Flat 2 Peabody Estate SE1 0TP

 Block K Flat 14 Peabody Estate SE1 0TN
 Block K Flat 15 Peabody Estate SE1 0TN
 Block K Flat 16 Peabody Estate SE1 0TN

 Block B Flat 6 Peabody Estate SE1 0TP
 Block B Flat 7 Peabody Estate SE1 0TP
 Block B Flat 8 Peabody Estate SE1 0TP
 Block B Flat 3 Peabody Estate SE1 0TP
 Block B Flat 4 Peabody Estate SE1 0TP
 Block B Flat 5 Peabody Estate SE1 0TP

 Block C Flat 12 Peabody Estate SE1 0TR
 Block C Flat 13 Peabody Estate SE1 0TR
 Block C Flat 14 Peabody Estate SE1 0TR
 Block C Flat 9 Peabody Estate SE1 0TR
 Block C Flat 10 Peabody Estate SE1 0TR
 Block C Flat 11 Peabody Estate SE1 0TR
 Block A Flat 5 Peabody Estate SE1 0TW
 Block A Flat 6 Peabody Estate SE1 0TW
 Block A Flat 7 Peabody Estate SE1 0TW
 Block A Flat 2 Peabody Estate SE1 0TW
 Block A Flat 3 Peabody Estate SE1 0TW

Units 232 To 234 16-48 Great Guildford Street SE1 0HS
 Unit 304 16-48 Great Guildford Street SE1 0HS
 Units 209 And 210 16-48 Great Guildford Street SE1 0HS
 Unit 101 16-48 Great Guildford Street SE1 0ES
 Units 105 And 106 16-48 Great Guildford Street SE1 0ES
 Unit 201 16-48 Great Guildford Street SE1 0HS
 Units 203 And 204 16-48 Great Guildford Street SE1 0HS
 Units 207 And 208 16-48 Great Guildford Street SE1 0HS
 Units 107 And 108 16-48 Great Guildford Street SE1 0HS
 Unit 109 To Unit120 16-48 Great Guildford Street SE1 0HS
 Unit 121 16-48 Great Guildford Street SE1 0HS
 Third Floor 5-7 Southwark Street SE1 1RQ
 Basement And Ground Floor 73-75 Union Street SE1 1SG
 Basement And Ground Floor 31 Union Street SE1 1SD
 Basement And Ground Floor 37 Union Street SE1 1SD
 54-58 Union Street London SE1 1TD
 Second Floor Flat 6 Union Street SE1 1SZ
 First Floor 1 St Margarets Court SE1 1XF
 First Floor And Second Floor 10 Stoney Street SE1 9AD
 Basement And Ground Floor 13 Stoney Street SE1 9AD
 Store Adjacent 1 Peabody Buildings SE1 0TW
 11 Sumner Street London SE1 9JZ
 1 Flat Iron Square Southwark Bridge Road SE1 0AB
 First To Third Floors 13 Stoney Street SE1 9AD
 9 Sumner Street London SE1 9JZ
 53 Southwark Street London SE1 1RU
 The Ragged School 47 Union Street SE1 1SG
 Seventh Floor 61 Southwark Street SE1 0HL
 Caretakers Office The Hop Exchange SE1 1TY
 Part Lower Basement The Hop Exchange SE1 1TY
 Ground Floor 24a Southwark Street SE1 1TY
 Room 67 The Hop Exchange SE1 1TY
 Room 72 The Hop Exchange SE1 1TY
 Rooms 75 And 76 The Hop Exchange SE1 1TY
 Ground Floor Right Thrale House SE1 1UN
 Part Second Floor Left Thrale House SE1 1UN
 Part Second Floor Right Thrale House SE1 1UN
 First Floor 24a Southwark Street SE1 1TY
 Second Floor 24a Southwark Street SE1 1TY
 Third Floor 24a Southwark Street SE1 1TE
 Room 53 To 55 The Hop Exchange SE1 1TY
 Part Basement The Hop Exchange SE1 1TY
 Lower Ground Floor The Hop Exchange SE1 1TY
 Rooms 27 To 29 The Hop Exchange SE1 1TY
 Fourth Floor 5-7 Southwark Street SE1 1RQ
 Fifth Floor 5-7 Southwark Street SE1 1RQ
 Rooms 40 To 41 The Hop Exchange SE1 1TY
 Rooms 42 To 44 The Hop Exchange SE1 1TY
 Room 48 The Hop Exchange SE1 1TY
 Rooms 30 To 33 The Hop Exchange SE1 1TY
 Rooms 56 To 59 The Hop Exchange SE1 1TY
 Third Floor And Fourth Floor The Hop Exchange SE1 1TY
 First Floor Crowne House SE1 1UN
 Third Floor Crowne House SE1 1UN
 Fourth Floor Crowne House SE1 1UN
 Basement Crowne House SE1 1UN
 Ground Floor Crowne House SE1 1UN
 Fifth Floor Front 61 Southwark Street SE1 0HR
 Fifth Floor Rear 61 Southwark Street SE1 0HL
 Part Sixth Floor 61 Southwark Street SE1 0HR
 Fifth Floor Crowne House SE1 1UN
 First Floor Front 61 Southwark Street SE1 0HL
 Fourth Floor Front 61 Southwark Street SE1 0HR
 Fourth Floor Pentagon House SE1 1UN
 Fourth Floor Right Thrale House SE1 1UN
 First Floor Right Thrale House SE1 1UN
 Basement To First Floors 49 Southwark Street SE1 1RU
 Third Floor Left Thrale House SE1 1UN
 Third Floor Right Thrale House SE1 1UN
 Fourth Floor Left Thrale House SE1 1UN
 Basement Pentagon House SE1 1UN
 Second Floor Pentagon House SE1 1UN
 Third Floor Pentagon House SE1 1UN
 Second Floor 49 Southwark Street SE1 1RU
 Third Floor 49 Southwark Street SE1 1RU
 Flat F 37 Southwark Bridge Road SE1 9HH
 7a Park Street London SE1 9AB
 7b Park Street London SE1 9AB
 Second Floor Left Thames House SE1 9EQ
 Block A Flat 4 Peabody Estate SE1 0TW
 Block C Flat 8 Peabody Estate SE1 0TR
 Block F Flat 12 Peabody Estate SE1 0TQ
 Block F Flat 13 Peabody Estate SE1 0TQ
 Block F Flat 14 Peabody Estate SE1 0TQ
 Block F Flat 9 Peabody Estate SE1 0TQ
 Block F Flat 10 Peabody Estate SE1 0TQ
 Block F Flat 11 Peabody Estate SE1 0TQ
 Block C Flat 5 Peabody Estate SE1 0TR
 Block C Flat 6 Peabody Estate SE1 0TR
 Block C Flat 7 Peabody Estate SE1 0TR
 Block C Flat 2 Peabody Estate SE1 0TR
 Block C Flat 3 Peabody Estate SE1 0TR
 Block C Flat 4 Peabody Estate SE1 0TR
 Block K Flat 13 Peabody Estate SE1 0TN
 Block H Flat 9 Peabody Estate SE1 0TJ
 Block H Flat 10 Peabody Estate SE1 0TJ
 Block H Flat 11 Peabody Estate SE1 0TJ
 Block H Flat 6 Peabody Estate SE1 0TJ
 Block H Flat 7 Peabody Estate SE1 0TJ
 Block H Flat 8 Peabody Estate SE1 0TJ
 Block H Flat 15 Peabody Estate SE1 0TJ
 Block H Flat 16 Peabody Estate SE1 0TJ
 Block H Flat 17 Peabody Estate SE1 0TJ
 Block H Flat 12 Peabody Estate SE1 0TJ
 Block H Flat 13 Peabody Estate SE1 0TJ
 Block H Flat 14 Peabody Estate SE1 0TJ
 Block H Flat 5 Peabody Estate SE1 0TJ
 Block G Flat 9 Peabody Estate SE1 0TH
 Block G Flat 10 Peabody Estate SE1 0TH
 Block G Flat 11 Peabody Estate SE1 0TH
 Block G Flat 6 Peabody Estate SE1 0TH
 Block G Flat 7 Peabody Estate SE1 0TH
 Block G Flat 8 Peabody Estate SE1 0TH
 Block H Flat 2 Peabody Estate SE1 0TJ
 Block H Flat 3 Peabody Estate SE1 0TJ
 Block H Flat 4 Peabody Estate SE1 0TJ
 Block G Flat 12 Peabody Estate SE1 0TH
 Block G Flat 13 Peabody Estate SE1 0TH
 Block G Flat 14 Peabody Estate SE1 0TH
 Block K Flat 4 Peabody Estate SE1 0TN
 Block K Flat 5 Peabody Estate SE1 0TN
 Block K Flat 6 Peabody Estate SE1 0TN
 Block I Flat 14 Peabody Estate SE1 0TL
 Block K Flat 2 Peabody Estate SE1 0TN
 Block K Flat 3 Peabody Estate SE1 0TN
 Block K Flat 10 Peabody Estate SE1 0TN
 Block K Flat 11 Peabody Estate SE1 0TN
 Block K Flat 12 Peabody Estate SE1 0TN
 Block K Flat 7 Peabody Estate SE1 0TN
 Block K Flat 8 Peabody Estate SE1 0TN
 Block K Flat 9 Peabody Estate SE1 0TN
 Block I Flat 13 Peabody Estate SE1 0TL
 Block I Flat 4 Peabody Estate SE1 0TL
 Block I Flat 5 Peabody Estate SE1 0TL
 Block I Flat 6 Peabody Estate SE1 0TL
 Block H Flat 18 Peabody Estate SE1 0TJ
 Block I Flat 2 Peabody Estate SE1 0TL
 Block I Flat 3 Peabody Estate SE1 0TL
 Block I Flat 10 Peabody Estate SE1 0TL
 Block I Flat 11 Peabody Estate SE1 0TL
 Block I Flat 12 Peabody Estate SE1 0TL
 Block I Flat 7 Peabody Estate SE1 0TL
 Block I Flat 8 Peabody Estate SE1 0TL
 Block I Flat 9 Peabody Estate SE1 0TL
 Block A Flat 8 Peabody Estate SE1 0TW
 Ground Floor Pentagon House SE1 1UR
 11 Ayres Street London SE1 1ES
 13 Ayres Street London SE1 1ES
 84-86 Borough High Street London SE1 1LN
 54 Borough High Street London SE1 1XL
 21 Ayres Street London SE1 1ES
 23 Ayres Street London SE1 1ES
 25 Ayres Street London SE1 1ES
 15 Ayres Street London SE1 1ES
 17 Ayres Street London SE1 1ES
 19 Ayres Street London SE1 1ES
 92 Borough High Street London SE1 1LL
 Fifty Nine And A Half Southwark Street SE1 0AL

2 Park Street London SE1 9AB
 6-8 Park Street London SE1 9AB
 4 Stoney Street London SE1 9AA
 Jade House 3 Park Street SE1 9AB
 8 Stoney Street London SE1 9AA
 105 Sumner Street London SE1 9HZ
 11 Park Street London SE1 9AB
 35 Maiden Lane London SE1 9HG
 4a Redcross Way London SE1 9HR
 4b Redcross Way London SE1 9HR
 2a Redcross Way London SE1 9HR
 7 Park Street London SE1 9AB
 4a Park Street London SE1 9AB
 15 Park Street London SE1 9AB
 First Floor Wigglesworth House SE1 9HH
 Flat 12 Old Theatre Court SE1 9ES
 Flat 13 Old Theatre Court SE1 9ES
 Flat 15 Old Theatre Court SE1 9ES
 Flat 9 Old Theatre Court SE1 9ES
 Flat 10 Old Theatre Court SE1 9ES
 Flat 11 Old Theatre Court SE1 9ES
 Flat 19 Old Theatre Court SE1 9ES
 Flat 20 Old Theatre Court SE1 9ES
 Flat 21 Old Theatre Court SE1 9ES
 Flat 16 Old Theatre Court SE1 9ES
 Flat 17 Old Theatre Court SE1 9ES
 Flat 18 Old Theatre Court SE1 9ES
 Flat 8 Old Theatre Court SE1 9ES
 12-14 Park Street London SE1 9AB
 52 Thrale Street London SE1 9HW
 9 Stoney Street London SE1 9AA
 10 Park Street London SE1 9AB
 Flat 6 Anchor Terrace SE1 9HQ
 Flat 5 Old Theatre Court SE1 9ES
 Flat 6 Old Theatre Court SE1 9ES
 Flat 7 Old Theatre Court SE1 9ES
 Flat 1 Old Theatre Court SE1 9ES
 Flat 2 Old Theatre Court SE1 9ES
 Flat 3 Old Theatre Court SE1 9ES
 2b Redcross Way London SE1 9HR
 32 Maiden Lane London SE1 9HG
 34 Maiden Lane London SE1 9HG
 37 Park Street London SE1 9EA
 26 Maiden Lane London SE1 9HG
 28 Maiden Lane London SE1 9HG
 30 Maiden Lane London SE1 9HG
 45 Park Street London SE1 9EA
 47 Park Street London SE1 9EA
 49 Park Street London SE1 9EA
 39 Park Street London SE1 9EA
 41 Park Street London SE1 9EA
 43 Park Street London SE1 9EA
 24 Maiden Lane London SE1 9HG
 6 Maiden Lane London SE1 9HG
 8 Maiden Lane London SE1 9HG
 10 Maiden Lane London SE1 9HG
 19 Porter Street London SE1 9HD
 2 Maiden Lane London SE1 9HG
 4 Maiden Lane London SE1 9HG
 18 Maiden Lane London SE1 9HG
 20 Maiden Lane London SE1 9HG
 22 Maiden Lane London SE1 9HG
 12 Maiden Lane London SE1 9HG
 14 Maiden Lane London SE1 9HG
 16 Maiden Lane London SE1 9HG
 83 Park Street London SE1 9EA
 85 Park Street London SE1 9EA
 89 Park Street London SE1 9EA
 77 Park Street London SE1 9EA
 79 Park Street London SE1 9EA
 81 Park Street London SE1 9EA
 97 Park Street London SE1 9EA
 99 Park Street London SE1 9EA
 31 Park Street London SE1 9EA
 91 Park Street London SE1 9EA
 93 Park Street London SE1 9EA
 95 Park Street London SE1 9EA
 75 Park Street London SE1 9EA
 57 Park Street London SE1 9EA
 Unit 322 Great Guildford Business Square SE1 0HS
 Flat 5 Henley Apartments SE1 0FA
 Flat 6 Henley Apartments SE1 0FA
 Flat 7 Henley Apartments SE1 0FA
 54 Ayres Street London SE1 1EU
 27-29 Union Street London SE1 1SD
 Flat 16 Pattison House Marshalsea Estate SE1 1EY
 Flat 17 Pattison House Marshalsea Estate SE1 1EY
 Flat 18 Pattison House Marshalsea Estate SE1 1EY
 Flat 13 Pattison House Marshalsea Estate SE1 1EY
 Flat 14 Pattison House Marshalsea Estate SE1 1EY
 Flat 15 Pattison House Marshalsea Estate SE1 1EY
 Flat 21 Pattison House Marshalsea Estate SE1 1EY
 Flat 22 Pattison House Marshalsea Estate SE1 1EY
 Flat 23 Pattison House Marshalsea Estate SE1 1EY
 Flat 19 Pattison House Marshalsea Estate SE1 1EY
 Flat 2 Pattison House Marshalsea Estate SE1 1EY
 Flat 20 Pattison House Marshalsea Estate SE1 1EY
 Flat 12 Pattison House Marshalsea Estate SE1 1EY
 Flat 1 79-81 Union Street SE1 1SG
 Flat 2 79-81 Union Street SE1 1SG
 2 Union Street London SE1 1SZ
 27 Ayres Street London SE1 1ES
 29 Ayres Street London SE1 1ES
 Flat 1 Pattison House Marshalsea Estate SE1 1EY
 Flat 10 Pattison House Marshalsea Estate SE1 1EY
 Flat 11 Pattison House Marshalsea Estate SE1 1EY
 22 Redcross Way London SE1 1TA
 Flat Above 62 Union Street SE1 1TD
 32 Southwark Street London SE1 1TU
 Flat 4 Henley Apartments SE1 0FA
 47 Great Guildford Street London SE1 0ES
 78 Southwark Bridge Road London SE1 0AS
 Unit 204 Great Guildford Business Square SE1 0HS
 Unit 228 Great Guildford Business Square SE1 0HS
 Unit 216 Great Guildford Business Square SE1 0HS
 Unit 208 Great Guildford Business Square SE1 0HS
 Block A Flat 12 Peabody Estate SE1 0TW
 Block A Flat 13 Peabody Estate SE1 0TW
 Block A Flat 14 Peabody Estate SE1 0TW
 Block A Flat 9 Peabody Estate SE1 0TW
 Block A Flat 10 Peabody Estate SE1 0TW
 Block A Flat 11 Peabody Estate SE1 0TW
 70-72 Union Street London SE1 0NW
 90-96 Union Street London SE1 0NW
 16 Great Guildford Street London SE1 0HS
 91-95 Southwark Bridge Road London SE1 0AX
 2 Ciba Apartments 101 Union Street SE1 0LQ
 3 Ciba Apartments 101 Union Street SE1 0LQ
 4 Ciba Apartments 101 Union Street SE1 0LQ
 Unit 323 Great Guildford Business Square SE1 0HS
 Unit 128 Great Guildford Business Square SE1 0HS
 1 Ciba Apartments 101 Union Street SE1 0LQ
 Flat 1 Henley Apartments SE1 0FA
 Flat 2 Henley Apartments SE1 0FA
 Flat 3 Henley Apartments SE1 0FA
 5 Ciba Apartments 101 Union Street SE1 0LQ
 6 Ciba Apartments 101 Union Street SE1 0LQ
 7 Ciba Apartments 101 Union Street SE1 0LQ
 Unit 232 Great Guildford Business Square SE1 0HS
 Unit 229 Great Guildford Business Square SE1 0HS
 The Harlequin Building 65 Southwark Street SE1 0HR
 56 Southwark Bridge Road London SE1 0AS
 Unit 317 Great Guildford Business Square SE1 0HS
 Unit 129 Great Guildford Business Square SE1 0HS
 Unit 230 Great Guildford Business Square SE1 0HS
 52 Southwark Bridge Road London SE1 0AR
 Unit 320 Great Guildford Business Square SE1 0HS
 4-6 America Street London SE1 0NJ
 Block G Flat 5 Peabody Estate SE1 0TH
 11a Southwark Street London SE1 1RQ
 Flat 1 70-72 Union Street SE1 1TD
 Flat 2 70-72 Union Street SE1 1TD
 Apartment 6 11 Southwark Street SE1 1RQ
 Apartment 7 11 Southwark Street SE1 1RQ
 Apartment 8 11 Southwark Street SE1 1RQ
 Fourth Floor The Harlequin Building SE1 0HR
 Fifth And Sixth Floor The Harlequin Building SE1 0HR
 Basement The Harlequin Building SE1 0HR

59 Park Street London SE1 9EA
 61 Park Street London SE1 9EA
 51 Park Street London SE1 9EA
 53 Park Street London SE1 9EA
 55 Park Street London SE1 9EA
 69 Park Street London SE1 9EA
 71 Park Street London SE1 9EA
 73 Park Street London SE1 9EA
 63 Park Street London SE1 9EA
 65 Park Street London SE1 9EA
 67 Park Street London SE1 9EA
 Flat 22 Old Theatre Court SE1 9ES
 38-48 Southwark Bridge Road London SE1 9EJ
 22 Southwark Bridge Road London SE1 9HB
 Fourth Floor Wigglesworth House SE1 9HH
 Merchant House 14-16 Stoney Street SE1 9AD
 18 New Globe Walk London SE1 9DR
 Wykeham House 123 Union Street SE1 0LG
 1a Park Street London SE1 9AB
 11b Stoney Street London SE1 9AD
 Flat 17 21 Great Guildford Street SE1 9EP
 Flat 8 21 Great Guildford Street SE1 9EP
 Flat 9 21 Great Guildford Street SE1 9EP
 Flat 10 21 Great Guildford Street SE1 9EP
 Flat 5 21 Great Guildford Street SE1 9EP
 Flat 6 21 Great Guildford Street SE1 9EP
 Flat 7 21 Great Guildford Street SE1 9EP
 Flat 14 21 Great Guildford Street SE1 9EP
 Flat 15 21 Great Guildford Street SE1 9EP
 Flat 16 21 Great Guildford Street SE1 9EP
 Flat 11 21 Great Guildford Street SE1 9EP
 Flat 12 21 Great Guildford Street SE1 9EP
 Flat 13 21 Great Guildford Street SE1 9EP
 Second Floor And Third Floor And Mansard Floor Flat 55
 Southwark Street SE1 1RU
 Studio Flat 43 Great Guildford Street SE1 0ES
 Unit 4 The Ragged School SE1 1SG
 Ground Floor And First Floor Flat 66 Southwark Bridge Road
 SE1 0AS
 First Floor And Second Floor Flat 12 Stoney Street SE1 9AD
 Second Floor Flat 56 Ayres Street SE1 1EU
 Flat C 37 Southwark Bridge Road SE1 9HH
 Flat D 37 Southwark Bridge Road SE1 9HH
 Flat E 37 Southwark Bridge Road SE1 9HH
 2 Calverts Building 52 Borough High Street SE1 1XN
 Flat A 37 Southwark Bridge Road SE1 9HH
 Flat B 37 Southwark Bridge Road SE1 9HH
 First To Third Floor Flat 66 Southwark Bridge Road SE1 0AS
 First Floor Flat 75 Union Street SE1 1SG
 First Floor Flat 60 Southwark Bridge Road SE1 0AS
 First Floor Flat 31 Union Street SE1 1SD
 Rose And Crown 65-67 Union Street SE1 1SG
 8 Park Street London SE1 9AB
 First Floor And Second Floor Flat 54 Thrale Street SE1 9HW
 Apartment 3 1 Playhouse Court SE1 0AS
 Flat 4 41 Great Guildford Street SE1 0ES
 First Floor And Second Floor Flat 3 Park Street SE1 9AB
 First To Third Floors 5 Park Street SE1 9AB
 Apartment 1 1 Playhouse Court SE1 0AS
 Apartment 2 1 Playhouse Court SE1 0AS
 Flat 4 21 Great Guildford Street SE1 9EP
 Flat 51 Old Theatre Court SE1 9ES
 Flat 52 Old Theatre Court SE1 9ES
 Flat 53 Old Theatre Court SE1 9ES
 Flat 38 Old Theatre Court SE1 9ES
 Flat 39 Old Theatre Court SE1 9ES
 Flat 50 Old Theatre Court SE1 9ES
 4 Anchor Terrace 125 Park Street SE1 9EW
 5 Anchor Terrace 125 Park Street SE1 9EW
 Flat 7 Anchor Terrace SE1 9HQ
 1 Anchor Terrace 125 Park Street SE1 9EW
 2 Anchor Terrace 125 Park Street SE1 9EW
 3 Anchor Terrace 125 Park Street SE1 9EW
 Flat 37 Old Theatre Court SE1 9ES
 Flat 27 Old Theatre Court SE1 9ES
 Flat 28 Old Theatre Court SE1 9ES
 Flat 29 Old Theatre Court SE1 9ES
 Flat 23 Old Theatre Court SE1 9ES
 Flat 25 Old Theatre Court SE1 9ES
 Unit 101-119 16-48 Great Guildford Street SE1 0ES
 First Floor The Harlequin Building SE1 0HR
 Second And Third The Harlequin Building SE1 0HR
 Apartment 5 11 Southwark Street SE1 1RQ
 Railway Arch 29 To 31 Omeara Street SE1 1TE
 Third Floor 8 Playhouse Court SE1 0AT
 Room 2 Tulip House SE1 1XF
 Basement To First Floor 58 Borough High Street SE1 1XF
 Second To Third Floor 58 Borough High Street SE1 1XF
 Apartment 2 11 Southwark Street SE1 1RQ
 Apartment 3 11 Southwark Street SE1 1RQ
 Apartment 4 11 Southwark Street SE1 1RQ
 Third Floor 38-40 Southwark Street SE1 1UN
 11 Southwark Street London SE1 1RQ
 Apartment 1 11 Southwark Street SE1 1RQ
 80 Southwark Bridge Road London SE1 0AS
 45 Great Guildford Street London SE1 0ES
 72 Southwark Bridge Road London SE1 0AS
 74 Southwark Bridge Road London SE1 0AS
 76 Southwark Bridge Road London SE1 0AS
 70 Southwark Bridge Road London SE1 0AS
 Unit 1 Great Guildford Business Square SE1 0HS
 To Many Cooks Great Guildford Business Square SE1 0HS
 Ground Floor The Harlequin Building SE1 0HR
 Garage Ground Floor 52 Southwark Bridge Road SE1 0AR
 Unit 209 To 211 16-48 Great Guildford Street SE1 0HS
 54 Southwark Bridge Road London SE1 0AR
 68 Southwark Bridge Road London SE1 0AS
 Crane Building 22 Lavington Street SE1 0NZ
 Room 1 Basement Tulip House SE1 1XF
 Flat 7 92 Borough High Street SE1 1LL
 Flat 8 92 Borough High Street SE1 1LL
 94 Borough High Street SE1 1LL
 Flat 4 92 Borough High Street SE1 1LL
 Flat 5 92 Borough High Street SE1 1LL
 Flat 6 92 Borough High Street SE1 1LL
 Unit 207 To 211 Great Guildford Business Square SE1 0HS
 Third Floor 60 Borough High Street SE1 1XF
 First And Second Floor 60 Borough High Street SE1 1XF
 First Floor 30 Park Street SE1 9EQ
 Second Floor 30 Park Street SE1 9EQ
 First Floor Left Maidstone Buildings Mews 1b SE1 1GD
 Flat 3 92 Borough High Street SE1 1LL
 Flat 1 92 Borough High Street SE1 1LL
 Flat 2 92 Borough High Street SE1 1LL
 Unit 211 16-48 Great Guildford Street SE1 0HS
 Unit 212 16-48 Great Guildford Street SE1 0HS
 First Floor Beckett House SE1 1XF
 Ninth Floor Bankside 3 90-100 Southwark Street SE1 0SW
 Ground Floor Left Hand Side The Harlequin Building SE1 0HR
 Flat 4 64 Southwark Bridge Road SE1 0AS
 Ground Floor Left 30 Park Street SE1 9EQ
 Second Floor 1 St Margarets Court SE1 1XF
 Third Floor 1 St Margarets Court SE1 1XF
 Ground Floor South 91-95 Southwark Bridge Road SE1 0AX
 Flat 3 70-72 Union Street SE1 0NW
 Flat 4 70-72 Union Street SE1 0NW
 Flat 5 70-72 Union Street SE1 0NW
 Ground Floor 81 Southwark Bridge Road SE1 0NQ
 Unit 1 70-72 Union Street SE1 0NW
 Unit 2 70-72 Union Street SE1 0NW
 Third Floor 91-95 Southwark Bridge Road SE1 0AX
 Flat 6 70-72 Union Street SE1 0NW
 First Floor 81 Southwark Bridge Road SE1 0NQ
 Third To Fifth Floor 81 Southwark Bridge Road SE1 0NQ
 Unit 215 Great Guildford Business Square SE1 0HS
 Unit 224 Great Guildford Business Square SE1 0HS
 Unit 225 Great Guildford Business Square SE1 0HS
 85a Southwark Bridge Road London SE1 0NQ
 Unit 214 Great Guildford Business Square SE1 0HS
 Block H Flat 1 Peabody Estate SE1 0TJ
 Block I Flat 1 Peabody Estate SE1 0TL
 Block K Flat 1 Peabody Estate SE1 0TN
 Unit 309 Great Guildford Business Square SE1 0HS
 Unit 310 Great Guildford Business Square SE1 0HS
 Block G Flat 1 Peabody Estate SE1 0TH
 Block E Flat 13 Peabody Estate SE1 0TG

Flat 26 Old Theatre Court SE1 9ES
 Flat 33 Old Theatre Court SE1 9ES
 Flat 35 Old Theatre Court SE1 9ES
 Flat 36 Old Theatre Court SE1 9ES
 Flat 30 Old Theatre Court SE1 9ES
 Flat 31 Old Theatre Court SE1 9ES
 Flat 32 Old Theatre Court SE1 9ES
 Flat 24 Anchor Terrace SE1 9HQ
 Flat 25 Anchor Terrace SE1 9HQ
 Flat 26 Anchor Terrace SE1 9HQ
 Flat 21 Anchor Terrace SE1 9HQ
 Flat 22 Anchor Terrace SE1 9HQ
 Flat 23 Anchor Terrace SE1 9HQ
 Flat 1 21 Great Guildford Street SE1 9EP
 Flat 2 21 Great Guildford Street SE1 9EP
 Flat 3 21 Great Guildford Street SE1 9EP
 Flat 27 Anchor Terrace SE1 9HQ
 Flat 28 Anchor Terrace SE1 9HQ
 Flat 29 Anchor Terrace SE1 9HQ
 Flat 20 Anchor Terrace SE1 9HQ
 Flat 11 Anchor Terrace SE1 9HQ
 Flat 12 Anchor Terrace SE1 9HQ
 Flat 13 Anchor Terrace SE1 9HQ
 Flat 8 Anchor Terrace SE1 9HQ
 Flat 9 Anchor Terrace SE1 9HQ
 Flat 10 Anchor Terrace SE1 9HQ
 Flat 17 Anchor Terrace SE1 9HQ
 Flat 18 Anchor Terrace SE1 9HQ
 Flat 19 Anchor Terrace SE1 9HQ
 Flat 14 Anchor Terrace SE1 9HQ
 Flat 15 Anchor Terrace SE1 9HQ
 Flat 16 Anchor Terrace SE1 9HQ
 First Floor 72-76 Borough High Street SE1 1XF
 Peer Group Part Lower Ground Floor The Hop Exchange SE1 1TY
 Part Basement Crowne House SE1 1UN
 1-2 Rochester Walk London SE1 9AF
 Basement And Ground Floor 50 Southwark Bridge Road SE1 0AR
 First Floor Flat 6 Union Street SE1 1SZ
 Part Third Floor North Rosemount Thames House SE1 9EL
 Third Floor South Thames Thames House SE1 9EL
 Fourth Floor South Thames House SE1 9EL
 Fourth Floor North Thames House SE1 9EL
 Block E Flat 14 Peabody Estate SE1 0TG
 Block E Flat 15 Peabody Estate SE1 0TG
 Block E Flat 10 Peabody Estate SE1 0TG
 Block E Flat 11 Peabody Estate SE1 0TG
 Block E Flat 12 Peabody Estate SE1 0TG
 Block G Flat 2 Peabody Estate SE1 0TH
 Block G Flat 3 Peabody Estate SE1 0TH
 Block G Flat 4 Peabody Estate SE1 0TH
 Block E Flat 16 Peabody Estate SE1 0TG
 Block E Flat 17 Peabody Estate SE1 0TG
 Block E Flat 18 Peabody Estate SE1 0TG
 Block E Flat 9 Peabody Estate SE1 0TG
 Block A Flat 1 Peabody Estate SE1 0TW
 Block E Flat 1 Peabody Estate SE1 0TG
 Block E Flat 2 Peabody Estate SE1 0TG
 Block B Flat 1 Peabody Estate SE1 0TP
 Block F Flat 1 Peabody Estate SE1 0TQ
 Block C Flat 1 Peabody Estate SE1 0TR
 Block E Flat 6 Peabody Estate SE1 0TG
 Block E Flat 7 Peabody Estate SE1 0TG
 Block E Flat 8 Peabody Estate SE1 0TG
 Block E Flat 3 Peabody Estate SE1 0TG
 Block E Flat 4 Peabody Estate SE1 0TG
 Block E Flat 5 Peabody Estate SE1 0TG
 1-2 Doyce Street London SE1 0EU
 Flat 2, 31 Union Street London SE1 1SD
 Flat 1, 28 Clennam Street London SE1 1ER
 10 Overy House London SE18QX
 10 Overy House London SE1 8QX
 57a Lant Street Southwark SE1 1QN
 The Russia House Ltd Chapel Court SE1 1HH
 17 Tabard Street London SE1 4LA
 Flat 1, 28 Clennam Street London SE1 1ER
 61 Albert Barnes House New Kent Road SE1 6PJ
 Flat 2 26 Marshalsea Road SE1 1HF
 Flat 6 Hatters Court 99 Redcross Way SE1 1EB
 Flat6 14 Weller Street Se1 1qu
 Flat 2, 26 Marshalsea Road Borough SE1 1HF
 8 Thorold House Pepper Street SE1 0EL
 47 Union Street London se11sg
 47 Burnham Estate Burnham Street E2 0jf
 By E-Form
 Triangle Court 10 Redcorss Way SE1

Re-consultation: n/a

APPENDIX 2**Consultation responses received****Internal services**Flood and Drainage Team

- The Flood Risk Assessment (FRA) states that the basement finished floor level is 5.80m below ground level, and that BGS boreholes state that the groundwater is 2.8m below ground level. It is not clear from the FRA what effects the introduction of the basement will have on groundwater levels in the surrounding area and whether it is possible that flooding would be caused. No information is provided regarding any groundwater flows through and around the site.
- No details are provided of the current runoff rate, or the proposed runoff rate for the site. This information is required to determine whether the proposed surface water management measures are suitable.
- No drainage strategy is currently provided, but would be happy to deal with this via condition, along the lines of those used previously.

In order to approve this application, it is expected the first two points above to be addressed.

Statutory and non-statutory organisationsEnvironment Agency

No objections in principle, but have made comments and suggestions on some aspects of the scheme:

- consideration of other sources of flooding may be necessary to inform suitable mitigation measures to reduce the impact of any such flooding.
- some of the flooding information referred to within the submitted FRA has been superseded.
- expect to review an up-to-date FRA for any planning application. However, on this occasion, the EA are adopting a pragmatic approach by not objecting to this planning application, as the production of an updated FRA would not materially alter our stance on the proposed development. Nevertheless, the EA do not want to set a precedent for any future proposals that such an FRA is appropriate. Moreover, the Local Planning Authority may require, and thus request, an updated FRA in order to inform their decisions on the development.
- Strongly recommend that the finished floor levels are raised to levels to an updated modelled 1 in 200 year flood level, if at all possible.
- prefer that lower ground floor (basement) levels are not incorporated within developments within areas at risk of flooding.
- recommend that flood resistant and resilient measures are incorporated in to the design and construction of the development proposals.

Greater London Authority

At the time of writing, the GLA has not provided their Stage 1 report. It is anticipated that a combined Stage 1 and 2 report would be issued after the date of the Planning Committee meeting.

Historic England

Objects to the scheme. The information provided with the application is wholly inadequate to assess the potentially significant impacts of these proposals on

designated and undesignated heritage assets. The proposed design of the development neither reflects or respects the established character of the conservation area and would cause unjustified and substantial harm to the historic environment.

The site does not appear to be identified in LB Southwark's own policies as a suitable site for a tall building. The small scale sketches and associated table provided within the Design and Access Statement are insufficient to assess the potential impact of a tall building and associated development on the immediate and wider historic environment. Given the significance of the heritage assets identified above, the potential impact of a tall building in this area and the absence of any convincing justification or analysis, including visually verified images, Historic England can only conclude that the harm would be substantial.

The proposed development does not reflect the established character and appearance of the area, as it is oversized and visually very dominant. The building fronting onto Southwark Street is oversized in the street, with a confused elevational treatment. The main frontage is largely solid on its lower floors and clad with precast concrete described in the application as 'imitation stone'. It is punctuated by doors and windows which have a random appearance on the elevation which do little to resolve its solid appearance or relationship with the street. The upper four floors are comprised of a series of large triangular 'feature' stained glass windows. It appears bulky and visually dwarfs the lower floors of the building and the neighbouring listed buildings. Together the height, scale, massing, forms and materials of this elevation compete visually and would appear incongruous in the context of the surrounding Victorian buildings with their clearly expressed rhythm, solid to void ratios and fine detailing.

In the absence of representational material of an appropriate scope, quality, clarity and detail accompanying information, Historic England wishes to reserve their position to provide detailed comments on the design of the proposed tall building until such information has been made available.

Historic England urges the LPA to refuse the application.

London Fire & Emergency Planning Authority

No specific planning comments on this application have been made.

London Underground Limited

Though there is no objection in principle to the planning application there are a number of potential constraints on the redevelopment of a site situated close to underground tunnels and infrastructure and recommends a condition to ensure that the development will not have any detrimental effect on the tunnels and structures either in the short or long term.

Network Rail (Planning)

No objections made, but general comments have been provided in relation to the safety and any potential damage to NR's infrastructure. NR highlights that the developer must ensure that their proposal, both during construction and after completion of works on site, does not encroach onto Network Rail land or affect the safety, operation or integrity of the company's railway and its infrastructure.

With regards to the design of the development, NR states that the developer must ensure that there will be no glare from the glazing that could affect the sighting of train drivers, in particular to see any signals. This may require a specific type of glazing or a 'signal sighting' exercise to be undertaken.

Basement – The construction of the basement should be such that there is no detrimental effect on the railway viaduct foundations. This should be considered in the design and construction. It is most likely that a Party Wall Agreement will be required. Network Rail will be required to maintain and access their viaduct and arches. As such, any development should leave a minimum of 2 meter clearance from the viaduct.

Metropolitan Police Service (Designing out Crime)

The size and importance of this building really should have measures put in place to prevent anti-social behaviour crime and criminality and would therefore seek for a condition to be entered into the decision that this development must achieve Secured by design accreditation for the residential and commercial.

Conservation Area Advisory Group (CAAG)

This scheme was presented to Southwark's CAAG in July. The minutes of their meeting record an objection to this scheme and note the following specific concerns:

It was noted that this scheme was located on the site of the former Southwark Square which existed prior to the coming of the railway: however investigations to date have not indicated that it is a site of archaeological importance.

The panel was appalled by the insensitivity of the applicant's proposals for this prominent site located on Southwark Street, adjoining an important listed building, within the Thrale Road CA. and adjoining the Union Street CA, from which the proposed development will also be very visible.

The panel's view of the applicant's proposals included the following observations:

- The building fails to meet the basic criteria required when building next to an important listed building: that it has to complement and enhance its setting, not demean it, as this proposal clearly does.
- The site lies immediately adjacent to one of the area's finest listed buildings, the Victorian former Menier Chocolate factory, but the proposed new building pays no regard to it, crudely crashes into it and obscures an important part of it. Any adjoining building on this site should be respectfully separate from it.
- The applicant's scheme shows no appreciation of the history, architecture and character of Southwark Street and is alien to the architecture of London
- The scheme is frankly coarse, comic and preposterous.
- It will impact totally unacceptably on the conservation area that it is sited in and on the adjoining, small scale, Union St CA and listed buildings nearby.
- The tower is wholly inappropriate in character and scale and lies outside the area designated for high buildings in the London and Southwark plans.
- The site stops short of the railway viaduct but uses land outside the site curtilage to service it. However, this area is designated in the Southwark plan as a pedestrian route-way, (the "Low-Line") between London Bridge and Waterloo along the line of the viaduct.
- The ground planning concentrates it's servicing at the rear of the building, thus turning it's back on the proposed "Low-Line" scheme for a pedestrian route. Active frontages should be provided to both north and south frontages of the building, (i.e. to Southwark Street and to the "Low-Line" route-way.)
- The proposed nine residential units planned within this huge scheme appear to be a blatant attempt to circumvent the council's requirement for the social housing element that is required in larger residential housing schemes.
- The panel urged that planning consent be refused on all these grounds.

Neighbours and local groups

Better Bankside

Concerned with the lack of detail on cycle parking provision and strongly recommend that the proposed provision goes beyond the current London Plan Standards for all use classes; As well as looking at how the development could share waste facilities with the adjoining Menier Chocolate Factory, Better Bankside would welcome efforts to see how this development could help consolidate waste from other nearby businesses, particularly those located on Flat Iron Square; recommendations on the construction logistics of the development and how it could be co-ordinated with the developments nearby; There is very little detail in the Design and Access Statement about the design and materials used for the surrounding public realm. In addition, it would be useful to understand how the proposed development will interface with the emerging Low Line route at the rear of the site, which promotes greater footfall and pedestrian access along the viaduct. It will also be useful to understand the proposed detailed design for access to Flat Iron Square for pedestrians via Arch 33; welcome the measures being proposed in the planning application and suggest that there is further scope for greater water management and efficiency on site – particularly in relation to the green roof and ground level landscaped areas; the bulk and heavy detailing of the proposed building does not add to the built quality of the area; this section of Southwark Street also lies outside the area identified by Southwark Council as suitable for tall buildings; commercial use, to be developed at the proposed sizes with floor plates of around 500sqm each are welcomed, as there is an evidenced need for offices of this size in the neighbourhood.

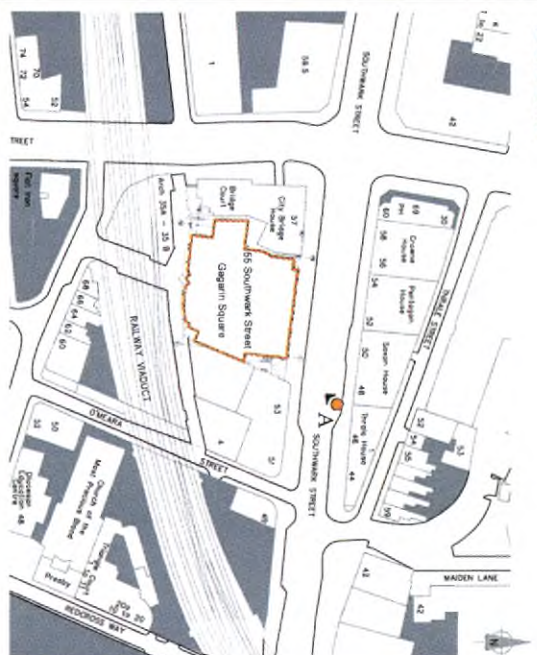
A total of 24 letters/emails have been received from neighbour consultation and they are summarised in the main report.



ARTIST IMPRESSION - VIEW FROM SOUTHWARK STREET

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LEGEND



NOTES

C	28.05.2015	Gantry omitted. FOR PLANNING
B	03.02.2015	Gantry omitted. FOR PLANNING
A	26.11.2014	FOR PLANNING
REV	DATE	DESCRIPTION

Local Agent at Planning Stage

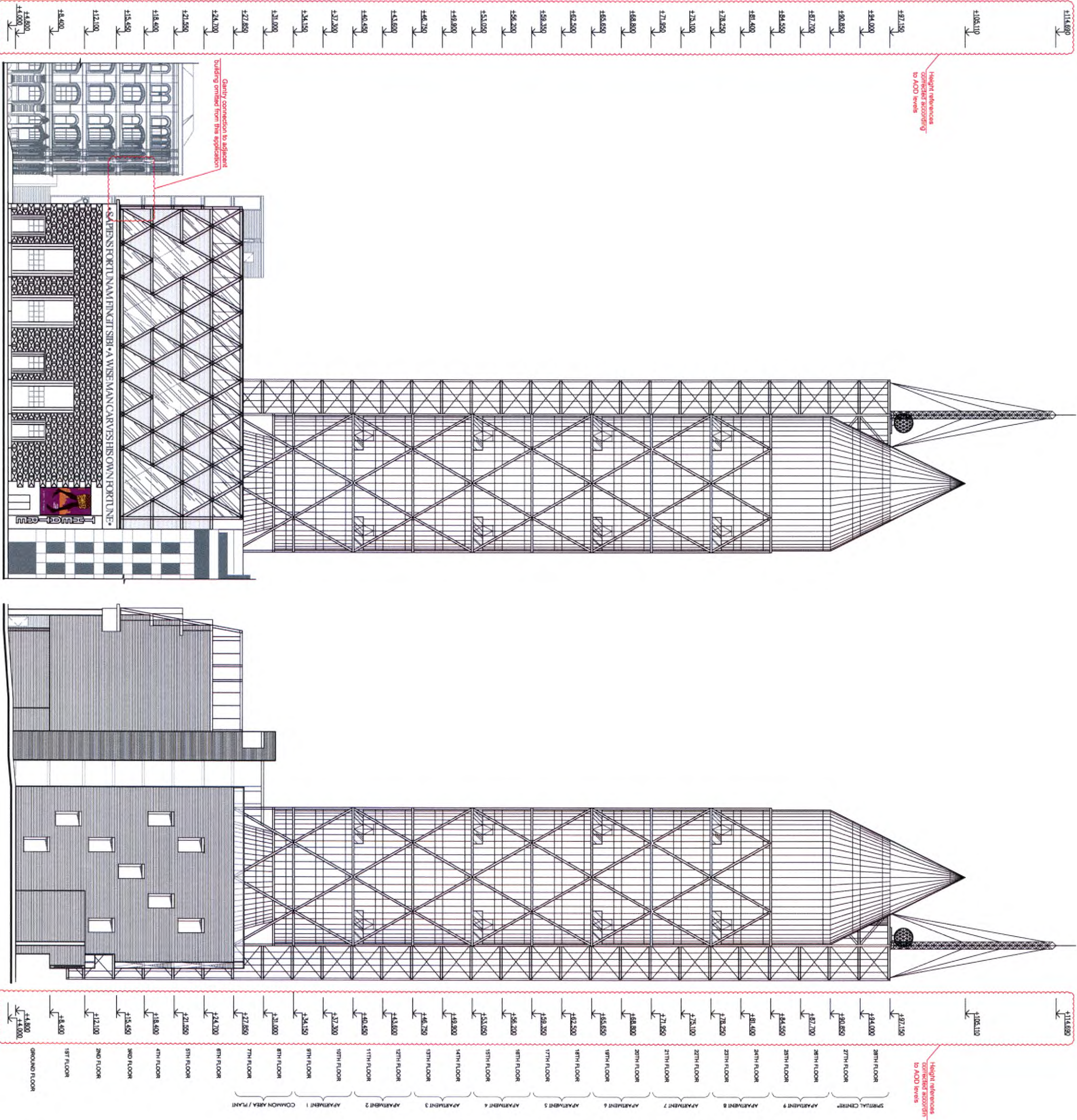
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PROJECT
 GAGARIN SQUARE
CLIENT
 SOUTHWARK SQUARE LIMITED
 42 Southwark Street, SE1 1UN, London, UK

ORIGINAL SIZE	SCALE:	PURPOSE
A3	-	Planning
A1	-	
DATE	DRAWN BY	APPROVED BY
26.11.2014	Andrei Patrikeev	Valerij Kulachenkov

DRAWING
 3D PERSPECTIVE VIEW, LOCATION A - DAYTIME VIEW
DRAWING NUMBER
 JAP-277/10-AR_34 C



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0 8 16 24 32

LEGEND

- Roof tiles
- Precast concrete facade cladding.
- Initiation stone
- Frameless sealed stained glass
- Load bearing steel bracing system
- Brick cladding: **British standard scale**
- Brick cladding: small scale

NOTES

C 28.05.2015 Gantry omitted. Height levels corrected (AOD). Drawing note amended. FOR PLANNING

B 03.02.2015 Gantry omitted. FOR PLANNING

A 26.11.2014 FOR PLANNING

REV DATE DESCRIPTION

Local Agent at Planning Stage

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PROJECT
GAGARIN SQUARE

CLIENT
SOUTHWARK SQUARE LIMITED
 42 Southwark Street, SE1 1UN, London, UK

ORIGINAL SIZE SCALE: 1:400 PURPOSE: Planning

DATE 26.11.2014 **DRAWN BY** Daria Gordina **APPROVED BY** Valerij Kulachenkov

DRAWING
 NORTH FACADE, WEST FACADE (WITH THE GAGARIN TOWER)

DRAWING NUMBER
 JAP-277/10-AR_23 C

RECOMMENDATION

This document shows the case officer's recommended decision for the application referred to below.
This document is not a decision notice for this application.

Applicant	Southwark Square Ltd	Reg. Number	14/AP/4773
Application Type	Full Planning Permission	Case	TP/1145-53
Recommendation	Refuse permission	Number	

Draft of Decision Notice

Planning Permission was **REFUSED** for the following development:

Demolition of existing building at No. 55 Southwark Street and redevelopment of site to erect a 7 storey building and a 30 storey tower (plus basement and roof gardens) to a maximum height of 105.110m AOD to accommodate the following uses: public theatre and rehearsal space (Sui Generis use), art space and museum (Class D1/D2 use), restaurant and cafe (Class A3 use), bar (Class A4 use), offices (Class B1 use) and 9 residential flats.

At: 55 SOUTHWARK STREET, LONDON SE1 1TE

In accordance with application received on 22/12/2014 08:02:59

and Applicant's Drawing Nos. JAP-277/10-AR:

02A, 03A, 04C, 05C, 06C, 07C, 08C, 09D, 10D, 11C, 12C, 13C, 14C, 15C, 16C, 17C, 18C, 19C, 20B, 21B, 22B, 23C, 24C, 25C, 26C, 27C, 28C, 29C, 30B, 31B, 32A, 33A, 34C, 35C, 36A, 37A, 38A, 39A, 40A, 41B, 42A, 43A, 44A, 45A, 46A, 47A, 48A, 49C, 50A, 51A

Site Plan 955_GS_000_01B, 955_GS_000_02.1B, 955_GS_000_02A, 955_GS_000_03A, 955_GS_000_04A, 955_GS_000_05, 955_GS_000_06A

Design and Access Statement and Appendices

Reason for refusal:

- 1 The proposed tower, standing at over 105m in height, would appear as an incongruous, isolated and alien feature in the townscape, and the crude 'rocket' design would be willfully insensitive to the established character of the area. It makes no positive contribution to the surrounding public landscape and the site is not an appropriate location for a tall building, as defined by Policy 7.7 'Location and design of tall and large buildings' of the London Plan 2015, Strategic Policy 12 'Design and Conservation' of the Core Strategy 2011 and saved policy 3.20 'Tall Buildings' of the Southwark Plan 2007.
- 2 The proposed tower would exceed the threshold height established in the London View management Framework for the Background Wider Setting Consultation Area of Protected Vista 1A.2. Insufficient information has been submitted to enable a proper, complete and reliable assessment of the impact on the World Heritage site of St Pauls and its landmark dome. The material submitted does not demonstrate that the development will preserve this view and the proposed tower would neither consolidate an existing (or emerging cluster) nor provide a justifiable key focus within views. It would be an incongruous addition to the skyline, not only in terms of its height, but also in terms of form, materiality and appearance and would cause unacceptable harm to the character of the local area and to the skyline of London as a whole. As such, the development is contrary to Policy 7.12 'Implementing the London view management framework' of the London plan 2015, Strategic policy 12 'Design and Conservation' of the Core Strategy 2011 and saved policy 3.20 'Tall Buildings' of the Southwark Plan 2007.
- 3 The proposed development, owing to its height, form, massing, quality of design, geometry and use of materials would fail to preserve or enhance the character and appearance of the Thrale Street Conservation Area or the setting of the adjacent Union Street conservation area. The insensitive relationship with nearby listed buildings at 51 and 53 Southwark Street, as well as other listed buildings in the vicinity, would fail to preserve or enhance the setting of these heritage assets. As such, this is contrary to Policy 7.8 'Heritage Assets and Archaeology' of the London Plan 2015, Strategic Policy 12 'Design and Conservation' of The Core Strategy 2011 and saved policies 3.15 'Conservation of the Historic Environment', 3.16 'Conservation Areas' and 3.18 'Setting of Listed buildings, Conservation Areas and world heritage sites' of the Southwark Plan 2007.

- 4 The application does not make any provision for affordable housing. The applicant has not demonstrated that private housing is required to cross-subsidise the office and theatre uses, and that this would deliver benefits of greater weight than affordable housing. Although the development provides only 9 dwellings, the size of each of these dwellings (265 sqm) means that the building would have the capacity to provide more than 10 units, and therefore would be expected to contribute to affordable housing, as required by London Plan Policy 3.13 'Affordable Housing Thresholds' and Adopted Affordable housing SPD 2008 and draft Affordable Housing SPD 2011. Therefore, notwithstanding the objections set out in reasons 1 and 2 to the scale of the tower, a building of this scale should provide affordable housing and failure to do so is contrary to Policy 3.11 'Affordable Housing Targets' of The London Plan 2015 and Strategic Policy 6 'Homes for people on different incomes' of the Core Strategy 2011.
- 5 Insufficient information has been submitted to enable a proper, complete and reliable assessment of the impact on the local highway network and the traffic flow. The proposed cycling storage provision is significantly below the policy standards and the scheme does not encourage other sustainable modes of transport. This is contrary to Policy 6.3 'Assessing effects of development on transport capacity' and 6.9 'Cycling' of the London Plan 2015, Strategic Policy 2 'Sustainable Transport' of the Core Strategy 2011 and saved policies 5.2 'Transport impacts' and 5.3 'Walking and Cycling' of the Southwark Plan 2007.
- 6 The application relies on access and servicing over land which is not in the applicant's control. The application has failed to demonstrate that the buildings could be safely and conveniently serviced without adverse impact on other users, contrary to Policy 7.1 'Lifetime Neighbourhoods' and Policy 7.2 'Inclusive Environment' of the London Plan 2015, Strategic Policy 2 'Sustainable Transport' and Strategic Policy 12 'Design and Conservation' of the Core Strategy 2011 and saved policies 3.2 'Protection of Amenity', 3.11 'Efficient Use of Land' and 4.2 'Quality of Accommodation' of the Southwark Plan 2007.
- 7 In the absence of a signed Section 106 Agreement, there is no mechanism in place to avoid or mitigate the impact of the proposed development on employment, public open space, the transport network, the public realm, archaeology and affordable housing, and the proposal would therefore be contrary to Policy 8.2 'Planning Obligations' of the London Plan 2015, Strategic Policy 14 'Implementation and Delivery' of the Core Strategy and saved Policy 2.5 'Planning Obligations' of the Southwark Plan 2007.
- 8 Insufficient information has been submitted to enable a proper, complete and reliable assessment of the impact on the daylight and sunlight levels to the neighbouring properties and how the development would affect the local wind microclimate both within the site and within the immediate vicinity of the site. The proposal does not demonstrate the impacts on the local environment and future occupants including surface water run-off and risks associated with contamination, contrary to Policy 7.6 'Architecture' of the London Plan 2015, Strategic Policies 12 'Design and Conservation' and 13 'High Environmental Standards' of the Core Strategy 2011 and saved policies 3.1 'Environmental Effects', 3.2 'Protection of Amenity', 3.6 'Air Quality' and 3.11 'Efficient use of Land' of the Southwark Plan 2007.
- 9 The submitted Energy Strategy lacks sufficient evidence and information on how the energy savings would be achieved in accordance with the GLA's Guidance on Preparing Energy Assessments (April 2015) and the applicant has not demonstrated fully how the energy hierarchy has been followed, contrary to Policy 5.2 'Minimising Carbon Dioxide Emissions' of the London Plan 2015 and Strategic Policy 13 'High Environmental Standards' of the Core Strategy 2011.
- 10 The proposed development would not provide adequate private amenity space to family-sized units, Flats No. 1, 3, 5, 7 and 9 and therefore representing poor living accommodation, contrary to Policy 3.5 'Quality and Design of Housing Developments' of the London Plan 2015, Strategic Policy 12 'Design and Conservation' of the Core Strategy 2011, Saved Policy 4.2 'Quality of Accommodation' of the Southwark Plan 2007 and the Residential Design Standards SPD 2011.

Statement of positive and proactive action in dealing with the application

The pre-application service was used for a scheme that is similar in scale, height and form and this initial advice in 2011 concluded that this would be an inappropriate tall building and would have significant harm on the townscape and surrounding heritage assets. No engagement with the local planning authority has been made since the initial pre-application enquiry and as the initial advice was not followed, the local planning authority has decided to make a timely determination of the application.

Informatives

- 1 The applicant should note that the site lies alongside a railway viaduct and any future application that may be submitted should include a noise and vibration report to assess impact of rail and road noise on future occupants.
- 2 The applicant should note that the site lies within an Air Quality Management Area and any future application that may be submitted should include an air quality report to assess impact on air quality on future occupants, and impacts of the development on pollution levels in the surrounding area.

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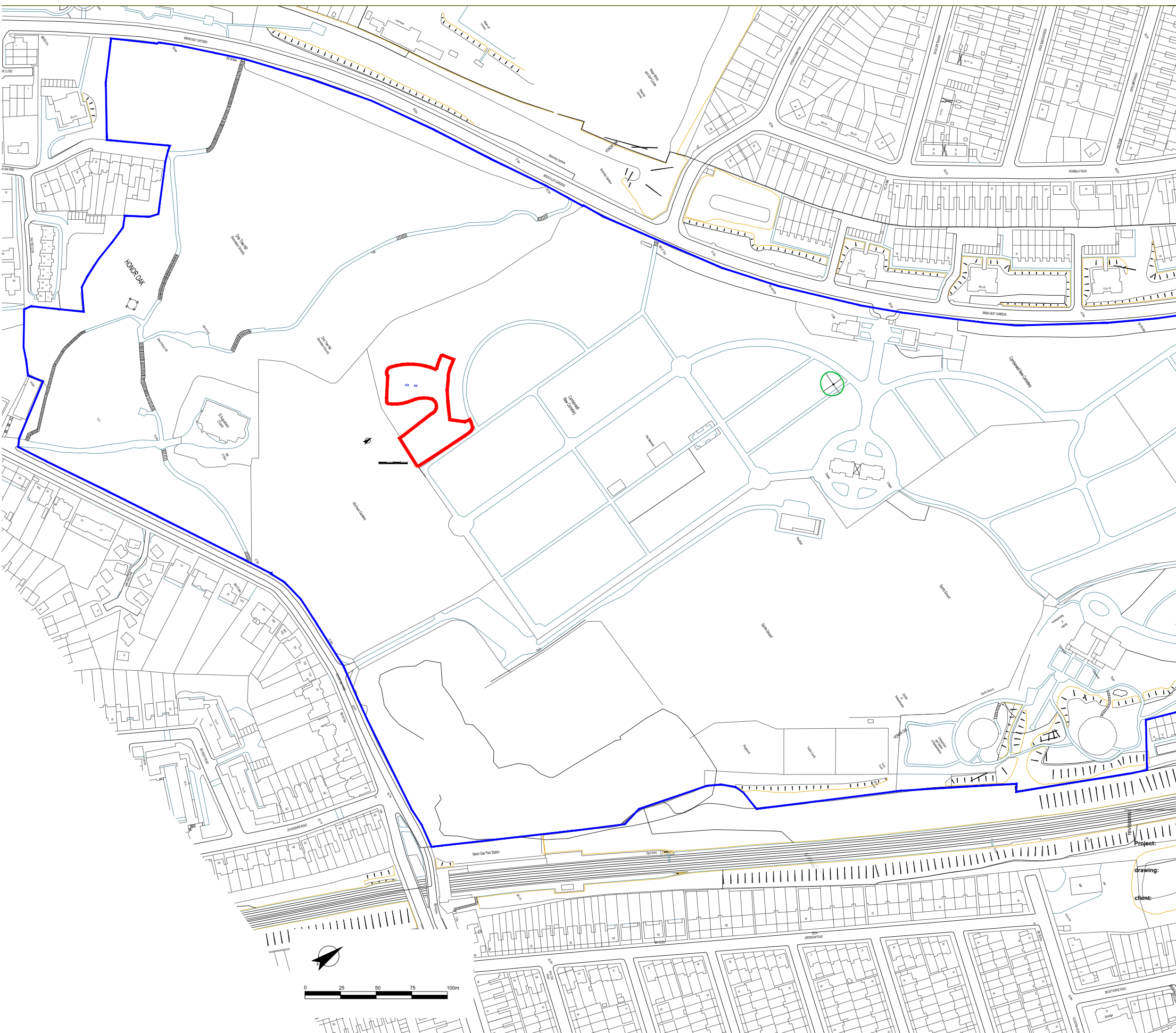
Follow any figured dimensions - do not scale. IF IN DOUBT ASK.



Site Application Boundary



Land also under the control of the applicant



revisions:	description:	drawn:	checked:	date:
D	annotation , planning boundary		PHPH	
C	annotation , planning boundary		PHPH	
B	annotation , planning boundary		PHPH	

Project: Camberwell New Cemetery

drawing: Site Location Plan (Statutory Plan)

client: Southwark Council

scale(s):	date:	drawn by:	checked:
1:250 @A1/2500@A3	2.08.11	AP	PH
drawing number:	048.05.10		
xrefs: none	status: Prelim	rev: D	

Item No. 5.3	Classification: Open	Date: 6 October 2015	Meeting Name: Planning Committee
Report title:	Development Management planning application: Council's own development Application 15/AP/3190 for: Full Planning Permission Address: CAMBERWELL NEW CEMETERY, BRENCHLEY GARDENS, LONDON SE23 3RD Proposal: Localised ground modelling, drainage works; the laying out of new paths and associated landscape works.		
Ward(s) or groups affected:	Peckham Rye		
From:	Director of Planning		
Application Start Date 27/08/2015		Application Expiry Date 22/10/2015	
Earliest Decision Date 27/09/2015			

RECOMMENDATION

1. a. That members consider the applications as it represents development on Metropolitan Open Land (MOL) and;
- b. That members grant full planning permission.

BACKGROUND INFORMATION

Site location and description

2. The site is located in the western part of the Camberwell New Cemetery. To the west of the site is One Tree Hill Allotments and to the northwest is One Tree Hill Nature Reserve. The site can be seen in two parts, a northern part and southern part. There is a relatively recent wooded area on the edge of the site which acts as a buffer between the wider cemetery and One Tree Hill. The cemetery itself is has the following designations:

- Air Quality Management Area (AQMA)
- Green Chain Park
- Metropolitan Open Land (MOL)
- Peckham and Nunhead Action Area
- Site of Importance for Nature Conservation (SINC) - Grade 2.

Details of proposal

3. This application is for the laying of a footpath to provide access to this part of the cemetery. It would be a tarmac path finished in bound chipping dressing. Some localised modeling of the ground would take place around the edge of the site. The northern glade would be increased in area from 400 to 500sq.m, although this aspect of the proposal itself does not require planning permission as none of the 26 trees to

be removed are protected.

4. The works proposed in this application are part of a wider programme detailed in the council's Cemetery Strategy 2012. Two other applications as part of this programme are running concurrently:

5. 15/AP/3184

CAMBERWELL OLD CEMETERY, UNDERHILL ROAD, LONDON, SE22

Replacement of boundary fence along Underhill Road, and the creation of a new pedestrian entrance on Underhill Road.

6. 15/AP/3185

CAMBERWELL OLD CEMETERY, FOREST HILL ROAD, LONDON, SE22 0RU:

Remediation and remodelling of part of the cemetery close to Underhill Road; drainage works; the laying out of new access paths and associated landscaping.

7. **Relevant Planning history**

<p>12/AP/2376 Application type: Council's Own Development - Reg. 3 (REG3) To create a new section of road to link the crematorium to the chapel in Camberwell New Cemetery. A small section of existing garden will be removed to install a new carriageway linking the existing access roads together including new kerbs, footway and removal of trees. Decision date 26/10/2012 Decision: Granted (GRA)</p>
<p>13/AP/4258 Application type: Council's Own Development - Reg. 3 (REG3) Change of use of existing listed cemetery lodge building from (vacant) residential use (ancillary to the cemetery) to office use (ancillary to the cemetery). Improvements to the setting of the building including relocation of car parking to rear and reinstatement of front lawns. Minor alterations to the fabric of the building. Decision date 13/03/2014 Decision: Granted (GRA)</p>
<p>13/AP/4259 Application type: Listed Building Consent (LBC) Change of use of existing listed cemetery lodge building from (vacant) residential use (ancillary to the cemetery) to office use (ancillary to the cemetery). Improvements to the setting of the building including relocation of car parking to rear and reinstatement of front lawns. Minor alterations to the fabric of the building. Decision date 28/05/2014 Decision: Granted (GRA)</p>
<p>15/EQ/0149 Application type: Pre-Application Enquiry (ENQ) Preparation of an area on land within Camberwell New Cemetery for burial, comprising tree felling, ground modelling, drainage, laying out of access paths and associated soft landscaping. Decision date 05/08/2015 Decision: Pre-application enquiry closed (EQC) The reply to this pre-application enquiry is included in appendix 3.</p>

Planning history of adjoining sites

8. None of particular relevance to this application.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

9. The main issues to be considered in respect of this application are:

- a. The principle of the development and its impact on Metropolitan Open Land
- b. The impact of the development on the amenity of nearby residents
- c. Impact on ecology
- d. Works to trees
- e. Design of the proposal.

Planning policy

National Planning Policy Framework (the Framework)

10. This application should be assessed against the Framework as a whole, however the following sections are particularly relevant to the proposal:

7. Requiring good design
9. Protecting Green Belt land
11. Conserving and enhancing the natural environment

11. London Plan 2015

- Policy 7.4 Local character
- Policy 7.6 Architecture
- Policy 7.17 Metropolitan open land
- Policy 7.19 Biodiversity and access to nature
- Policy 7.21 Trees and woodlands

12. Core Strategy 2011

- Strategic Policy 11 - Open Spaces and Wildlife
- Strategic Policy 13 - High Environmental Standards

Southwark Plan 2007 (July) - saved policies

13. The Council's cabinet on 19 March 2013, as required by para 215 of the Framework, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the Council satisfied itself that the policies and proposals in use were in conformity with the Framework. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the Framework. The following saved policies are particularly relevant to this applications:

- Policy 3.1 Environmental effects
- Policy 3.2 Protection of Amenity
- Policy 3.25 Metropolitan Open Land
- Policy 3.28 Biodiversity

Area action plans

14. Peckham and Nunhead Area Action Plan 2014
15. A large number of consultation responses have been received for this application- 281 to date. Of these 279 have been objections. A number of issues are referred to by objectors with some not being material to this application. Concerns raised include:
 - Impacts from noise; water and air pollution
 - Impacts on the highway and highway users
 - Impact on biodiversity and Site of Importance for Nature Conservation
 - Concern about the consultation undertaken
 - Concern that the development would give access to development further into the site

- Inappropriate assessment for the impact on trees.

Principle of development

16. Camberwell New Cemetery is afforded a significant degree of protection, being located within Metropolitan Open Land (MOL). Paragraph 7.56 of the London Plan states that paragraphs 79-92 of the Framework on Green Belt apply equally to MOL. Although with particular reference to buildings, the Framework does say that the provision of appropriate facilities for cemeteries are acceptable as long as it preserves the openness of the space. The footpath would maintain the openness of this part of the cemetery.
17. Policy 7.17 Metropolitan Open Land of the London Plan states that the strongest protection should be given to London's MOL and that inappropriate development should be refused except in very special circumstances. Further it advises that ancillary facilities for appropriate uses would only be acceptable where they maintain the openness of the MOL. The same requirement for the preservation of openness of MOL is referred to in saved policy 3.25 of the Southwark Plan which additionally states that planning permission will only be granted for appropriate development on MOL, including cemeteries.
18. Considering that the scheme would maintain the openness of the cemetery, the principle of the proposed development is acceptable.

Environmental impact assessment

19. This application is not EIA development because it is not a Schedule 1 or Schedule 2 development as defined in the Environmental Impact Assessment Regulations 2010.

Impact of proposed development on amenity of adjoining occupiers and surrounding area

20. The nearest residential properties are approximately 200m from the site and considering the screening afforded by the topography and vegetation, there would be no noticeable impact on local residential amenity.
21. The council's environmental protection team have reviewed this application and advised that they have no objections.

Impact on ecology

22. The ecological assessment submitted within the application identifies that the cemetery as a whole consists of amenity grassland and species-poor semi-improved grassland between graves. They are of little conservation interest. Biodiversity interest is provided by the hedgerows and scrub around the cemetery with the wooded area on the edge of this application site likely to support breeding birds with a possibility of providing habitat for small mammals, amphibians and invertebrates. The understorey is dominated by Ivy and is species poor.
23. The Framework states that local planning authorities should aim to conserve and enhance biodiversity by applying principles that include refusing planning permission if significant harm from development cannot be mitigated or compensated for and should encourage development that would incorporate biodiversity.
24. Policy 7.19 of the London Plan advises that a hierarchy be applied for development in SINC's to firstly avoid adverse impact to the biodiversity interest; secondly to minimise impact and finally to seek compensation while policy 3.28 of the Southwark Plan

states that planning permission will not be permitted where it would damage the nature conservation status of SINC's.

25. An increase in the area of the glade from 400sq.m to 550sq.m. would be made by increasing its area around the glade's border through the clearance of some understorey vegetation and 26 trees. These would consist of 21 category C trees, one category B tree and 4 category U trees. Without mitigation, these works would have a moderate negative impact on biodiversity. New habitat would be created in the form of log stacks and other wildlife refuges while bird and bat boxes would be provided both within and outside of the application site. Woodland understorey shrubs characteristic of oak woodlands would be provided to replace the species poor Ivy understorey.

Works to trees

26. The framework states that ancient woodland and veteran trees should be protected unless the benefits of development clearly outweigh the loss. Policy 7.21 of the London Plan advises that existing trees of value should be retained and any loss replaced. Strategic policy 11 of the Core Strategy states that the council will protect woodland and trees to maintain a network of open spaces and green corridors.
27. The site does not form part of an ancient woodland and there are no trees subject to a tree preservation order that would be affected by the proposal. There would be the loss however of 26 trees of varying quality, crucially no category A trees would be lost. In mitigation, more than 25 trees would be planted at heights of between three and six metres along the boundary of the site to provide continuity with the woodland on the edges, where native shrub is also proposed. Additional planting wildflower turf and wildflower mix is proposed away from the boundaries.
28. Objections received suggest that not all of the trees on site are shown on the drawings and that a CAVAT (Capital Asset Value for Amenity Trees) or iTree assessments were not undertaken.
29. The surveys have been undertaken in accordance with BS5837 and the drawings trees with diameters of 75mm and above at a height of 1.5m that were recorded during the survey, criteria that are also referred to in the Town and Country Planning (Tree Preservation)(England) Regulations 2012.
30. CAVAT assessments are used to assign a capital value for trees to inform asset management. A CAVAT assessment was not considered necessary for this application because the canopy cover provided by the replacement planting would be greater than that of the trees that would be lost. No iTree figures are currently available for Southwark as this methodology is not yet in place.

Design

31. The footpath has been designed to allow for step free access to the site that would be used for burial. The glade would be extended modestly but would relate in the same manner to this historic cemetery.

Transport issues

32. The only impact the highway network would be during the construction phase of the development. Works on the site would be modest and vehicles associated with the works would have negligible, if any impact on the highway network.

Hydrogeology

33. Objections have been received regarding the potential impact that the scheme could have on groundwater. The site is within Source Protection Zone (SPZ) 2 for a groundwater extraction point at the Honor Oak Well Station and objectors are concerned about the potential impact that burials would have on this extraction point and the chalk aquifer generally.
34. It is important to note that this application is not for the use of the site for burial or indeed as a cemetery as this is an established use. Nonetheless, the site is underlain by the London clay formation which is an aquiclude - a stratum that prevents the flow of water through it. Thus, any groundwater within the site will not migrate to the chalk aquifer from which the abstraction point draws its water. The Environment Agency have been asked for comments on this application and while their written comments have not yet been received, they have advised orally that they have no concern with respect to groundwater.

Sustainable development implications

35. The provision of biodiversity enhancements proposed, including the planting of native hedgerows and trees would provide a beneficial environmental impact while the path would allow access to the site and this part of the cemetery for wheelchair users providing a societal benefit.

Other matters

36. Many of the comments received suggest that this proposal does not make allowance for burial for members of all faiths. This application is not for the use of the site for burial as discussed above and access to the site would be available to all members of the community. Burial provision for all members of Southwark's community was considered within the council's cemetery strategy which includes provision for burial for all faiths.

Conclusion on planning issues

37. This scheme would provide access for all visitors to the cemetery to the site in the form of a new footpath and while some trees would be lost, they would be replaced by native species and an understorey typical of Oak woodlands to replace the species poor Ivy understorey that presently exists. Other biodiversity enhancements such as bird and bat boxes and refuges for wildlife would see a net gain for biodiversity.

Community impact statement

38. In line with the council's community impact statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process. No adverse impact on any group with the protected characteristics identified above is expected.

Consultations

39. Details of consultation and any re-consultation undertaken in respect of this application are set out in Appendix 1.

Consultation replies

40. Details of consultation responses received are set out in Appendix 2.

Human rights implications

41. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.
42. This application has the legitimate aim of providing groundworks to an existing cemetery. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/2339-A Application file: 15/AP/3190 Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 1778 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Pre-application letter
Appendix 4	Image
Appendix 5	Recommendation

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Dipesh Patel, Team Leader – Major Applications	
Version	Final	
Dated	24 September 2015	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic director, finance & corporate services	No	No
Strategic director, environment and leisure	Yes	Yes
Strategic director, housing and community services	No	No
Director of regeneration	No	No
Date final report sent to Constitutional Team		24 September 2015

APPENDIX 1

Consultation undertaken

Site notice date: 04/09/2015

Press notice date: 03/09/2015

Case officer site visit date: n/a

Neighbour consultation letters sent: 04/09/2015

Internal services consulted:

Ecology Officer
Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]

Statutory and non-statutory organisations consulted:

London Borough of Lewisham

Neighbour and local groups consulted:

X
X

330 Devonshire Road London SE23 3TH
Flat 1, 228 Devonshire Road London SE23 3TQ
Flat 2, 228 Devonshire Road London SE23 3TQ
Flat 3, 228 Devonshire Road London SE23 3TQ
Flat 4, 228 Devonshire Road SE23 3TQ
226 Devonshire Road London SE23 3TQ
87 Honor Oak Park London SE23 3LB
89 Honor Oak Park London SE23 3LB
91a Honor Oak Park London SE23 3LB
91b Honor Oak Park London SE23 3LB
91c Honor Oak Park London SE23 3LB
93 Honor Oak Park London SE23 3LB
95 Honor Oak Park London SE23 3LB
97 Honor Oak Park London SE23 3LB
99a Honor Oak Park London SE23 3LB
99b Honor Oak Park London SE23 3LB
99c Honor Oak Park London SE23 3LB
99d Honor Oak Park London SE23 3LB
101 Honor Oak Park London SE23 3LB
101a Honor Oak Park London SE23 3LB
101b Honor Oak Park London SE23 3LB

Terridell Farm Devil'S Dyke Road BN1 8YJ
341 Ivydale Road Nunhead SE153ED
132 Gammons Lane Watford WD245HY
31 Senrab Street London E1 0QE
138 Erlanger Road London SE14 5TJ
15 St. Peters Close Daventry NN11 4SG
46 Underhill Road London SE22 0QT
2 Brookledge Lane Adlington SK10 4JX
12 Dowson Close Camberwell SE5 8AS
28 Yale Court NW6 1JG
21 Trevelyan Road London E15 1SU
24 Belham Walk London SE5 7DX
Basement Flat, 34, Cornwallis Cres. Bristol BS8 4PH
39 Therapia Road London SE22 0SF
26 Springham Drive Colchester CO4 5FN
61 Rye Hill Park SE15 3JN
3 Acacia Grove West Dulwich SE21 8ER
47 Dunstons Road London SE22 0HG
103 Friern Rd London SE22 0AZ
2 Chesterfield Grove East Dulwich SE22 8RW
43 Montague Square London SE15 2LR
Flat 26, Newland Court Old Street EC1V 9NS
Lewell Mill Farm West Stafford DT2 8AN
123 Upper Wickham Lane Welling DA16 3AQ
172 Radstock Way Redhill RH1 3NL
24 Ivymount Road London SE27 0NB
55 Hichisson Rd London SE15 3AN
29 Shelbury Road London Se220nl
122 Ivydale Road Nunhead SE153BT
36 Hillcourt Road East Dulwich SE220PE
64 Canterbury Place London SE17 3AG
Flat 1, 71 Falkland Rd London Nw52xb
16 Grenville Way Stevenage SG2 8XZ
32 Maxted Rd London Se15 4lf
8 Hillcourt Road SE22 0PE
66a Stondon Park SE23 1JZ
50a Waveney Avenue London SE15 3UE
2 Solomons Passage London se15 3uh
16 Hillside Road Liverpool L18 2ED
67 Blenheim Crescent London W11 2EG

101c Honor Oak Park London SE23 3LB
 103 Honor Oak Park London SE23 3LB
 103a Honor Oak Park London SE23 3LB
 103b Honor Oak Park London SE23 3LB
 105 Honor Oak Park London SE23 3LB
 105a Honor Oak Park London SE23 3LB
 105b Honor Oak Park London SE23 3LB
 107 Honor Oak Park London SE23 3LB
 107 Honor Oak Park London SE23 3LB
 107a Honor Oak Park London SE23 3LB
 107b Honor Oak Park London SE23 3LB
 107c Honor Oak Park London SE23 3LB
 107d Honor Oak Park London SE23 3LB
 109 Honor Oak Park London SE23 3LB
 111 Honor Oak Park SE23 3LB
 58a Bargery Road London SE6 2LN
 6 Anchor Lane Dedham CO76BX
 22 Oakhill Court Honor Oak Park SE23 3LF
 50 Crownstone Court St Matthews Rd SW2 1LT
 174 Wood Vale London SE23 3EB
 11 Skipton Road Sheffield S4 7DD
 11a Ackroyd Road Forest Hill SE23 1DN
 91 Hicks House Freatn St SE16 4AS
 29 Lind Street London SE8 4JE
 11 Buttery's Southend-On-Sea SS1 3DT
 50a Waveney Avenue London SE15 3UE
 3 Mawley House Webber Row SE1 8XQ
 101 Belfield Lane Rochdale
 57 Choumert Rd London SE15 4AR
 16 Hichisson Road London SE15 3AL
 17 Grosvenor Road Chichester PO19 8RT
 5a Nettleton Road London SE15 5UJ
 11 Wroxton Road London SE15 2BN
 27 Friern Road London SE22 0AU
 24 Athenlay Road Se153el
 5 Borland Road London SE15 3AJ
 264 Upland Road London SE22 0DN
 99 Salehurst Rd London SE4 1AR
 27 Sutton Place London E9 6EH
 24 Brantwood Road Herne Hill SE24 0DJ
 111 Frankland Road WD3 3AS
 55 Eversley Road Upper Norwood SE19 3PY
 29 Lind St London SE8 4JE
 33 Woodyates Road Lee SE12 9JD
 53 Woodsford London SE17 2TN
 9 Therapia Road London SE22 0SF
 26 Ballina Street London SE23 1DR
 20 Langurtho Road Fowey PL23 1EQ
 43 Taymount Grange Taymount Rise SE23 3UH
 Orchard Lodge Flat Whaddon Lane, SO21 1JJ
 17 Chalgrove Ave Morden SM4 5RB
 74 Cheltenham Rd Nunhead SE15 3AQ
 Wellington House East Dulwich SE22 9QP
 134 Grierson Road Honor Oak Park SE23 1NX
 13 Scads Hill Close br6 0eb
 81 Moor Lane Upminster RM14 1ET
 15 Spa Road Bermondsey SE163SA
 6b Marmora Road SE22 0RX
 128 Benhill Road London SE5 7LZ
 Earthship Brighton Brighton BN1 9PZ
 Flat 3, Melford Court London SE22 0AE
 22 Scutari Road London SE220NN
 22 Scutari Road London SE220NN
 24 Sidmouth House Peckham SE151BL
 2 Royal George Mews London SE5 8FD
 191 Underhill Road East Dulwich SE220PD
 Flat 1 165 Camberwell Road SE5 0HB
 Penmorfae 14 The Gue TR13 9DN
 85 Devon Mansions Tooley Street SE1 2LB
 Wealden Cottage Cranbrook Rd tn17 4eu
 60 Helsinki Square London SE16 7UT
 8 Sovereign Close Hastings TN34 2UB
 157 Underhill Road East Dulwich SE22 0PG
 2 Tipperwell Way Penicuik EH26 8QP
 14 Barnes Court Lofting Road N1 1JD
 1c Dacre Gardens Brandram Road SE13 5RY
 107 Woolstone Rd London SE232TQ
 98 Glenlea Road Eitham Se91dz
 63 Willes Road London NW5 3DN
 326 Devonshire Road London SE23 3TH
 1 Honor Oak Road London se23 3sq
 14 Buckstone Close Honor Oak Park SE233QT
 35 Brockley Way London SE4 2LW
 32 Ross Road Cobham KT11 2AZ
 8 Marmora Road SE22 0RX
 3 Dinsdale Road London SE3 7RJ
 20 Clatter Brune Estate Presteigne LD8 2LB
 1 Chadwick Road London SE15 4RA
 39 Queen Elizabeth'S Close London N16 0HL
 18 Elm Road London E11 4DN
 14 Somerton Road London SE15 3UG
 20c Therapia Road se220se
 30 Manners Road Southsea PO40BB
 31 Furneaux Ave London SE27 0EQ
 134 Empire Square South London SE1 4NG
 16a Central Road Worcester Park KT4 8HZ
 43 Ashburnham Grove London SE10 8UL
 62 Newquay Road London SE6 2NS
 7 Highbury Grove London
 13a Ackroyd Rd Honor Oak Park SE23 1DN
 2 Bromley Avenue Bromley BR1 4BQ
 15 Tollet Street London E1 4EE
 224 Brockley Grove London SE4 1HG
 16 Santley St London sw4 7qb
 3 Pottery Street London SE16 4PH
 32 Wood Vale London SE23 3EE
 38 Beckwith Road London SE24 9LG
 49 John Kennedy House Rotherhithe Old Road SE16 2QE
 The Coach House, 14 Wickham Road Brockley SE41PB
 Flat 6 207 Havil St SE5 7EE
 10 Court Close Princes Risborough HP27 9BG
 12a Alleyn Rd London SE21 8AL
 3 Choumert Grove London SE154RB
 3 Choumert Grove London SE154RB
 98 Canonbie Road London SE23 3AG
 14a Kinsale Road London SE15 4HL
 14a Kinsale Road London Se14 4HL
 5 Somerford Way Se166qn
 14a Kinsale Road London se15 4hl
 14a Kinsale Road London se15 4hl
 5 Rosebery Square West Rosebery Avenue EC1R 4PT
 13 Atwood House Kingswood Estate SE21 8NT
 The Keep London SE30AG
 38 Reading House Greenhundred Rd. SE15 1RS
 3 St Michael'S Court Worthing BN11 4SA
 9 Venetian Road London SE5 9RR
 176 Croxted Road London Se21 8nw
 10 Tower Terrace London N22 6SX
 59 Comerford Road Brockley se42ba
 23 Harlescott Road SE15 3DA
 7st John'S Road Kingston Kt1 4an
 Newbrough Farmhouse Newbrough NE47 5AR
 32 Grosvenor Gardens, Bournemouth BH14HH
 16 Piermont Road Se220ln
 8a Inverton Road SE15 3DD
 38 Bexhill Road London se4 1sl
 34 Brooklyn Road Bath BA1 6TE
 1 Glangwy Cwmdeuddwr LD6 5BW
 15 Colyton Road London SE22 0NE
 18 Willow Walk London se1 5su
 9 Ebsworth London se231er
 Flat 1 Beech Court 1b East Dulwich Road SE22 9BA
 43 Liverpool Road London E10 6DN
 13 Howard Road Surbiton KT5 8SA
 Kara Woodmead Road DT7 3AB
 Oasis Farm Waterloo 20 Carlisle Lane SE17LH
 120a Grosvenor Terrace London SE5 0NL
 20 Church Street Northrepps NR27 0AA
 3 Piermomt Green London SE22 0LP
 38 Agate Road London W6 0AH
 2 St Albans Clarach Road SY24 5LN
 116 Cardomom Building 31 Shad Thames SE1 2YR
 Freshwell House Freshwell Steet CB10 1BY
 310 Queens Road London SE14 5JN
 Flat 22 Rye Court 214 Peckham Rye SE22 0LT
 92 Devonshire Road London SE23 3SX
 41 Ashburnham Grove London SE10 8UL
 Top Flat 45 Blenheim Road London W4 1ET

6 Lowther Hill London SE23 1PY
 Flat 4 16 Deanhaugh Street EH4 1LY
 15 Isla Road, Plumstead Common, SE18 3AA
 15 Thicket Road London SE20 8DB
 2 Colchester co1 1ej
 Flat 1 Murchison House 379 Portobello Rd w10 5sw
 9 Grove Park London SE5 8LR
 31 Longley Street Bermondsey SE1 5QQ
 33 Netherlands Road New Barnet
 22 Urlwin Street Camberwell SE5 0NF
 1 Plygyrhiw, Dol Llan Road, X
 237a Underhill Road Flat 1 SE22 0PB
 41 Lyall Gardens Rubery B45 9YW
 4 Talbot Road East Dulwich SE22 8EH
 12a Hollycroft Avenue London NW3 7QL
 21 Ridgemount Close London SE20 8NJ
 8 Finch Ave London SE27 9TX
 18a Whorlton Road London SE15 3PD
 4 Longton Avenue Sydenham se266qj
 120 Stafford Road Caterham CR3 6JE
 56 Goodrich Road East Dulwich Se22 0EQ
 52 Clarence Avenue Clapham sw4 8jf
 Flat Four,16 Deanhaugh Street Edinburgh eh4 1ly
 129 Constantine Rd London NW32LR
 30 Dunstons Road London SE22 0HQ
 18 Laitwood Road London SW12 9QL
 Weavers Cottage 9 Cuttle Lane SN14 7DA
 37 King St Manly Vale
 17 Gilkes Crescent London SE21 7BP
 23 Browning Street London
 29 Gledhow Gardens London SW5 0AZ
 13 Courtrai Road London SE23 1PL
 32 Purrett Road Plumstead SE18 1jw
 4 Hillcourt Road London Se22 0pe
 59 Union Road London SW4 6JF
 14 Chichester Way Feltham TW14 0DF
 57 Douglas Street, Douglas Street m46 9eb
 28 Therapia Road 28 Therapia Road SE220SE
 2 Muswell Hill London N10 3TG
 150 Flanderwell Lane Sunnyside s66 3rh
 114 Parkway London NW1 7AN
 20 Rye Court 214 Peckham Rye SE22 0LT
 70a Monnow Road London SE1 5RQ
 31 Kinburn St London SE16 6DW
 Finstall Road Bromsgrove B60 3DB
 9 Rockells Place East Dulwich SE22 0RT
 54 Ludlow Avenue Luton LU1 3RW
 Moorview Okehampton EX20 3EF
 94 Wellington Row London E2 7BQ
 23 Monks Drive London W3 0EB
 106 Goulden House Bullen St SW11 3HH
 81 St James Avenue Chester CH2 1NN
 55 Lamberhurst Road, London SE27 0SD
 1 Lea Cottage The Green Hallow WR2 6PE
 41 Towermill Road London se156by
 26 Myrtle Rd Walthamstow e17 8bx
 3 Leonard Place Allen Road n16 8ra
 17 Lawrie Park Road London SE26 6DP
 108 Willoughby House Barbican EC2Y 8BL
 59 Whatman Road London SE23 1EY
 2a Frankfurt Road London SE24 9NY
 St Julian'S Friars Shrewsbury SY1 1XY
 14 Gaumont House Staffordshire Street SE15 5TS
 4 Trafalgar Avenue London SE15 6NR
 100 Pontardulais Road Gorseinon SA4 4FQ
 30 Honor Oak Rise London SE23 3RA
 10 Eagle Mansions London n16 8au
 70 Grierson Road London SE23 1PE
 100 Lyndhurst Grove London SE15 5AH
 11 Hillcourt Road London SE22 0PF
 171 Denmark Hill London SE5 8DX
 28 Cuerden Close Bamber Bridge PR5 6BX
 45 Lyne Crescent Walthamstow E17 5HY
 By Email
 109 School Lane Bushey WD231BY
 19a Midmoor Road Balham sw12 0ew
 227 Reading Road W RG41 1HS
 By Email
 17 King Arthur Close SE15 2LP
 25 Azenby Road SE15 2LP
 27 Ryedale East Dulwich SE22 0QW
 36 Banfield Road London SE15 3TX
 9 St Norbert Green London se4 2hd
 12 Dovedale Road East Dulwich SE22 0NF
 6 Trajan Street South Shields NE33 2AW
 71 Ralphs Ride Bracknell RG12 9LN
 65 Devonshire Road London SE23 3LU
 113 Malham Road Forest Hill SE23 1AL
 56 Henslowe Road Southwark SE22 0AR
 16 Tyrrell Rd Flat B SE22 9NA
 35 Tannsfeld Rd London SE26 5DQ
 5 Greatford Road Baston PE6 9NR
 Nunhead London
 53 Ford Road Arundel BN18 9EB
 87 Underhill Road London SE22 0QR
 109 Goodrich Road East Dulwich
 5 Keston House Kinglake Estate SE17 2RB
 Waveney Ave London Se153uq
 4 Buckstone Close London SE233QT
 137 Ravenmeols Lane Formby L37 4DE
 137 Ravenmeols Lane Formby L37 4DE
 21 St Mark'S Rd., Salisbury SP1 3AY
 32 Tresco Road London SE15 3PX
 77 Portland St London SE17 2PG
 115 Dulwich Village London SE21 7BJ
 2 Kelmores Villas Kelmores Grove SE22 9BJ
 140 St. Norbert Road SE4 2HX
 Flat 2 Sydenham Hill SE26 6AQ
 28 Hawkslade Road London SE15 3DQ
 The City Of London SW4 9LT
 55 Hillcourt Road East Dulwich SE22 0PF
 6 Charles Talbot Mews East Dulwich SE22 8AZ
 19 North Cross Road East Dulwich SE22 9ET

Re-consultation: n/a

108 Willoughby House Barbican EC2Y 8BL
109 Goodrich Road East Dulwich
109 School Lane Bushey WD231BY
11 Buttery's Southend-On-Sea SS1 3DT
11 Hillcourt Road London SE22 0PF
11 Skipton Road Sheffield S4 7DD
11 Wroxton Road London SE15 2BN
11a Ackroyd Road Forest Hill SE23 1DN
111 Frankland Road WD3 3AS
113 Malham Road Forest Hill SE23 1AL
113 Malham Road Forest Hill SE23 1AL
114 Parkway London NW1 7AN
115 Dulwich Village London SE21 7BJ
116 Cardomom Building 31 Shad Thames SE1 2YR
12 Dovedale Road East Dulwich SE22 0NF
12 Dowson Close Camberwell SE5 8AS
12a Hollycroft Avenue London NW3 7QL
120 Stafford Road Caterham CR3 6JE
120a Grosvenor Terrace London SE5 0NL
122 Ivydale Road Nunhead SE153BT
123 Upper Wickham Lane Welling DA16 3AQ
128 Benhill Road London SE5 7LZ
129 Constantine Rd London NW32LR
13 Atwood House Kingswood Estate SE21 8NT
13 Courtrai Road London SE23 1PL
13 Howard Road Surbiton KT5 8SA
13 Scads Hill Close br6 0eb
13a Ackroyd Rd Honor Oak Park SE23 1DN
13a Ackroyd Rd Honor Oak Park SE23 1DN
132 Gammons Lane Watford WD245HY
134 Empire Square South London SE1 4NG
134 Grierson Road Honor Oak Park SE23 1NX
137 Ravenmeols Lane Formby L37 4DE
137 Ravenmeols Lane Formby L37 4DE
138 Erlanger Road London SE14 5TJ
14 Barnes Court Lofting Road N1 1JD
14 Buckstone Close Honor Oak Park SE233QT
14 Chichester Way Feltham TW14 0DF
14 Gaumont House Staffordshire Street SE15 5TS
14 Somerton Road London SE15 3UG
14a Kinsale Road London Se14 4HL
14a Kinsale Road London SE15 4HL
14a Kinsale Road London se15 4hl
14a Kinsale Road London se15 4hl
140 St. Norbert Road SE4 2HX
15 Colyton Road London SE22 0NE
15 Isla Road, Plumstead Common, SE18 3AA
15 Spa Road Bermondsey SE163SA
15 St. Peters Close Daventry NN11 4SG
15 Tollet Street London E1 4EE
150 Flanderwell Lane Sunnyside s66 3rh
157 Underhill Road East Dulwich SE22 0PG
16 Grenville Way Stevenage SG2 8XZ
16 Hichisson Road London SE15 3AL
16 Hillside Road Liverpool L18 2ED
16 Piermont Road Se220ln
16 Santley St London sw4 7qb
16 Tyrrell Rd Flat B SE22 9NA
16a Central Road Worcester Park KT4 8HZ
16a Central Road Worcester Park KT4 8HZ
17 Chalgrove Ave Morden SM4 5RB
17 Gilkes Crescent London SE21 7BP
17 Grosvenor Road Chichester PO19 8RT
17 King Arthur Close SE15 2LP
17 Lawrie Park Road London SE26 6DP
171 Denmark Hill London SE5 8DX
171 Denmark Hill London SE5 8DX
172 Radstock Way Redhill RH1 3NL
172 Radstock Way Redhill RH1 3NL
174 Wood Vale London SE23 3EB
176 Croxted Road London Se21 8nw
18 Elm Road London E11 4DN
18 Elm Road London E11 4DN
18 Laitwood Road London SW12 9QL
18 Laitwood Road London SW12 9QL
18 Willow Walk London se1 5su
18a Whorlton Road London SE15 3PD
19 North Cross Road East Dulwich SE22 9ET
19a Midmoor Road Balham sw12 0ew

191 Underhill Road East Dulwich SE220PD
 2 Bromley Avenue Bromley BR1 4BQ
 2 Brookledge Lane Adlington SK10 4JX
 2 Chesterfield Grove East Dulwich SE22 8RW
 2 Colchester co1 1ej
 2 Kelmores Villas Kelmores Grove SE22 9BJ
 2 Kelmores Villas Kelmores Grove SE22 9BJ
 2 Muswell Hill London N10 3TG
 2 Royal George Mews London SE5 8FD
 2 Solomons Passage London se15 3uh
 2 Tipperwell Way Penicuik EH26 8QP
 2a Frankfurt Road London SE24 9NY
 20 Church Street Northrepps NR27 0AA
 20 Langurtho Road Fowey PL23 1EQ
 20 Rye Court 214 Peckham Rye SE22 0LT
 20c Therapia Road se220se
 21 Ridgemount Close London SE20 8NJ
 21 St Mark'S Rd., Salisbury SP1 3AY
 21 Trevelyan Road London E15 1SU
 22 Oakhill Court Honor Oak Park SE23 3LF
 22 Oakhill Court Honor Oak Park SE23 3LF
 22 Scutari Road London SE220NN
 22 Scutari Road London SE220NN
 22 Urlwin Street Camberwell SE5 0NF
 224 Brockley Grove London SE4 1HG
 227 Reading Road W RG41 1HS
 23 Browning Street London
 23 Harlescott Road SE15 3DA
 23 Monks Drive London W3 0EB
 237a Underhill Road Flat 1 SE22 0PB
 24 Athenlay Road Se153el
 24 Belham Walk London SE5 7DX
 24 Brantwood Road Herne Hill SE24 0DJ
 24 Ivymount Road London SE27 0NB
 24 Sidmouth House Peckham SE151BL
 25 Azenby Road SE15 2LP
 26 Ballina Street London SE23 1DR
 26 Myrtle Rd Walthamstow e17 8bx
 26 Springham Drive Colchester CO4 5FN
 264 Upland Road London SE22 0DN
 27 Friern Road London SE22 0AU
 27 Ryedale East Dulwich SE22 0QW
 27 Sutton Place London E9 6EH
 28 Cuerden Close Bamber Bridge PR5 6BX
 28 Hawkslade Road London SE15 3DQ
 28 Therapia Road 28 Therapia Road SE220SE
 28 Yale Court NW6 1JG
 29 Gledhow Gardens London SW5 0AZ
 29 Lind St London SE8 4JE
 29 Lind Street London SE8 4JE
 29 Shelbury Road London Se220nl
 3 Acacia Grove West Dulwich SE21 8ER
 3 Choumert Grove London SE154RB
 3 Choumert Grove London SE154RB
 3 Dinsdale Road London SE3 7RJ
 3 Dinsdale Road London SE3 7RJ
 3 Leonard Place Allen Road n16 8ra
 3 Mawdley House Webber Row SE1 8XQ
 3 Piermomt Green London SE22 0LP
 3 Pottery Street London SE16 4PH
 3 St Michael'S Court Worthing BN11 4SA
 30 Dunstons Road London SE22 0HQ
 30 Honor Oak Rise London SE23 3RA
 30 Manners Road Southsea PO40BB
 31 Furneaux Ave London SE27 0EQ
 31 Kinburn St London SE16 6DW
 31 Longley Street Bermondsey SE1 5QQ
 31 Senrab Street London E1 0QE
 310 Queens Road London SE14 5JN
 32 Grosvenor Gardens, Bournemouth BH14HH
 32 Maxted Rd London Se15 4lf
 32 Purrett Road Plumstead SE18 1jw
 32 Ross Road Cobham KT11 2AZ
 32 Tresco Road London SE15 3PX
 32 Wood Vale London SE23 3EE
 326 Devonshire Road London SE23 3TH
 33 Woodyates Road Lee SE12 9JD
 34 Brooklyn Road Bath BA1 6TE
 341 Ivydale Road Nunhead SE153ED

341 Ivydale Road Nunhead SE153ED
 35 Brockley Way London SE4 2LW
 35 Brockley Way London SE4 2LW
 35 Brockley Way London SE4 2LW
 35 Tannsfield Rd London SE26 5DQ
 36 Banfield Road London SE15 3TX
 36 Hillcourt Road East Dulwich SE220PE
 38 Agate Road London W6 0AH
 38 Beckwith Road London SE24 9LG
 38 Bexhill Road London se4 1sl
 38 Reading House Greenhundred Rd. SE15 1RS
 38 Reading House Greenhundred Rd. SE15 1RS
 39 Queen Elizabeth'S Close London N16 0HL
 39 Therapia Road London SE22 0SF
 4 Buckstone Close London SE233QT
 4 Hillcourt Road London Se22 0pe
 4 Hillcourt Road London Se22 0pe
 4 Longton Avenue Sydenham se266qj
 4 Talbot Road East Dulwich SE22 8EH
 4 Trafalgar Avenue London SE15 6NR
 41 Ashburnham Grove London SE10 8UL
 41 Lyall Gardens Rubery B45 9YW
 41 Towermill Road London se156by
 43 Ashburnham Grove London SE10 8UL
 43 Liverpool Road London E10 6DN
 43 Montague Square London SE15 2LR
 43 Taymount Grange Taymount Rise SE23 3UH
 45 Lyne Crescent Walthamstow E17 5HY
 46 Underhill Road London SE22 0QT
 46 Underhill Road London SE22 0QT
 47 Dunstans Road London SE22 0HG
 49 John Kennedy House Rotherhithe Old Road SE16 2QE
 5 Borland Road London SE15 3AJ
 5 Greatford Road Baston PE6 9NR
 5 Keston House Kinglake Estate SE17 2RB
 5 Rosebery Square West Rosebery Avenue EC1R 4PT
 5 Somerford Way Se166qn
 5a Nettleton Road London SE15 5UJ
 50 Crownstone Court St Matthews Rd SW2 1LT
 50a Waveney Avenue London SE15 3UE
 50a Waveney Avenue London SE15 3UE
 52 Clarence Avenue Clapham sw4 8jf
 53 Ford Road Arundel BN18 9EB
 53 Woodsford London SE17 2TN
 54 Ludlow Avenue Luton LU1 3RW
 55 Eversley Road Upper Norwood SE19 3PY
 55 Hichisson Rd London SE15 3AN
 55 Hillcourt Road East Dulwich SE22 0PF
 55 Lamberhurst Road, London SE27 0SD
 56 Goodrich Road East Dulwich Se22 0EQ
 56 Henslowe Road Southwark SE22 0AR
 57 Choumert Rd London SE15 4AR
 57 Douglas Street, Douglas Street m46 9eb
 58a Bargery Road London SE6 2LN
 59 Comerford Road Brockley se42ba
 59 Comerford Road Brockley se42ba
 59 Union Road London SW4 6JF
 59 Whatman Road London SE23 1EY
 6 Anchor Lane Dedham CO76BX
 6 Charles Talbot Mews East Dulwich SE22 8AZ
 6 Lowther Hill London SE23 1PY
 6 Trajan Street South Shields NE33 2AW
 6b Marmora Road SE22 0RX
 60 Helsinki Square London SE16 7UT
 61 Rye Hill Park SE15 3JN
 62 Newquay Road London SE6 2NS
 63 Willes Road London NW5 3DN
 65 Devonshire Road London SE23 3LU
 66a Stondon Park SE23 1JZ
 67 Blenheim Crescent London W11 2EG
 70 Grierson Road London SE23 1PE
 70a Monnow Road London SE1 5RQ
 71 Ralphps Ride Bracknell RG12 9LN
 74 Cheltenham Rd Nunhead SE15 3AQ
 77 Portland St London SE17 2PG
 8 Finch Ave London SE27 9TX
 8 Hillcourt Road SE22 0PE
 8 Marmora Road SE22 0RX
 8 Sovereign Close Hastings TN34 2UB

8a Inverton Road SE15 3DD
81 Moor Lane Upminster RM14 1ET
81 St James Avenue Chester CH2 1NN
85 Devon Mansions Tooley Street SE1 2LB
87 Underhill Road London SE22 0QR
9 Ebsworth London se231er
9 Grove Park London SE5 8LR
9 Rockells Place East Dulwich SE22 0RT
9 St Norbert Green London se4 2hd
9 Therapia Road London SE22 0SF
9 Therapia Road London SE22 0SF
9 Venetian Road London SE5 9RR
91 Hicks House Freatn St SE16 4AS
92 Devonshire Road London SE23 3SX
94 Wellington Row London E2 7BQ
94 Wellington Row London E2 7BQ
98 Canonbie Road London SE23 3AG
98 Glenlea Road Eltham Se91dz
99 Salehurst Rd London SE4 1AR



Chief executive's department
 Planning division
 Development management (5th floor - hub 2)
 PO Box 64529
 LONDON SE1P 5LX

Mr Paul Harrison
 Harrison Design Development



Your Ref:
Our Ref: 15/EQ/0149
Contact: Dipesh Patel
Telephone: 020 7525 1778
E-Mail: planning.applications@southwark.gov.uk
Web Site: <http://www.southwark.gov.uk>

Date: 30/07/2015

Dear Mr Harrison

TOWN & COUNTRY PLANNING ACT 1990 (as amended)
PRE-APPLICATION ENQUIRY

At: CAMBERWELL NEW CEMETERY, BRENCHLEY GARDENS, LONDON, SE23 3RD
Proposal: Preparation of an area on land within Camberwell New Cemetery for burial, comprising tree felling, ground modelling, drainage, laying out of access paths and associated soft landscaping.

Further to your enquiry for pre-application advice and your meeting with council officers on 15 April 2015, I am please to provide you with the following advice:

Development

Being an established cemetery, the proposal would not affect the use of the land. The parts of the scheme that could be defined as development are the new footpath that and potentially the replacement railings fence, depending on whether it would materially affect the appearance of the boundary treatment. I note however that your view is that the replacement fence would not need planning permission.

Principle of development

Being on Metropolitan Open Land (MOL), the site is afforded significant protection in planning terms, development of appropriate facilities for cemeteries is development that would be acceptable, in principle.

Arboriculture

There are no protected trees on the site but there would be the loss of some semi-mature trees and one mature poplar of moderate quality. Replacement planting using native species would provide an enhancement of the site. It is recommended that the replacement planting shedule be included as part of the application.

Biodiversity

With the works proposed, there would inevitably be some loss of habitat but biodiversity enhancements should mitigate this loss and indeed increase biodiversity and habitat. Active management of the enhancements would ensure that their optimal benefit.

Monuments

Should any monuments need to be removed from the site, it is recommended that their detail should be recorded.

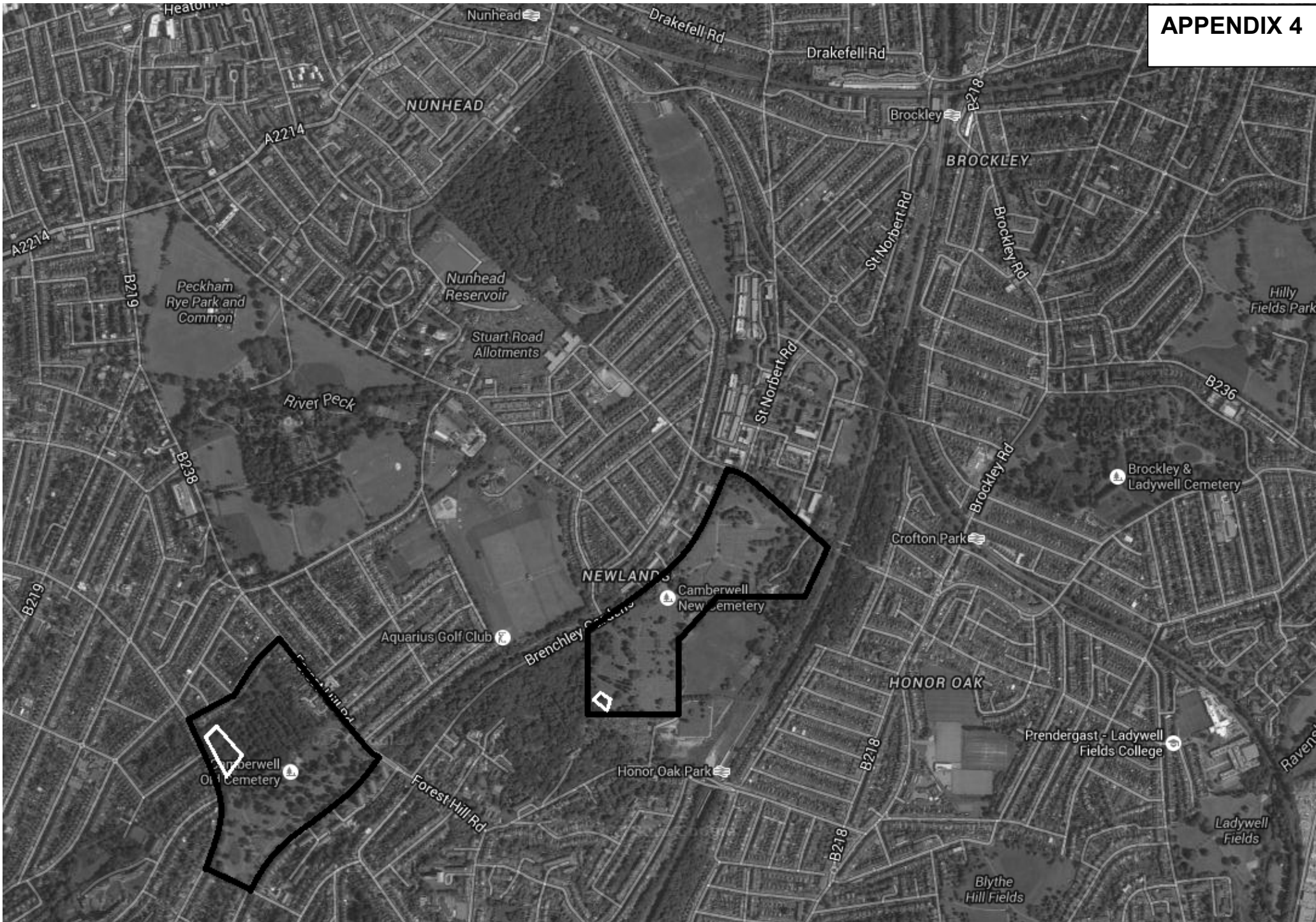
Summary

The development proposed would be limited to the installation of a footway to provide access to a burial area.

The development would be appropriate development on Metropolitan Open Land. Enhancements with respect to biodiversity are welcome.

Yours sincerely

Simon Bevan
Director of Planning.



RECOMMENDATION

This document shows the case officer's recommended decision for the application referred to below.
This document is not a decision notice for this application.

Applicant	Mr R Towers Southwark Council	Reg. Number	15/AP/3190
Application Type	Full Planning Permission	Case Number	TP/2339-A
Recommendation	Grant permission		

Draft of Decision Notice

Planning Permission was GRANTED for the following development:

Localised ground modelling, drainage works; the laying out of new paths and associated landscape works.

At: CAMBERWELL NEW CEMETERY, BRENCHLEY GARDENS, LONDON SE23 3RD

In accordance with application received on 06/08/2015 18:36:59

and Applicant's Drawing Nos.

048-05-01

048-05-10 - Revision E

048-05-41 - Revision J

048-05-43 - Revision C

048-05-51 - Revision J

048-07-30

Design and Access Statement

Flood Risk Assessment

Design and Access Statement

Ecological Assessment

Bat Survey Report

Tree Protection Plan

Tree Survey Schedule Table

Subject to the following three conditions:

Time limit for implementing this permission and the approved plans

- 1 The development hereby permitted shall not be carried out otherwise than in accordance with the following approved plans:

048-05-41 - Revision J

048-05-43 - Revision C

048-05-51 - Revision J

048-07-30

Reason:

For the avoidance of doubt and in the interests of proper planning.

Pre-commencement condition(s) - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before any work in connection with implementing this permission is commenced.

- 2 Prior to works commencing, including any demolition, an Arboricultural Method Statement shall be submitted to and approved in writing by the Local Planning Authority.

This shall show the means by which any retained trees on or directly adjacent to the site are to be protected from

damage by demolition works, excavation, vehicles, stored or stacked building supplies, waste or other materials, and building plant, scaffolding or other equipment, together with facilitative pruning specifications.

The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations contained in the method statement. Following the pre-commencement meeting all tree protection measures shall be installed, carried out and retained throughout the period of the works, unless otherwise agreed in writing by the Local Planning Authority. In any case, all works must adhere to BS5837: (2012) Trees in relation to demolition, design and construction and BS3998: (2010) Tree work - recommendations.

If within the expiration of 5 years from the date of the occupation of the building for its permitted use any retained tree is removed, uprooted is destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the Local Planning Authority.

Reason

To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with The National Planning Policy Framework 2012 Parts 7, 8, 11 & 12 and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

Commencement of works above grade - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before any work above grade is commenced. The term 'above grade' here means any works above ground level.

- 3 Before any above grade work hereby authorised begins, 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 and material samples of hard landscaping), 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.

The planting, seeding and/or turfing shall be carried out in the first planting season following completion of building works and any trees or shrubs that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the same size and species in the first suitable planting season. Planting shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction and BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf).

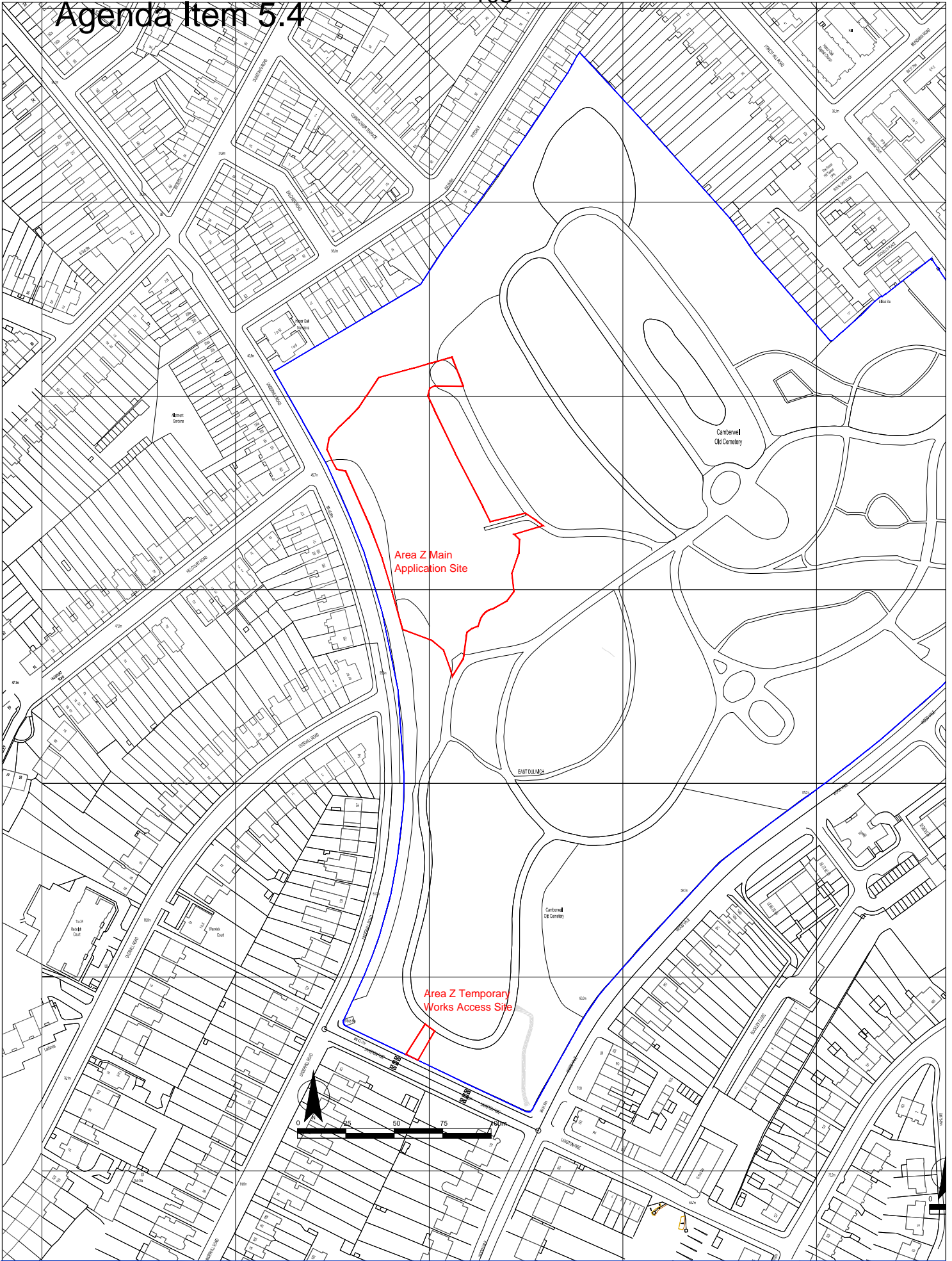
Reason

So that the Council may be satisfied with the details of the landscaping scheme in accordance with The National Planning Policy Framework 2012 Parts 7, 8, 11 & 12 and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

Statement of positive and proactive action in dealing with the application

The Council has published its development plan and core strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

The pre-application service was used for this application and the advice given was followed.



client:	project:	scale(s):	date:	drawn by:	checked:
Southwark Council	Area Z	1:2500@A3	20.04.15	AP	PH
drawing title:	Location Plan (Statutory Plan)	drawing number:	048-07-11	rev: A	status: P

Item No. 5.4	Classification: Open	Date: 6 October 2015	Meeting Name: Planning Committee
Report title:	Development Management planning application: Council's own development Application 15/AP/3185 for: Full Planning Permission Address: CAMBERWELL OLD CEMETERY, FOREST HILL ROAD, LONDON SE22 0RU Proposal: Remediation and remodelling of part of the cemetery close to Underhill Road; drainage works; the laying out of new access paths and associated landscaping.		
Ward(s) or groups affected:	Peckham Rye		
From:	Director of Planning		
Application Start Date 27/08/2015		Application Expiry Date 22/10/2015	
Earliest Decision Date 27/09/2015			

RECOMMENDATION

1. a. That members consider the applications it represents development on Metropolitan Open Land (MOL) and;
- b. That members grant full planning permission.

BACKGROUND INFORMATION

Site location and description

2. The site covers an area on the western part of the cemetery close to Underhill Road and is known as area Z. It is an area that has been subject to unauthorised tipping which has resulted in a stockpile of a varying depth from 0.7m on the south of the site to 5m on its northern part. Since 2003, it has become overgrown with scrub. Contaminative material is present within the stockpile, including ash, concrete and putrescible waste. Because of the contamination on the site and the irregularity of the land surface, it has been closed to public access since 2008.
3. The cemetery itself has the following designations:
 - Air Quality Management Area (AQAM)
 - Green Chain Park
 - Metropolitan Open Land (MOL)
 - Site of Importance for Nature Conservation (SINC)- Grade 1

Details of proposal

4. This application is for the remediation of the site and its remodelling to a 1:10 land profile but with gentle terracing. A footpath is proposed for the upper level while a carriageway would be reconstructed on alignment with a historical one on the

southern part of the site. Additionally, biodiversity measures and enhancements are proposed which are discussed below.

5. The works proposed in this application are part of a wider programme detailed in the council's cemetery strategy 2012. Two other applications as part of this programme are running concurrently:
6. 15/AP/3184
CAMBERWELL OLD CEMETERY, UNDERHILL ROAD, LONDON, SE22
Replacement of boundary fence along Underhill Road, and the creation of a new pedestrian entrance on Underhill Road.
7. 15/AP/3190:
CAMBERWELL NEW CEMETERY, BRENCHLEY GARDENS, LONDON, SE23 3RD
Localised ground modelling, drainage works; the laying out of new paths and associated landscape works.
8. **Planning history**

09/AP/2805 Application type: Council's Own Development - Reg. 3 (REG3) Installation of new gates to Camberwell Old Cemetery on the corner of Wood Vale and Langton Rise Decision date 10/02/2010 Decision: Granted (GRA)
12/AP/1023 Application type: Tree Preservation Order - works related (TPO) 1 x Leylandii (Cupressus) - Remove overgrown screening trees 1 x Ash (Fraxinus Sp) - Reduce overhang branches 1 x Oak (Quercus Sp) - Reduce overhang branches Decision date 15/05/2012 Decision: TPO consent granted (TPOG)
12/AP/0682 Application type: Council's Own Development - Reg. 3 (REG3) Raising of ground levels on Langton Rise and Wood Vale frontages, by a maximum of 1m to allow for the provision of burial space. Works also include removal of trees, the import of soil, new pathways and associated soft landscaping. Decision date 07/06/2012 Decision: Granted (GRA)
11/EQ/0231 Application type: Pre-Application Enquiry (ENQ) The development area 7,7175 sqm of public burial space, the proposal raising ground levels by 1 metre installing pedestrian footpaths and new planting in the area to create new burial spaces Decision date 07/01/2014 15:32:24 Decision: Pre-application enquiry closed (EQC)
14/AP/1214 Application type: Council's Own Development - Reg. 3 (REG3) Erection of a single storey temporary building providing 2 new public toilets within the existing cemetery Decision date 27/06/2014 Decision: Granted for Limited Period (GFLP)
14/EQ/0078 Application type: Pre-Application Enquiry (ENQ) New buildings to provide mausoleum and waiting rooms Decision date 01/08/2014 Decision: Pre-application enquiry closed (EQC)
14/EQ/0248 Application type: Pre-Application Enquiry (ENQ) Conversion of existing listed lodge, now a dwelling house to office, public wc, waiting room and mess rooms, all ancillary to cemetery use.

Decision date 23/01/2015 Decision: Pre-application enquiry closed (EQC)
15/EQ/0150 Application type: Pre-Application Enquiry (ENQ) Ground remediation works including decontamination and remodelling of unauthorized tipped material, importation of construction materials and capping, laying out of access paths and drainage, burial areas, boundary treatments, planting and nature conservation measures over an existing area of public within Camber well Old Cemetery. Decision date 06/08/2015 Decision: Pre-application enquiry closed (EQC) The reply to this enquiry is included as appendix 3 to this report.

Planning history of adjoining sites

9. None of particular relevance to this application.

KEY ISSUES FOR CONSIDERATION

10. Summary of main issues

- a. The principle of the development and its impact on Metropolitan Open Land
- b. The impact of the development on the amenity of nearby residents
- c. Impact on ecology
- d. Works to trees
- e. Design of the proposal

Planning policy

National Planning Policy Framework (the Framework)

11. This application should be assessed against the Framework as a whole, however the following sections are particularly relevant to the proposal:

7. Requiring good design
9. Protecting Green Belt land
11. Conserving and enhancing the natural environment

12. London Plan 2015

- Policy 7.4 Local character
- Policy 7.6 Architecture
- Policy 7.17 Metropolitan open land
- Policy 7.19 Biodiversity and access to nature
- Policy 7.21 Trees and woodlands

13. Core Strategy 2011

- Strategic Policy 11 - Open Spaces and Wildlife
- Strategic Policy 13 - High Environmental Standards

Southwark Plan 2007 (July) - saved policies

14. The council's cabinet on 19 March 2013, as required by para 215 of the Framework, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the Council satisfied itself that the policies and proposals in use were in conformity with the Framework. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency

with the Framework. The following saved policies are particularly relevant to this applications:

Policy 3.1 Environmental effects
 Policy 3.2 Protection of Amenity
 Policy 3.25 Metropolitan Open Land
 Policy 3.28 Biodiversity

Summary of consultation responses

15. A large number of consultation responses have been received for this application- over 300 to date. All of these have been objections. A number of issues are referred to by objectors with some not being material to this application. Concerns raised include:

- Impacts from noise; water and air pollution
- Impacts on the highway and highway users
- Impact on biodiversity and Site of Importance for Nature Conservation
- Concern about the consultation undertaken
- Concern that the development would give access to development further into the site
- Inappropriate assessment for the impact on trees

Principle of development

16. Camberwell Old Cemetery is afforded a significant degree of protection, being Metropolitan Open Land (MOL). Paragraph 7.56 of the London Plan states that paragraphs 79-92 of the Framework on Green Belt apply equally to MOL. Although with particular reference to buildings, the Framework does say that the provision of appropriate facilities for cemeteries are acceptable as long as it preserves the openness of the space. The carriageway and footpaths would maintain the openness of this part of the cemetery as would the remediation and remodelling work.
17. Policy 7.17 Metropolitan Open Land of the London Plan states that the strongest protection should be given to London's MOL and that inappropriate development should be refused except in very special circumstances. Further it advises that ancillary facilities for appropriate uses would only be acceptable where they maintain the openness of the MOL. The same requirement for the preservation of openness of MOL is referred to in saved policy 3.25 of the Southwark Plan which additionally states that planning permission will only be granted for appropriate development on MOL, including cemeteries.
18. Considering that the remodelling and carriageway and footway would effectively maintain the openness of the cemetery, the principle of the proposed development is acceptable.

Environmental impact assessment

19. This application is not EIA development because it is not a Schedule 1 or Schedule 2 development as defined in the Environmental Impact Assessment Regulations 2010.

The impact of the development on the amenity of nearby residents

20. The site is well screened from residents on Underhill Road. Because of this and the fact that the works include the laying of a carriageway and footway and

ground re-modelling, there would be no significant impact on residents from the completed scheme. Indeed, the works would allow the area to be accessible to the public. In this respect, the application would improve the amenity the cemetery provides.

21. Objections received refer to the impact that the development would have with respect to air, water and noise pollution. The remodelling of the land would require some processing of contaminated material on site, the removal of some and the import of clean fill. Processing this material will be undertaken in consultation with the Environment Agency and in accordance with health and safety regulations to protect site workers. Measures in place to protect site workers from pollution from for example, airborne material, would also protect residents and the wider community.
22. Other environmental controls such as dust suppression would be use to avoid nuisance. Some noise would be generated from works on site and as for all construction and development sites, some degree of disturbance might occur. It would however be controlled through the Control of Pollution Act 1974 and best practice would need to be employed at all times. The council's Environmental Protection Team have provided comments on this application and advised they have no objection. They have agreed with the recommended wording of the condition relating to contaminated land and have recommended an informative relating to works on the spoil.
23. Being of a temporary nature, any disturbance that may be caused would be outweighed by the public benefit of removing contaminates from the site, bringing it back to a state where the public can access it and the biodiversity enhancements discussed below.

Impact on ecology

24. Phase 1 and 2 ecology surveys have been undertaken for this site. The area covered by this application is classified as an area of recent ruderal scrub and is 12 years old. Its main composition is of Bramble species and Buddleia, the latter of which is an invasive species. There are some self-seeded Sycamore, Horse Chestnut and Willow on the site but these are either young trees or saplings. It forms a habitat of low biodiversity value although some areas support a moderate value. This area provides limited biodiversity interest, the biodiversity interest of area Z is predominately within the more mature wooded areas and glades closer to the boundaries. Most of the objections received refer to the impact that this application would have on the site of importance for nature conservation (SINC) and biodiversity.
25. The framework states that local planning authorities should aim to conserve and enhance biodiversity by applying principles that include refusing planning permission if significant harm from development cannot be mitigated or compensated for and should encourage development that would incorporate biodiversity.
26. Policy 7.19 of the London Plan advises that a hierarchy be applied for development in SINCs to firstly avoid adverse impact to the biodiversity interest; secondly to minimise impact and finally to seek compensation while policy 3.28 of the Southwark Plan states that planning permission will not be permitted where it would damage the nature conservation status of SINCs.
27. While no bat roosts were identified during the surveys, there is the potential for a moderate negative impact on them because two of the trees proposed for

removal have a high potential for bats. These trees have extensive deadwood but sections with notable cavities would be retained and ratchet strapped to surrogate trees. Further, bat boxes would be erected along clear flight paths on this site and elsewhere in the cemetery.

28. Additional enhancement biodiversity include:
- Retention of dead wood as 'fallen dead wood' on site- an important invertebrate habitat
 - Erection of bird boxes
 - Planting of a wildflower and grassland mix
 - Planting of a mixed native hedgerow
 - Native shrub planting
29. The development, following these interventions would have a moderate to high positive impact on biodiversity within the site resulting a significant biodiversity enhancement for vegetation, invertebrates, mammals and birds.

Works to trees

30. The Framework states that ancient woodland and veteran trees should be protected unless the benefits of development clearly outweigh the loss. Policy 7.21 of the London Plan advises that exiting trees of value should be retained and any loss replaced strategic policy 11 of the core strategy states that the council will protect woodland and trees to maintain a network of open spaces and green corridors.
31. Camberwell Old Cemetery has a number protected trees in groups within it; this site is not an ancient woodland.
32. A total of 18 trees presently on the site would be lost should planning permission be granted: 13 category C trees; 4 category B trees and 1 category U tree. None of these are subject to a tree preservation order which includes individual trees of greatest significance to amenity. Protected trees within the site include two Oaks and one Ash, all of which would be protected during works and retained.
33. Partly in mitigation but also for additional enhancement, over 60 trees would be planted ranging from three to six metres in height in addition to the native scrub and other flora referred to above.
34. Objections received suggest that not all of the trees on site are shown on the drawings and that a CAVAT (Capital Asset Value for Amenity Trees) or iTree assessments were not undertaken.
35. The surveys have been undertaken in accordance with BS5837 and the drawings trees with diameters of 75mm and above at a height of 1.5m that were recorded during the survey, criteria that are also referred to in the Town and Country Planning (Tree Preservation)(England) Regulations 2012.
36. CAVAT assessments are used to assign a capital value for trees to inform asset management. A CAVAT assessment was not considered necessary for this application because the canopy cover provided by the replacement planting would be greater than that of the trees that would be lost. No iTree figures are currently available for Southwark as this methodology is not yet in place.

Design

37. The groundworks would result in a landform with slopes of 1:10 while the footpath

and carriageway would be 1:12. They would be constructed with tarmac but with a bound gravel surface dressing to soften their appearance. With the maturing of the vegetation proposed for the site, the overall scheme would create glades surrounded by woodland. It is considered that this would sit well within the historic character of the cemetery.

Transport issues

38. The only impact on the highway network would be during the construction phase of the development. Vehicles would approach the site from the South Circular Road, and enter the site over a temporary crossover on Langton Rise. Egress would be from the main cemetery. By maintaining such a one way system, the impact on highways would be limited. There could be up to 900 vehicle movements during the construction works but these would be limited to 25 per day- a concentration that would not significantly affect the network.

Hydrogeology

39. Objections have been received regarding the potential impact that the scheme could have on groundwater. The site is within Source Protection Zone (SPZ) 2 for a groundwater extraction point at the Honor Oak Well Station and objectors are concerned about the potential impact that burials would have on this extraction point and the chalk aquifer generally.
40. It is important to note that this application is not for the use of the site for burial or indeed as a cemetery as this is an established use. Nonetheless, the site is underlain by the London Clay formation which is an aquiclude- a stratum that prevents the flow of water through it. Thus, any groundwater within the site will not migrate to the chalk aquifer from which the abstraction point draws its water. The Environment Agency have been asked for comments on this application and while their written comments have not yet been received, they have advised orally that they have no concern with respect to groundwater.

Sustainable development implications

41. A proposal for remediation and remodelling of this area of the cemetery with the addition of a carriageway and footpath would re-enable public access to this part of the MOL, bringing it back into sustainable use and would be a significant social benefit of the scheme. Biodiversity enhancements (including the planting of over 60 trees) would significantly outweigh the loss of 18 trees and ruderal scrub. Furthermore the remediation would result in a significant environmental benefit, removing contaminants from the site.

Other matters

42. Many of the comments received suggest that this proposal does not make allowance for burial for members of all faiths. This application is not for the use of the site for burial as discussed above and access to the remediated site would be available for all members of the community. Burial provision for all members of Southwark's community was considered within the council's Cemetery Strategy which includes provision for burial for all faiths.
43. The steps proposed to link the proposed entrance on Underhill Road (see application 15/AP/3184) would not be accessible by wheelchair users and other people with mobility impairments, the design has been driven by the desire to have minimal impact on biodiversity and a step free access would have a much larger footprint. There is step free access from other entrances and importantly, the carriageway and footpaths within the site would provide step free access.

44. A sustainable drainage system is proposed to ensure that surface water is attenuated across the site. It would infiltrate into the topsoil and would be collected at intervals along the slope by shallow surface drains. Two soakaways are proposed which together would deal with surface water drainage, including 1:100 year storm events.

Conclusion on planning issues

45. The works proposed would result in a site that the public could once again access and enjoy. Replacing ruderal scrub with a mix of native trees, hedgerows; scrub and grassland would benefit biodiversity. Many objections have been received for this application and material issues are addressed above.

Community impact statement

46. In line with the council's community impact statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process. Other than the issue access for people for mobility impairments discussed above, no adverse impacts are expected as a result of this scheme.

Consultations

47. Details of consultation and any re-consultation undertaken in respect of this application are set out in Appendix 1.

Consultation replies

48. Details of consultation responses received are set out in Appendix 2

Human rights implications

49. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.
50. This application has the legitimate aim of providing remediation and remodelling of an existing cemetery. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/2341-F Application file: 15/AP/3185 Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 1778 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Pre-application letter
Appendix 4	Image
Appendix 5	Recommendation

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Dipesh Patel, Team Leader, Major Applications	
Version	Final	
Dated	22 September 2015	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic director, finance & corporate services	No	No
Strategic director, environment and leisure	Yes	Yes
Strategic director, housing and community services	No	No
Director of regeneration	No	No
Date final report sent to Constitutional Team	24 September 2015	

APPENDIX 1

Consultation undertaken

Site notice date: 04/09/2015

Press notice date: 20/08/2015

Case officer site visit date: n/a

Neighbour consultation letters sent: 04/09/2015

Internal services consulted:

Ecology Officer
Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]

Statutory and non-statutory organisations consulted:

London Borough of Lewisham

Neighbour and local groups consulted:

	3 Lacey Gardens Louth LN11 8DF
	12 Dunstons Road London SE22 0HQ
	Flat 19 Howard Court London SE15 3PH
	Flat 1 130 Jerningham Rd SE14 5NL
	10 Merttins Road London Se15 3eb
	15 Spa Road Bermondsey SE163SA
	41 Lyall Gardens Rubery B45 9YW
	79 Stanswood Gardens London se57sr
	69a Perry Vale Forest Hill SE23 2NJ
	2 Cleeve Hill London SE23 3DD
	2 Cleeve Hill Forest Hill SE23 3DD
	6b Marmora Road SE22 0RX
	2 Vandyke Close Redhill RH1 2DS
	128 Benhill Road London SE5 7LZ
	7 Le Grand Pre Rue De Causie JE26SU
	Earthship Brighton Brighton BN1 9PZ
	5 Wilbury Avenue Cheam sm2 7du
	Flat 3, Melford Court London SE22 0AE
	45 Alleyn Park London SE21 8AT
	22 Scutari Road London SE220NN
	22 Scutari Road London SE220NN
	24 Sidmouth House Peckham SE151BL
	2 Royal George Mews London SE5 8FD
	85 Devon Mansions Tooley Street SE1 2LB
	60 Helsinki Square London se16 7ut
	17 Drake Avenue Bath BA2 5NX
	33 Dunoos Road London SE23 3TD
	8 Sovereign Close Hastings TN34 2UB
	2 Tipperwell Way Howgate EH26 8QP
	113 Malham Road Forest Hill SE23 1AL
	47 Ryedale London SE22 0QL
	1c Dacre Gardens Brandram Road SE13 5RY
	98 Glenlea Road Eltham Se91dz
	107 Woolstone Rd London SE232TQ
	308a Ivydale Road Nunhead SE15 3DG
	63 Willes Road London NW5 3DN
	15 Isla Road, Plumstead Common, SE18 3AA
	15 Thicket Road London SE20 8DB
	2 Colchester co1 1ej
	9 Grove Park London SE5 8LR
3 Honor Oak Mansions Underhill Road SE22 0QP	
2 Honor Oak Mansions Underhill Road SE22 0QP	
5 Honor Oak Mansions Underhill Road SE22 0QP	
4 Honor Oak Mansions Underhill Road SE22 0QP	
10 Honor Oak Mansions Underhill Road SE22 0QP	
1 Honor Oak Mansions Underhill Road SE22 0QP	
12 Honor Oak Mansions Underhill Road SE22 0QP	
11 Honor Oak Mansions Underhill Road SE22 0QP	
111a Underhill Road London SE22 0QS	
129a Underhill Road London SE22 0QS	
113b Underhill Road London SE22 0QS	
7 Honor Oak Mansions Underhill Road SE22 0QP	
6 Honor Oak Mansions Underhill Road SE22 0QP	
9 Honor Oak Mansions Underhill Road SE22 0QP	
8 Honor Oak Mansions Underhill Road SE22 0QP	
77 Ryedale London SE22 0QL	
205a Underhill Road London SE22 0PD	
203a Underhill Road London SE22 0PD	
By Email	
159a Underhill Road London SE22 0PG	
197a Underhill Road London SE22 0PD	
195a Underhill Road London SE22 0PD	

201a Underhill Road London SE22 0PD
 199a Underhill Road London SE22 0PD
 71 Ryedale London SE22 0QL
 75 Ryedale London SE22 0QL
 73 Ryedale London SE22 0QL
 165a Underhill Road London SE22 0PG
 163a Underhill Road London SE22 0PG
 67 Ryedale London SE22 0QL
 63 Ryedale London SE22 0QL
 Flat D 171-173 Underhill Road SE22 0PG
 Flat C 171-173 Underhill Road SE22 0PG
 Flat F 171-173 Underhill Road SE22 0PG
 Flat E 171-173 Underhill Road SE22 0PG
 Flat 3 155 Underhill Road SE22 0PG
 Flat 2 155 Underhill Road SE22 0PG
 Flat B 171-173 Underhill Road SE22 0PG
 Flat A 171-173 Underhill Road SE22 0PG
 65 Ryedale London SE22 0QL
 Rear Of 61 Ryedale SE22 0QL
 Ground Floor Flat 110 Underhill Road SE22 0QU
 Ground Floor Flat 69 Ryedale SE22 0QL
 Ground Floor Flat 135 Underhill Road SE22 0QS
 Ground Floor Flat 133 Underhill Road SE22 0QS
 Flat 1 155 Underhill Road SE22 0PG
 139b Underhill Road London SE22 0QS
 137c Underhill Road London SE22 0QS
 113 Wood Vale London SE23 3DT
 139c Underhill Road London SE22 0QS
 61 Ryedale London SE22 0QL
 149 Underhill Road London SE22 0QS
 137b Underhill Road London SE22 0QS
 First Floor Flat 129 Underhill Road SE22 0QS
 First Floor Flat 69 Ryedale SE22 0QL
 First Floor Flat 135 Underhill Road SE22 0QS
 First Floor Flat 133 Underhill Road SE22 0QS
 113a Underhill Road London SE22 0QS
 115 Wood Vale London SE23 3DT
 First Floor And Second Floor 111 Underhill Road SE22 0QS
 205b Underhill Road London SE22 0PD
 193a Underhill Road London SE22 0PD
 197 Underhill Road London SE22 0PD
 195 Underhill Road London SE22 0PD
 201 Underhill Road London SE22 0PD
 199 Underhill Road London SE22 0PD
 183 Underhill Road London SE22 0PD
 193 Underhill Road London SE22 0PD
 191 Underhill Road London SE22 0PD
 161 Underhill Road London SE22 0PG
 159 Underhill Road London SE22 0PG
 By Email
 163 Underhill Road London SE22 0PG
 207 Underhill Road London SE22 0PD
 203 Underhill Road London SE22 0PD
 157 Underhill Road London SE22 0PG
 Basement Flat 181 Underhill Road SE22 0PD
 131a Underhill Road London SE22 0QS
 Flat F 177 Underhill Road SE22 0PG
 137a Underhill Road London SE22 0QS
 139a Underhill Road London SE22 0QS
 Flat C 177 Underhill Road SE22 0PG
 Flat B 177 Underhill Road SE22 0PG
 Flat E 177 Underhill Road SE22 0PG
 Flat D 177 Underhill Road SE22 0PG
 Flat 3 149 Underhill Road SE22 0QS
 Flat 2 149 Underhill Road SE22 0QS
 205a-205b Underhill Road London SE22 0PD
 Flat 4 149 Underhill Road SE22 0QS
 Basement Flat 179 Underhill Road SE22 0PD
 Flat 1 149 Underhill Road SE22 0QS
 Flat 2 110 Underhill Road SE22 0QU
 143 Underhill Road London SE22 0QS
 141 Underhill Road London SE22 0QS
 131 Underhill Road London SE22 0QS
 179b Underhill Road London SE22 0PD
 179a Underhill Road London SE22 0PD
 181b Underhill Road London SE22 0PD
 181a Underhill Road London SE22 0PD
 147 Underhill Road London SE22 0QS
 31 Longley Street Bermondsey SE1 5QQ
 Flat 3, Evelyn Ct London E3 4JU
 31 Surrey Road London SE15 3AS
 237a Underhill Road Flat 1 SE22 0PB
 4 Talbot Road East Dulwich SE22 8EH
 8 Finch Ave London SE27 9TX
 Flat 4 16 Deanhaugh Street EH4 1LY
 4 Longton Avenue Sydenham se266qj
 Weavers Cottage 9 Cuttle Lane SN14 7DA
 Flat Four, 16 Deanhaugh Street Edinburgh eh4 1ly
 30 Dunstons Road London SE22 0HQ
 18 Laitwood Road London SW12 9QL
 37 King St Manly Vale
 17 Gilkes Crescent London SE21 7BP
 23 Browning Street London SE17 1LN
 29 Gledhow Gardens London SW5 0AZ
 32 Purrett Road Plumstead SE18 1jw
 13 Courtrai Road London SE23 1PL
 4 Hillcourt Road London Se22 0pe
 59 Union Road London SW4 6JF
 150 Flanderwell Lane Sunnyside s66 3rh
 11 Josephs Rd gu1 1dn
 70a Monnow Road London SE1 5RQ
 9 Rockells Place East Dulwich SE22 0RT
 Finstall Road Bromsgrove B60 3DB
 Moorview Okehampton EX20 3EF
 54 Ludlow Avenue Luton LU1 3RW
 5a Trinity Rise London SW2 2QP
 71b Balfour St se17 1pl
 94 Wellington Row London E2 7BQ
 106 Goulden House Bullen Street SW11 3HH
 81 St James Avenue Chester CH2 1NN
 1 Lea Cottage The Green Hallow WR2 6PE
 17 Lawrie Park Road London Se26 6DP
 108 Willoughby House Barbican EC2Y 8BL
 24 Brook Lodge Golders Green NW11 9LG
 Terridell Farm Devil'S Dyke Road BN1 8YJ
 66, Middle Wall Whitstable CT5 1BN
 341 Ivydale Road Nunhead SE153ED
 31 Senrab Street London E1 0QE
 138 Erlanger Road London SE14 5TJ
 46 Underhill Road London SE22 0QT
 2 Brookledge Lane Adlington SK10 4JX
 12 Dowson Close Camberwell SE5 8AS
 28 Yale Court NW6 1JG
 50a Duncombe Hill London SE23 1QB
 21 Trevelyan Road London E15 1SU
 24 Belham Walk London SE5 7DX
 Basement Flat, 34, Cornwallis Cres. Bristol BS8 4PH
 39 Therapia Road London SE22 0SF
 26 Springham Drive Colchester CO4 5FN
 3 Acacia Grove West Dulwich SE21 8ER
 47 Dunstons Road London SE22 0HG
 13 Robinson Road Colliers Wood SW179DQ
 103 Friern Rd London SE22 0AZ
 2 Chesterfield Grove East Duwich SE22 8RW
 Flat 4, 69 Silvester Road East Dulwich SE22 9PF
 43 Montague Square London SE15 2LR
 Flat 26, Newland Court Old Street EC1V 9NS
 Lewell Mill Farm West Stafford DT2 8AN
 1b Holyoake Court Brian Road SE16 5HJ
 172 Radstock Way Redhill RH1 3NL
 56 Homestall Road London SE22 0SB
 148b Wood Vale London SE23 3EB
 55 Hichisson Rd London SE15 3AN
 29 Shelbury Road London Se220nl
 36 Hillcourt Road East Dulwich SE220PE
 122 Ivydale Road Nunhead SE153BT
 64 Canterbury Place London SE17 3AG
 Flat B 114 Peckham Rye SE15 4HA
 16 Grenville Way 16 SG2 8XZ
 8 Hillcourt Road SE22 0PE
 16 Hillside Road Liverpool L18 2ED
 66a Stondon Park SE23 1JZ
 50a Waveney Avenue London SE15 3UE
 1 Honor Oak Road London se23 3sq
 14 Buckstone Close Honor Oak Park SE233QT
 59 Thrale St London SE1 9HW

145 Underhill Road London SE22 0QS
 114 Underhill Road London SE22 0QU
 112 Underhill Road London SE22 0QU
 127 Underhill Road London SE22 0QS
 175 Underhill Road London SE22 0PG
 4 Overhill Road London SE22 0PH
 2 Overhill Road London SE22 0PH
 169 Underhill Road London SE22 0PG
 167 Underhill Road London SE22 0PG
 121 Underhill Road London SE22 0QS
 117 Underhill Road London SE22 0QS
 125 Underhill Road London SE22 0QS
 123 Underhill Road London SE22 0QS
 1 Overhill Road London SE22 0PQ
 6 Overhill Road London SE22 0PH
 115 Underhill Road London SE22 0QS
 14 Westover Gardens Broadstairs CT10 3EY
 14 Westover Gardens Broadstairs CT10 3EY
 10 Cornflower Terrace London SE22 0HH
 58a Bargery Road London SE6 2LN
 6 Anchor Lane Dedham CO7 6BX
 Friern Road London
 22 Oakhill Court Honor Oak Park SE23 3LF
 82 Friern Rd London SE22 0AX
 282 Devonshire Road London SE23 3TH
 50 Crownstone Court St Matthews Rd SW2 1LT
 174 Wood Vale London SE23 3EB
 11 Skipton Road Sheffield S4 7DD
 11a Ackroyd Rd Forest Hill SE23 1DN
 3 Emily Mansions 85-91 Landor Road sw9 9ru
 142, Court Lane London SE21 7EB
 7 Deer Park Way West Wickham BR4 9QQ
 54 Buckingham Avenue Feltham TW14 9LE
 45 Northfield House Peckham Park Rd SE15 6TL
 91 Hicks House Freatn St SE16 4AS
 4 Aurania Villas Cranbrook Road TN18 4AT
 Siemensstr. 34 Düsseldorf
 134 Breakspears Road Brockley SE4 1UA
 11 Buttery's Southend-On-Sea SS1 3DT
 134 Breakspears Road Brockley se4 1ua
 29 Lind Street London SE8 4JE
 Stone House Cade Street TN21 9BS
 39 Aspinall Road London SE4 2EH
 50a Waveney Avenue London SE15 3UE
 14a Kinsale Road Peckham SE15 4HL
 Flat 4 1 Bedwardine Road se19 3ap
 69 Humber Rd London Se3 7lr
 2morkyns Walk London Se21 8bg
 20 Rye Court 214 Peckham Rye SE22 0LT
 15 Torgrange Holywood BT18 0NG
 16 Hichisson Road London SE15 3AL
 Selgars Mill Cullompton EX153DA
 Flat 20 Rye Court 214 Peckham Rye SE22 0LT
 44 Roan Street London SE10 9JT
 26 Surrey Road London SE15 3AT
 17 Grosvenor Road Chichester PO19 8RT
 62 Newquay Road London SE62NS
 191a Deptford High Street Deptford SE8 3NT
 5a Nettleton Road London SE15 5UJ
 11 Wroxton Road London SE152bn
 113 Malham Road SE23 1AL
 17 Calton Ave London SE217DE
 5 Kensington Hall Gardens London W14 9LS
 69 Lowden Road Herne Hill SE24 0BT
 27 Friern Road London SE22 0AU
 Flat 1, 8a York Road London SW11 3QA
 30 Homeleigh Road London SE15 3EE
 24 Athenlay Rd Se15 3el
 13 Lytcott Grove East Dulwich SE22 8QX
 71 Ralphs Ride Bracknell RG12 9LN
 49 Silvester Road East Dulwich SE22 9PB
 5 Borland Road London SE15 3AJ
 Wheeldon Trees Farm Earl Sterndlae SK17 0AA
 33 Hawkslade Road Nunhead SE15 3DQ
 264 London SE22 0DN
 62 Underhill Road London SE22 0QT
 24 Brantwood Road Herne Hill SE24 0DJ
 Flat 4 Kiln Court Newell St E15 7jp
 47 Belmont Park London SE13 5BW
 3 Dinsdale Road London SE3 7RJ
 32 Ross Road Cobham KT11 2AZ
 8 Marmora Road SE22 0RX
 1 Chadwick Road London SE15 4RA
 18 Elm Road London E11 4DN
 20c Therapia Road se220se
 14 Somerton Road London SE15 3UG
 30 Manners Road Southsea PO40BB
 292a, Crystal Palace Road Dulwich SE229JJ
 28a Border Road London SE26 6HB
 18b Brunswick Park Camberwell SE5 7RJ
 134 Empire Square South London SE1 4NG
 43 Ashbrunham Grove London SE10 8UL
 20b Barnsbury Park Islington N1 1HQ
 2 Bromley Avenue Bromley BR1 4BQ
 15 Tollet Street London E1 4EE
 224 Brockley Grove London SE4 1HG
 16 Santley St London sw4 7qb
 32 Wood Vale London SE23 3EE
 30b Bovill Road SE23 1HA
 38 Beckwith Road London Se24 9LG
 49 John Kennedy House Rotherhithe Old Road SE16 2QE
 The Coach House, 14 Wickham Road Brockley SE41PB
 98 Canonbie Road London SE23 3AG
 14a Kinsale Road London Se15 4HL
 8a Inverton Rd Nunhead SE153DD
 14a Kinsale Road London SE15 4HL
 14a Kinsale Road London se154hl
 9 Venetian Road London SE5 9RR
 13 Atwood House Kingswood Estate SE21 8NT
 3 Pottery Street London SE16 4PH
 38 Reading House Greenhundred Rd. SE15 1RS
 23 Harlescott Road SE15 3DA
 59 Comerford Road Brockley se42ba
 26 Petley Road London W6 9ST
 7 St John St Kingston
 Newbrough Farmhouse Newbrough NE47 5AR
 38 Bexhill Road London se4 1sl
 34 Brooklyn Road Bath BA1 6TE
 32 Grosvenor Gardens, Bournemouth BH14HH
 1 Glangwy Cwmdeuddwr LD6 5BW
 18 Willow Walk London se1 5su
 15 Colyton Road London SE22 0NE
 9 Ebsworth London se231er
 59 Hurstbourne Rd London SE23 2AA
 Flat 1 Beech Court 1b East Dulwich Road SE22 9BA
 43 Liverpool Road London E10 6DN
 13 Howard Road Surbiton KT5 8SA
 Kara Woodmead Road DT7 3AB
 120a Grosvenor Terrace London SE5 0NL
 20 Church Street Northrepps NR27 0AA
 3 Piermont Green London SE22 0LP
 310 Queens Road London SE14 5JN
 16a Athenlay Road London SE15 3EL
 Flat 22 Rye Court 214 Peckham Rye SE22 0LT
 92 Devonshire Road London SE23 3SX
 41 Ashburnham Grove London SE10 8UL
 Top Flat 45 Blenheim Road London W4 1ET
 59 Whatman Road London SE23 1EY
 121 Beulah Rd. Thornton Heath CR7 8JJ
 2a Frankfurt Road London SE24 9NY
 St Julian'S Friars Shrewsbury SY1 1XY
 14 Gaumont House Staffordshire Street SE15 5TS
 4 Trafalgar Avenue London SE15 6NR
 108 Goodrich Road East Dulwich SE22 0ER
 100 Pontardulais Road Gorseinon SA4 4FQ
 30 Honor Oak Rise London SE23 3RA
 10 Eagle Mansions London n16 8au
 70 Grierson Road London SE23 1PE
 100 Lyndhurst Grove London SE15 5AH
 11 Hillcourt Road London SE22 0PF
 171 Denmark Hill London SE58DX
 109 School Lane Bushey WD231BY
 28 Cuerden Close Bamber Bridge PR5 6BX
 19a Midmoor Road Balham sw12 0ew
 227 Reading Road Winnersh RG41 1HS
 By Email
 By Email
 17 King Arthur Close SE15 2LP

99 Salehurst Rd London SE4 1AR
 7 Portgate Close London W9 3DL
 1a Hillcourt Road London SE22 0PF
 27 Sutton Place London E9 6EH
 31 Eastwood Road Bramley GU5 0DY
 34, Shawbury Road London SE22 9DH
 15 Marcus Garvey Mews S3ww 0RG
 38 Priory Court London Se15 3BG
 55 Eversley Road Upper Norwood SE19 3PY
 29 Lind St London SE8 4JE
 105 Anchorage Gaol Ferry Steps bs16uz
 58 Northampton Road Croydon CR0 7HT
 53 Woodsford London SE17 2TN
 8 Alconbury Road London E5 8RH
 88 Rattray Road Rattray Road SW2 1BE
 13 Hayles Street Kennington SE11 4SU
 26 Ballina Street London SE23 1DR
 20 Langurtho Road Fowey PL23 1EQ
 67 Blenheim Crescent London W112EG
 43 Taymount Grange Taymount Rise SE23 3UH
 19 Dunoon Road London SE23 3TD
 54 Hooks Close Nunhead SE15 2TP
 80 Burghley Road London NW51UN
 93 Honor Oak Park Forest Hill SE23 3LB
 Orchard Lodge Flat Whaddon Lane, SO21 1JJ
 17 Chalgrove Ave Morden SM4 5RB
 Wellington House East Dulwich SE22 9QP
 134 Grierson Road Honor Oak Park SE23 1NX
 81 Moor Lane Upminster RM14 1ET
 36 Banfield Road London SE15 3TX
 27 Ryedale East Dulwich SE22 0QW
 9 St Norbert Green London se4 2hd
 6 Trajan Street South Shields NE33 2AW
 12 Dovedale Road East Dulwich SE22 0NF
 58 Grive Hill Road London SE5 8DG
 65 Devonshire Road London SE23 3LU
 56 Henslowe Road Southwark SE22 0AR
 87 Underhill Road East Dulwich SE22 0QR
 109 Goodrich Road East Dulwich
 5 Keston House Kinglake Estate SE17 2RB
 47 Waveney Ave Se153uq
 21 Hichisson Road SE153AN
 4 Buckstone Close London SE233QT
 137 Ravenmeols Lane Formby L37 4DE
 137 Ravenmeols Lane Formby L37 4DE
 21 St Mark'S Rd., Salisbury SP1 3AY
 Barnfield Avenue Kingston Upon Thames KT2 5RQ
 32 Tresco Road London SE15 3PX
 77 Portland St London SE17 2PG
 140 St. Norbert Road Bockley SE4 2HX
 Flat 2 Sydenham Hill SE26 6AQ
 Downing Street
 114b Peckham Rye London SE15 4HA
 55 Hillcourt Road East Dulwich SE22 0PF
 6 Charles Talbot Mews East Dulwich SE22 8AZ
 19 North Cross Road East Dulwich SE22 9ET

Re-consultation: n/a

APPENDIX 2**Consultation responses received****Internal services**

Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]

Statutory and non-statutory organisations

None

Neighbours and local groups

Barnfield Avenue Kingston Upon Thames KT2 5RQ
 Basement Flat, 34, Cornwallis Cres. Bristol BS8 4PH
 Downing Street
 Earthship Brighton Brighton BN1 9PZ
 Email representation
 Email representation
 Email representation
 Email representation
 Email representation
 Email representation
 Email representation
 Email representation
 Email representation
 Email representation
 Finstall Road Bromsgrove B60 3DB
 Flat B 114 Peckham Rye SE15 4HA
 Flat Four,16 Deanhaugh Street Edinburgh eh4 1ly
 Flat 1 Beech Court 1b East Dulwich Road SE22 9BA
 Flat 1 130 Jerningham Rd SE14 5NL
 Flat 1 130 Jerningham Rd SE14 5NL
 Flat 1, 8a York Road London SW11 3QA
 Flat 19 Howard Court London SE15 3PH
 Flat 2 Sydenham Hill SE26 6AQ
 Flat 20 Rye Court 214 Peckham Rye SE22 0LT
 Flat 20 Rye Court 214 Peckham Rye SE22 0LT
 Flat 22 Rye Court 214 Peckham Rye SE22 0LT
 Flat 26, Newland Court Old Street EC1V 9NS
 Flat 3, Evelyn Ct London E3 4JU
 Flat 3, Evelyn Ct London E3 4JU
 Flat 3, Melford Court London SE22 0AE
 Flat 4 Kiln Court Newell St E15 7jp
 Flat 4 1 Bedwardine Road se19 3ap
 Flat 4 16 Deanhaugh Street EH4 1LY
 Flat 4, 69 Silvester Road East Dulwich SE22 9PF
 Flat 4, 69 Silvester Road East Dulwich SE22 9PF
 Friern Road London
 Friern Road London
 Kara Woodmead Road DT7 3AB
 Lewell Mill Farm West Stafford DT2 8AN
 Moorview Okehampton EX20 3EF
 Newbrough Farmhouse Newbrough NE47 5AR
 Newbrough Farmhouse Newbrough NE47 5AR
 Orchard Lodge Flat Whaddon Lane, SO21 1JJ
 Selgars Mill Cullompton EX153DA
 St Julian'S Friars Shrewsbury SY1 1XY
 Stone House Cade Street TN21 9BS
 Terridell Farm Devil'S Dyke Road BN1 8YJ
 The Coach House, 14 Wickham Road Brockley SE41PB
 Top Flat 45 Blenheim Road London W4 1ET
 Weavers Cottage 9 Cuttle Lane SN14 7DA
 Wellington House East Dulwich SE22 9QP
 Wheeldon Trees Farm Earl Sterndlae SK17 0AA
 1 Chadwick Road London SE15 4RA
 1 Glangwy Cwmdeuddwr LD6 5BW
 1 Honor Oak Road London se23 3sq
 1 Lea Cottage The Green Hallow WR2 6PE
 1a Hillcourt Road London SE22 0PF
 1b Holyoake Court Brian Road SE16 5HJ
 1b Holyoake Court Brian Road SE16 5HJ

1c Dacre Gardens Brandram Road SE13 5RY
 10 Cornflower Terrace London SE22 0HH
 10 Cornflower Terrace London SE22 0HH
 10 Eagle Mansions London n16 8au
 10 Merttins Road London Se15 3eb
 100 Lyndhurst Grove London SE15 5AH
 100 Pontardulais Road Gorseinon SA4 4FQ
 103 Friem Rd London SE22 0AZ
 105 Anchorage Gaol Ferry Steps bs16uz
 106 Goulden House Bullen Street SW11 3HH
 107 Woolstone Rd London SE232TQ
 108 Goodrich Road East Dulwich SE22 0ER
 108 Willoughby House Barbican EC2Y 8BL
 109 Goodrich Road East Dulwich
 109 School Lane Bushey WD231BY
 11 Buttery's Southend-On-Sea SS1 3DT
 11 Hillcourt Road London SE22 0PF
 11 Josephs Rd gu1 1dn
 11 Skipton Road Sheffield S4 7DD
 11 Wroxton Road London SE152bn
 11a Ackroyd Rd Forest Hill SE23 1DN
 113 Malham Road SE23 1AL
 113 Malham Road SE23 1AL
 113 Malham Road Forest Hill SE23 1AL
 113 Malham Road Forest Hill SE23 1AL
 114b Peckham Rye London SE15 4HA
 117 Underhill Road London SE22 0QS
 117 Underhill Road London SE22 0QS
 12 Dovedale Road East Dulwich SE22 0NF
 12 Dowson Close Camberwell SE5 8AS
 12 Dunstons Road London SE22 0HQ
 120a Grosvenor Terrace London SE5 0NL
 121 Beulah Rd. Thornton Heath CR7 8JJ
 121 Underhill Road London SE22 0QS
 121 Underhill Road London SE22 0QS
 122 Ivydale Road Nunhead SE153BT
 123 Underhill Road London SE22 0QS
 128 Benhill Road London SE5 7LZ
 13 Atwood House Kingswood Estate SE21 8NT
 13 Courtrai Road London SE23 1PL
 13 Hayles Street Kennington SE11 4SU
 13 Howard Road Surbiton KT5 8SA
 13 Lytcott Grove East Dulwich SE22 8QX
 13 Robinson Road Colliers Wood SW179DQ
 134 Breakspears Road Brockley SE4 1UA
 134 Breakspears Road Brockley se4 1ua
 134 Empire Square South London SE1 4NG
 134 Grierson Road Honor Oak Park SE23 1NX
 137 Ravenmeols Lane Formby L37 4DE
 137 Ravenmeols Lane Formby L37 4DE
 138 Erlanger Road London SE14 5TJ
 14 Buckstone Close Honor Oak Park SE233QT
 14 Gaumont House Staffordshire Street SE15 5TS
 14 Somerton Road London SE15 3UG
 14 Westover Gardens Broadstairs CT10 3EY
 14 Westover Gardens Broadstairs CT10 3EY
 14a Kinsale Road London SE15 4HL
 14a Kinsale Road London Se15 4HL
 14a Kinsale Road London se154hl
 14a Kinsale Road Peckham SE15 4HL
 14a Kinsale Road Peckham SE15 4HL
 140 St. Norbert Road Bockley SE4 2HX
 142, Court Lane London SE21 7EB
 142, Court Lane London SE21 7EB
 148b Wood Vale London SE23 3EB
 15 Colyton Road London SE22 0NE
 15 Isla Road, Plumstead Common, SE18 3AA
 15 Marcus Garvey Mews S3ww 0RG
 15 Marcus Garvey Mews S3ww 0RG
 15 Marcus Garvey Mews S3ww 0RG
 15 Spa Road Bermondsey SE163SA
 15 Thicket Road London SE20 8DB
 15 Tollet Street London E1 4EE
 15 Torgrange Holywood BT18 0NG
 150 Flanderwell Lane Sunnyside s66 3rh
 16 Grenville Way 16 SG2 8XZ
 16 Hichisson Road London SE15 3AL
 16 Hichisson Road London SE15 3AL
 16 Hillside Road Liverpool L18 2ED

16 Santley St London sw4 7qb
 16a Athenlay Road London SE15 3EL
 17 Calton Ave London SE217DE
 17 Chalgrove Ave Morden SM4 5RB
 17 Drake Avenue Bath BA2 5NX
 17 Gilkes Crescent London SE21 7BP
 17 Grosvenor Road Chichester PO19 8RT
 17 King Arthur Close SE15 2LP
 17 Lawrie Park Road London Se26 6DP
 172 Radstock Way Redhill RH1 3NL
 174 Wood Vale London SE23 3EB
 18 Elm Road London E11 4DN
 18 Laitwood Road London SW12 9QL
 18 Willow Walk London se1 5su
 18b Brunswick Park Camberwell SE5 7RJ
 183 Underhill Road London SE22 0PD
 19 Dunoon Road London SE23 3TD
 19 Dunoon Road London SE23 3TD
 19 North Cross Road East Dulwich SE22 9ET
 19a Midmoor Road Balham sw12 0ew
 191 Underhill Road London SE22 0PD
 191a Deptford High Street Deptford SE8 3NT
 191a Deptford High Street Deptford SE8 3NT
 2 Bromley Avenue Bromley BR1 4BQ
 2 Brookledge Lane Adlington SK10 4JX
 2 Chesterfield Grove East Duwich SE22 8RW
 2 Cleeve Hill Forest Hill SE23 3DD
 2 Cleeve Hill Forest Hill SE23 3DD
 2 Cleeve Hill London SE23 3DD
 2 Cleeve Hill London SE23 3DD
 2 Colchester co1 1ej
 2 Royal George Mews London SE5 8FD
 2 Tipperwell Way Howgate EH26 8QP
 2 Vandyke Close Redhill RH1 2DS
 2a Frankfurt Road London SE24 9NY
 2morkyns Walk London Se21 8bg
 2morkyns Walk London Se21 8bg
 20 Church Street Northrepps NR27 0AA
 20 Langurtho Road Fowey PL23 1EQ
 20 Rye Court 214 Peckham Rye SE22 0LT
 20b Barnsbury Park Islington N1 1HQ
 20c Therapia Road se220se
 21 Hichisson Road SE153AN
 21 Hichisson Road SE153AN
 21 St Mark'S Rd., Salisbury SP1 3AY
 21 Trevelyan Road London E15 1SU
 22 Oakhill Court Honor Oak Park SE23 3LF
 22 Oakhill Court Honor Oak Park SE23 3LF
 22 Scutari Road London SE220NN
 22 Scutari Road London SE220NN
 224 Brockley Grove London SE4 1HG
 227 Reading Road Winnersh RG41 1HS
 23 Browning Street London SE17 1LN
 237a Underhill Road Flat 1 SE22 0PB
 24 Athenlay Rd Se15 3el
 24 Belham Walk London SE5 7DX
 24 Brantwood Road Herne Hill SE24 0DJ
 24 Brook Lodge Golders Green NW11 9LG
 24 Brook Lodge Golders Green NW11 9LG
 24 Sidmouth House Peckham SE151BL
 26 Ballina Street London SE23 1DR
 26 Petley Road London W6 9ST
 26 Springham Drive Colchester CO4 5FN
 26 Surrey Road London SE15 3AT
 26 Surrey Road London SE15 3AT
 264 London SE22 0DN
 27 Friern Road London SE22 0AU
 27 Ryedale East Dulwich SE22 0QW
 27 Sutton Place London E9 6EH
 28 Cuerden Close Bamber Bridge PR5 6BX
 28 Yale Court NW6 1JG
 28a Border Road London SE26 6HB
 28a Border Road London SE26 6HB
 282 Devonshire Road London SE23 3TH
 29 Gledhow Gardens London SW5 0AZ
 29 Lind St London SE8 4JE
 29 Lind Street London SE8 4JE
 29 Shelbury Road London Se220nl
 292a, Crystal Palace Road Dulwich SE229JJ

3 Acacia Grove West Dulwich SE21 8ER
 3 Dinsdale Road London SE3 7RJ
 3 Emily Mansions 85-91 Landor Road sw9 9ru
 3 Emily Mansions 85-91 Landor Road sw9 9ru
 3 Lacey Gardens Louth LN11 8DF
 3 Piermont Green London SE22 0LP
 3 Pottery Street London SE16 4PH
 30 Dunstons Road London SE22 0HQ
 30 Homeleigh Road London SE15 3EE
 30 Homeleigh Road London SE15 3EE
 30 Honor Oak Rise London SE23 3RA
 30 Manners Road Southsea PO40BB
 30b Bovill Road SE23 1HA
 308a Ivydale Road Nunhead SE15 3DG
 31 Eastwood Road Bramley GU5 0DY
 31 Longley Street Bermondsey SE1 5QQ
 31 Senrab Street London E1 0QE
 31 Surrey Road London SE15 3AS
 31 Surrey Road London SE15 3AS
 310 Queens Road London SE14 5JN
 32 Grosvenor Gardens, Bournemouth BH14HH
 32 Purrett Road Plumstead SE18 1jw
 32 Ross Road Cobham KT11 2AZ
 32 Tresco Road London SE15 3PX
 32 Wood Vale London SE23 3EE
 33 Dunoon Road London SE23 3TD
 33 Hawkslade Road Nunhead SE15 3DQ
 33 Hawkslade Road Nunhead SE15 3DQ
 34 Brooklyn Road Bath BA1 6TE
 34, Shawbury Road London SE22 9DH
 34, Shawbury Road London SE22 9DH
 341 Ivydale Road Nunhead SE153ED
 341 Ivydale Road Nunhead SE153ED
 36 Banfield Road London SE15 3TX
 36 Hillcourt Road East Dulwich SE220PE
 38 Beckwith Road London Se24 9LG
 38 Beckwith Road London Se24 9LG
 38 Priory Court London Se15 3BG
 38 Priory Court London Se15 3BG
 38 Reading House Greenhundred Rd. SE15 1RS
 39 Aspinall Road London SE4 2EH
 39 Therapia Road London SE22 0SF
 4 Aurania Villas Cranbrook Road TN18 4AT
 4 Aurania Villas Cranbrook Road TN18 4AT
 4 Buckstone Close London SE233QT
 4 Hillcourt Road London Se22 0pe
 4 Hillcourt Road London Se22 0pe
 4 Longton Avenue Sydenham se266qj
 4 Talbot Road East Dulwich SE22 8EH
 4 Trafalgar Avenue London SE15 6NR
 41 Ashburnham Grove London SE10 8UL
 41 Lyall Gardens Rubery B45 9YW
 41 Lyall Gardens Rubery B45 9YW
 43 Ashbrunham Grove London SE10 8UL
 43 Liverpool Road London E10 6DN
 43 Montague Square London SE15 2LR
 43 Taymount Grange Taymount Rise SE23 3UH
 44 Roan Street London SE10 9JT
 45 Alleyn Park London SE21 8AT
 45 Alleyn Park London SE21 8AT
 45 Northfield House Peckham Park Rd SE15 6TL
 46 Underhill Road London SE22 0QT
 47 Belmont Park London SE13 5BW
 47 Dunstons Road London SE22 0HG
 47 Ryedale London SE22 0QL
 47 Waveney Ave Se153uq
 49 John Kennedy House Rotherhithe Old Road SE16 2QE
 49 Silvester Road East Dulwich SE22 9PB
 5 Borland Road London Se15 3AJ
 5 Kensington Hall Gardens London W14 9LS
 5 Keston House Kinglake Estate SE17 2RB
 5 Wilbury Avenue Cheam sm2 7du
 5 Wilbury Avenue Cheam sm2 7du
 5a Nettleton Road London SE15 5UJ
 5a Trinity Rise London SW2 2QP
 50 Crownstone Court St Matthews Rd SW2 1LT
 50a Duncombe Hill London SE23 1QB
 50a Waveney Avenue London SE15 3UE
 50a Waveney Avenue London SE15 3UE

53 Woodsford London SE17 2TN
 54 Buckingham Avenue Feltham TW14 9LE
 54 Buckingham Avenue Feltham TW14 9LE
 54 Hooks Close Nunhead SE15 2TP
 54 Ludlow Avenue Luton LU1 3RW
 55 Eversley Road Upper Norwood SE19 3PY
 55 Hichisson Rd London SE15 3AN
 55 Hillcourt Road East Dulwich SE22 0PF
 56 Henslowe Road Southwark SE22 0AR
 56 Homestall Road London SE22 0SB
 58 Grive Hill Road London SE5 8DG
 58 Northampton Road Croydon CR0 7HT
 58a Bargery Road London SE6 2LN
 59 Comerford Road Brockley se42ba
 59 Hurstbourne Rd London SE23 2AA
 59 Thrale St London SE1 9HW
 59 Union Road London SW4 6JF
 59 Whatman Road London SE23 1EY
 6 Anchor Lane Dedham CO7 6BX
 6 Charles Talbot Mews East Dulwich SE22 8AZ
 6 Trajan Street South Shields NE33 2AW
 6b Marmora Road SE22 0RX
 60 Helsinki Square London se16 7ut
 61 Ryedale London SE22 0QL
 62 Newquay Road London SE62NS
 62 Underhill Road London SE22 0QT
 63 Willes Road London NW5 3DN
 64 Canterbury Place London SE17 3AG
 65 Devonshire Road London SE23 3LU
 66, Middle Wall Whitstable CT5 1BN
 66a Stondon Park SE23 1JZ
 67 Blenheim Crescent London W112EG
 67 Blenheim Crescent London W112EG
 69 Humber Rd London Se3 7lr
 69 Lowden Road Herne Hill SE24 0BT
 69a Perry Vale Forest Hill SE23 2NJ
 7 Deer Park Way West Wickham BR4 9QQ
 7 Deer Park Way West Wickham BR4 9QQ
 7 Le Grand Pre Rue De Causie JE26SU
 7 Portgate Close London W9 3DL
 7 Portgate Close London W9 3DL
 70 Grierson Road London SE23 1PE
 70a Monnow Road London SE1 5RQ
 71 Ralphs Ride Bracknell RG12 9LN
 71b Balfour St se17 1pl
 71b Balfour St se17 1pl
 77 Portland St London SE17 2PG
 79 Stanswood Gardens London se57sr
 8 Alconbury Road London E5 8RH
 8 Alconbury Road London E5 8RH
 8 Finch Ave London SE27 9TX
 8 Hillcourt Road SE22 0PE
 8 Sovereign Close Hastings TN34 2UB
 8a Inverton Rd Nunhead SE153DD
 80 Burghley Road London NW51UN
 81 Moor Lane Upminster RM14 1ET
 81 St James Avenue Chester CH2 1NN
 82 Friern Rd London SE22 0AX
 82 Friern Rd London SE22 0AX
 85 Devon Mansions Tooley Street SE1 2LB
 87 Underhill Road East Dulwich SE22 0QR
 88 Rattray Road Rattray Road SW2 1BE
 88 Rattray Road Rattray Road SW2 1BE
 9 Ebsworth London se231er
 9 Grove Park London SE5 8LR
 9 Rockells Place East Dulwich SE22 0RT
 9 St Norbert Green London se4 2hd
 9 Venetian Road London SE5 9RR
 91 Hicks House Freat St SE16 4AS
 92 Devonshire Road London SE23 3SX
 93 Honor Oak Park Forest Hill SE23 3LB
 94 Wellington Row London E2 7BQ
 98 Canonbie Road London SE23 3AG
 98 Glenlea Road Eltham Se91dz
 99 Salehurst Rd London SE4 1AR



Chief executive's department
 Planning division
 Development management (5th floor - hub 2)
 PO Box 64529
 LONDON SE1P 5LX

Mr Paul Harrison
 Harrison Design Development



Your Ref:
Our Ref: 15/EQ/0150
Contact: Dipesh Patel
Telephone: 020 7525 1778
E-Mail: planning.applications@southwark.gov.uk
Web Site: <http://www.southwark.gov.uk>

Date: 30/07/2015

Dear Mr Harrison

TOWN & COUNTRY PLANNING ACT 1990 (as amended)
PRE-APPLICATION ENQUIRY

At: CAMBERWELL OLD CEMETERY, AREA 2, FOREST HILL ROAD, LONDON, SE22 0RU
Proposal: Ground remediation works including decontamination and remodelling of unauthorized tipped material, importation of construction materials and capping, laying out of access paths and drainage, burial areas, boundary treatments, planting and nature conservation measures over an existing area of public within Camberwell Old Cemetery.

Further to your enquiry for pre-application advice and your meeting with council officers on 15 April 2015, I am pleased to provide you with the following advice:

Development

The site is an established cemetery and the proposal would not alter this use of the land. The use of the site for burials does not require planning permission, nor would maintenance works subject to the comments below. As part of the remediation proposed levels across part of the site would be re-modelled and would require planning permission as would the introduction of new footpaths and the carriageway.

Principle of development

Being Metropolitan Open Land (MOL), the site is afforded significant protection in planning terms, development of appropriate facilities for cemeteries is development that would be acceptable, in principle.

Remediation

The tier 1 groundwater risk assessment suggests that the London Clay underlying the site provides a suitable barrier to any contamination reaching the principal and secondary aquifers below and that no additional assessment with respect to groundwater impacts is necessary. Conversely, the phase two land quality assessment indicates that there could be a moderate to low risk for future users of the site (including grave diggers) and makes recommendations to reduce this risk further through remediation. By removing or otherwise reducing the risk from contamination on the site, the works to area Z would be a significant environmental improvement.

Arboriculture

The Camberwell Old Cemetery Tree Preservation Order 1993 was varied on 23 July 2015. This variation rationalised the order to protect trees in two groups and four areas. The plans submitted for this enquiry show that trees in the groups and areas detailed in the varied order would be retained. It is recommended that any application is accompanied by a tree protection plan for the protected trees.

Biodiversity

A phase 2 bat survey is recommended, along with details of the mitigation of the loss of medium and high roost potential bat boxes in the area. Enhancement of the boundary and the buffer zone is likely to benefit biodiversity.

Footpath and carriageway

The proposed footpath and carriageway would provide essential access to the burial plots and making these accessible would provide an enhancement of the cemetery.

Boundary treatment

A new access is proposed on Underhill Road along with the replacement of the existing fence with metal railings, this is likely to form part of a separate application. Providing greater permeability for the site, the access would facilitate pedestrian movement across the cemetery to Forest Hill Road, this new access is welcomed and should not give rise to unacceptable harm to local amenity. Details of the boundary treatment should included in the submission.

Monuments

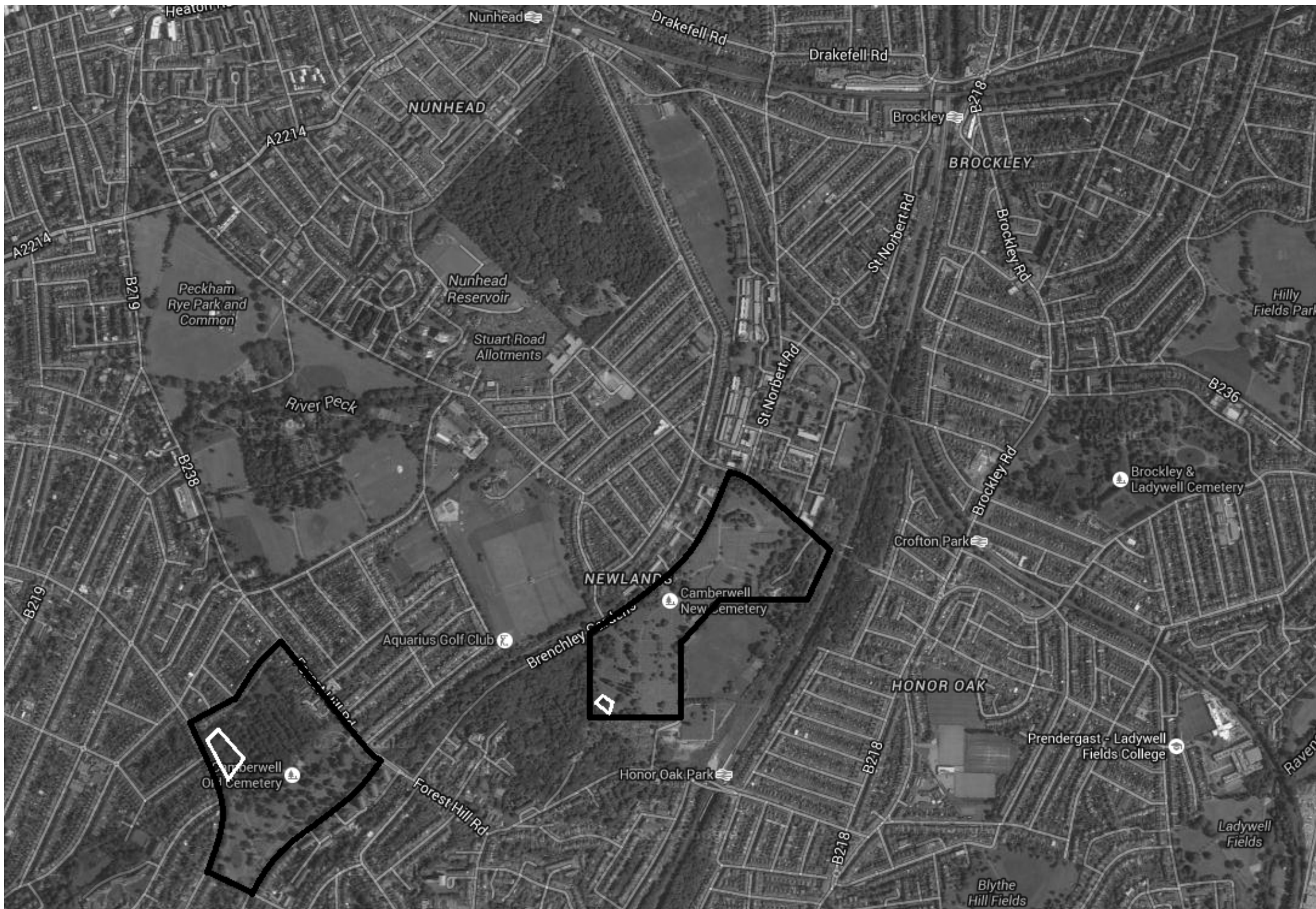
Should any monuments need to be removed from the site, it is recommended that their detail should be recorded.

Summary

The works proposed would remediate land that is presently contaminated. New and re-instated footways and the carriageway would provide essential access to the cemetery and maintain the openness of this MOL while the new boundary fence would improve the streetscene at this location. Tree protection measures for protected trees would need to be submitted as would biodiversity mitigation.

Yours sincerely

Simon Bevan
Director of Planning.



RECOMMENDATION

This document shows the case officer's recommended decision for the application referred to below.
This document is not a decision notice for this application.

Applicant	Ms Rebecca Towers Southwark Council	Reg. Number	15/AP/3185
Application Type	Full Planning Permission	Case Number	TP/2341-F
Recommendation	Grant permission		

Draft of Decision Notice

Planning Permission was GRANTED for the following development:

Remediation and remodelling of part of the cemetery close to Underhill Road; drainage works; the laying out of new access paths and associated landscaping.

At: CAMBERWELL OLD CEMETERY, FOREST HILL ROAD, LONDON SE22 0RU

In accordance with application received on 07/08/2015 18:35:58

and Applicant's Drawing Nos.

048-07-01	048-07-34 - Revision C
048-07-02 - Revision C	048-07-40 - Revision E
048-07-03 - Revision C	048-07-41 - Revision C
048-07-11 - Revision A	048-07-42 - Revision B
048-07-15 - Revision B	048-07-43 - Revision A
048-07-21 - Revision F	048-07-46
048-07-24 - Revision C	048-07-50 - Revision C
048-07-26 - Revision C	048-07-52 - Revision D
048-07-27 - Revision C	048-12-32 - Revision A
048-07-30 - Revision C	

Design and Access Statement
 Drainage Strategy
 Ecological Assessment
 Extended Phase 1 Survey and Impact Assessment
 Phase 2 Land Quality Intrusive Investigation
 Phase 2 Surveys for Reptiles and Invasive Plants
 Phase 2 Land Quality Assessment (April 2009)
 Phase 2 Land Quality Assessment (October 2008)
 Preliminary Bat Survey Report
 Remediation Strategy Report - Draft
 Tier 1 Groundwater Risk Assessment
 Tree Survey Schedule

Subject to the following five conditions:

Time limit for implementing this permission and the approved plans

- 1 The development hereby permitted shall not be carried out otherwise than in accordance with the following approved plans:

048-07-15 - Revision B
 048-07-21 - Revision F
 048-07-24 - Revision C
 048-07-26 - Revision C
 048-07-27 - Revision C
 048-07-30 - Revision C
 048-07-34 - Revision C

048-07-40 - Revision E
 048-07-41 - Revision C
 048-07-42 - Revision B
 048-07-43 - Revision A
 048-07-46
 048-07-50 - Revision C
 048-07-52 - Revision D
 048-12-32 - Revision A

Reason:

For the avoidance of doubt and in the interests of proper planning.

- 2 The development hereby permitted shall be begun before the end of three years from the date of this permission.

Reason

As required by Section 91 of the Town and Country Planning Act 1990 as amended.

Pre-commencement condition(s) - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before any work in connection with implementing this permission is commenced.

- 3 Prior to works commencing, including any demolition, an Arboricultural Method Statement shall be submitted to and approved in writing by the Local Planning Authority.

This shall show the means by which any retained trees on or directly adjacent to the site are to be protected from damage by demolition works, excavation, vehicles, stored or stacked building supplies, waste or other materials, and building plant, scaffolding or other equipment, together with facilitative pruning specifications.

The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations contained in the method statement. Following the pre-commencement meeting all tree protection measures shall be installed, carried out and retained throughout the period of the works, unless otherwise agreed in writing by the Local Planning Authority. In any case, all works must adhere to BS5837: (2012) Trees in relation to demolition, design and construction and BS3998: (2010) Tree work - recommendations.

If within the expiration of 5 years from the date of the occupation of the building for its permitted use any retained tree is removed, uprooted is destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the Local Planning Authority.

Reason

To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with The National Planning Policy Framework 2012 Parts 7, 8, 11 & 12 and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

- 4 a) Prior to the commencement of any development, a detailed remediation strategy shall be submitted to and approved by the local planning authority. The strategy should detail measures to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health. The scheme shall ensure that the site would not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. The approved remediation scheme shall be carried out in accordance with its terms prior to the commencement of development other than that required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority
- b) Following the completion of the measures identified in the approved remediation strategy, a verification report providing evidence that all work required by the remediation strategy has been completed shall be submitted to and approved in writing by the Local Planning Authority.
- c) In the event that contamination is found at any time when carrying out the approved development that was not previously identified, it shall be reported in writing immediately to the Local Planning Authority, and a scheme of investigation and risk assessment, a remediation strategy and verification report (if required) shall be submitted to the Local Planning Authority for approval in writing, in accordance with a-c above.

Reason

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with saved policy 3.2 Protection of amenity of the Southwark Plan (2007), strategic policy 13 High environmental standards of the Core Strategy (2011) and the National Planning Policy Framework 2012.

Commencement of works above grade - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before any work above grade is commenced. The term 'above grade' here means any works above ground level.

- 5 Before any above grade work hereby authorised begins, 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 and material samples of hard landscaping), 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.

The planting, seeding and/or turfing shall be carried out in the first planting season following completion of building works and any trees or shrubs that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the same size and species in the first suitable planting season. Planting shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction and BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf).

Reason

So that the Council may be satisfied with the details of the landscaping scheme in accordance with The National Planning Policy Framework 2012 Parts 7, 8, 11 & 12 and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

Statement of positive and proactive action in dealing with the application

The Council has published its development plan and core strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

The pre-application service was used for this application and the advice given was followed.

Informative

The applicant is advised that the recommendations of Guidance Note HS (G) 66-HMSO 'Protection of workers and the general public during the development of contaminated land' (1991) should be incorporated into all relevant work practices on site.



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KEY

Application Boundary (Planning- provisional)

Land also under the applicants control

A	Scale note	dwnt	BB	PH	DATE
rev:	description:	dwnt	BB	PH	DATE
Project: Underhill Road Boundary Improvements					
drawing: Location Plan (Statutory Plan)-					
client: Southwark Council -					
scale(s):	date:	drawn by:	checked:		
1:1250@A3	20.04.15	AJDP	PH		
drawing number:	048-12-11				
xrefs:	status:	rev:			
-	PLANNING	A			
Harrison Design Development Limited					
e. info@harrisondd.co.uk t. 01352 758077 w. www.harrisondd.co.uk					

Item No. 5.5	Classification: OPEN	Date: 6 October 2015	Meeting Name: Planning Committee
Report title:	Development Management planning application: Council's own development Application 15/AP/3184 for: Full Planning Permission Address: CAMBERWELL OLD CEMETERY, UNDERHILL ROAD, LONDON SE22 Proposal: Replacement of boundary fence along Underhill Road, and the creation of a new pedestrian entrance on Underhill Road.		
Ward(s) or groups affected:	Peckham Rye		
From:	Director of Planning		
Application Start Date 27/08/2015		Application Expiry Date 22/10/2015	
Earliest Decision Date 27/09/2015			

RECOMMENDATION

1. a. That members consider the applications it represents development on Metropolitan Open Land (MOL) and;
- b. That members grant full planning permission.

BACKGROUND INFORMATION

Site location and description

2. The site for this application is a linear one at the western end of Camberwell Old Cemetery encompassing the whole of the boundary of the cemetery with Underhill Road, with a length of over 800m. The site extends into the cemetery at varying lengths to a maximum of approximately 45m opposite Overhill Road.
3. Presently there is a timber fence on concrete posts demarcating the boundary. It is in a poor state of repair, in places there is fly-tipped material against the back of the fence.
4. The cemetery itself has the following designations:
 - Air Quality Management Area (AQMA)
 - Green Chain Park
 - Metropolitan Open Land (MOL)
 - Site of Importance for Nature Conservation (SINC)- Grade 1

Details of proposal

5. The proposal is for the replacement of the existing fence with a 2m high railing fence set in a low plinth with a height of 2m. A gated pedestrian access is proposed opposite Hillcourt Road. At this point either side of the pedestrian access the railings would be curved. The gate itself would be of a modern design with an ornate leaf motif and

stand at a height of almost 3m at its highest point. Steps required to access the cemetery to the east are included in application reference 15/AP/3185. A 1.2m fence is shown on the drawings behind the boundary at a minimum distance of 7.5m. The lower fence is not part of this application but it is permitted development under Class A, Part 2 of the General Permitted Development Order 2015.

6. The works proposed in this application are part of a wider programme detailed in the council's Cemetery Strategy 2012. Two other applications as part of this programme are running concurrently:
7. 15/AP/3185
CAMBERWELL OLD CEMETERY, FOREST HILL ROAD, LONDON, SE22 0RU:
Remediation and remodelling of part of the cemetery close to Underhill Road; drainage works; the laying out of new access paths and associated landscaping.
8. 15/AP/3190:
CAMBERWELL NEW CEMETERY, BRENCHLEY GARDENS, LONDON, SE23 3RD
Localised ground modelling, drainage works; the laying out of new paths and associated landscape works.
9. **Relevant Planning history**

09/AP/2805 Application type: Council's Own Development - Reg. 3 (REG3) Installation of new gates to Camberwell Old Cemetery on the corner of Wood Vale and Langton Rise Decision date 10/02/2010 Decision: Granted (GRA)
12/AP/1023 Application type: Tree Preservation Order - works related (TPO) 1 x Leylandii (Cupressus) - Remove overgrown screening trees 1 x Ash (Fraxinus Sp) - Reduce overhang branches 1 x Oak (Quercus Sp) - Reduce overhang branches Decision date 15/05/2012 Decision: TPO consent granted (TPOG)
12/AP/0682 Application type: Council's Own Development - Reg. 3 (REG3) Raising of ground levels on Langton Rise and Wood Vale frontages, by a maximum of 1m to allow for the provision of burial space. Works also include removal of trees, the import of soil, new pathways and associated soft landscaping. Decision date 07/06/2012 Decision: Granted (GRA)
11/EQ/0231 Application type: Pre-Application Enquiry (ENQ) The development area 7,7175 sqm of public burial space, the proposal raising ground levels by 1 metre installing pedestrian footpaths and new planting in the area to create new burial spaces Decision date 07/01/2014 15:32:24 Decision: Pre-application enquiry closed (EQC)
14/AP/1214 Application type: Council's Own Development - Reg. 3 (REG3) Erection of a single storey temporary building providing 2 new public toilets within the existing cemetery Decision date 27/06/2014 Decision: Granted for Limited Period (GFLP)
14/EQ/0078 Application type: Pre-Application Enquiry (ENQ) New buildings to provide mausoleum and waiting rooms Decision date 01/08/2014 Decision: Pre-application enquiry closed (EQC)
14/EQ/0248 Application type: Pre-Application Enquiry (ENQ) Conversion of existing listed lodge, now a dwelling house to office, public wc, waiting room and mess rooms, all ancillary to cemetery use.

Decision date 23/01/2015 Decision: Pre-application enquiry closed (EQC)

15/EQ/0150 Application type: Pre-Application Enquiry (ENQ)
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Ground remediation works including decontamination and remodelling of unauthorized tipped material, importation of construction materials and capping, laying out of access paths and drainage, burial areas, boundary treatments, planting and nature conservation measures over an existing area of public within Camber well Old Cemetery.

Decision date 06/08/2015 Decision: Pre-application enquiry closed (EQC)

The reply to this enquiry is included as appendix 3 to this report.

Planning history of adjoining sites

10. None of particular relevance to this application.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

11. The main issues to be considered in respect of this application are:
- a. The principle of the development and its impact on Metropolitan Open Land
 - b. The impact of the development on the amenity of nearby residents
 - c. Impact on ecology
 - d. Works to trees
 - e. Design of the proposal

Planning policy

12. National Planning Policy Framework (the Framework)
This application should be assessed against the Framework as a whole, however the following sections are particularly relevant to the proposal:
7. Requiring good design
 9. Protecting Green Belt land
 11. Conserving and enhancing the natural environment
13. London Plan 2015
Policy 7.4 Local character
Policy 7.6 Architecture
Policy 7.17 Metropolitan open land
Policy 7.19 Biodiversity and access to nature
Policy 7.21 Trees and woodlands
14. Core Strategy 2011
Strategic Policy 11 - Open Spaces and Wildlife
Strategic Policy 13 - High Environmental Standards
15. Southwark Plan 2007 (July) - saved policies
The Council's cabinet on 19 March 2013, as required by para 215 of the Framework, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the Council satisfied itself that the policies and proposals in use were in conformity with the Framework. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in

accordance to their degree of consistency with the Framework. The following saved policies are particularly relevant to this applications:

Policy 3.1 Environmental effects
 Policy 3.2 Protection of Amenity
 Policy 3.25 Metropolitan Open Land
 Policy 3.28 Biodiversity

Summary of consultation responses

16. A large number of consultation responses have been received for this application- over 300 to date of which all but two have been objections. A number of issues are referred to by objectors with some not being material to this application. Concerns raised include:
- Impacts from noise; water and air pollution
 - Impacts on the highway and highway users
 - Impact on biodiversity and Site of Importance for Nature Conservation
 - Concern about the consultation undertaken
 - Concern that the development would give access to development further into the site
 - Inappropriate assessment for the impact on trees

Principle of development

17. Camberwell Old Cemetery is afforded a significant degree of protection, being Metropolitan Open Land (MOL). Paragraph 7.56 of the London Plan states that paragraphs 79-92 of the Framework on Green Belt apply equally to MOL. The Framework states that buildings should be regarded as inappropriate on Green Belt except for certain purposes. While the development proposed is not a building the relevant sections of the Framework do provide useful guidelines for appropriate development on MOL, one of which crucially includes replacement buildings. In this instance, the fence would be a replacement structure which would not be materially larger than the existing one.
18. Policy 7.17 Metropolitan Open Land of the London Plan states that the strongest protection should be given to London's MOL and that inappropriate development should be refused except in very special circumstances. The supporting text states that appropriate development should be limited to small scale structures to support open space uses and minimise any adverse impact on the openness of MOL. Considering that the fence would be a replacement, there would be no adverse impact on the openness of the MOL, indeed, with a railing fence, the visual permeability of the site from Underhill Road would be improved, increasing the openness of the cemetery from the west.
19. Strategic Policy 11 Open spaces and wildlife of the Core Strategy commits the council to protect open spaces against inappropriate development. It refers to Southwark Plan policies 3.25-3.27 for further information on how such spaces would be protected.
20. Saved policy 3.25 of the Southwark Plan states that there is a general presumption against development on MOL and that planning permission will only be permitted for appropriate development for a number of purposes such as essential facilities for outdoor sport and recreation and importantly, for other uses that preserve the openness of MOL. In common with the Framework, it refers to replacement buildings being acceptable as long as they are not materially larger than that the one it would replace. The boundary fence is also an essential facility for the cemetery which is

considered appropriate development on MOL by this policy

21. The new entrance would provide pedestrian access to the cemetery from Underhill Road. While this would not be a replacement feature, it would be a modest structure and provide better access to this area of MOL. The proposal is therefore considered to be appropriate development on MOL and the principle of the development acceptable in accordance with the Framework and policies within the London Plan; Core Strategy and the saved Southwark Plan.

Environmental impact assessment

22. This application is not EIA development because it is not a Schedule 1 or Schedule 2 development as defined in the Environmental Impact Assessment Regulations 2010.

The impact of the development on the amenity of nearby residents

23. The proposed fence would not have any impact over and above the existing fence which has no significant impact on amenity presently. There is potential for the gate to generate more activity on this part of Underhill Road and on Hillcourt Road. Activity would be 'low level' and access to the gate would be locked when the cemetery grounds close. Opening hours are:

1st April to 30th September
Monday to Saturday 08:30-19:00
Sundays and Bank Holidays 10:00-17:00

1st October to 31st March
Monday to Saturday 08:30-17:00
Sunday and Bank Holidays 10:00-17:00

Christmas Day 10:00-14:00

24. A pedestrian access would not give rise to significant impact on amenity. Indeed, the access would improve the amenity of local residents by providing direct access to the cemetery and a route through it to Forest Hill road and the amenities there.
25. A number of objections have referred to the impact that the development would have with respect to air, noise and water pollution. No significant vehicle movements are expected for this development. There may be some noise from the works during construction however this would be for a temporary period and would occur during normal hours for construction. The proposal would not affect any controlled water, lying as it does on the London Clay which is an aquiclude (a stratum that acts as a barrier to the flow of water), thus providing protection to the chalk aquifer below.

Impact on ecology

26. Phase 1 and phase 2 ecology surveys have been undertaken and reviewed by the council's ecologist. The survey was undertaken for the area known as Area Z within Camberwell Old Cemetery which also includes the area under for which application 15/AP/3185 has been submitted. The area covered by this application covers the majority of broad-leaved secondary woodland habitat. It's biodiversity interest lies in it being a secondary woodland with a mix of native and garden escape plants. No protected species or bat roost sites were found during the surveys. Most of the objections received refer to the impact that this application would have on the SINC and biodiversity.

27. The Framework states that local planning authorities should aim to conserve and enhance biodiversity by applying principles that include refusing planning permission if significant harm from development cannot be mitigated or compensated for and should encourage development that would incorporate biodiversity.
28. Policy 7.19 of the London Plan advises that a hierarchy be applied for development in SINC's to firstly avoid adverse impact to the biodiversity interest; secondly to minimise impact and finally to seek compensation while policy 3.28 of the Southwark Plan states that planning permission will not be permitted where it would damage the nature conservation status of Sites of the Importance for Nature Conservation (SINC).
29. This site is of moderate biodiversity value and interest, it does however present a real opportunity for biodiversity enhancement. A number of recommendations are made within the technical reports and by the council's ecologist which can be secured through condition; they include the creation of stag beetle loggeries and other hibernacula (animal refuges) and the planting of native mix shrub and woodland flora.
30. Through these interventions, the biodiversity of the site would be increased, providing a net benefit which would have moderate to high positive benefits for vegetation, invertebrates, mammals and birds.

Works to trees

31. The framework states that ancient woodland and veteran trees should be protected unless the benefits of development clearly outweigh the loss. Policy 7.21 of the London Plan advises that existing trees of value should be retained and any loss replaced strategic policy 11 of the Core Strategy states that the council will protect woodland and trees to maintain a network of open spaces and green corridors.
32. Camberwell Old Cemetery has a number protected trees in groups within it; this site is not an ancient woodland. Only one of approximately 20 trees on the site would require removal to facilitate this scheme: an early mature category C, self-seeded Sycamore on the boundary of Underhill Road. Suitable replacement planting can be secured through condition. This tree is not subject to a Tree Protection Order (TPO) which along with its category C status indicates its relatively low value. This site is not an ancient woodland. Importantly, all trees that are protected would be retained.
33. Other trees (those subject to a TPO and those not subject to one) within the site area would be protected through measures such as the use of hand digging; re-using existing fence post holes. Crucially such measures would be compliant with BS5837: 2012 (Trees in relation to design, demolition and construction- Recommendations).
34. Objections received suggest that not all of the trees on site are shown on the drawings and that a CAVAT (Capital Asset Value for Amenity Trees) or iTree assessments were not undertaken.
35. The surveys have been undertaken in accordance with BS5837 and the drawings trees with diameters of 75mm and above at a height of 1.5m that were recorded during the survey, criteria that are also referred to in the Town and Country Planning (Tree Preservation)(England) Regulations 2012.
36. CAVAT assessments are used to assign a capital value for trees to inform asset management. As referred to above, only one tree would be lost through this scheme and it would be a category C Sycamore. As this is a separate application to that for the rest of area Z (see 15/AP/3185), it is recommended that a condition be imposed to require replacement planting for the Sycamore, should planning permission be granted.

Design

37. A railing fence would allow greater visual permeability through the site and would be a significant improvement to the existing timber fence. The gates for the pedestrian access would be subtly ornate and provide a pleasant entrance to this part of the cemetery.

Transport issues

38. Vehicles would approach the site from the South Circular Road, and enter the site over a temporary crossover on Langton Rise. Egress would be from the main cemetery. By maintaining such a 'one way' system, the impact on highways would be limited.

Sustainable development implications

39. The boundary fence proposed would provide longer term security to this part of the cemetery while the new entrance would result in a social benefit of pedestrian access to the cemetery from Underhill Road. Works proposed to vegetation would be minimal to facilitate the fence and gates while replacement planting and wildlife management measures would provide a biodiversity enhancement.

Other matters

40. Objections have been received that refer to this application supporting unfair burial provision. Burial itself does not need planning permission as the site has a lawful use as a cemetery, notwithstanding, this application site would not contain any burials.

Conclusion on planning issues

41. The development proposed would provide for a new boundary fence and pedestrian access to the cemetery. Impacts on biodiversity and trees would be minimal with replacement planting and other measures would provide a biodiversity enhancement. A large number of objections have been received for this application and the material planning issues are addressed above.

Community impact statement

42. In line with the council's community impact statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process.
43. In line with the council's community impact statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process. This development is not expected to result in an adverse impact on any group with the protected characteristics details above.

Consultations

44. Details of consultation and any re-consultation undertaken in respect of this application are set out in Appendix 1.

Consultation replies

45. Details of consultation responses received are set out in Appendix 2.

Human rights implications

46. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.
47. This application has the legitimate aim of providing a new boundary treatment and entrance. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/2341-F Application file: 15/AP/3184 Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 1778 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Pre-application letter
Appendix 4	Image
Appendix 5	Recommendation

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Dipesh Patel, Team Leader – Major Applications	
Version	Final	
Dated	22 September 2015	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic director, finance & corporate services	No	No
Strategic director, environment and leisure	Yes	Yes
Strategic director, housing and community services	No	No
Director of regeneration	No	No
Date final report sent to Constitutional Team		24 September 2015

APPENDIX 1

Consultation undertaken

Site notice date: 04/09/2015

Press notice date: 03/09/2015

Case officer site visit date: 15/09/2015

Neighbour consultation letters sent: 04/09/2015

Internal services consulted:

Ecology Officer

Statutory and non-statutory organisations consulted:

London Borough of Lewisham

Neighbour and local groups consulted:

	79 Stanswood Gardens Camberwell SE5 7SR
	2 Cleeve Hill London SE23 3DD
	2 Cleeve Hill Forest Hill SE23 3DD
	2 Vandyke Close Redhill RH1 2DS
	128 Benhill Road London SE5 7LZ
	6b Marmora Road SE22 0RX
	7 Le Grand Pre Rue De Causie St.Clement Causie Lane, St.Clement JE2 6SU
	Earthship Brighton Brighton BN19PZ
	12 Dunstons Road London SE22 0HQ
	5 Wilbury Avenue Cheam SM2 7DU
X	Flat 3, Melford Court London SE22 0AE
	45 Alleyn Park London SE21 8AT
	22 Scutari Road London ae220nn
X	22 Scutari Rad London SE220NN
X	24 Sidmouth House Peckham SE151BL
X	10c Ringford Rd London SW18 1RS
X	2 Royal George Mews London SE5 8FD
	Flat 1 165 Camberwell Road SE5 0HB
	85 Devon Mansions Tooley Street SE1 2LB
X	33 Dunoon Road London SE23 3TD
	60 Helsinki Square London SE16 7ut
	11 Honor Oak Mansions Underhill Road SE22 0QP
	12 Honor Oak Mansions Underhill Road SE22 0QP
	52 Ansdell Road London SE15 2DS
	17 Drake Avenue Bath BA2 5NX
	13 Fontside Mitford NE61 3PS
	73 Ryedale London SE22 0QL
	8 Sovereign Close Hastings TN34 2UB
	75 Ryedale London SE22 0QL
	2 Tipperwell Way Howgate EH26 8QP
	2 Honor Oak Mansions Underhill Road SE22 0QP
	47 Ryedale London SE22 0QL
	7 Honor Oak Mansions Underhill Road SE22 0QP
	98 Glenlea Road Eltham Se91dz
	8 Honor Oak Mansions Underhill Road SE22 0QP
	31 Surrey Road London SE15 3AS
	9 Honor Oak Mansions Underhill Road SE22 0QP
	1c Dacre Gardens Brandram Road SE13 5RY
	6 Honor Oak Mansions Underhill Road SE22 0QP
	107 Woolstone Rd London SE232TQ
	44 Farley Road London SE6 2AB
	3 Honor Oak Mansions Underhill Road SE22 0QP
	63 Willes Road Kentish Town NW5 3DN
	4 Honor Oak Mansions Underhill Road SE22 0QP
	15 Isla Road, Plumstead Common, SE18 3AA
	5 Honor Oak Mansions Underhill Road SE22 0QP
	15 Thicket Road London SE20 8DB
	71 Ryedale London SE22 0QL
	2 Colchester co1 1ej
	199a Underhill Road London SE22 0PD
	32 St Aidens Road East Dulwich Se22 0rp
	201a Underhill Road London SE22 0PD
	9 Grove Park London SE5 8LR
	203a Underhill Road London SE22 0PD
	31 Longley Street Bermondsey SE1 5QQ
	197a Underhill Road London SE22 0PD
	Flat 3, Evelyn Ct 139 Burdett Rd E3 4JU
	181b Underhill Road London SE22 0PD
	18 Laitwood Road London SW12 9QL
	193a Underhill Road London SE22 0PD
	237a Underhill Road Flat 1 SE22 0PB
	195a Underhill Road London SE22 0PD

205a Underhill Road London SE22 0PD
 63 Ryedale London SE22 0QL
 67 Ryedale London SE22 0QL
 165a Underhill Road London SE22 0PG
 159a Underhill Road London SE22 0PG
 161a Underhill Road London SE22 0PG
 163a Underhill Road London SE22 0PG
 129a Underhill Road London SE22 0QS
 Flat D 171-173 Underhill Road SE22 0PG
 Flat E 171-173 Underhill Road SE22 0PG
 Flat F 171-173 Underhill Road SE22 0PG
 Flat C 171-173 Underhill Road SE22 0PG
 Flat 3 155 Underhill Road SE22 0PG
 Flat A 171-173 Underhill Road SE22 0PG
 Flat B 171-173 Underhill Road SE22 0PG
 Ground Floor Flat 69 Ryedale SE22 0QL
 65 Ryedale London SE22 0QL
 Rear Of 61 Ryedale SE22 0QL
 Ground Floor Flat 110 Underhill Road SE22 0QU
 Ground Floor Flat 133 Underhill Road SE22 0QS
 Ground Floor Flat 135 Underhill Road SE22 0QS
 Flat 2 155 Underhill Road SE22 0PG
 137c Underhill Road London SE22 0QS
 139b Underhill Road London SE22 0QS
 139c Underhill Road London SE22 0QS
 137b Underhill Road London SE22 0QS
 149 Underhill Road London SE22 0QS
 61 Ryedale London SE22 0QL
 113 Wood Vale London SE23 3DT
 First Floor Flat 133 Underhill Road SE22 0QS
 First Floor Flat 135 Underhill Road SE22 0QS
 Flat 1 155 Underhill Road SE22 0PG
 First Floor Flat 129 Underhill Road SE22 0QS
 115 Wood Vale London SE23 3DT
 205b Underhill Road London SE22 0PD
 First Floor Flat 69 Ryedale SE22 0QL
 193 Underhill Road London SE22 0PD
 195 Underhill Road London SE22 0PD
 197 Underhill Road London SE22 0PD
 191 Underhill Road London SE22 0PD
 Basement Flat 181 Underhill Road SE22 0PD
 183 Underhill Road London SE22 0PD
 199 Underhill Road London SE22 0PD
 159 Underhill Road London SE22 0PG
 161 Underhill Road London SE22 0PG
 163 Underhill Road London SE22 0PG
 157 Underhill Road London SE22 0PG
 201 Underhill Road London SE22 0PD
 203 Underhill Road London SE22 0PD
 205a-205b Underhill Road London SE22 0PD
 Flat F 177 Underhill Road SE22 0PG
 131a Underhill Road London SE22 0QS
 139a Underhill Road London SE22 0QS
 Flat E 177 Underhill Road SE22 0PG
 Flat B 177 Underhill Road SE22 0PG
 Flat C 177 Underhill Road SE22 0PG
 Flat D 177 Underhill Road SE22 0PG
 137a Underhill Road London SE22 0QS
 Flat 2 149 Underhill Road SE22 0QS
 Flat 3 149 Underhill Road SE22 0QS
 Flat 4 149 Underhill Road SE22 0QS
 Flat 1 149 Underhill Road SE22 0QS
 Basement Flat 179 Underhill Road SE22 0PD
 Flat 2 110 Underhill Road SE22 0QU
 165 Underhill Road London SE22 0PG
 141 Underhill Road London SE22 0QS
 131 Underhill Road London SE22 0QS
 143 Underhill Road London SE22 0QS
 179a Underhill Road London SE22 0PD
 179b Underhill Road London SE22 0PD
 181a Underhill Road London SE22 0PD
 114 Underhill Road London SE22 0QU
 145 Underhill Road London SE22 0QS
 147 Underhill Road London SE22 0QS
 112 Underhill Road London SE22 0QU
 127 Underhill Road London SE22 0QS
 175 Underhill Road London SE22 0PG
 2 Overhill Road London SE22 0PH
 167 Underhill Road London SE22 0PG
 5a Cleeve Wood Road Rodney Road BS16 2SF
 4 Talbot Road East Dulwich SE22 8EH
 8 Finch Ave London Se27 9TX
 Flat 4 16 Deanhaugh Street EH4 1LY
 4 Longton Avenue Sydenham se266qj
 14, The Ridings, Telscombe Cliffs BN10 7EF
 Weavers Cottage 9 Cuttlelane SN14 7DA
 Flat Four, 16 Deanhaugh Street Edinburgh eh4 1ly
 54 Ludlow Avenue Luton LU1 3RW
 30 Dunstans Road East Dulwich SE22 0HQ
 37 King St Manly Vale
 17 Gilkes Crescent London SE21 7BP
 23 Browning Street London SE17 1LN
 29 Gledhow Gardens London SW5 0AZ
 32 Purrett Rd Plumstead SE18 1jw
 13 Courtraid Road London SE23 1PL
 59 Union Road London SW4 6JF
 4 Hillcourt Road London Se22 0pe
 38 Gresley Avenue Howich BL6 5TQ
 20 Rye Court 214 Peckham Rye SE22 0LT
 150 Flanderwell Lane Sunnyside s66 3rh
 11 Josephs Rd gu1 1dn
 70a Monnow Road London SE1 5RQ
 9 Rockells Place East Dulwich SE22 0RT
 Finstall Road Bromsgrove B60 3DB
 5a Trinity Rise London SW2 2QP
 71b Balfour St se17 1pl
 10 Merttins Road London Se15 3eb
 81 St James Avenue Chester CH2 1NN
 1 Lea Cottage The Green Hallow WR2 6PE
 17 Lawrie Park Road London SE26 6DP
 Terridell Farm Devil'S Dyke Road BN1 8YJ
 341 Ivydale Road Nunhead SE153ED
 31 Senrab Street London E1 0QE
 15 St. Peters Close Daventry NN11 4SG
 2 Brookledge Lane Adlington SK10 4JX
 12 Dowson Close SE5 8AS
 83 Churchill Rd Smallfeild Horley Rh6 9nr
 28 Yale Court NW6 1JG
 237 Oxford ox2 7ad
 50a Duncombe Hill Honor Oak SE23 1QB
 21 Trevelyan Road London E15 1SU
 24 Belham Walk London SE5 7DX
 Basement Flat, 34, Cornwallis Cres. Bristol BS8 4PH
 39 Therapia Road London SE22 0SF
 26 Springham Drive Colchester CO4 5FN
 61 Rye Hill Park SE15 3JN
 3 Acacia Grove West Dulwich SE21 8ER
 47 Dunstans Road London SE22 0HG
 103 Friern Rd London SE22 0AZ
 Flat 4, 69 Silvester Road East Dulwich SE22 9PF
 2 Chesterfield Grove East Dulwich SE22 8RW
 43 Montague Square London SE15 2LR
 Flat 26, Newland Court Old Street EC1V 9NS
 Lewell Mill Farm West Stafford DT2 8AN
 152 Wood Vale London SE233EB
 123 Upper Wickham Lane Welling DA16 3AQ
 69 Astbury Road Peckham SE15 2NP
 38 Westwood Park London SE23 3QH
 1b Holyoake Court Brian Rd Se16 5HJ
 56 Homestall Road London
 26 Tree Lane Iffley Village OX44EY
 55 Hichisson Rd London SE15 3AN
 29 Shelbury Road London Se220nl
 122 Ivydale Road Nunhead SE153BT
 36 Hillcourt Road East Dulwich SE220PE
 64 Canterbury Place London SE17 3AG
 Flat B 114 Peckham Rye SE15 4HA
 Flat 1, 71 Falkland Rd London Nw52xb
 16 Grenville Way 16 SG2 8XZ
 8 Hillcourt Road SE22 0PE
 16 Hillside Road Liverpool L18 2ED
 66a Stondon Park SE23 1JZ
 326 Devonshire Road London se23 3th
 67 Blenheim Crescent London W11 2EG
 50a Waveney Avenue London SE15 3UE
 1 Honor Oak Road London se23 3sq
 14 Buckstone Close Honor Oak Park SE233QT
 20 Clatter Brune Estate Presteigne LD8 2LB

169 Underhill Road London SE22 0PG
 4 Overhill Road London SE22 0PH
 121 Underhill Road London SE22 0QS
 125 Underhill Road London SE22 0QS
 117 Underhill Road London SE22 0QS
 6 Overhill Road London SE22 0PH
 1 Overhill Road London SE22 0PQ
 115 Underhill Road London SE22 0QS
 110 Wood Vale London SE23 3EB
 110a Wood Vale London SE23 3EB
 112 Wood Vale London SE23 3EB
 114 Wood Vale London E3 3EB
 116 Wood Vale London SE23 3EB
 118 Wood Vale London SE23 3EP
 118a Wood Vale London SE23 3EB
 118b Wood Vale London SE23 3EB
 118c Wood Vale London SE23 3EB
 120 Wood Vale London SE23 3EB
 122 Wood Vale London SE23 3EB
 123b Wood Vale London SE23 3EB
 124c Wood Vale London SE23 3EB
 19 Hillcourt Road East Dulwich
 14 Westover Gardens Broadstairs CT10 3EY
 10 Cornflower Terrace London SE22 0HH
 58a Bargery Rd London SE6 2LN
 6 Anchor Lane Dedham CO7 6BX
 82 Friern Rd London SE220AX
 282 Devonshire Road London SE23 3TH
 138 Erlanger Road London SE145TJ
 50 Crownstone Court St Matthews Rd SW2 1LT
 174 Wood Vale London SE233EB
 11 Skipton Road Sheffield S4 7DD
 11a Ackroyd Rd Forest Hill se23 1dn
 7 Deer Park Way West Wickham BR4 9QQ
 91 Hicks House Freatn St SE16 4AS
 4 Aurlia Villas Cranbrook Road TN18 4AT
 29 Lind Street London SE8 4JE
 54 Buckingham Avenue Feltham TW14 9LE
 45 Northfield House Peckham Park Rd SE15 6TL
 134 Breakspears Road Brockley SE4 1UA
 Flat 8, Alban House 19 Shardeloes Road SE14 6PH
 39 Aspinall Road London SE4 2EH
 11 Buttery's Southend-On-Sea SS1 3DT
 14a Kinsale Road Peckham SE15 4HL
 50a Waveney Avenue London SE15 3UE
 2 Morkyns Walk London Se21 8bg
 63 Ryedale London SE22 0QL
 62 Newquay Road London SE62NS
 Flat 20 Rye Court 214 Peckham Rye SE22 0LT
 69 Lowden Road London SE24 0BT
 26 Surrey Road se15 3at
 17 Grosvenor Road Chichester PO19 8RT
 191a Depiford High St Deptford SE8 3NT
 113 Malham Road SE23 1AL
 11 Wroxton Road London SE152bn
 5a Nettleton Road London SE15 5UJ
 121 Underhill Road London SE22 0QS
 5 Kensington Hall Gardens London W14 9LS
 27 Friern Road London SE22 0AU
 1a Hillcourt Road London SE22 0PF
 Flat 1, 8a York Road London SW11 3QA
 61 Dunstons Rd London Se220hg
 24 Athenlay Rd London Se15 3el
 13 Lytcott Grove East Dulwich SE22 8QX
 4 West Bank London N16 5DG
 8 Alconbury Road London E5 8RH
 103 Estreham Road London sw16 5ph
 Wheeldon Trees Farm Earl Sterndlae SK17 0AA
 5 Borland Road London Se15 3AJ
 96 Buchan Road Nunhead SE15 3HG
 24 Brantwood Road Herne Hill SE24 0DJ
 264 Upland Road London SE22 0DN
 62 Underhill Road London SE22 0QT
 41d Duncombe Hill London SE23 1QY
 Flat 4 Kiln Court Newell St E14 7JP
 43 Malvern WR14 2DE
 47 Belmont Park London SE13 5BW
 99 Salehurst Rd London SE41AR
 8 Forest View London E11 3AP
 59 Thrale Street London SE1 9HW
 3 Dinsdale Road London SE3 7RJ
 32 Ross Road Cobham KT11 2AZ
 8 Marmora Road SE22 0RX
 152 Waller Road London SE14 5LU
 1 Chadwick Road London SE15 4RA
 18 Elm Road London E11 4DN
 20c Therapia Road se220se
 30 Manners Road Southsea PO40BB
 292a, Crystal Palace Road Dulwich SE229JJ
 134 Empire Square South London SE1 4NG
 28a Border Road London SE26 6HB
 43 Ashbrunham Grove London SE10 8UL
 37 Peckamans Wood London SE26 6RY
 224 Brockley Grove London SE4 1HG
 13a Ackroyd Rd Honor Oak Park SE23 1DN
 2 Bromley Avenue Bromley BR1 4BQ
 15 Tollet Street London E1 4EE
 16 Santley St London sw4 7qb
 32 Wood Vale London SE23 3EE
 38 Beckwith Road London SE24 9LG
 49 John Kennedy House Rotherhithe Old Road SE16 2QE
 The Coach House, 14 Wickham Road Brockley SE41PB
 12a Alleyn Rd London SE21 8AL
 98 Canonbie Road London SE23 3AG
 32 Grosvenor Gardens, Bournemouth BH14HH
 8a Inverton Rd Nunhead SE153DD
 14a Kinsale Road London SE15 4HL
 14a Kinsale Road London
 9 Venetian Road London SE5 9RR
 Friends Meeting House 12 Jesus Lane CB5 8BA
 14a Kinsale Road London se15 4hl
 13 Atwood House Kingswood Estate SE21 8NT
 38 Reading House Greenhundred Rd. SE15 1RS
 Dede 26 Petley Road W6 9ST
 90 Foulser Road Tooting Sw178ud
 59 Comerford Road Brockley se42ba
 7 St Johns Road Kingston Kt1 4an
 Newbrough Farmhouse Newbrough NE47 5AR
 34 Brooklyn Road Bath BA1 6TE
 18 Willow Walk London se1 5su
 9 Ebsworth London se231er
 15 Colyton Road London SE22 0NE
 59 Hurstbourne Rd London SE23 2AA
 Flat 1 Beech Court 1b East Dulwich Road SE22 9BA
 43 Liverpool Road London E10 6DN
 13 Howard Road Surbiton KT5 8SA
 Kara Woodmead Road DT7 3AB
 120a Grosvenor Terrace London SE5 0NL
 20 Church Street Northrepps NR27 0AA
 3 Piermont Green London SE22 0LP
 310 Queens Road London SE14 5JN
 92 Devonshire Road London SE23 3SX
 Top Flat 45 Blenheim Road London W4 1ET
 41 Ashburnham Grove London SE10 8UL
 59 Whatman Road London SE23 1EY
 3 Pottery Street London SE16 4PH
 2a Frankfurt Road London SE24 9NY
 St Julian'S Friars Shrewsbury SY1 1XY
 14 Gaumont House Staffordshire Street SE15 5TS
 4 Trafalgar Avenue London SE15 6NR
 108 Goodrich Road East Dulwich SE22 0ER
 100 Pontardulais Road Gorseinon SA4 4FQ
 30 Honor Oak Rise London SE23 3RA
 70 Grierson Road London SE23 1PE
 100 Lyndhurst Grove London SE15 5AH
 11 Hillcourt Road London SE22 0PF
 171 Denmark Hill London SE58DX
 109 School Lane Bushey WD231BY
 28 Cuerden Close Bamber Bridge PR5 6BX
 19a Midmoor Road Balham SW12 0EW
 227 Reading Road Winnersh RG41 1HS
 By Email
 By Email
 17 King Arthur Close SE15 2LP
 25 Azenby Road SE15 5AJ
 36 Banfield Road London SE15 3TX
 27 Ryedale East Dulwich SE22 0QW
 9 St Norbert Green London se4 2hd

27 Sutton Place London E9 6EH
 10 Cuerden Close Chorley PR5 6BX
 111 Frankland Road Croxley Green WD3 3AS
 31 Eastwood Road Bramley GU5 0DY
 41a Hillcourt Rd London SE220PF
 34, Shawbury Road London SE22 9DH
 15 Marcus Garvey Mews SE22 0RG
 38 Priors Court London SE15 3BG
 55 Eversley Road Upper Norwood SE19 3PY
 29 Lind St London SE8 4JE
 53 Woodsford London SE17 2TN
 13 Hayles Street Kennington SE11 4SU
 15 Marcus Garvey Mews SE22 0RG
 26 Ballina Street London SE23 1DR
 20 Langurtho Road Fowey PL23 1EQ
 43 Taymount Grange Taymount Rise SE23 3UH
 19 Dunoon Road London SE23 3TD
 54 Hooks Close Nunhead SE15 2TP
 80 Burghleyroad London NW51UN
 93 Honor Oak Park Forest Hill SE23 3LB
 Orchard Lodge Flat Whaddon Lane, SO21 1JJ
 17 Chalgrove Ave Morden SM4 5RB
 74 Cheltenham Rd Nunhead SE15 3AQ
 1 Wellington House East Dulwich SE22 9QP
 134 Grierson Road Honor Oak Park SE23 1NX
 81 Moor Lane Upminster RM14 1ET
 Flat 19 Howard Court London SE15 3PH
 26a Hervery Park Rd London E17 6LJ
 15 Spa Road Bermondsey SE163SA
 41 Lyaal Gardens Rubery B45 9YW

71 Ralphs Ride Bracknell RG12 9LN
 6 Trajan Street South Shields NE33 2AW
 12 Dovedale Road East Dulwich SE22 0NF
 40 Priors Court 1 Cheltenham Road SE15 3BG
 87 Underhill Road East Dulwich SE22 0QR
 109 Goodrich Road East Dulwich
 5 Keston House Kinglake Estate SE17 2RB
 Waveney Ave London SE 153uq
 2 Merttins Road London SE15 3EB
 21 Hichisson Road SE153AN
 4 Buckstone Close London SE233QT
 137 Ravenmeols Lane Formby L37 4DE
 137 Ravenmeols Lane Formby L37 4DE
 21 St Mark'S Rd., Salisbury SP1 3AY
 32 Tresco Road London SE15 3PX
 77 Portland St London SE17 2PG
 140 St. Norbert Road Brockley SE4 2HX
 Flat 2, Wirrall House Sydenham Hill SE26 6AQ
 The White SW4 9LT
 65 Devonshire Road London SE23 3LU
 56 Henslowe Road Southwark SE22 0AR
 16 Tyrrell Rd Flat B SE22 9NA
 5 Greatford Road Baston PE6 9NR
 55 Hillcourt Road East Dulwich SE22 0PF
 49 Balfron Tower London E14 0QS
 6 Charles Talbot Mews East Dulwich SE22 8AZ
 19 North Cross Road East Dulwich SE22 9ET

 11 Dunstons Road London SE22 0HQ
 Email 45 Kinsale Road

Re-consultation: n/a

APPENDIX 2

Consultation responses received

Internal services

None

Statutory and non-statutory organisations

None

Neighbours and local groups

Basement Flat, 34, Cornwallis Cres. Bristol BS8 4PH
 Dede 26 Petley Road W6 9ST
 Earthship Brighton Brighton BN19PZ
 Email representation
 Email representation
 Email representation
 Email representation
 Email representation
 Fininstall Road Bromsgrove B60 3DB
 Flat B 114 Peckham Rye SE15 4HA
 Flat Four, 16 Deanhaugh Street Edinburgh eh4 1ly
 Flat 1 Beech Court 1b East Dulwich Road SE22 9BA
 Flat 1 165 Camberwell Road SE5 0HB
 Flat 1, 71 Falkland Rd London Nw52xb
 Flat 1, 8a York Road London SW11 3QA
 Flat 19 Howard Court London SE15 3PH
 Flat 2, Wirral House Sydenham Hill SE26 6AQ
 Flat 20 Rye Court 214 Peckham Rye SE22 0LT
 Flat 26, Newland Court Old Street EC1V 9NS
 Flat 3, Evelyn Ct 139 Burdett Rd E3 4JU
 Flat 4 Kiln Court Newell St E14 7JP
 Flat 4 16 Deanhaugh Street EH4 1LY
 Flat 4, 69 Silvester Road East Dulwich SE22 9PF
 Flat 8, Alban House 19 Shardeloes Road SE14 6PH
 Friends Meeting House 12 Jesus Lane CB5 8BA
 Kara Woodmead Road DT7 3AB
 Lewell Mill Farm West Stafford DT2 8AN
 Newbrough Farmhouse Newbrough NE47 5AR
 Orchard Lodge Flat Whaddon Lane, SO21 1JJ
 St Julian'S Friars Shrewsbury SY1 1XY
 Terridell Farm Devil'S Dyke Road BN1 8YJ
 The Coach House, 14 Wickham Road Brockley SE41PB
 The White SW4 9LT
 Top Flat 45 Blenheim Road London W4 1ET
 Waveney Ave London SE 153uq
 Weavers Cottage 9 Cuttlelane SN14 7DA
 Wheeldon Trees Farm Earl Sterndlae SK17 0AA
 1 Chadwick Road London SE15 4RA
 1 Honor Oak Road London se23 3sq
 1 Lea Cottage The Green Hallow WR2 6PE
 1 Wellington House East Dulwich SE22 9QP
 1a Hillcourt Road London SE22 0PF
 1b Holyoake Court Brian Rd Se16 5HJ
 1c Dacre Gardens Brandram Road SE13 5RY
 10 Cornflower Terrace London SE22 0HH
 10 Cuerden Close Chorley PR5 6BX
 10 Merttins Road London Se15 3eb
 100 Lyndhurst Grove London SE15 5AH
 100 Pontardulais Road Gorseinon SA4 4FQ
 103 Estreham Road London sw16 5ph
 103 Friern Rd London SE22 0AZ
 107 Woolstone Rd London SE232TQ
 108 Goodrich Road East Dulwich SE22 0ER
 109 Goodrich Road East Dulwich
 109 School Lane Bushey WD231BY
 11 Butterys Southend-On-Sea SS1 3DT
 11 Dunstons Road London SE22 0HQ
 11 Hillcourt Road London SE22 0PF
 11 Josephs Rd gu1 1dn

11 Skipton Road Sheffield S4 7DD
11 Wroxtton Road London SE152bn
11a Ackroyd Rd Forest Hill se23 1dn
111 Frankland Road Croxley Green WD3 3AS
113 Malham Road SE23 1AL
113 Malham Road SE23 1AL
117 Underhill Road London SE22 0QS
12 Dovedale Road East Dulwich SE22 0NF
12 Dovedale Road East Dulwich SE22 0NF
12 Dowson Close SE5 8AS
12 Dunstons Road London SE22 0HQ
12a Alleyn Rd London SE21 8AL
12a Alleyn Rd London SE21 8AL
120a Grosvenor Terrace London SE5 0NL
121 Underhill Road London SE22 0QS
122 Ivydale Road Nunhead SE153BT
123 Upper Wickham Lane Welling DA16 3AQ
128 Benhill Road London SE5 7LZ
13 Atwood House Kingswood Estate SE21 8NT
13 Courtrai Road London SE23 1PL
13 Fontside Mitford NE61 3PS
13 Hayles Street Kennington SE11 4SU
13 Howard Road Surbiton KT5 8SA
13 Lytcott Grove East Dulwich SE22 8QX
13a Ackroyd Rd Honor Oak Park SE23 1DN
134 Breakspears Road Brockley SE4 1UA
134 Empire Square South London SE1 4NG
134 Grierson Road Honor Oak Park SE23 1NX
137 Ravenmeols Lane Formby L37 4DE
137 Ravenmeols Lane Formby L37 4DE
138 Erlanger Road London SE145TJ
138 Erlanger Road London SE145TJ
14 Buckstone Close Honor Oak Park SE233QT
14 Gaumont House Staffordshire Street SE15 5TS
14, The Ridings, Telscombe Cliffs BN10 7EF
14 Westover Gardens Broadstairs CT10 3EY
14a Kinsale Road London
14a Kinsale Road London SE15 4HL
14a Kinsale Road London se15 4hl
14a Kinsale Road Peckham SE15 4HL
140 St. Norbert Road Brockley SE4 2HX
15 Colyton Road London SE22 0NE
15 Isla Road, Plumstead Common, SE18 3AA
15 Marcus Garvey Mews SE22 0RG
15 Marcus Garvey Mews SE22 0RG
15 Spa Road Bermondsey SE163SA
15 Spa Road Bermondsey SE163SA
15 St. Peters Close Daventry NN11 4SG
15 Thicket Road London SE20 8DB
15 Tollet Street London E1 4EE
150 Flanderwell Lane Sunnyside s66 3rh
152 Waller Road London SE14 5LU
152 Wood Vale London SE233EB
16 Grenville Way 16 SG2 8XZ
16 Hillside Road Liverpool L18 2ED
16 Santley St London sw4 7qb
16 Tyrrell Rd Flat B SE22 9NA
17 Chalgrove Ave Morden SM4 5RB
17 Drake Avenue Bath BA2 5NX
17 Gilkes Crescent London SE21 7BP
17 Grosvenor Road Chichester PO19 8RT
17 King Arthur Close SE15 2LP
17 Lawrie Park Road London SE26 6DP
171 Denmark Hill London SE58DX
174 Wood Vale London SE233EB
18 Elm Road London E11 4DN
18 Laitwood Road London SW12 9QL
18 Laitwood Road London SW12 9QL
183 Underhill Road London SE22 0PD
19 Dunoon Road London SE23 3TD
19 North Cross Road East Dulwich SE22 9ET
19a Midmoor Road Balham SW12 0EW
191 Underhill Road London SE22 0PD
191a Deptford High St Deptford SE8 3NT
2 Bromley Avenue Bromley BR1 4BQ
2 Brookledge Lane Adlington SK10 4JX
2 Chesterfield Grove East Dulwich SE22 8RW
2 Cleeve Hill Forest Hill SE23 3DD
2 Cleeve Hill London SE23 3DD

2 Colchester co1 1ej
2 Merttins Road London SE15 3EB
2 Morkyns Walk London Se21 8bg
2 Royal George Mews London SE5 8FD
2 Tipperwell Way Howgate EH26 8QP
2 Vandyke Close Redhill RH1 2DS
2a Frankfurt Road London SE24 9NY
20 Church Street Northrepps NR27 0AA
20 Clatter Brune Estate Presteigne LD8 2LB
20 Langurtho Road Fowey PL23 1EQ
20 Rye Court 214 Peckham Rye SE22 0LT
20c Therapia Road se220se
21 Hichisson Road SE153AN
21 Hichisson Road SE153AN
21 St Mark'S Rd., Salisbury SP1 3AY
21 Trevelyan Road London E15 1SU
224 Brockley Grove London SE4 1HG
227 Reading Road Winnersh RG41 1HS
23 Browning Street London SE17 1LN
237 Oxford ox2 7ad
237a Underhill Road Flat 1 SE22 0PB
24 Athenlay Rd London Se15 3el
24 Belham Walk London SE5 7DX
24 Brantwood Road Herne Hill SE24 0DJ
25 Azenby Road SE15 5AJ
26 Ballina Street London SE23 1DR
26 Springham Drive Colchester CO4 5FN
26 Surrey Road se15 3at
26 Tree Lane Iffley Village OX44EY
26a Hervery Park Rd London E17 6LJ
264 Upland Road London SE22 0DN
27 Friern Road London SE22 0AU
27 Ryedale East Dulwich SE22 0QW
27 Sutton Place London E9 6EH
28 Cuerden Close Bamber Bridge PR5 6BX
28 Yale Court NW6 1JG
28a Border Road London SE26 6HB
282 Devonshire Road London SE23 3TH
29 Gledhow Gardens London SW5 0AZ
29 Lind St London SE8 4JE
29 Lind Street London SE8 4JE
29 Shelbury Road London Se220nl
29 Shelbury Road London Se220nl
292a, Crystal Palace Road Dulwich SE229JJ
3 Acacia Grove West Dulwich SE21 8ER
3 Dinsdale Road London SE3 7RJ
3 Piermont Green London SE22 0LP
3 Pottery Street London SE16 4PH
30 Dunstans Road East Dulwich SE22 0HQ
30 Honor Oak Rise London SE23 3RA
30 Manners Road Southsea PO40BB
31 Eastwood Road Bramley GU5 0DY
31 Longley Street Bermondsey SE1 5QQ
31 Senrab Street London E1 0QE
31 Surrey Road London SE15 3AS
310 Queens Road London SE14 5JN
32 Grosvenor Gardens, Bournemouth BH14HH
32 Purrett Rd Plumstead SE18 1jw
32 Ross Road Cobham KT11 2AZ
32 St Aidens Road East Dulwich Se22 0rp
32 Tresco Road London SE15 3PX
32 Wood Vale London SE23 3EE
326 Devonshire Road London se23 3th
33 Dunoon Road London SE23 3TD
34 Brooklyn Road Bath BA1 6TE
34, Shawbury Road London SE22 9DH
341 Ivydale Road Nunhead SE153ED
341 Ivydale Road Nunhead SE153ED
36 Banfield Road London SE15 3TX
36 Hillcourt Road East Dulwich SE220PE
37 Peckarmans Wood London SE26 6RY
37 Peckarmans Wood London SE26 6RY
38 Beckwith Road London SE24 9LG
38 Beckwith Road London SE24 9LG
38 Gresley Avenue Howich BL6 5TQ
38 Priors Court London SE15 3BG
38 Reading House Greenhundred Rd. SE15 1RS
38 Westwood Park London SE23 3QH
39 Aspinall Road London SE4 2EH

39 Therapia Road London SE22 0SF
 4 Aurania Villas Cranbrook Road TN18 4AT
 4 Buckstone Close London SE233QT
 4 Hillcourt Road London Se22 Ope
 4 Hillcourt Road London Se22 Ope
 4 Longton Avenue Sydenham se266qj
 4 Talbot Road East Dulwich SE22 8EH
 4 Trafalgar Avenue London SE15 6NR
 4 West Bank London N16 5DG
 40 Priory Court 1 Cheltenham Road SE15 3BG
 41 Ashburnham Grove London SE10 8UL
 41 Lyall Gardens Rubery B45 9YW
 41a Hillcourt Rd London SE220PF
 41d Duncombe Hill London SE23 1QY
 43 Ashbrunham Grove London SE10 8UL
 43 Liverpool Road London E10 6DN
 43 Malvern WR14 2DE
 43 Montague Square London SE15 2LR
 43 Taymount Grange Taymount Rise SE23 3UH
 44 Farley Road London SE6 2AB
 45 Northfield House Peckham Park Rd SE15 6TL
 47 Belmont Park London SE13 5BW
 47 Dunstans Road London SE22 0HG
 47 Ryedale London SE22 0QL
 49 Balfron Tower London E14 0QS
 49 John Kennedy House Rotherhithe Old Road SE16 2QE
 5 Borland Road London Se15 3AJ
 5 Greatford Road Baston PE6 9NR
 5 Kensington Hall Gardens London W14 9LS
 5 Keston House Kinglake Estate SE17 2RB
 5 Wilbury Avenue Cheam SM2 7DU
 5a Cleeve Wood Road Rodney Road BS16 2SF
 5a Nettleton Road London SE15 5UJ
 5a Trinity Rise London SW2 2QP
 50 Crownstone Court St Matthews Rd SW2 1LT
 50 Crownstone Court St Matthews Rd SW2 1LT
 50a Duncombe Hill Honor Oak SE23 1QB
 50a Waveney Avenue London SE15 3UE
 50a Waveney Avenue London SE15 3UE
 52 Ansdell Road London SE15 2DS
 53 Woodsford London SE17 2TN
 54 Buckingham Avenue Feltham TW14 9LE
 54 Hooks Close Nunhead SE15 2TP
 54 Ludlow Avenue Luton LU1 3RW
 55 Eversley Road Upper Norwood SE19 3PY
 55 Hichisson Rd London SE15 3AN
 55 Hillcourt Road East Dulwich SE22 0PF
 56 Henslowe Road Southwark SE22 0AR
 56 Homestall Road London
 58a Bargery Rd London SE6 2LN
 59 Comerford Road Brockley se42ba
 59 Hurstbourne Rd London SE23 2AA
 59 Thrale Street London SE1 9HW
 59 Union Road London SW4 6JF
 59 Whatman Road London SE23 1EY
 6 Anchor Lane Dedham CO7 6BX
 6 Charles Talbot Mews East Dulwich SE22 8AZ
 6 Trajan Street South Shields NE33 2AW
 6b Marmora Road SE22 0RX
 60 Helsinki Square London SE16 7ut
 61 Dunstans Rd London Se220hg
 61 Rye Hill Park SE15 3JN
 62 Newquay Road London SE62NS
 62 Underhill Road London SE22 0QT
 63 Ryedale London SE22 0QL
 63 Willes Road Kentish Town NW5 3DN
 64 Canterbury Place London SE17 3AG
 65 Devonshire Road London SE23 3LU
 66a Stondon Park SE23 1JZ
 67 Blenheim Crescent London W11 2EG
 69 Astbury Road Peckham SE15 2NP
 69 Lowden Road London SE24 0BT
 7 Deer Park Way West Wickham BR4 9QQ
 7 Le Grand Pre Rue De Causie St.Clement Causie Lane, St.Clement JE2 6SU
 7 St Johns Road Kingston Kt1 4an
 70 Grierson Road London SE23 1PE
 70a Monnow Road London SE1 5RQ
 71 Ralphs Ride Bracknell RG12 9LN
 71b Balfour St se17 1pl

74 Cheltenham Rd Nunhead SE15 3AQ
77 Portland St London SE17 2PG
79 Stanswood Gardens Camberwell SE5 7SR
8 Alconbury Road London E5 8RH
8 Finch Ave London Se27 9TX
8 Forest View London E11 3AP
8 Hillcourt Road SE22 0PE
8 Marmora Road SE22 0RX
8 Sovereign Close Hastings TN34 2UB
8a Inverton Rd Nunhead SE153DD
80 Burghleyroad London NW51UN
81 Moor Lane Upminster RM14 1ET
81 St James Avenue Chester CH2 1NN
82 Friern Rd London SE220AX
83 Churchill Rd Smallfeild Horley Rh6 9nr
85 Devon Mansions Tooley Street SE1 2LB
87 Underhill Road East Dulwich SE22 0QR
9 Ebsworth London se231er
9 Grove Park London SE5 8LR
9 Rockells Place East Dulwich SE22 0RT
9 St Norbert Green London se4 2hd
9 Venetian Road London SE5 9RR
90 Foulser Road Tooting Sw178ud
91 Hicks House Freatn St SE16 4AS
92 Devonshire Road London SE23 3SX
93 Honor Oak Park Forest Hill SE23 3LB
96 Buchan Road Nunhead SE15 3HG
98 Canonbie Road London SE23 3AG
98 Glenlea Road Eltham Se91dz
99 Salehurst Rd London SE41AR



Chief executive's department
 Planning division
 Development management (5th floor - hub 2)
 PO Box 64529
 LONDON SE1P 5LX

Mr Paul Harrison
 Harrison Design Development



Your Ref:
Our Ref: 15/EQ/0150
Contact: Dipesh Patel
Telephone: 020 7525 1778
E-Mail: planning.applications@southwark.gov.uk
Web Site: <http://www.southwark.gov.uk>

Date: 30/07/2015

Dear Mr Harrison

TOWN & COUNTRY PLANNING ACT 1990 (as amended)
PRE-APPLICATION ENQUIRY

At: CAMBERWELL OLD CEMETERY, AREA 2, FOREST HILL ROAD, LONDON, SE22 0RU
Proposal: Ground remediation works including decontamination and remodelling of unauthorized tipped material, importation of construction materials and capping, laying out of access paths and drainage, burial areas, boundary treatments, planting and nature conservation measures over an existing area of public within Camberwell Old Cemetery.

Further to your enquiry for pre-application advice and your meeting with council officers on 15 April 2015, I am pleased to provide you with the following advice:

Development

The site is an established cemetery and the proposal would not alter this use of the land. The use of the site for burials does not require planning permission, nor would maintenance works subject to the comments below. As part of the remediation proposed levels across part of the site would be re-modelled and would require planning permission as would the introduction of new footpaths and the carriageway.

Principle of development

Being Metropolitan Open Land (MOL), the site is afforded significant protection in planning terms, development of appropriate facilities for cemeteries is development that would be acceptable, in principle.

Remediation

The tier 1 groundwater risk assessment suggests that the London Clay underlying the site provides a suitable barrier to any contamination reaching the principal and secondary aquifers below and that no additional assessment with respect to groundwater impacts is necessary. Conversely, the phase two land quality assessment indicates that there could be a moderate to low risk for future users of the site (including grave diggers) and makes recommendations to reduce this risk further through remediation. By removing or otherwise reducing the risk from contamination on the site, the works to area Z would be a significant environmental improvement.

Arboriculture

The Camberwell Old Cemetery Tree Preservation Order 1993 was varied on 23 July 2015. This variation rationalised the order to protect trees in two groups and four areas. The plans submitted for this enquiry show that trees in the groups and areas detailed in the varied order would be retained. It is recommended that any application is accompanied by a tree protection plan for the protected trees.

Biodiversity

A phase 2 bat survey is recommended, along with details of the mitigation of the loss of medium and high roost potential bat boxes in the area. Enhancement of the boundary and the buffer zone is likely to benefit biodiversity.

Footpath and carriageway

The proposed footpath and carriageway would provide essential access to the burial plots and making these accessible would provide an enhancement of the cemetery.

Boundary treatment

A new access is proposed on Underhill Road along with the replacement of the existing fence with metal railings, this is likely to form part of a separate application. Providing greater permeability for the site, the access would facilitate pedestrian movement across the cemetery to Forest Hill Road, this new access is welcomed and should not give rise to unacceptable harm to local amenity. Details of the boundary treatment should included in the submission.

Monuments

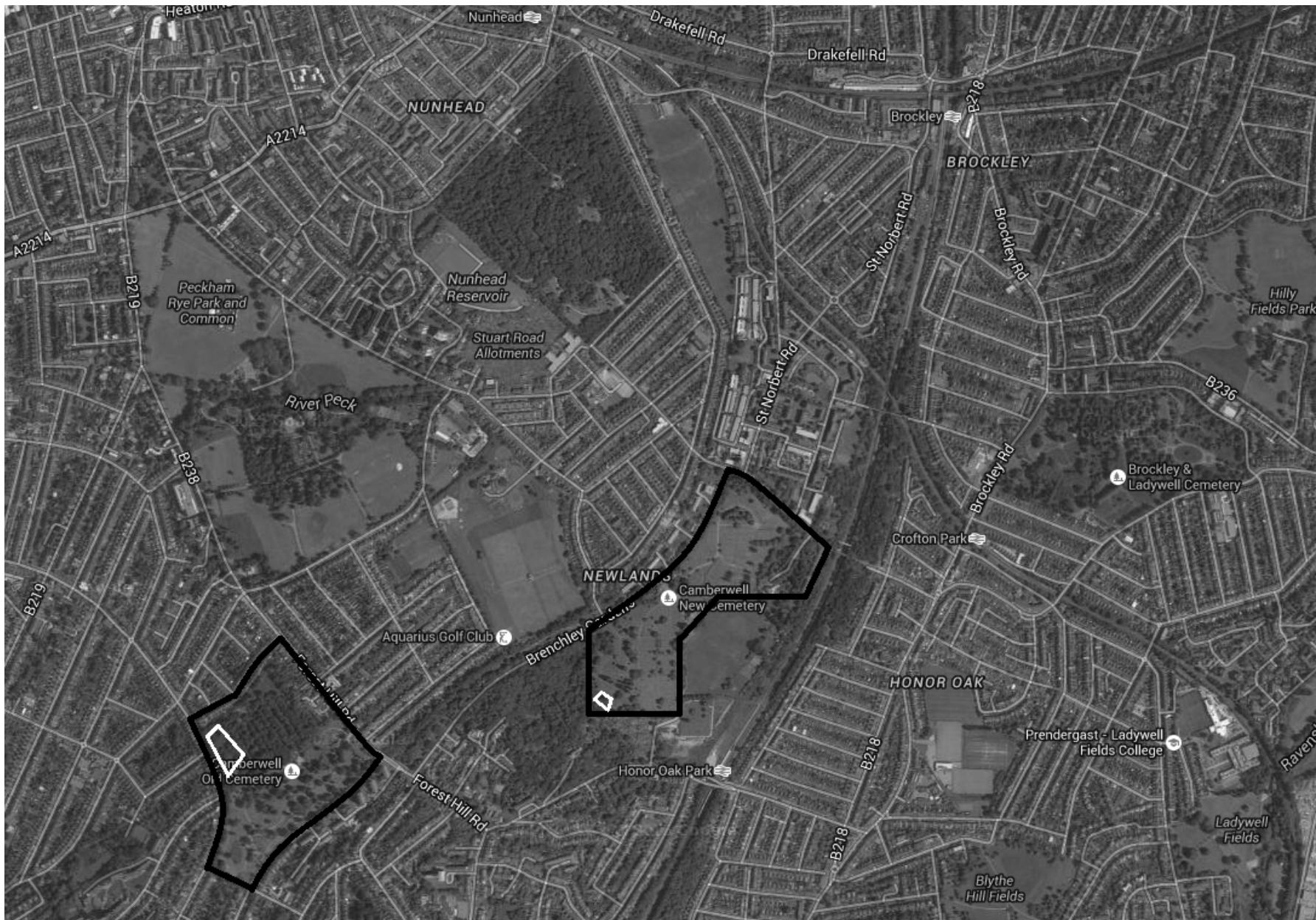
Should any monuments need to be removed from the site, it is recommended that their detail should be recorded.

Summary

The works proposed would remediate land that is presently contaminated. New and re-instated footways and the carriageway would provide essential access to the cemetery and maintain the openness of this MOL while the new boundary fence would improve the streetscene at this location. Tree protection measures for protected trees would need to be submitted as would biodiversity mitigation.

Yours sincerely

Simon Bevan
Director of Planning.



RECOMMENDATION

This document shows the case officer's recommended decision for the application referred to below.
This document is not a decision notice for this application.

Applicant	Ms Rebecca Towers Southwark Council	Reg. Number	15/AP/3184
Application Type	Full Planning Permission	Case Number	TP/2341-F
Recommendation	Grant permission		

Draft of Decision Notice

Planning Permission was GRANTED for the following development:

Replacement of boundary fence along Underhill Road, and the creation of a new pedestrian entrance on Underhill Road.

At: CAMBERWELL OLD CEMETERY, UNDERHILL ROAD, LONDON, SE22

In accordance with application received on 07/08/2015 18:36:43

and Applicant's Drawing Nos.

048-12-05 Revision A	048-12-29 Revision A
048-12-06 Revision A	048-12-30 Revision A
048-12-07 Revision A	048-12-31
048-12-08 Revision A	048-12-32 Revision A
048-12-09 Revision A	048-12-33
048-12-11 Revision A	048-12-46 Revision A
048-12-27 Revision A	048-12-50 Revision A
048-12-28 Revision A	048-12-51 Revision A

Design and Access Statement
Tree Survey Schedule
Preliminary Bat Survey Report
Extended Phase 1 Survey and Impact Assessment
Camberwell Old cemetery - Area Z Extended Phase 1 Survey and Impact Assessment
Phase 2 Surveys for Reptiles and Invasive Plants

Subject to the following two conditions:

Time limit for implementing this permission and the approved plans

- 1 The development hereby permitted shall not be carried out otherwise than in accordance with the following approved plans:

048-12-27 Revision A
048-12-28 Revision A
048-12-29 Revision A
048-12-30 Revision A
048-12-31
048-12-32 Revision A
048-12-33
048-12-46 Revision A
048-12-50 Revision A
048-12-51 Revision A

Reason:

For the avoidance of doubt and in the interests of proper planning.

Pre-commencement condition(s) - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before any work in connection with implementing this permission is commenced.

- 2 Prior to works commencing, including any demolition, an Arboricultural Method Statement shall be submitted to and approved in writing by the Local Planning Authority.

This shall show the means by which any retained trees on or directly adjacent to the site are to be protected from damage by demolition works, excavation, vehicles, stored or stacked building supplies, waste or other materials, and building plant, scaffolding or other equipment, together with facilitative pruning specifications.

The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations contained in the method statement. Following the pre-commencement meeting all tree protection measures shall be installed, carried out and retained throughout the period of the works, unless otherwise agreed in writing by the Local Planning Authority. In any case, all works must adhere to BS5837: (2012) Trees in relation to demolition, design and construction and BS3998: (2010) Tree work - recommendations.

If within the expiration of 5 years from the date of the occupation of the building for its permitted use any retained tree is removed, uprooted is destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the Local Planning Authority.

Reason

To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with The National Planning Policy Framework 2012 Parts 7, 8, 11 & 12 and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

Statement of positive and proactive action in dealing with the application



WIDER
ESTATE

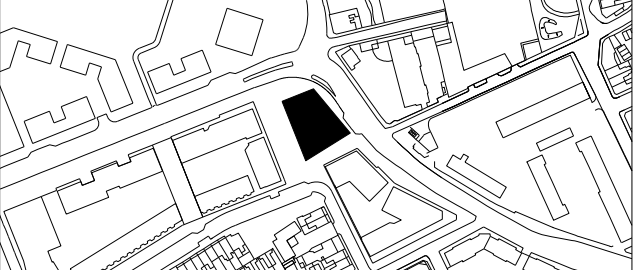
MP1

MP1A

- KEY:
- - - Masterplan boundary
 - Parameter outline
 - Site Boundary: 2730m²
MP1A boundary
 - Building footprint

SCALE BAR
1:1250@A1 - 1:2500@A3
0m 10m 50m

Rev	Description	By	Date
-	Planning Issue		15.06.15



Lend Lease

Author
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Project Title
The Energy Hub - MP1A

Drawing Title
Site Plan

Purpose of Issue
Information

Project Number 305987	Scale 1:1250/1:2500 @ A1/A3
Drawing No 305987-A100-H12X-01-PL-00-P003	Revision -

Item No. 5.6	Classification: OPEN	Date: 6 October 2015	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 15/AP/2572 for: Approval of Reserved Matters Address: PLOT H12 WITHIN LAND BOUNDED BY HEYGATE STREET TO THE NORTH, RODNEY ROAD TO THE EAST, PLOT H10 OF ELEPHANT PARK TO THE WEST AND PLOT H13 OF ELEPHANT PARK THE SOUTH Proposal: Application for the approval of reserved matters (access, scale, appearance, layout and landscaping) for Plot H12 within Elephant Park (previously referred to as the Heygate Masterplan), submitted pursuant to Outline Planning Permission 12/AP/1092. The proposals comprise the construction of a development plot of 4 storeys in height (maximum building height 23.53m AOD) comprising an 872sqm (GEA) Energy Hub (sui generis use class), 334sqm (GEA) Retail (A1-A4 use class), 895sqm (GEA) of Nursery floorspace (D1 use class), 65sqm (GEA) of flexible Retail/Community floorspace (A1-A4 & D1 use class), cycle storage, landscaping, new public realm and other associated works.		
Ward(s) or groups affected:	East Walworth		
From:	Director of Planning		
Application Start Date 10/07/2015		Application Expiry Date 09/10/2015	
Earliest Decision Date 15/08/2015			

RECOMMENDATION

1. That planning permission is granted, subject to appropriate conditions.

BACKGROUND INFORMATION

Site location and description

2. Plot H12 forms part of the first phase (MP1a) of the delivery of Elephant Park, formerly the Heygate Estate. The site is approximately 0.27 hectares in size and is bounded by Heygate Street to the north, Rodney Road to the east, Plot H13 and Wansey Street to the south and by Plot H10 to the west.
3. The site sits entirely within the red line boundary of the Elephant Park Outline Planning Permission (OPP), which was granted in March 2013. Through the

approved Parameters Plans and Development Specification, the OPP established a three dimensional building envelope for each of the Development Plots, as well as specifying the range of uses that would be appropriate on each Plot. The principal use of Plot H12 was specified as an Energy Centre to serve the wider development site.

4. Though this site currently exists within the wider development site, once neighbouring Plots are completed, the prevailing character of the area will be very much residential. This includes, to the east, the recently completed Trafalgar Place development; a residential scheme developed by Lendlease and rising to 10 storeys at the junction of Rodney Road and Victory Place, opposite Plot H12. Also to the east, adjacent to Trafalgar Place, is Victory Primary School.
5. Plot H12 was originally intended to be developed as part of the first phase of construction - South Gardens (MP1) - however, protracted negotiations with the Energy Services Company (now confirmed as EON) led to a delay in the submission of the Reserved Matters Application. The construction is now programmed to broadly coincide with the completion of the first phase of development, such that this plot is considered to form a sub-phase, MP1a.

Planning policy designations (Adopted Policies Map)

6. The following designations are applicable to Plot H12 of Elephant Park:
 - Central Activities Zone;
 - Elephant and Castle Opportunity Area;
 - Elephant and Castle Major Town Centre;
 - Air Quality Management Area.
7. The site is also located within Flood Zone 3 (as identified by the Environment Agency flood map) which indicates a high probability of flooding), has a Public Transport Accessibility Level (PTAL) of 6a, indicating excellent access to public transport and is within a Control Parking Zone.
8. The site also forms part of designated Proposal Site 39P 'Elephant and Castle Core Area' which identifies a large area of land at the centre of Elephant and Castle for comprehensive, mixed-use redevelopment.
9. Elephant and Castle lies in the background of the townscape view looking from the Serpentine Bridge in Hyde Park to Westminster (Townscape View 23A.1 of the London View Management Framework 2011).

Details of Proposal

10. Reserved Matters Approval (access, scale, appearance, layout and landscaping) is sought for the development of an Energy Hub on Plot H12, which will serve the Elephant Park development and, subject to connection, a large number of properties in the vicinity of the site.
11. Plot H12 is roughly divided in half along a north/south axis, with the Energy Hub building occupying the eastern half running parallel to Rodney Road and a new

pocket park, Brandon Place, on the western half adjacent to Plot H10. Further landscaped areas will be laid out to the north of the Plot adjacent to Heygate Street and to the south of the Plot adjacent to Plot H13.

12. The energy hub will be a predominantly four storey building with the chimney serving the energy centre rising to the maximum permissible height, 23.53m AOD, in the north-east corner of the site. The principal function will be as an energy centre (sui generis use class) to provide clean energy to the Elephant Park development site and a large number of homes in the local area. The plant associated with energy provision will occupy 787sqm floorspace across the eastern half of the building at ground and first floor levels. This comprises two combined heat and power (CHP) boilers, supported by a number of high efficiency modular gas boilers and 2 associated thermal stores. The Energy Centre is sized such that the number of gas boilers could be increased to at a future date to provide capacity to connect to a larger number of homes. The Energy Centre will connect to all Plots on Elephant Park and to neighbouring developments, where appropriate, via a newly established district heating network.
13. The remainder of the ground floor will comprise a new café facility (A3 use class) covering 334sqm with a large expanse of glazed frontage facing on to Brandon Place. A secondary linked space (65sqm) at first floor level will operate as part of the café, but also will be available for independent hire as a community space. Though the energy centre will be sealed and completely independent of the café and nursery spaces, internal glazing will be incorporated into the café spaces to provide views into the energy centre.
14. A new nursery (D1 use class) occupying 895sqm floorspace will be located on the second and third floors, the main point of access to which will be adjacent to the cafe, fronting on to Brandon Place. The massing of the building is articulated such that the bulk reduces on the upper floors and this allows for the creation of outdoor terraces to serve the nursery, both at second and third floor levels. These terrace spaces are located at the southern end of the building, at the opposite end to the energy centre chimney.
15. Brandon Place will be a new pocket park located between Plot H10 and the Energy Hub building. The space is dominated by retained mature trees and will also incorporate areas of fixed local play to serve residents in the first phase of the masterplan (South Gardens)(Plots H6, H10 and H13). It is anticipated that the new square might contain an element of spill-out space associated with the new café. A further area of public realm separates the Energy Hub building from Plot H13 to the south. This space also contains a signed, delineated cycle route running on an east/west access, which will connect Wansey Street with the London Cycle Network running along Rodney Road and beyond this, to Victory Place.

Planning History

16. 12/AP/1092 Application type: Outline Planning Permission (OUT)
Outline application for: Redevelopment to provide a mixed use development comprising a number of buildings ranging between 13.13m (AOD) and 104.8m (AOD) in height with capacity for between 2,300 (min) and 2,469 (max) residential units together with retail (Class A1-A5), business (Class B1), leisure and community (Class

D2 and D1), energy centre (sui generis) uses. New landscaping, park and public realm, car parking, means of access and other associated works.

The application is accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) 2011.

Decision date 27/03/2013 Decision: Granted with Legal Agreement (GWLA)

17. Applications for the approval of reserved matters (access, scale, appearance, layout and landscaping) for the following Development Plots:

14/AP/3439 – **H2** - The proposals comprise the construction of a development plot ranging between 10 and 31 storeys in height (max height 104.8m AOD) comprising 365 residential units, 2,033sqm (GEA) flexible retail (A1-A5) uses, car parking, cycle storage, servicing, plant areas, landscaping, new public realm and other associated works.

14/AP/3438 – **H3** - The proposals comprise the construction of a development plot ranging between 5 and 19 storeys in height (max height 67.5m AOD), comprising 228 residential units, 2,370sqm (GEA) of flexible retail (A1-A5) uses, cycle storage, servicing, plant areas, new landscaping, new public realm and other associated works

13/AP/3584 – **H10** - The proposals comprise the construction of a development plot ranging between 3 and 10 storeys in height (maximum building height 37.23m AOD), comprising 69 residential units, car parking, motorcycle parking, cycle storage, servicing, plant areas, new landscaping, and other associated works.

13/AP/3583 – **H13** - The proposals comprise the construction of a development plot ranging between 3 and 7 storeys in height (maximum building height 26.68m AOD), comprising 67 residential units, cycle storage, plant areas, new landscaping, and other associated works.

13/AP/3582 – **MP1 Public Realm** - The proposals comprise the construction of a development plot ranging between 3 and 7 storeys in height (maximum building height 26.68m AOD), comprising 67 residential units, cycle storage, plant areas, new landscaping, and other associated works.

13/AP/3581 – **H6** - The proposals comprise the construction of a development plot ranging between 3 and 16 storeys in height (maximum building height 55.23m AOD), comprising 224 residential units, 695 sqm (GEA) of flexible retail (Classes A1-A4), business (Class B1), non-residential institution (Class D1), and leisure (Class D2) uses, car parking, motorcycle parking, cycle storage, servicing, plant areas, new landscaping, and other associated work

18. 15/AP/1284 Application type: Screening Opinion (EIA) (SCR)
Screening Opinion in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) in relation to the Reserved Matters Applications (RMA) for the 'Energy Centre' (Phase MP1a) of Elephant Park, submitted pursuant to the outline planning permission for the redevelopment of the Heygate Estate (ref: 12/AP/1092, Granted 27/03/2013).

Decision date 06/05/2015 Decision: Screening Opinion - EIA Regs (SCR)

19. 15/AP/0306 Application type: Variation: non-material changes (VNMC)
Non-material amendment to outline planning permission ref. 12-AP-1092 for: Redevelopment to provide a mixed use development comprising a number of buildings ranging between 13.13m (AOD) and 104.8m (AOD) in height with capacity for between 2,300 (min) and 2,469 (max) residential units together with retail (Class A1-A5), business (Class B1), leisure and community (Class D2 and D1), energy centre (sui generis) uses. New landscaping, park and public realm, car parking, means of access and other associated works. The non-material amendment is to correct a drafting error in the approved Development Specification relating to the maximum permissible floorspace in Plot H12

Decision date 11/03/2015 Decision: Agreed - for app types VLA & VNMC (AGR)

20. 14/AP/3412 Application type: Variation / discharge of legal agreement (VLA)
Details of the CHP provision and site wide energy strategy pursuant to planning obligation Paragraph 26.8 of schedule 3 of the Section 106 Agreement dated 27/03/2103 (12/AP/1092 & 12/AP/3203) for; The outline application for: Redevelopment to provide a mixed use development comprising a number of buildings ranging from between 13.13 (AOD) and 104.8m (AOD) in height with capacity for between 2,300 (min) and 2,469 (max) residential units together with retail (Class A1-A5), business (Class B1), leisure and community (Class D2 and D1), energy centre (sui generis) uses. New landscaping, park and public realm, car parking, means of access and other associated works.

Decision date 30/10/2014 Decision: Agreed - for app types VLA & VNMC (AGR)

21. 13/AP/1986 Application type: Variation / discharge of legal agreement (VLA)
Details of the Site Wide Energy Strategy pursuant to Paragraph 26.1 of Schedule 3 of the S106 Agreement dated 27 March 2013 attached to planning permission reference 12-AP-1092 for: Redevelopment to provide a mixed use development comprising a number of buildings ranging between 13.13m (AOD) and 104.8m (AOD) in height with capacity for between 2,300 (min) and 2,469 (max) residential units together with retail (Class A1-A5), business (Class B1), leisure and community (Class D2 and D1), energy centre (sui generis) uses. New landscaping, park and public realm, car parking, means of access and other associated works.

Decision date 14/02/2014 Decision: Agreed - for app types VLA & VNMC (AGR)

Relevant planning history of adjacent and nearby sites

22. Trafalgar Place: Land bounded by Victory Place to the north, Balfour Street to the east, and Rodney Road to the south and west
12-AP-2797
Permission granted on 15 March 2013 for: Construction of 8 buildings between 4 and 10 storeys in height (maximum building height 38.5m AOD), comprising 235 residential units, 204 sqm (GEA) of retail use (Class A1-A3), car parking beneath podium level, cycle storage, servicing, plant areas, landscaping and public realm improvements.

Relevant planning policies

23. The development plan for the borough comprises the London Plan 2015 consolidated with alterations since 2011, Southwark's Core Strategy 2011 and saved policies from the Southwark Plan 2007. A number of Supplementary Planning Documents (SPDs) provide further detailed guidance. The National Planning Policy Framework (NPPF) is also a material consideration in the determination of planning applications.
24. The following policies and guidance are considered most relevant to the reserved matters application for Plot H12:
25. National Planning Policy Framework (NPPF)(2012)
- Section 1 'Building a strong, competitive economy,
 Section 2 'Ensuring the vitality of town centres'
 Section 4 'Promoting sustainable transport'
 Section 7 'Requiring good design'
 Section 8 'Promoting healthy communities'
 Section 10 'Meeting the challenge of climate change, flooding and coastal change'
 Section 11 'Conserving and enhancing the natural environment'
26. On 19 March 2013, the council's cabinet considered whether Southwark's planning policies were consistent with guidance in the NPPF, in line with the requirements of NPPF paragraph 215. All policies and proposals were reviewed and the council determined that those in use were in general conformity with the NPPF. The resolution was that, with the exception of Southwark Plan policy 1.8 (locations of retail outside town centres), all local planning policies would be saved. Therefore, material weight should be afforded to existing policies.
27. London Plan (2015) consolidated with minor alterations since 2011
- Policy 2.10 - Central Activities Zone – Strategic Priorities
 Policy 2.11 - Central Activities Zone – Strategic Functions
 Policy 2.12 - Central Activities Zone – Predominantly Local Activities
 Policy 2.13 - Opportunity Areas and Intensification Areas
 Policy 2.15 - Town Centres
 Policy 3.1 - Ensuring Equal Life Chances For All
 Policy 3.6 - Children and Young People's Play and Informal Recreation Facilities
 Policy 4.7 - Retail and Town Centre Development
 Policy 4.8 - Supporting a Successful and Diverse Retail Sector
 Policy 4.12 - Improving Opportunities for All
 Policy 5.1 - Climate Change Mitigation
 Policy 5.2 - Minimising Carbon Dioxide Emissions
 Policy 5.3 - Sustainable Design and Construction
 Policy 5.5 - Decentralised Energy Networks
 Policy 5.6 - Decentralised Energy in Development Proposals
 Policy 5.7 - Renewable Energy
 Policy 5.9 - Overheating and Cooling
 Policy 5.10 - Urban Greening
 Policy 5.11 - Green Roofs and Development Site Environs
 Policy 5.13 - Sustainable Drainage

Policy 5.14 - Water Quality and Wastewater Infrastructure
 Policy 5.15 - Water Use and Supplies
 Policy 6.9 – Cycling
 Policy 6.10 – Walking
 Policy 6.13 – Parking
 Policy 7.1 - Building London's Neighbourhoods and Communities
 Policy 7.2 - An Inclusive Environment
 Policy 7.3 - Designing out Crime
 Policy 7.4 - Local Character
 Policy 7.5 - Public Realm
 Policy 7.6 – Architecture
 Policy 7.7 - Location and Design of Tall Buildings
 Policy 7.8 - Heritage Assets and Archaeology
 Policy 7.14 – Improving Air Quality
 Policy 7.19 – Biodiversity and Access to Nature
 Policy 7.21 – Trees and Woodland

28. Core Strategy (2011)

Strategic Policy 1 – Sustainable development
 Strategic Policy 2 – Sustainable transport
 Strategic Policy 3 – Shopping, leisure and entertainment
 Strategic Policy 10 – Jobs and businesses
 Strategic Policy 11 - Open spaces and wildlife
 Strategic Policy 12 – Design and conservation
 Strategic Policy 13 – High environmental standards
 Strategic Policy 14 – Implementation and delivery

29. Southwark Plan 2007 – saved policies

Policy 1.1 - Access to employment opportunities
 Policy 1.7 - Development within town and local centres
 Policy 2.2 - Provision of new community facilities
 Policy 3.1 - Environmental effects
 Policy 3.2 - Protection of amenity
 Policy 3.3 - Sustainability assessment
 Policy 3.4 - Energy efficiency
 Policy 3.6 - Air quality
 Policy 3.7 - Waste reduction
 Policy 3.9 – Water
 Policy 3.11 - Efficient use of land
 Policy 3.12 - Quality in design
 Policy 3.13 - Urban design
 Policy 3.14 - Designing out crime
 Policy 3.15 - Conservation of the historic environment
 Policy 3.18 - Setting of listed buildings, conservation areas and world heritage sites
 Policy 3.22 - Important local views
 Policy 3.28 – Biodiversity
 Policy 5.2 - Transport impacts
 Policy 5.3 - Walking and cycling
 Policy 5.6 - Car parking

30. Supplementary Planning Documents (SPDs)

Elephant and Castle Opportunity Area Planning Framework/SPD (2012)
 Sustainability Assessment SPD (2009)
 Sustainable Design and Construction SPD (2009)
 Sustainable Transport SPD (2010)

Principle of development and land use considerations

31. The NPPF sets out the Government's strong commitment to the delivery of sustainable development, stating that planning should proactively drive and support sustainable growth, delivering the homes, business and infrastructure that local places need.
32. The London Plan and Southwark's Core Strategy identify the Elephant and Castle Opportunity Area as an area within the Central Activities Zone where significant levels of growth can be accommodated, contributing to London's need for housing, commercial and other development.
33. At the heart of the Elephant and Castle is Elephant Park, the site of the former Heygate Estate. The redevelopment of the former estate to create a vibrant new quarter is a key part of the overall vision for the Elephant and Castle, as set out in the Elephant and Castle SPD/OAPF. The SPD highlights that the redevelopment of the site should contribute towards the delivery of around 3,000 new homes in the vicinity of Heygate Street, should include the retention of the maximum number of trees and should consist of a built form that is of the highest design quality. The SPD also sets out an aspiration to provide a district CHP/communal heating system for the Heygate development site, which has the potential to link to the shopping centre, and leisure centre and other external buildings, where viable.
34. Outline Planning Permission (OPP) was granted in March 2013 for the comprehensive redevelopment of the site for up to 2,469 homes, a range of retail, business, leisure and community uses, a new park as well as extensive areas of new public realm. Elephant Park is now cleared of former estate buildings.

Compliance with the Outline Planning Permission

35. Condition 17 of the OPP requires evidence to be submitted with each Reserved Matters Application (RMA) demonstrating how the proposed Plot development complies with the site-wide development controls (i.e. Parameter Plans, Development Specification, and Design Strategy Document) approved at the outline stage, as well with site-wide strategies and plot specific strategies that have since been approved pursuant to obligations contained within the S106 legal agreement.
36. As noted in the Planning History section of the report, the council has agreed a non-material amendment under Section 96a of the Town and Country Planning Act 1990 (as amended) to vary the maximum level of floorspace on Plot H12. This is to correct a drafting error at the outline planning stage, which would have restricted the permitted floorspace to that required by energy plant alone. However, the Development Specification clearly permits a broader range of land-uses on Plot H12.

To correct this error an increase in the maximum amount of floorspace up to 3,300sqm was agreed, which sits comfortably within the approved building envelope described in the Parameter Plans.

37. A reconciliation statement has been submitted with the Energy Hub RMA to demonstrate compliance with the OPP. The following table provides a summary of the key design controls established by the OPP and assessment of the Energy Hub development in response to these controls:

Key Data	OPP Requirements	OPP Reference	MP1a Assessment
Plot extent	Plot extents within maximum and minimum parameters at ground / mezzanine and upper floors	Parameter Plans P03 and P04	The building footprint sits within the extent defined in the parameter plans for Plot H12
% occupancy of plot	Total area of built footprint + balcony zones will be a maximum of 72% of the maximum plot extent at upper levels	DSD (Consolidated February 2013 Version), p.119 Parameter Plan P04	The proposal is not residential and so this measure is not relevant.
% occupancy of tall building	Maximum floorplate area (including balconies) = 85% of maximum parameter plan Maximum volumetric occupancy (including balconies) = 85% of maximum parameter volume	DSD (Consolidated February 2013 Version), p.293	The proposal is not residential and so this measure is not relevant.
Building envelopes	Plot extents within maximum and minimum AOD heights at ground / mezzanine and upper levels	Parameter Plans P08 and P09.	Plot H12 sits within the building envelope defined in the parameter plans, with only the chimney reaching the maximum parameter height.
Development GEA	Development floorspace (GEA sqm) set by a maximum and minimum quantum per plot	Table 4.2 of the Development Specification (Sept 2013) specified 925sqm, though this was amended by s96a to 3,300sqm.	Plot H12 will deliver 2,679sqm of floorspace, which is well within the adjusted floorspace allowance.

38. The provision of an energy centre to supply cleaner energy to future residential

properties and commercial premises is an integral component of the outline planning permission and its provision crucial to achieving the vision for an environmentally sustainable Elephant Park. The additions of a café (use class A1) and nursery (use class D1) within the energy hub building are consistent with the ambitions of the OPP, as well as the specific requirements for Plot H12. Subject to consideration of the issues detailed below, the development proposals are supported in principle.

Environmental impacts

39. An environmental statement (ES), including a subsequent addendum, was submitted with the Outline Planning Application for the redevelopment of the Heygate Estate. In accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended), the ES assessed the likely significant environmental impacts arising across the Elephant Park site during demolition, construction and once the development is completed.
40. Further to the regulations, the applicant requested a screening opinion (application ref: 15/AP/2184) to determine whether or not the Energy Hub proposals would be consistent with the assessment undertaken at the outline planning stage, or whether a supplementary ES would be required. The council concluded that, on the basis of the information provided, the energy hub proposal would not generate any new or previously unidentified impacts that would warrant an additional environmental impact assessment (EIA) being undertaken.

Impact of proposed development on the amenity of adjoining occupiers and the surrounding area

Daylight and sunlight analysis

41. A 3D computer model has been developed that allows for detailed analysis of the daylight and sunlight levels within each Development Plot and the impacts on the neighbouring buildings.
42. The impacts of daylight and sunlight received by properties in the immediate vicinity have been assessed, including: 44-46 Brandon Street; 1-7 Brandon Mews; 66-68 Wansey Street; the east façade for H10; north façade for H13 and Victory School. In addition, a façade study for Plot H11b has been completed based on the massing proposed in the Indicative Masterplan. An overshadowing assessment has also been completed for Victory Community Park and the two areas of public realm to be laid out as part of the Energy Hub scheme.

Daylight analysis

43. In line with guidance issued by the Building Research Establishment (BRE), the Vertical Skylight Component (VSC) test has been completed to assess the impact on levels of daylight received by neighbours. This test determines the angle of visible sky at the centre of a window. The BRE assert that a minimum VSC of 27% should be achieved and where a development would lead to losses in excess of 20%, the BRE assert that this would be noticeable to the occupier.
44. To better determine the impact of the Energy Hub on the amount of daylight received

by neighbours, the testing models the consented South Gardens development (MP1), located south of Heygate Street, with the blocks of the former Heygate Estate still standing north of Heygate Street.

Impact on neighbours outside Elephant Park

45. No impacts were measured at Victory Primary School, 46 Brandon Street, 46b Brandon Street, 44b Brandon Street, 1-7 Brandon Mews, 66 Wansey Street or 68 Wansey Street. At 44a Brandon Street, a single window experiences a 21.9% reduction, but there are 2 other windows serving this room that are unaffected. In fact, the VSC values for a number of windows are predicted to improve very slightly. The results suggest a negligible impact on the levels of daylight received by residential neighbours adjacent to Elephant Park.

Plot H10

46. It is possible to carry out the more detailed Average Daylight Factor (ADF) analysis for residential properties within Elephant Park due to the fact that the internal layouts and decorative finishes are known to the applicant. ADF analysis considers the size of the window, depth of rooms and internal reflectivity to provide a more detailed picture of the quality of daylight in a room. The BRE recommend an ADF rating of 2% in kitchens, 1.5% in living rooms and 1% in bedrooms.
47. The impacts on habitable rooms fronting Brandon Place have been assessed. Of the 8 Living room/kitchen/diners tested, 7 experience reductions in ADF in the region of 20% and are below the 2% recommendation from BRE, but these rooms are below this level without taking the Energy Hub into account. All retain an ADF in excess of 1%. All other rooms on the first to ninth floors retain ADF levels in excess of the BRE recommendations.
48. The No Sky Line (NSL) test has also been undertaken, which simply identifies the proportion of a room from which the sky is visible. As with the ADF analysis, ground floor units in H10 will generally experience a reduction in the proportion of the rooms from which the sky is visible, as is also the case with a handful of bedrooms at first floor levels.

Plot H13

49. 27 rooms to the north of Plot H13 were tested. Of these, 2 kitchen diners at ground floor and 1 at first floor level drop below the 2% recommended by the BRE. All other habitable rooms in this facade continue to exceed the minimum ADF levels recommended by the BRE.
50. The NSL testing highlights that impacts are limited to the four rooms across the ground and first floor level.

Trafalgar Place – Block R1A

51. 14 habitable rooms have been tested in Block R1A of Trafalgar Place, located east of the Energy Hub and adjoining Rodney Road. A single bedroom drops from the recommended 1% to 0.9%, whilst a further 6 rooms are below the ADF values recommended by the BRE, but are unaffected by the Energy Hub proposal. The Energy Hub has a negligible impact on daylight received in tested properties at Trafalgar Place.

Plot H11b

52. Further VSC analysis has been undertaken to determine the potential impacts on Plot 11b, located to the north at the junction of Rodney Place and Heygate Street. This Plot forms part of the final phase of development (MP5) and is yet to be designed, so the analysis focuses on a notional scheme should the Plot be developed to its maximum parameter. The analysis indicates that a good level of daylight will be achievable, subject to careful design, and that the Energy Hub building has little impact on potential levels of daylight.

Sunlight analysis

53. BRE guidance sets out that where development takes place in close proximity to existing properties, it can affect the amount of sunlight received by properties where they have windows that are orientated within 90 degrees of south. The only property in the immediate vicinity with windows facing with 90 degrees of south is Victory Primary School. Sunlight analysis indicates that every window will continue to receive levels of sunlight recommended by the BRE; 25% of possible sunlight hours annually and 5% in winter.
54. Overshadowing analysis has also been carried out to determine how much sunlight will reach the new pocket park, Brandon Place, and the existing park surrounding Victory Primary School. In both cases, the report concludes that 100% of the space will receive 2hours direct sunlight on 21st March, which is consistent with the recommendations of the BRE and indicative of a good level of sunlight.
55. The ES acknowledged that for both maximum & minimum envelopes, where facades are directly opposite, daylight levels at these facades will generally not comply with the minimum standards advocated by the BRE. However, the results of the daylight and sunlight analysis clearly show that, overall, the Energy Hub can be considered to have a positive relationship with its neighbours and will not unduly diminish levels of daylight or sunlight received.

Overlooking and privacy

56. The separation distances between the Energy Hub and the neighbouring Plots generally exceed the 12m distance that is referenced in the council's Sustainable Design and Construction SPD. The most sensitive relationship is to Plot H13 to the south, where there is the potential for overlooking between the nursery and residential properties. However, upper floors of the nursery building are set back and exceed the 12m distance and the terraces are bound by a 1.8m parapet. Further, the nature of the perforated cladding for the Energy Hub is that it will allow views out from the building, but be perceived as a solid façade when viewed from the external spaces or neighbouring buildings. This limits the prospect of direct overlooking between the various blocks and officers are satisfied that the relationship is acceptable and this will not give rise to undue loss of privacy.

Noise

57. The levels of noise arising through construction will be monitored to ensure that residents are not exposed to unreasonable levels of disruption. Thresholds will be established in a Construction Environmental Management Plan (CEMP) and action taken where these thresholds are breached.

58. The acoustics of the Energy Centre will also require consideration to ensure that the operation of plant, machinery and ventilation systems do not present a level of noise that would be to the detriment of residential amenity. Planning conditions are attached to the outline planning permission that require further information to be submitted in this regard.

Design

59. Core Strategy policy 12 states that development will be of the highest possible standards of design for buildings and public spaces. The OPP established a number of key principles through the Design Strategy Document and Parameters Plans.
60. Key principles that have underpinned the design development of the Energy Hub include:
- Establish building lines by creating public spaces, including a new pocket park to the west;
 - Create active frontages on the ground floor, through retail uses;
 - Developing the massing of the plot to relate to the scale of the existing context and the emerging wider developments in Elephant and Castle
 - Modulating the massing and providing a richness of detail in the building elevations;
 - Meeting the council's 'exemplary' design standards (where appropriate)
61. The design of the Energy Hub has emerged from a complex brief that demands that the technical requirements of providing the combined heat and power facility are fully addressed, whilst embedding the building within a high quality public realm with a number of retained, mature trees and providing supporting uses that will animate the Plot and reflect the mixed-use nature of Elephant Park.

Height, bulk and massing

62. The Energy hub building is a modest four storey building with a highly articulated profile, which provides visual interest from different vantage points around the site. This also improves the functionality of the building, allowing the creation of outdoor terraces for the nursery that is located at the upper floors.
63. The chimney serving the energy centre is suitably the tallest element on the Plot, rising to the maximum parameter height (23.53m AOD) and effectively anchoring the building at the prominent corner of Heygate Street and Rodney Road. This is appropriate both architecturally and technically, since the height of the chimney has a proportional impact on the quality of the emissions released. This point is discussed in detail below.
64. In contrast, the staggered nature of the terraces at the south of the Plot responds in part to the lower building heights that prevail to the south.
65. The massing of the building represents a well considered response to the uses within the Energy Hub and the relationship with neighbouring buildings. The design and access statement clearly demonstrates that building form has responded to the space requirements of the various elements, consideration of how the building will be appreciated in views and technical studies such as daylight, sunlight and

overshadowing analysis.

Facades: materials and fenestration

66. The OPP requires materials that are high quality, durable, robust and sustainable throughout Elephant Park. Generally, all buildings should reinforce local identity and create consistency with adjoining developments. However, Officers advised that the by virtue of the uses proposed for this Plot, there is an opportunity to present something distinctive rather than contextual and this is reflected in the choice of materials and architectural expression of the Energy Hub.
67. In terms of materials, the Energy Hub has two distinct elements. The dominant material will be a light-weight perforated metal cladding. The intention is that this cladding is profiled to provide a rich texture to the façade and a high degree of vertical emphasis. It is also proposed that the cladding will split laterally at second floor level, with varied perforation on the upper and lower half of the building. This will provide a subtle datum and avoid the impression of a continuous, uniform sheet.
68. The intention is that the cladding will wrap around the building and extend slightly beyond the roof plane. This will help to give the impression that the top of the building is lighter in its form, whilst helping to mask rooftop plant and also provide an effective parapet for the terraced areas serving the nursery.
69. At the base of the building, the cladding will be peeled back to reveal a more solid, undulating plinth. This will be used to frame entrances to the café and nursery, as well as to servicing entrances at various points. This will achieve a much more robust finish and help to embed the Energy Hub within its setting.
70. A key feature of the cladding will be the interaction with windows. The windows themselves will vary in both size and nature to provide depth and variety to the facades. The pattern of fenestration is such that a number of large feature windows will 'punch' through the cladding and be flush with the external skin of the building, whilst a number of secondary windows will sit behind the cladding, flush with the more solid building. The perforated cladding will mean that these recessive windows provide good levels of daylight and a good outlook from inside the building, but will be largely hidden from the spaces surrounding the Energy Hub. However, in darker conditions, light from within the building will make these windows visible from behind the cladding. A number of large feature windows are proposed at ground floor level on all elevations to provide views into the Energy Hub, avoid large expanses of blank façade at street level. The result will be a playful, engaging building that has a different appearance in different lighting conditions and at different times of the day.
71. The final choice of materials will be informed by samples submitted pursuant to planning conditions attached to the outline planning permission and the construction detailing will be critical, but Officers are satisfied that the architectural concept is a strong one capable of delivering a building of the necessary design quality.

Internal configuration

72. The different uses within the Energy Hub demand careful consideration of the configuration of space. Whilst visual connections to the Energy Centre have been created, the constituent uses are all able to operate independently and securely, with each use having its own dedicated entrance.

73. The energy centre and substations occupy the eastern and southern half of the building, whilst the café space and nursery entrance sensibly front on to Brandon Place, maximising the opportunities for interaction with the new pocket park.
74. The entrance to the nursery has been slightly recessed into the building and the cladding peeled away to a greater extent than elsewhere on the building to make the entrance space more legible and to give it additional prominence in this elevation. Consideration has been given to the requirements of nursery users and a large buggy store is provided adjacent to the lobby space. It is noted that a nursery provider has been secured and that this provider has had the opportunity to tweak the configuration of the nursery spaces to better meet their requirements.
75. Ancillary spaces such as bin and cycle stores are appropriately located away from the prominent frontages and circulation spaces are minimised. Officers are satisfied that the configuration of the Energy Hub is successful and, subject to acoustic controls, adequately addresses potential conflicts between users.

Design Review Panel

76. The Design Review Panel considered the scheme in February 2015. The panel members were supportive of the development, welcoming the clear architectural ambition in light of a challenging, technical brief. However, whilst the panel commended the level of refinement in the Energy Hub building from an aesthetic and architectural perspective, they felt that further consideration was required to improve how the building would actually function, including the relationship between the various land-uses and with the public realm.
77. Specifically with regard to the nursery space, the Panel questioned whether the sequence of spaces from the entrance to the nursery reception at second floor level was adequately sized and secure. They also questioned whether detailed consideration had been given to window locations and patterns to ensure that children in the nursery space would be able to positively interact with them.
78. Further, the Panel commented that whilst the landscape design had a strong concept, the detailed design would need to more clearly demonstrate that some of the constraints presented by level changes, retained trees and the various users of the space could be successfully resolved.
79. Officers are satisfied that a number of changes have been made in response to the comments made by the Design Review Panel and that issues that were highlighted have been successfully resolved.

Public realm

80. Guidance in the Elephant and Castle SPD states that the council will work with developers to transform the quality of the public realm in the Opportunity Area. A Site Wide Public Realm strategy has been approved, which sets out how this vision will be achieved for Elephant Park.
81. Brandon Place will be a new pocket park located immediately to the west of the Energy Hub, in the space that separates the development from Plot H10. The space

will be designed with a focus on pedestrian activity, play and landscape.

82. The space is dominated by four mature trees, which are to be retained. The emerging public realm design celebrates the presence of these trees and adopts a design that is based on a series of concentric circles that radiate from each of the trees. This influences the shape of the landscape, seating and play elements, as well as extending into the ground floor café in the Energy Hub to better integrate the landscaping with the building.
83. The pocket park has a strong focus on play, the provision of which is required to serve residents of the first phase of Elephant Park, South Gardens (Plots H6, H10 and H13). The emerging play concept proposes an array of fixed and informal play, with a variety of equipment, landscaping and more natural elements. Final details of the amount of play equipment and space will be confirmed as part of a holistic hard and soft landscaping proposal for the Plot.
84. In contrast, the space to the south of the Energy Hub between Plots H12 and H13 is more of a transitional space; forming an important pedestrian and cycle link between Wansey Street and Rodney Road. The space will also be used only very infrequently as a servicing access to the substations located along the southern flank of the Energy Hub. The space is predominantly hard landscaping and is arranged as four distinct strips: pavements to the north and south, with a delineated cycle route and narrow landscaped buffer in the middle. The configuration is such that the cycle route will also function as the servicing access for the substations, on the rare occasions that this is required. The cycle route effectively links Wansey Street to the London Cycle Network on Rodney Road, as well as the pedestrian and cycle crossing that will provide a further link to Victory Place. This is consistent with the approved Site Wide Pedestrian and Cycle Route Strategy.
85. In principle, the configuration of the space is supported, though detailed landscaping design and materials will need to be finalised in due course with a view to ensuring that the space is successful for both pedestrians and cyclists.

Trees and landscaping

86. The approved site wide tree strategy identifies 10 mature trees within Plot H12 that need to be retained: four to the west of the energy hub within Brandon Place and six to the north of the Hub, adjacent to Heygate Street. Details of the tree protection measures to be put in place during construction will be secured by condition (prior to the commencement of the development).
87. Further woodland and herbaceous planting is proposed to compliment the retained trees. The design and access statement sets out that the emerging planting proposals reflect the microclimate within Brandon Place, including availability of daylight and sunlight and topography. The council's urban forester has reviewed the indicative planting proposals and notes that the proposals are of design merit, with an appropriate palette of species proposed. The final landscaping design will be the subject of a planning condition in due course.
88. The tiered nature of the Energy Hub roof provides several opportunities for green roofs. The first will be located to the north of the building on the roof area adjoining

the chimney, whilst two discrete areas of green roof are provided on the taller middle section surrounding the roof top plant. The design and access statement specifies that these will be extensive green roofs with meadow planting; the intention being that as well as the environmental benefits, this will improve the outlook from taller, neighbouring Development Plots. Details of the specification and maintenance arrangements for the green roofs will be agreed prior to installation pursuant to the Condition 49 of the Outline Planning Permission.

Transport and highways

89. Strategic Policy 2 of the Core Strategy sets out that through development, the council will encourage walking, cycling and the use of public transport. The application site is located in a high PTAL (Transport for London Public Transport Accessibility Level) area of 6a, and therefore benefits from excellent links to public transport.
90. The outline planning permission was underpinned by a detailed transport assessment that anticipated trip generation associated with the development of Elephant Park, as well as a framework travel plan, which set out broadly the measures and initiatives that would be implemented to facilitate sustainable travel. A range of measures are secured via planning conditions and legal obligations attached to the outline planning permission.
91. No car parking is proposed within Plot H12, though its development gives rise to a number of other site-specific transport and public realm issues, as detailed below.

Pedestrian and Cycle Network

92. The delivery of a more permeable, pedestrian and cycle friendly development is one of the fundamental principles enshrined in the Outline Planning Permission. Subsequently, a site wide pedestrian and cycle route strategy has been agreed, identifying a network of routes and spaces that will be designed in varying degrees to cater for pedestrians and cyclists.
93. The energy hub plot incorporates areas of public realm immediately to the west adjacent to Plot H10 and to the south, adjacent to Plot H13. In the area to the south, a pedestrian link will be provided adjacent to Plot H13, with a narrow landscaped buffer providing separation from a delineated, signed cycle route. This will link Wansey Street to the Rodney Road, which forms part of the London Cycle Network. A segregated pedestrian and cycle crossing is also proposed across Rodney Road, linking to Victory Place, where a new cycle hire docking station is to be delivered. These measures will provide a useful route for less confident cyclists and, whilst the final design and landscaping treatments are still to be fully determined, are supported by officers.
94. In contrast, Brandon Place will be designed expressly for pedestrians and is not intended as a cycle cut-through. The area is dominated by a number of retained, mature trees and the design of the new pocket park responds to this. A range of factors including the trip generation associated with the nursery, the potential for spill-out space from the café, the incorporation of children's play areas and the topographic challenges presented retained trees, combine to give this space has a very different character. As a result, officers are of the view that this is a space best

designed for pedestrian movement and play. This is consistent with approved site wide strategies for Play and Pedestrian and Cycle Routes.

Cycle parking

95. Minimum cycle parking standards are established in Table 6.3 of the London Plan. In the case of café and community space, they are expressed as long-term spaces for staff and short-term for visitors. It is proposed to provide 2 cycle storage spaces for nursery staff, 2 for staff at the café and 24 spaces for visitors. Spaces for staff will be provided within the Hub building in bespoke stores, whilst those for visitors will take the form of Sheffield Stands within the public realm. Visitor cycle parking is located at the north (14) and south (10) of Brandon Place and is intended to discourage cycling through the space. The amount of cycle storage is consistent with the London Plan, whilst the format and location is broadly consistent with Southwark's Sustainable Transport SPD. The precise location of the cycle parking, particular within Brandon Place, will be confirmed via planning condition.

Servicing

96. A servicing management plan (SMP) has been prepared by Peter Brett Associates. Servicing will comprise deliveries to the nursery and café, weekly refuse collection and the infrequent servicing of plant and machinery associated with the Energy Centre and adjoining substations. The SMP sets out that the Energy Hub will give rise to fairly modest servicing demands, approximately in the region of 3 deliveries per day; the transport assessment underpinning the OPP estimated between 20 and 25 deliveries per week for a café unit, whilst a single delivery per week is anticipated for the nursery. It is anticipated that the largest vehicle servicing the site would be an 11m refuse truck and a 30m loading bay is provided on Rodney Road to cater for this. Though this seems excessive, the bay is also intended to cater for servicing and deliveries to the adjoining Plot H13. On this basis, officers are satisfied with the proposals.
97. In addition, infrequent servicing access will be required to the substations that are located to the south of the energy hub, immediately adjoining the area of public realm between the building and Plot H13. The hard landscaping will need to be designed such that it can withstand very infrequent vehicle access.
98. In terms of refuse collection, 6x 1100L bins are provided in a single bin store located to the north-west corner of the plot. The bin store is accessed internally by a servicing corridor and opens directly to the public realm adjoining Heygate Street. This provides for a relatively short drag distance to the Rodney Road loading bay and is considered a sensible solution. Waste collections will ultimately be undertaken by a private waste contractor.

Construction Management

99. A construction environmental management plan (CEMP) will be submitted prior to implementation, providing details on: permitted hours of construction, routes of construction traffic, specification of works, monitoring of noise, vibration and dust and appropriate mitigation, measures to ensure the continued, safe operation of Heygate Street and Rodney Road, a commitment to Considerate Contractors Scheme and

details of training for all HGV drivers. The construction of the Energy Hub in the wider context of the construction of Elephant Park and other developments in the wider area will be subject to discussion with the Elephant and Castle Logistics Group.

Sustainability

Energy

100. The NPPF sets out that planning has a key role to play in meeting the challenge of climate change, through securing radical reductions in greenhouse emissions, through providing resilience to climate change and by supporting the delivery of renewable and low carbon energy.
101. London Plan Policy 5.2 stipulates that in order to make the fullest contribution to minimising carbon dioxide emissions, developments should employ the following energy hierarchy: be lean (use less energy), be clean (supply energy efficiently), be green (use renewable energy). Policy 5.7 states that for major developments, this should incorporate the use of on-site renewable energy generation, where feasible. Strategic Policy 13 of Southwark's Core Strategy states that we will require development to meet the highest possible environmental standards.
102. The Elephant Park OPP was registered relative to Building Regulations 2010 and the approved Site-wide Energy Strategy sets out how the Elephant Park development will utilise the energy hierarchy to achieve a 40% saving in carbon dioxide emissions relative to the baseline established relative to these Regulations.
103. The provision of the Energy Hub is fundamental to reducing carbon dioxide emissions across the site. Of the three tiers of the energy hierarchy, the clean provision of energy via the Energy Hub and associated district heating network is responsible for the largest proportion of carbon savings across Elephant Park. A Master Concession Agreement was signed in December 2014 with EON to fulfil the role of Energy Service Company (ESCO) to operate the Energy Centre and associated Heygate Heat Network.
104. The Energy Hub will contain 2x 850kWth gas-fired CHP boilers, supported by 16x 750kW gas fired boilers, which is adequate to supply Elephant Park and an additional 1,000 residential units in the local area, as stipulated in the s106. Provision is made for the possible installation of a further 8 modular boilers at a future date, which would allow connection to a further 2,581 dwellings off-site, giving a notional capacity of up to 6,050 dwellings and the commercial space within Elephant Park.
105. Whilst the energy hub is integral to the site wide energy strategy, its efficiency has also been considered in isolation. An Energy Statement has been provided to demonstrate how the Energy Hub meets, and exceeds, the carbon reduction targets established in the London Plan. Through a combination of a thermally efficient building fabric, the provision of combined heat and power (CHP) boilers and the installation of photovoltaic panels at roof level, the development is able to make an overall carbon saving in the region of 15 tonnes per annum. This is equivalent to a 57% saving in regulated carbon dioxide emissions relative to a development that would be compliant with Building Regulations 2010.

106. The breakdown is as follows:

	Estimated annual electrical energy consumption (KWh/year)	Estimated annual regulated CO2 emissions (tonnes)	% reduction from 'Baseline' – cumulative
Baseline	68,359	26	-
Fabric efficiency <i>'Be lean'</i>	66,249	23	10%
CHP Supply <i>'Be clean'</i>	33,118	13	48%
Renewable technologies <i>'Be green'</i>	28,938	11	57%

107. This level of carbon reduction surpasses the 40% requirement established in the Outline Planning Permission and is supported by officers.

108. As stated at the outline planning stage and in the approved site wide energy strategy, the ambition is that biomethane gas will eventually be used in conjunction with the energy hub as an alternative to conventional gas. This biomethane would be injected into the gas network, effectively displacing the same amount of conventional gas. The use of biomethane would dramatically improve the level of carbon reduction across Elephant Park, however, at this point, it has not been demonstrated that this is a technical feasible solution. This will continue to be monitored and the site wide energy strategy updated, if necessary.

109. The s106 agreement sets out that the Energy Centre will not become operational until triggers are reached linked to sufficient thermal demand or a minimum number of units are occupied, whichever is earliest. These triggers were revised in planning approval 14/AP/3412 to be the occupation of 823 units or 3kW of thermal demand. Based on the current phasing plan, the first of the CHP boilers should be operational by Q2 2017. A temporary containerised solution is proposed in the interim to provide power for initial occupiers in Plots H6, H10, H13 and H3. This is subject to approval under planning application 15/AP/2512.

BREEAM

110. The importance of the energy hub in the context of the Elephant Park vision is demonstrated by the stated intention for the Energy Hub to achieve a BREEAM Outstanding accreditation, which would surpass the targets expressed in Core Strategy Policy 13. A pre-assessment appended to the Design and Access Statement sets out that this should be achievable. This is strongly supported by Officers.

Wind

111. A desk based wind assessment has been undertaken by RWDI to identify how comfortable the spaces around the building will be from the perspective of a pedestrian. This includes analysis of the conditions on the external nursery terraces. The assessment models prevailing wind conditions with the built form of the Energy Hub and its immediate surroundings, to determine the local microclimate.

112. The analysis indicates that the target conditions for a typical urban development are achieved and that the microclimate immediately surrounding the Energy Hub is generally suited to the uses proposed. The exception to this is along the western flank of the Energy Hub, which is exposed to south-westerly winds. The report sets out that the recessed nature of the nursery entrance provides an effective buffer at this point, whilst low level planting and landscaping will provide effective mitigation to the south of Brandon Place and in close proximity to the café entrance. This detail should be pursued as part of the future consideration of the detailed landscape design, which, as is the case with other Elephant Park Reserved Matters Applications to date, will be secured via planning condition.

Air Quality

113. The site is located within the borough's Air Quality Management Area (AQMA). Air quality at Elephant and Castle is known to be particularly poor, with vehicular traffic acknowledged as the principal source of air borne pollutants. European and National legislation establish a series of standards and objectives for improving air quality, which represent the levels at which pollutant concentrations are thought to avoid or minimise risks to health. This includes objectives for concentrations of nitrogen dioxide and nitrous oxide (NO_x) and particulate matter (PM₁₀). Guidance in the NPPF sets out that planning decisions should contribute to sustaining compliance with these aims.
114. London Plan policy 7.14 states that development proposals should make provisions to address local problems of air quality through promoting sustainable design, minimising dust and emissions arising through demolition and construction and by promoting sustainable transport modes. It states that development should be at least Air Quality Neutral, with regard to the guidance in the Mayor's Sustainable Design and Construction SPD. Core Strategy policy 13: High Environmental Standards and saved Southwark Plan policy 3.6 Air quality set out a clear presumption against granting planning permission for development that would lead to a reduction in air quality.
115. The environmental statement underpinning the outline planning permission for Elephant Park identified emissions from the Energy Centre as being one of three sources that would have a potential impact on air quality, alongside dust and particulate matter (PM₁₀) associated with demolition and construction and vehicular traffic.
116. Of most relevance to the energy centre application is the level of nitrogen dioxide (NO₂), varying concentrations of which are produced during the combustion of natural gas. The UK Air Quality Strategy establishes objective levels for nitrogen dioxide of 200µg over 1hr mean, not to be exceeded more than 18 times a year, and of 40µg annual mean.
117. A comprehensive air quality assessment has been undertaken by Parsons Brinckerhoff, having regard to these objective levels as well as best practice guidance issued by the Institute of Air Quality Management (IAQM) and DEFRA, as well as the GLA.

Modelling

118. Detailed dispersion modelling has been undertaken to determine the potential air quality impacts associated with the Energy Centre. The assessment models nitrogen dioxide levels emitted from the flue as a result of the combustion of natural gases within the energy centre and then models prevailing wind conditions to assess the impacts at range of receptors. This includes the potential impact on each of the Development Plots within Elephant Park, as well as locations on the periphery of the Masterplan site and the wider area. It is important to note that whilst the current technical specification of the Energy Centre is for 2 CHP boilers and 16 modular boilers, there is capacity for this to be expanded to 24 boilers at a future point. The air quality modelling therefore assumes that the higher number of boilers is installed and that they are operating at their full capacity, to determine the largest possible impact.
119. Broadly speaking, the modelling couples the change in NO₂ concentration as a result of emissions from the energy centre with the prevailing background conditions at each receptor. Sensitivity analyses have been completed that consider the impacts on prevailing air quality with or without the development of the Elephant Park, and how the impacts would differ if background concentrations do not reduce at the pace projected by DEFRA. In line with guidance issued by the Institute of Air Quality Management, any impact deemed to be 'moderate' or 'substantial' could be considered a significant effect.
120. The modelling suggests that ground level impacts on-site, off-site and at major roads in the vicinity are largely negligible, with no significant effects anticipated. However, at the façade of Plot H10, immediately west of the energy hub, modelling suggests that a 'moderate adverse' impact could occur. Despite the resulting concentration being well within the objective levels, the impact is noted as potentially significant.
121. Further modelling incorporates road traffic emissions to determine the cumulative impacts at a range of receptors. Assuming DEFRA predictions on background concentrations diminishing over time are realised, the impacts are deemed negligible at buildings across the site and the wider area. This includes buildings stretching from the west of Elephant and Castle roundabout, down to the Peabody buildings on Rodney Road. Should background levels only improve to the levels anticipated in 2018, then whilst the magnitude of the impact from the energy centre remains the same, this impact would be more significant at several locations on and off-site. This analysis highlights that road traffic remains by far the greatest factor in determining local air quality.
122. In interpreting the analysis, a number of factors need to be considered. The inputs to the modelling are purposefully conservative and so could be considered as presenting a worst case scenario. As noted, modelling assumes that boilers are working to their full technical capacity, which would mean they are capable of supplying all of Elephant Park plus an additional 3,500 homes off-site. This is well in excess of the requirements of the s106 agreement. Further, the proportion of nitrogen dioxide leaving the flue is based on 'worst case' assumptions produced by the Environment Agency, which the report suggests will be surpassed. Additionally, it is noted that the specification of the gas-fired boilers and, in particular the CHP boilers, exceeds the technical standards advocated in appendices the Mayor's Sustainable Design and Construction SPG.

123. Officers in the Environmental Protection Team have reviewed the detailed modelled and sought further assurances on the localised impacts to neighbouring Plots, notably H10. Parsons Brinckerhoff have subsequently completed a Chimney Height calculation, pursuant to the Clean Air Act 1993. This calculation models the required height of a chimney as a result of the anticipated emissions. The calculation demonstrates that the height of the chimney is appropriate in this case. Further, Parsons Brinckerhoff assert that, if the operation of the boiler plant is restricted to fulfilling the s106 requirements of supplying Elephant Park and a further 1,000 homes, then the associated impact at the façade of H10 is borderline between 'slightly adverse' and 'moderate adverse'.

Air Quality Neutral

124. Since submission of the OPP Environmental Statement, the Mayor's Sustainable Design and Construction SPG has established benchmarks against which developers need to test their schemes to demonstrate that they are 'air quality neutral'. The analysis requires consideration of concentrations of nitrogen dioxide and particulate matter, for both emissions from the energy centre and from vehicular traffic. Whilst a relatively straightforward level of analysis in comparison to the detailed dispersion modelling undertaken in this case, the calculation does nonetheless demonstrate that the air quality impacts for the Energy Hub are below the benchmarks in the SPG and to this end, the Energy Hub can be considered 'air quality neutral'.

Conclusion

125. The air quality modelling presented is complex, with a large number of variables and sensitivity analyses to anticipate how background concentrations of nitrogen dioxide will change in the future. On balance, officers are satisfied that the predicted air quality impacts associated with the Energy Hub are acceptable. This is based on the range of modelling undertaken, the conservative nature of the inputs and fact that the boilers will not be operating at their maximum capacity until a date beyond the completion of Elephant Park, at which point prevailing air quality is anticipated to have improved.
126. In terms of the wider contribution of the development to air quality, consideration also needs to be given to the suite of measures in the s106 aimed at improving air quality over the lifetime of the development. This includes the submission of travel plans for each Development Plot, the creation of car club spaces and membership for residents, investment in cycle hire and the improvement to the pedestrian and cycle network. Further, construction management plans will establish challenging controls for dust and particulate matter throughout the construction programme to minimise adverse impacts on air quality.

Flood risk and drainage

127. The OPP Environmental Statement considered the likely impacts of the Elephant Park development on flood risk, groundwater levels and surface water drainage. As a consequence a number of conditions were attached to the outline planning permission addressing these issues.
128. The Environment Agency and the council's flood risk and drainage team have confirmed that they have no objections at this time and will respond to details

submitted pursuant to the necessary planning conditions in due course.

Planning Obligations

129. There are no new planning obligations arising from the reserved matters application for Plot H12. All obligations have been secured via the legal agreement attached to the outline planning permission for Elephant Park. Various clauses in the 106 agreement require the submission of additional information with each Reserved Matters Application, as well as others that will need to be satisfied prior to the implementation of the development.

Other matters

130. Section 143 of the Localism Act states that any financial contribution received in terms of community infrastructure levy (CIL) is a material "local financial consideration" in planning decisions. The requirement for payment of the Mayoral CIL is therefore a material consideration, however the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments of benefit to London as a whole, primarily Crossrail.
131. In Southwark, the Mayoral CIL was established at a rate of £35 per sqm of new development, although this is an index linked payment. The Energy Hub will comprise 2,199sqm (GIA) and so the Mayoral CIL would be £76,965 (subject to indexation).

Conclusion on planning issues

132. Approval of the reserved matters for Plot H12 are sought pursuant to the Elephant Park Outline Planning Permission. The proposed development fully accords with the parameters and principal design controls that were established in the OPP.
133. The Energy Hub is an integral component of the Elephant Park Outline Planning Permission and its provision fundamental to the environmental ambitions that we enshrined in the OPP. Its timely delivery will make an essential contribution to reductions in carbon dioxide emissions across Elephant Park. With a stated ambition to achieve a BREEAM Outstanding accreditation, the Energy Hub is symbolic of the sustainable design being delivered across Elephant Park.
134. The proposal represents a high quality, highly articulated design solution that successfully integrates the technical demands of the energy centre, with the functional requirements of the café and nursery. The configuration of uses in the Energy Hub presents a logical response to the site and ensures a positive relationship between the building and the adjoining pocket park, Brandon Place.
135. Technical studies have demonstrated that the potential impacts on air quality are broadly acceptable and that the potential for adverse impacts is only likely in the event that background concentrations fail to reduce over time and the energy centre is operating at its maximum technical capacity, beyond that envisaged in the outline planning permission. Officers are satisfied that the s106 agreement and conditions on the OPP provide the necessary mechanisms to allow any such changes to be properly assessed, at the relevant time.

136. In light of the above and with regard to the policies in the development plan and other material considerations, it is recommended that reserved matters approval is granted, subject to appropriate conditions.

Community impact statement

137. In line with the council's community impact statement, the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process. The impact on local people is set out above. It is not considered that the proposed development will have any impacts that are more pronounced for particular groups by virtue of the above characteristics.

Consultations

138. Details of consultation and any re-consultation undertaken in respect of this application are set out in Appendix 1.
139. A Statement of Community Involvement (SCI) has been provided which details the public consultation and engagement process undertaken by the applicant. This includes several initial workshops in Summer 2013, as well as a series of stakeholder meetings and exhibitions in Spring 2015. Key stakeholder groups engaged at different stages in the process include residents on Wansey Street and Brandon Street, Garland Court TRA, the Walworth Society, Southwark Cyclists and Victory Primary School.
140. The SCI states that key themes arising from stakeholder meetings include understanding the technologies used in the Energy Hub, the design of the public realm and children's play, the need to improve the junction at the confluence of Rodney Road, Rodney Place and Heygate Street and the potential to retain additional trees. Feedback presented in the SCI suggests a high level of support for the combination of uses in the Energy Hub and the provision of a new pocket park. Mixed responses were recorded on the proposed architectural treatment, though a preference was expressed for a distinctive design.
141. The Energy Hub proposal was presented to the Design Review Panel (DRP) on 9 February 2015. The Panel's comments are referred to in the main body of the report where relevant.

Consultation replies

142. Details of the comments received via consultation with neighbours, local stakeholders, internal services and external stakeholders are summarised below. It should be noted that no objections have been received in relation to the Energy Hub proposal. A list of the individuals, teams and organisations to respond to the formal consultation is set out in Appendix 2.

Neighbours

143. A single response was received from a resident of Trafalgar Place expressing very

strong support given that the proposal represents regeneration in a sustainable manner and that the nursery and shopping will be beneficial for families in the neighbourhood.

Statutory organisations

144. Transport for London
No specific comments on the basis that the strategic transport impacts are likely to be limited.
145. Thames Water
The reserved matters application does not affect Thames Water and as such we have no observations to make.
146. Environment Agency
No comments, subject to adherence with conditions on the outline planning permission in relation to flood risk (condition 8), piling design (condition 24), surface water drainage (condition 28), infiltration (condition 29) and contamination (conditions 30, 31 and 32)
147. London Fire and Emergency Planning Authority (LFEPA)
No objections

Internal services

148. Public Realm
Support in principle, subject to finalising the detailed design of public realm areas through the discharge of planning conditions and via separate highways approval processes.
149. Environmental Protection Team
Detailed comments provided on the Air Quality Assessment, including several requests for further information from the applicant's air quality consultant. Whilst the admission of a moderate adverse impact at the façade of H10 under the 'worst case scenario' is a concern, officers acknowledge that this is predicated on a long-term ambition to connect the energy centre to a much larger number of homes and that modelling is both comprehensive and conservative.
150. Design and conservation
Comments incorporated into the above report, including comments from the Design Review Panel.
151. Urban Forester
Commends the landscaping concept design and proposed planting regime for Brandon Place. It is noted that further details on tree protection measures, final hard and soft landscaping plans and green roof specifications will be submitted pursuant to the relevant conditions on the OPP.
152. Ecology
A number of conditions recommended. Further detail will be required pursuant to

existing conditions on the OPP.

153. Flood risk and drainage
No comments at this stage

Human rights implications

154. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.
155. This application has the legitimate aim of providing details of the reserved matters (access, scale, appearance, layout and landscaping) for development Plot H2, pursuant to the Elephant Park outline planning permission, ref: 12/AP/1092. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/1171-B Application file: 15/AP/1062 Southwark Local Development Framework and Development Plan Documents	Chief executive's department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020-7525-5349 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Images
Appendix 4	Recommendation

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Michael Glasgow, Senior Planning Officer	
Version	Final	
Dated	23 September 2015	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic director, finance & corporate services	No	No
Strategic director, environment and leisure	No	No
Strategic director, housing and community services	No	No
Director of regeneration	No	No
Date final report sent to Constitutional Team		24 September 2015

APPENDIX 1

Consultation undertaken

Site notice date: 20/07/2015

Press notice date: 23/07/2015

Case officer site visit date: n/a

Neighbour consultation letters sent: 23/07/2015

Internal services consulted:

Ecology Officer
 Elephant and Castle Special Projects
 Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]
 Flood and Drainage Team
 HIGHWAY LICENSING
 Highway Development Management
 Local Economy Team
 Waste Management

Statutory and non-statutory organisations consulted:

Environment Agency
 Greater London Authority
 London Fire & Emergency Planning Authority
 Metropolitan Police Service (Designing out Crime)
 Thames Water - Development Planning
 Transport for London (referable & non-referable app notifications and pre-apps)

Neighbour and local groups consulted:

The Archduke Charles Rodney Road SE17 1BA
 42a Wansey Street London SE17 1JP
 42b Wansey Street London SE17 1JP
 Flat 1 5 Elba Place SE17 1PT
 56a Larcom Street London SE17 1NQ
 58 Larcom Street London SE17 1NQ
 60a Larcom Street London SE17 1NQ
 56b Wansey Street London SE17 1JP
 58a Wansey Street London SE17 1JP
 58b Wansey Street London SE17 1JP
 56a Wansey Street London SE17 1JP
 44 Wansey Street London SE17 1JP
 54a Wansey Street London SE17 1JP
 54b Wansey Street London SE17 1JP
 54 Larcom Street London SE17 1NQ
 63a Larcom Street London SE17 1NJ

504 Blackwood Apartments Victory Place SE17 1AQ
 501 Blackwood Apartments Victory Place SE17 1AQ
 502 Blackwood Apartments Victory Place SE17 1AQ
 503 Blackwood Apartments Victory Place SE17 1AQ
 702 Blackwood Apartments Victory Place SE17 1AQ
 703 Blackwood Apartments Victory Place SE17 1AQ
 1 Victory Place London SE17 1PG
 701 Blackwood Apartments Victory Place SE17 1AQ
 603 Blackwood Apartments Victory Place SE17 1AQ
 604 Blackwood Apartments Victory Place SE17 1AQ
 605 Blackwood Apartments Victory Place SE17 1AQ
 405 Blackwood Apartments Victory Place SE17 1AQ
 205 Blackwood Apartments Victory Place SE17 1AQ
 301 Blackwood Apartments Victory Place SE17 1AQ
 302 Blackwood Apartments Victory Place SE17 1AQ
 204 Blackwood Apartments Victory Place SE17 1AQ

65a Larcom Street London SE17 1NJ
 67a Larcom Street London SE17 1NJ
 61a Larcom Street London SE17 1NJ
 27a Charleston Street London SE17 1NG
 45a Larcom Street London SE17 1NJ
 47a Larcom Street London SE17 1NJ
 42a Larcom Street London SE17 1NQ
 46a Larcom Street London SE17 1NQ
 52 Larcom Street London SE17 1NQ
 40a Larcom Street London SE17 1NQ
 69a Larcom Street London SE17 1NJ
 81 Larcom Street London SE17 1NJ
 38a Larcom Street London SE17 1NQ
 60a Wansey Street London SE17 1JP
 42 Walters Close Brandon Street SE17 1NE
 43 Walters Close Brandon Street SE17 1NE
 Flat A 53 Larcom Street SE17 1NJ
 40 Walters Close Brandon Street SE17 1NE
 37 Walters Close Brandon Street SE17 1NE
 38 Walters Close Brandon Street SE17 1NE
 39 Walters Close Brandon Street SE17 1NE
 Flat B 59 Larcom Street SE17 1NJ
 Flat A 71 Larcom Street SE17 1NJ
 Flat B 71 Larcom Street SE17 1NJ
 Flat A 59 Larcom Street SE17 1NJ
 Flat B 53 Larcom Street SE17 1NJ
 Flat A 55 Larcom Street SE17 1NJ
 Flat B 55 Larcom Street SE17 1NJ
 36 Walters Close Brandon Street SE17 1NE
 25 Walters Close Brandon Street SE17 1NE
 26 Walters Close Brandon Street SE17 1NE
 27 Walters Close Brandon Street SE17 1NE
 24 Walters Close Brandon Street SE17 1NE
 60b Wansey Street London SE17 1JP
 22 Walters Close Brandon Street SE17 1NE
 23 Walters Close Brandon Street SE17 1NE
 33 Walters Close Brandon Street SE17 1NE
 34 Walters Close Brandon Street SE17 1NE
 35 Walters Close Brandon Street SE17 1NE
 31 Walters Close Brandon Street SE17 1NE
 28 Walters Close Brandon Street SE17 1NE
 29 Walters Close Brandon Street SE17 1NE
 30 Walters Close Brandon Street SE17 1NE
 5 Tyler Court New Paragon Walk SE17 1AX
 6 Tyler Court New Paragon Walk SE17 1AX
 101 Tyler Court New Paragon Walk SE17 1AX
 4 Tyler Court New Paragon Walk SE17 1AX
 1 Tyler Court New Paragon Walk SE17 1AX
 2 Tyler Court New Paragon Walk SE17 1AX
 3 Tyler Court New Paragon Walk SE17 1AX
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 105 Tyler Court New Paragon Walk SE17 1AX
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 905 Rutherford Heights Rodney Road SE17 1AS
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 801 Rutherford Heights Rodney Road SE17 1AS
 802 Rutherford Heights Rodney Road SE17 1AS
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 401 Blackwood Apartments Victory Place SE17 1AQ
 303 Blackwood Apartments Victory Place SE17 1AQ
 304 Blackwood Apartments Victory Place SE17 1AQ
 305 Blackwood Apartments Victory Place SE17 1AQ
 3 Victory Place London SE17 1PG
 403 Capell Apartments Victory Place SE17 1PG
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 402 Capell Apartments Victory Place SE17 1PG
 305 Capell Apartments Victory Place SE17 1PG
 306 Capell Apartments Victory Place SE17 1PG
 401 Capell Apartments Victory Place SE17 1PG
 101 Mansfield Point Rodney Road SE17 1BA
 102 Mansfield Point Rodney Road SE17 1BA
 103 Mansfield Point Rodney Road SE17 1BA
 53 Rodney Road London SE17 1BA
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 503 Capell Apartments Victory Place SE17 1PG
 504 Capell Apartments Victory Place SE17 1PG
 304 Capell Apartments Victory Place SE17 1PG
 13 Victory Place London SE17 1PG
 201 Capell Apartments Victory Place SE17 1PG
 202 Capell Apartments Victory Place SE17 1PG
 11 Victory Place London SE17 1PG
 5 Victory Place London SE17 1PG
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 302 Capell Apartments Victory Place SE17 1PG
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 206 Capell Apartments Victory Place SE17 1PG
 203 Capell Apartments Victory Place SE17 1PG
 204 Capell Apartments Victory Place SE17 1PG
 205 Capell Apartments Victory Place SE17 1PG
 First Floor And Second Floor Flat 23 Charleston Street SE17 1NG
 Ground Floor Flat 29 Charleston Street SE17 1NG
 First Floor And Second Floor Flat 29 Charleston Street SE17 1NG
 Ground Floor Flat 23 Charleston Street SE17 1NG
 Flat 10 46b Brandon Street SE17 1NL
 Ground Floor Flat 21 Charleston Street SE17 1NG
 First Floor And Second Floor Flat 21 Charleston Street SE17 1NG
 Ground Floor Flat 39 Charleston Street SE17 1NG
 First Floor And Second Floor Flat 39 Charleston Street SE17 1NG
 Ground Floor Flat 41 Charleston Street SE17 1NG
 First Floor And Second Floor Flat 37 Charleston Street SE17 1NG
 Ground Floor Flat 35 Charleston Street SE17 1NG
 First Floor And Second Floor Flat 35 Charleston Street SE17 1NG
 Ground Floor Flat 37 Charleston Street SE17 1NG
 Flat 9 46b Brandon Street SE17 1NL
 Flat 4 75d Larcom Street SE17 1NJ
 Flat 1 75d Larcom Street SE17 1NJ
 Flat 1 46b Brandon Street SE17 1NL
 Flat 3 75d Larcom Street SE17 1NJ
 Top Flat 58 Larcom Street SE17 1NQ
 Part First Floor And Second Floor Flat 48 Brandon Street SE17 1NL
 Flat 2 75d Larcom Street SE17 1NJ
 Flat 6 46b Brandon Street SE17 1NL
 Flat 7 46b Brandon Street SE17 1NL
 Flat 8 46b Brandon Street SE17 1NL
 Flat 5 46b Brandon Street SE17 1NL
 Flat 2 46b Brandon Street SE17 1NL
 Flat 3 46b Brandon Street SE17 1NL
 Flat 4 46b Brandon Street SE17 1NL
 First Floor And Second Floor Flat 41 Charleston Street SE17 1NG

804 Rutherford Heights Rodney Road SE17 1AS
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 203 Tyler Court New Paragon Walk SE17 1AX
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 48 Wansey Street London SE17 1JP
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 Flat A 73 Larcom Street SE17 1NJ
 Flat 7 29 Rodney Place SE17 1PP
 Flat 8 29 Rodney Place SE17 1PP
 Flat 9 29 Rodney Place SE17 1PP
 Flat 6 29 Rodney Place SE17 1PP
 Flat 3 29 Rodney Place SE17 1PP
 Flat 4 29 Rodney Place SE17 1PP
 Flat 5 29 Rodney Place SE17 1PP
 Flat 4 10 Munton Road SE17 1PR
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 Flat 6 10 Munton Road SE17 1PR
 Flat 3 10 Munton Road SE17 1PR
 Flat 10 29 Rodney Place SE17 1PP
 Flat 1 10 Munton Road SE17 1PR
 Flat 2 10 Munton Road SE17 1PR
 Flat 2 29 Rodney Place SE17 1PP
 Flat 2 5 Elba Place SE17 1PT
 Flat 3 5 Elba Place SE17 1PT
 Flat 4 5 Elba Place SE17 1PT
 56b Larcom Street London SE17 1NQ
 50b Larcom Street London SE17 1NQ
 42b Larcom Street London SE17 1NQ
 48b Larcom Street London SE17 1NQ
 68b Wansey Street London SE17 1JP
 27b Charleston Street London SE17 1NG
 Flat 1 29 Rodney Place SE17 1PP
 46b Wansey Street London SE17 1JP
 Flat 5 5 Elba Place SE17 1PT
 Flat 6 5 Elba Place SE17 1PT
 Flat 7 5 Elba Place SE17 1PT
 25 Charleston Street London SE17 1NG
 Flat A 49 Larcom Street SE17 1NJ
 Ground Floor Flat 57 Larcom Street SE17 1NJ
 Flat 1 66 Wansey Street SE17 1JP
 Flat A 44 Larcom Street SE17 1NQ
 Ground Floor And First Floor Flat 48 Brandon Street SE17 1NL
 Ground Floor Flat 44a Brandon Street SE17 1NL
 Ground Floor Flat 50 Brandon Street SE17 1NL
 Flat 14 60 Brandon Street SE17 1AJ
 Flat 15 60 Brandon Street SE17 1AJ
 Flat 16 60 Brandon Street SE17 1AJ
 Flat 13 60 Brandon Street SE17 1AJ
 Flat 10 60 Brandon Street SE17 1AJ
 Flat 11 60 Brandon Street SE17 1AJ
 Flat 12 60 Brandon Street SE17 1AJ
 19 Victory Place London SE17 1PG
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 23 Victory Place London SE17 1PG
 17 Victory Place London SE17 1PG
 Flat 17 60 Brandon Street SE17 1AJ
 Flat 18 60 Brandon Street SE17 1AJ
 15 Victory Place London SE17 1PG
 Flat 9 60 Brandon Street SE17 1AJ
 47a Charleston Street London SE17 1NG
 47b Charleston Street London SE17 1NG
 Flat 1 60 Brandon Street SE17 1AJ
 First Floor And Second Floor Flat 45 Charleston Street SE17 1NG
 Ground Floor Flat 43 Charleston Street SE17 1NG
 First Floor And Second Floor Flat 43 Charleston Street SE17 1NG
 Ground And Part First Floor Flat 45 Charleston Street SE17 1NG
 Flat 6 60 Brandon Street SE17 1AJ
 Flat 7 60 Brandon Street SE17 1AJ
 Flat 8 60 Brandon Street SE17 1AJ
 Flat 5 60 Brandon Street SE17 1AJ
 Flat 2 60 Brandon Street SE17 1AJ
 Flat 3 60 Brandon Street SE17 1AJ
 Flat 4 60 Brandon Street SE17 1AJ
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 501 Rutherford Heights Rodney Road SE17 1AS
 604 Rutherford Heights Rodney Road SE17 1AS
 605 Rutherford Heights Rodney Road SE17 1AS
 606 Rutherford Heights Rodney Road SE17 1AS

Second Floor Flat 4 Victory Place SE17 1PG
 25 Brandon Street London SE17 1NE
 St Johns Institute Larcom Street SE17 1NQ
 Flat 3 66 Wansey Street SE17 1JP
 Ground Floor Flat 4 Victory Place SE17 1PG
 Ground Floor Flat 1-2 Munton Road SE17 1PR
 Flat B 79 Larcom Street SE17 1NJ
 Flat A 79 Larcom Street SE17 1NJ
 Victory Primary School Elba Place SE17 1PT
 First Floor And Second Floor Flat 44a Brandon Street SE17 1NL
 First Floor Flat 50 Brandon Street SE17 1NL
 77 Larcom Street London SE17 1NJ
 44a Wansey Street London SE17 1JP
 51 Larcom Street London SE17 1NJ
 62 Larcom Street London SE17 1NQ
 First Floor Flat 4 Victory Place SE17 1PG
 First Floor Flat 1-2 Munton Road SE17 1PR
 First Floor And Second Floor Flat 52 Brandon Street SE17 1NP
 Flat 2 66 Wansey Street SE17 1JP
 Flat B 44 Larcom Street SE17 1NQ
 Flat B 49 Larcom Street SE17 1NJ
 First Floor And Second Floor Flat 57 Larcom Street SE17 1NJ
 Block F Flat 3 Peabody Estate SE17 1BL
 Block F Flat 4 Peabody Estate SE17 1BL
 Block F Flat 5 Peabody Estate SE17 1BL
 Block F Flat 2 Peabody Estate SE17 1BL
 Block D Flat 8 Peabody Estate SE17 1BJ
 Block D Flat 9 Peabody Estate SE17 1BJ
 Block D Flat 10 Peabody Estate SE17 1BJ
 Block F Flat 10 Peabody Estate SE17 1BL
 Block E Flat 2 Peabody Estate SE17 1BT
 Block E Flat 3 Peabody Estate SE17 1BT
 Block F Flat 9 Peabody Estate SE17 1BL
 Block F Flat 6 Peabody Estate SE17 1BL
 Block F Flat 7 Peabody Estate SE17 1BL
 Block F Flat 8 Peabody Estate SE17 1BL
 Block D Flat 7 Peabody Estate SE17 1BJ
 50a Larcom Street London SE17 1NQ
 44b Brandon Street London SE17 1NL
 Block D Flat 1 Peabody Estate SE17 1BJ
 48a Larcom Street London SE17 1NQ
 Flat B 73 Larcom Street SE17 1NJ
 Flat A 75 Larcom Street SE17 1NJ
 Flat B 75 Larcom Street SE17 1NJ
 Block D Flat 4 Peabody Estate SE17 1BJ
 Block D Flat 5 Peabody Estate SE17 1BJ
 Block D Flat 6 Peabody Estate SE17 1BJ
 Block D Flat 3 Peabody Estate SE17 1BJ
 Block F Flat 1 Peabody Estate SE17 1BL
 Block E Flat 1 Peabody Estate SE17 1BT
 Block D Flat 2 Peabody Estate SE17 1BJ
 Block E Flat 4 Peabody Estate SE17 1BT
 63b Larcom Street London SE17 1NJ
 61b Larcom Street London SE17 1NJ
 69b Larcom Street London SE17 1NJ
 45b Larcom Street London SE17 1NJ
 46 Brandon Street London SE17 1NL
 Flat 4 66 Wansey Street SE17 1JP
 31 Charleston Street London SE17 1NG
 38b Larcom Street London SE17 1NQ
 60b Larcom Street London SE17 1NQ
 46b Larcom Street London SE17 1NQ
 40b Larcom Street London SE17 1NQ
 47b Larcom Street London SE17 1NJ
 65b Larcom Street London SE17 1NJ
 67b Larcom Street London SE17 1NJ
 1-27 Rodney Place London SE17 1PP
 Block E Flat 9 Peabody Estate SE17 1BT
 Block E Flat 10 Peabody Estate SE17 1BT
 Block E Flat 11 Peabody Estate SE17 1BT
 603 Rutherford Heights Rodney Road SE17 1AS
 506 Rutherford Heights Rodney Road SE17 1AS
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 206 Mansfield Point Rodney Road SE17 1BA
 301 Mansfield Point Rodney Road SE17 1BA
 302 Mansfield Point Rodney Road SE17 1BA
 701 Mansfield Point Rodney Road SE17 1BA
 301 Stockham Court Rodney Road SE17 1AT
 302 Stockham Court Rodney Road SE17 1AT
 303 Stockham Court Rodney Road SE17 1AT
 206 Stockham Court Rodney Road SE17 1AT
 203 Stockham Court Rodney Road SE17 1AT
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 2 Morris Court Rodney Road SE17 1AW
 3 Morris Court Rodney Road SE17 1AW
 4 Morris Court Rodney Road SE17 1AW
 1 Morris Court Rodney Road SE17 1AW
 304 Stockham Court Rodney Road SE17 1AT
 305 Stockham Court Rodney Road SE17 1AT
 306 Stockham Court Rodney Road SE17 1AT
 202 Stockham Court Rodney Road SE17 1AT
 801 Mansfield Point Rodney Road SE17 1BA
 802 Mansfield Point Rodney Road SE17 1BA
 803 Mansfield Point Rodney Road SE17 1BA
 705 Mansfield Point Rodney Road SE17 1BA
 702 Mansfield Point Rodney Road SE17 1BA
 703 Mansfield Point Rodney Road SE17 1BA

Block E Flat 8 Peabody Estate SE17 1BT
Block E Flat 5 Peabody Estate SE17 1BT
Block E Flat 6 Peabody Estate SE17 1BT
Block E Flat 7 Peabody Estate SE17 1BT
33 Charleston Street London SE17 1NG
St Johns Parish Club Larcom Street SE17 1NQ
52 Brandon Street London SE17 1NL
Block E Flat 15 Peabody Estate SE17 1BT
Block E Flat 12 Peabody Estate SE17 1BT
Block E Flat 13 Peabody Estate SE17 1BT
Block E Flat 14 Peabody Estate SE17 1BT
505 Blackwood Apartments Victory Place SE17 1AQ
601 Blackwood Apartments Victory Place SE17 1AQ
602 Blackwood Apartments Victory Place SE17 1AQ

704 Mansfield Point Rodney Road SE17 1BA
4 Stockham Court Rodney Road SE17 1AT
5 Stockham Court Rodney Road SE17 1AT
201 Stockham Court Rodney Road SE17 1AT
3 Stockham Court Rodney Road SE17 1AT
804 Mansfield Point Rodney Road SE17 1BA
1 Stockham Court Rodney Road SE17 1AT
2 Stockham Court Rodney Road SE17 1AT

Via Email x

28 Sutherland Square SE17 3EQ
Wansey Street London SE17 1LH

Re-consultation: n/a

APPENDIX 2**Consultation responses received****Internal services**

Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]
Flood and Drainage Team
Public Realm
Ecology
Urban Forester

Statutory and non-statutory organisations

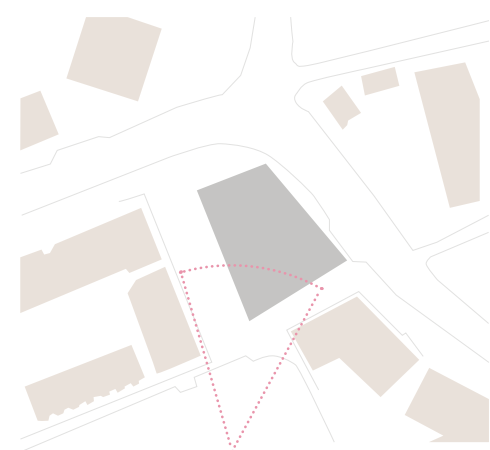
Environment Agency
London Fire & Emergency Planning Authority
Thames Water - Development Planning
Transport for London (referable & non-referable app notifications and pre-apps)

Neighbours and local groups

401 Tyler Court New Paragon Walk SE17 1AX

8. Design Proposal

Key:



View looking north through Brandon Place. Colour options.

RECOMMENDATION LDD MONITORING FORM REQUIRED

This document shows the case officer's recommended decision for the application referred to below.
This document is not a decision notice for this application.

Applicant	Lend Lease (Elephant & Castle) Limited	Reg. Number	15/AP/2572
Application Type	Approval of Reserved Matters	Case Number	TP/H1064A
Recommendation	Grant permission		

Draft of Decision Notice

Approval has been GIVEN for the following details:

Application for the approval of reserved matters (access, scale, appearance, layout and landscaping) for Plot H12 within Elephant Park (previously referred to as the Heygate Masterplan), submitted pursuant to Outline Planning Permission 12/AP/1092. The proposals comprise the construction of a development plot of 4 storeys in height (maximum building height 23.53m AOD) comprising an 872sqm (GEA) Energy Hub (sui generis use class), 334sqm (GEA) Retail (A1-A4 use class), 895sqm (GEA) of Nursery floorspace (D1 use class), 65sqm (GEA) of flexible Retail/Community floorspace (A1-A4 & D1 use class), cycle storage, landscaping, new public realm and other associated works.

At: PLOT H12 WITHIN LAND BOUNDED BY HEYGATE STREET TO THE NORTH, RODNEY ROAD TO THE EAST, PLOT H10 OF ELEPHANT PARK TO THE WEST AND PLOT H13 OF ELEPHANT PARK THE SOUTH

In accordance with application received on 22/06/2015

and Applicant's Drawing Nos. Planning Statement (DP9, June 2015); Design and Access Statement (Duggan Morris Architects, June 2015); Design and Access Statement Updated Drawings (comprising): 305987-A100-H12X-01-PL-00-P003/P001; 305987-A100-H12X-20-PL-00-P201/P001; 305987-A100-H12X-20-PL-00-P200/P001; 305987-A100-H12X-20-PL-00-P100/P001; 305987-A100-H12X-20-PL-00-P101/P001; 305987-A100-H12X-20-PL-00-P102/P001; 305987-A100-H12X-20-PL-00-P103/P001; 305987-A100-H12X-20-PL-00-P104/P001; 305987-A100-H12X-20-PL-00-P105/P001; 305987-A100-H12X-20-PL-00-P300/P001; 305987-A100-H12X-20-PL-00-P301/P001; 305987-A100-H12X-20-PL-00-P302/P001. Reconciliation Statement (A-Project, June 2015); Daylight, Sunlight and Overshadowing Assessment (GIA, June 2015); Air Quality Assessment (WSP Parsons Brinckerhoff, June 2015); Letter: Air Quality Impacts of Energy Hub, Elephant Park (286765B-BEL AQ002)(WSP Parsons Brinckerhoff, 18 September 2015); Letter: D1 Calculation correction (Parsons Brinckerhoff, 15/09/15); Energy Statement (TUV SUD Wallace Whittle, June 2015); Wind: Desk-based Pedestrian Level Wind Microclimate Assessment (RWDI, June 2015); Servicing Management Plan (Peter Brett Associates, June 2015); Employment and Training Scheme (Lend Lease, June 2015); Statement of Community Involvement (Soundings, June 2015).

Subject to the following condition:

Approved Plans

The development hereby permitted shall not be carried out otherwise than in accordance with the following approved plans:

305987-A100-H12X-01-PL-00-P003/P001; 305987-A100-H12X-20-PL-00-P201/P001; 305987-A100-H12X-20-PL-00-P200/P001; 305987-A100-H12X-20-PL-00-P100/P001; 305987-A100-H12X-20-PL-00-P101/P001; 305987-A100-H12X-20-PL-00-P102/P001; 305987-A100-H12X-20-PL-00-P103/P001; 305987-A100-H12X-20-PL-00-P104/P001; 305987-A100-H12X-20-PL-00-P105/P001; 305987-A100-H12X-20-PL-00-P300/P001; 305987-A100-H12X-20-PL-00-P301/P001; 305987-A100-H12X-20-PL-00-P302/P001.

Reason:

For the avoidance of doubt and in the interests of proper planning.

External Lighting - Public Realm

Details of any external lighting [including design, specification, power and position of luminaries], light intensity contours (including to adjoining sensitive premises) and security surveillance equipment of external areas within the public realm shall be submitted to and approved by the Local Planning Authority in writing before any such lighting or security equipment is installed. The development shall not be carried out otherwise in accordance with any such approval given.

Reason

In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the safety and security of persons using the area and the amenity and privacy of adjoining occupiers in accordance with The National Planning Policy Framework 2012, Strategic Policy 12 Design and Conservation and Strategic Policy 13 High environmental standards of The Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity and 3.14 Designing out crime of the Southwark Plan 2007.

Hard and Soft Landscaping

Before any above grade work hereby authorised begins, 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 and material samples of hard landscaping), 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.

The planting, seeding and/or turfing shall be carried out in the first planting season following completion of building works and any trees or shrubs that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the same size and species in the first suitable planting season. Planting shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction and BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf).

Reason

So that the Council may be satisfied with the details of the landscaping scheme in accordance with The National Planning Policy Framework 2012 Parts 7, 8, 11 & 12 and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

Ventilation of the Energy Centre

Prior to any above grade works being carried out, full particulars and details of a scheme for the ventilation of the Energy Centre to an appropriate outlet level, including details of sound attenuation for any associated plant and ducting, the standard of dilution expected and an appropriate inlet location shall have been submitted and approved in writing by the Local Planning Authority. The scheme shall meet the principles of EN13779 on Ventilation and Air Conditioning Systems and the development shall not be carried out otherwise than in accordance with any approval given.

Reason

In order to ensure that the ventilation ducting and ancillary equipment will not result in an odour, fume or noise nuisance and will not detract from the appearance of the building in the interests of amenity in accordance with Core Strategy Strategic Policy 12: Design and Conservation and Strategic Policy 13: High Environmental Standards, saved Southwark Plan Policy 3.2 Protection of Amenity and guidance in the National Planning Policy Framework.

Statement of positive and proactive action in dealing with the application

The Energy Hub Reserved Matters Application has been the subject of an extensive pre-application process, involving the specialist input of numerous council officers. The Proposal is policy compliant, supported by officers and the recommendation reached in a timely and professional manner.

Informatives

Images of the Energy Hub building indicate that signage may be incorporated into the main facade. The scale and nature of such signage may require that separate Advertisement Consent is gained under the Control of Advertisement Regulations.

Schedule 3 Paragraph 26.9 of the s106 agreement attached to the Elephant Park OPP stipulates that prior to implementation of the Energy Centre, the Developer shall update the Site Wide Energy Strategy to include the detailed design and specification of the Energy Centre. Further Condition 45 on the OPP requires full information regarding proposed CHP/Boiler Plant, including an appropriate methodology for assessing noise and emissions and any necessary mitigation, to be approved in writing by the Local Planning Authority prior to occupation of the Plot.

Notice is hereby given that external doors should not open outwards onto the street. Under S153 of the

Highways Act 1980 a door which is put up on any premises and opens on a street shall be so put up as not to open outwards.

Any approval granted under this application does not imply technical approval for the Highway works, separate approval for which is required pursuant to S278 of the Highways Act 1980.

For the avoidance of doubt, in discharging Condition 50: Design of the Elephant Park OPP for Plot H12, a 1.5m x 1.5m sample panel should be constructed, and presented on-site, comprising all components of the Energy Hub facade system to effectively demonstrate the quality of design.

Item No. 6.	Classification: Open	Date: 6 October 2015	Meeting Name: Planning Committee
Report title:		Edward III's Rotherhithe Conservation Area and Extension	
Ward(s) or groups affected:		Rotherhithe and Riverside	
From:		Director of Planning	

RECOMMENDATIONS

1. That members consider that the area shown on the plan at Appendix 1 is of special architectural or historic interest and supports the designation of the extension to the Edward III Rotherhithe Conservation Area.
2. That members note the response from the Bermondsey and Rotherhithe Community Council and the results of the public consultation on the proposed extension of the Edward III Rotherhithe Conservation Area.
3. That members agree to formally adopt the amended Edward III Rotherhithe conservation area appraisal.

BACKGROUND INFORMATION

4. The Edward III's Rotherhithe Conservation Area is an area of open land located between the River Thames and the registered park and garden of Southwark Park. The area is characterised by open land containing the Scheduled Ancient Monument of King Edward III's manor house and King's Stairs Gardens connecting Southwark Park to the Thames. The area is characterised by these open landscapes with relict features of the former built-up waterfront and a range of housing dating from the 18th century through to modern buildings and religious uses. The primary character of the area and its significance are the character and appearance of the open spaces and their relationship to the designated heritage assets within the proposed conservation area and immediately on its boundary.
5. On the 12 July 2012 Bermondsey and Rotherhithe Community Council considered a report to carry out public consultation with local businesses on the proposed extension to the Edward III's Rotherhithe conservation area. The proposed western extension includes: Cherry Gardens and Fountain Green Square on the riverfront, Nos. 1-10 Bermondsey Wall East, and two listed buildings the former Thames Water Authority Office Farncombe Street and Corbett Wharf, Bermondsey Wall East.
6. Letters were sent to all of the owners and occupiers of properties in the proposed conservation area extension and a wider boundary around the area, giving a 12 week consultation period. The letter included a copy of the conservation area map with the proposed extension and information as to where the conservation area appraisal could be viewed on the Council's website. Two

responses were received during the consultation period and are analysed in more detail below.

7. A report (see background documents) to the Bermondsey and Rotherhithe Community Council on 12 March 2013 set out the results of the public consultation. The Councillors considered and resolved to endorse the recommendations outlined in the report to designate the extension to the Edward III Rotherhithe Conservation Area.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

8. The main issues are:
 - a. the ability of the LPA to extend an existing conservation area and designate as an area of special architectural and historic interest.
 - b. to adopt the amended Edward III Rotherhithe Conservation Area Appraisal.

Planning policy

9. The National Planning Policy Framework (March 2012)
Section 12 Conserving and Enhancing the Historic Environment.

London Plan 2011 (July)

Policy 7.9 Heritage-led regeneration

Policy 7.8 Heritage assets and archaeology

The Local Plan

Core Strategy 2011 (April)

Strategic Policy 12 Design and Conservation.

Southwark Plan 2007 (July)

Saved Policy 3.15 Conservation of the Historic Environment

Saved Policy 3.16 Conservation Areas

Saved Policy 3.18 Setting of Listed Buildings, Conservation Areas and World Heritage Sites

Saved Policy 3.19 Archaeology

Consultation responses

10. Two consultation responses were received, one in favour from the Heritage Advisor to the GLA, who considered that the buildings and townscape were of merit and worthy of designation. The other respondent considered that the bulk of proposed extension area undeserving of conservation status. No consultation responses were received from those living within the existing conservation area boundary or the proposed extension.

Conclusion on planning issues

11. Section 69 of the Town and Country Planning Act 1990 imposes a duty on the local Planning Authority to designate as conservation areas any "areas of special architectural or historic interest the character or appearance of which is desirable

to preserve or enhance”. There is a duty on the local planning authority under Section 69 to review areas from time to time to consider whether designation of conservation areas is called for. Officers consider that the western extension to the conservation area; complies with paragraph 127 of the NPPF (March 2012), which states: 127: *‘when considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.’* The extended conservation area will include two Grade II listed buildings: the former Thames Water Authority Office No. 96 Bermondsey Wall East and former Corbett’s Wharf on Bermondsey Wall West. The extension would also include interesting local buildings such as Angel Wharf, The Old Justice Public House and the Victorian fountain, as well as preserving this section of river frontage. During the consultation period construction recommenced on the site adjacent to No. 96 Bermondsey Wall East. In view of this, it is proposed to exclude this site from the conservation area extension and realign the boundary so that it includes the listed building; the former Thames Water Authority Office, but not the depot site.

12. In March 2012 the government introduced the National Planning Policy Framework replacing the guidance formerly contained within PPS5. Paragraph 169 of the NPPF is particularly relevant with regard to conservation area appraisals *‘local planning authorities should have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to their environment..’* The conservation area appraisal complies with the requirements of NPPF paragraph 169.
13. In 2011 English Heritage published guidance on conservation area appraisals, *‘Understanding Place: Conservation Area Designation, Appraisal and Management’*. This sets out the importance of definition and assessment of a conservation area’s character and the need to record the area in some detail. The purpose is to provide a sound basis for rational and consistent judgements when considering planning applications within conservation areas. Conservation area appraisals, once they have been adopted by the council, can help to defend decisions on individual planning applications at appeal. They may also guide the formulation of proposals for the preservation and enhancement of the area. The Edward III’s Rotherhithe conservation area appraisal has been prepared in accordance with the English Heritage guidance.
14. Designation of a conservation area imposes certain duties on planning authorities. These duties are twofold, firstly, to formulate and publish from time to time, proposals for the preservation and enhancement of the conservation areas in their district and submit them for public consultation. Then secondly, in exercising their planning powers to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation areas. In exercising conservation area controls, local planning authorities are required to pay special attention to the desirability of preserving or enhancing the character or appearance of the area in question and therefore there is a presumption against the demolition of buildings within the area. In the case of conservation area controls, however, account should clearly be taken of the part played in the architectural or historic interest of the area by the building for which demolition is proposed, and in particular of the wider effects of demolition on the building’s surroundings and on the conservation area as a whole.

Community impact statement

15. The designation has been consulted on in accordance with the statement of community involvement. The statement of community involvement sets out how and when the council will involve the community in the alteration and development of town planning documents and applications for planning permission, and was adopted in January 2008. The statement of community involvement does not require the council to consult on the designation of a conservation area or an extension to an existing one, but in this instance the council proposes to follow a similar procedure here as a matter of good practice.
16. The consultation sought the views of local residents, businesses and other local interest groups over the definition of the boundaries and conservation area appraisal. Notification of the consultation on the proposed extension and supporting documents was placed on the council's website.
17. Officers are satisfied that the proposed extension complies with all the requirements of the NPPF, it captures this significant piece of public open space and its purpose is to preserve and improve this important river frontage.

Human rights implications

18. This conservation area engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.
19. This proposal has the legitimate aim of providing for the conservation of the historic environment within the conservation area. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

Resource implications

20. Notifying the public of the Edward III's Rotherhithe Conservation area appraisal has not resulted in resource implications for the staffing of the Chief Executive's Department.
21. Other resource implications will be the cost of publishing the conservation area appraisal, which can be met within the Chief Executive Department's revenue budget. The cover price of the document will be fixed to cover production costs.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Strategic Director of Finance and Corporate Services

22. A conservation area is an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance (*section 69(1), Listed Building Act (LBA) 1990*). A Local Planning Authority (LPA) is under a duty to designate conservation areas within its locality and to review them from time to time (*section 69(2)*). Section 69(2) of the Act imposes a further duty on local planning authorities to review the extent of their functions and if need be to

designate any further parts of their area as conservation areas. It is this section of the Act which is being triggered here.

23. There is no statutory requirement for LPA's to consult with anyone before a conservation area is designated and nor does the Council's Statement of community involvement require consultation in respect of designating conservation areas. However, English Heritage advises LPA's to consult as widely as possible, not only with local residents and amenity societies, but also with Chambers of Commerce, Public Utilities and Highway Authorities.
24. There is no formal designation procedure. The statutory procedure simply involves a council resolution to designate being made. The date of the resolution is the date the conservation area takes effect. The designation of conservation areas is reserved to Planning Committee under Part 3F, paragraph 3 of the constitution under the heading 'Role and Functions'.
25. There is no statutory requirement on the level of detail that must be considered by an LPA before designation. However, guidance from English Heritage states that it is vital an area's special architectural or historic interest is defined and recorded in some detail. A published character appraisal for both conservation areas can be found at Appendices 3 and 4 of this report. The overall impetus for designating a conservation area must be the desire to preserve and enhance the area.
26. Notice of the designation must be published in at least one local newspaper circulating in the LPA's area and in the London Gazette (*section 70(8), LBA 1990*). The Secretary of State and English Heritage must also be notified (*section 70(5)*). There is no requirement to notify the owners and occupiers of premises in the area. The conservation area must be registered as a local land charge (*section 69(4)*).
27. The designation of a conservation area gives the LPA additional powers over the development and the use of land within it and has the following consequences;
 - control of demolition of buildings - all demolition will require conservation area consent
 - any new development will need to enhance or preserve the conservation area –
 - protection of trees – certain criminal offences arise if trees in the conservation area are cut down or wilfully damaged without the consent of the LPA
 - duty of LPA to formulate and publish from time to time proposals for the conservation and enhancement of conservation areas (e.g, by updating conservation area appraisals)
 - certain permitted development rights are more restricted
 - specific statutory duties on telecommunications operators
 - exclusion of certain illuminated advertisements [although not very relevant in this context]
 - publicity for planning applications affecting the conservation area must be given under Section 73(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990
28. There is no statutory right of appeal against a building being included in a conservation area. However, it is possible to seek a judicial review of an LPA's decision to designate a conservation area.

Equalities and human rights

29. Positive equalities obligations are placed on local authorities, sometimes described as equalities duties with regard to race, disability and gender.
30. Gender equality duties were introduced by the Equality Act 2006, which amended the Sex Discrimination Act 1975. The general duties in summary require local authorities to have due regard to the need to:

- (a) “eliminate unlawful discrimination and harassment and;
- (b) promote the equality of opportunity between men and women.”

Race equality duties were introduced by the Race Relations Amendment Act 2000 which amended the Race Relations Act 1976. The general duties in summary require local authorities to give due regard to the need to:

- (a) “eliminate unlawful discrimination and harassment;
- (b) promote the equality of opportunity; and
- (c) promote good race relations between people of different racial groups”

Disability equality duties were introduced by the Disability Discrimination Act 2005 which amended the Disability Act 1995. The general duties in summary require local authorities to carry out their functions with due regard to the need to:

- (a) “promote equal opportunities between disabled persons and other persons;
- (b) eliminate discrimination that is unlawful under the Act;
- (c) eliminate harassment of disabled persons that is related to their disabilities;
- (d) promote a positive attitude towards disabled persons;
- (e) encourage participation by disabled persons in public life; and
- (f) take steps to take account of disabled person’s disabilities even where that involves treating disabled persons more favourably than other persons.”

Section 71 of the Race Relations Act 1976, section 49A(i) of the Disability Discrimination Act 1995 and section 76A of the Sex Discrimination Act 1975, require local authorities to act in accordance with the equalities duties and have due regard to these duties when we are carrying out our functions.

31. Equalities and Human Rights have been considered as part of the development conservation area appraisal and an Equalities Impact Assessment (EqIA) is in the process of being completed. EqIAs are an essential tool to assist councils to comply with equalities duties and ensure they make decisions fairly.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Report to Bermondsey and Rotherhithe Community Council (12/7/12)	Chief Executive's Dept. 160 Tooley Street London, SE1 2QH	Tracy Chapman Tel: 0207 525 2289
Amended appraisal for Edward III's Rotherhithe Conservation Area.	Chief Executive's Dept. 160 Tooley Street London, SE1 2QH	Tracy Chapman Tel: 0207 525 2289
https://www.southwark.gov.uk/downloads/download/385/conservation_area_appraisals		
Report to Bermondsey and Rotherhithe Community Council (12/03/2013)	Chief Executive's Dept. 160 Tooley Street London, SE1 2QH	Tracy Chapman Tel: 0207 525 2289
http://moderngov.southwark.gov.uk/ielListDocuments.aspx?CId=349&MId=4479&Ver=4		
Equalities Analysis	Chief Executive's Dept. 160 Tooley Street London, SE1 2QH	Tracy Chapman Tel: 0207 525 2289

APPENDICES

No.	Title
Appendix 1	Map of the proposed boundary changes

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Tracy Chapman, Senior Design and Conservation Officer	
Version	Final	
Dated	23 September 2015	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic director, finance & corporate services	Yes	Yes
Strategic director, environment and leisure	No	No
Strategic director, housing and community services	No	No
Director of regeneration	No	No
Date final report sent to Constitutional Team	24 September 2015	

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